

FREEDOM FROM RELIGION *foundation*

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SENT VIA EMAIL AND U.S. MAIL:
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J. Everett Moore, Jr.
County Attorney
Moore & Rutt, P.A.
P.O. Box 554
Georgetown, DE 19947

Re: Sussex County grants to religious activities

Dear Mr. Moore:

I am writing on behalf of the Freedom From Religion Foundation. We wrote to the Sussex County Council on February 9 regarding a grant to Delmarva Teen Challenge, a religious ministry that purports to help drug addicts by converting them to Christianity. We received your response dated May 11, in which you stated that the County would consider FFRF's input for similar entities' grant requests in the future.

We were disappointed to see that the Council has continued to fund religious ministries with taxpayer money. On June 21 the Council voted unanimously to award \$2,500 from Councilman Wilson's discretionary grant account to Grace-N-Mercy Ministries ("GNM"), a Christian church in Greenwood, "for youth camp expenses." In GNM's grant application, which was included in the meeting's public packet, GNM stated that the grant would be used to "expand [GNM's] already established summer youth camp," which "combines the social recreation and team building activities of a traditional summer camp with the faith-based principles of a vacation bible school."¹

The Vacation Bible School (VBS) is an overtly religious curriculum aimed at indoctrinating young children in Christianity. VBS's website states that "[a]fter every Bible story, kids will hear how that story ties into God's bigger story—his plan of salvation! Each day kids will learn about Christ's sacrifice for them and be challenged to respond to God's love in real and meaningful ways."²

The funds granted to GNM will be used "to support the activities/transportation of the children who attend the camp." An itemized budget for the funds included many items that will almost certainly include religious activities at this camp, such as \$400 for "youth camp curriculum" and \$200 for "Classroom supplies." The County

¹ See www.sussexcountyde.gov/sites/default/files/packets/SCC.Public.Packet.062116.pdf, 74–84.

² See <http://www.vacationbibleschool.com/>.

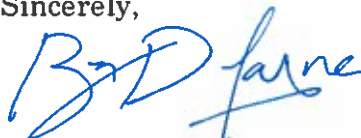
apparently took no steps to ensure that the \$2,500 would be used for entirely secular purposes. Indeed, the nature of GNM's camp all but *guarantees* that taxpayer funds will be used to promote religion. Although GNM's grant application plainly stated the religious nature of the camp, the audio recording of the Council meeting demonstrates that councilmembers voted on the grant without even discussing the possibility that the funds could be used to promote religion.³

As was emphasized in our original letter, the County violates both the Delaware and U.S. constitutions when it uses public money to maintain a ministry or to fund religious activities. The County should rescind this grant immediately and must stop its pattern of funding Christian ministries' efforts to convert vulnerable citizens—drug addicts and children as young as three, in recent history—to their particular brand of Christianity.

At a minimum, the County must take the necessary steps to ensure that any money given to fund an event that has both secular and religious components will be used exclusively for secular purposes. The Supreme Court has consistently held that direct grants to religious institutions require appropriate safeguards against the money *ever* being used for religious purposes. In *Tilton v. Richardson*, for instance, the Court struck down a grant to a religious university because the government placed a twenty-year limit on the school's prohibition against religious use of the funded building, rather than ensuring the building would be limited to secular uses permanently. 403 U.S. 672, 683 (1971). The County may not fund a church's religious summer camp, nor may it pay to transport children to such a camp. And, as our previous letter explained, the County may not pay for a religious ministry's fundraiser.

This pattern of unconstitutional grants must stop. Sussex County councilmembers may not use their discretionary funds to promote their personal religion, or religion in general. FFRF takes these issues very seriously. We recently sued Morris County in New Jersey to stop their restoration grants to historic churches. Litigation is not necessary here—this is not a close case. Please respond in writing with the steps the County takes to stop its regular practice of allowing councilmembers to fund religion with taxpayer money from their Councilmanic Grant Accounts. Additionally, the recent grant to Grace-N-Mercy Ministries should be immediately rescinded. Thank you for your continued attention to this important matter.

Sincerely,



Ryan D. Jayne, Esq.
Diane Uhl Legal Fellow
Freedom From Religion Foundation

³ Finance Director Gina Jennings described GNM's camp to the Council without any reference to its religious content, presenting only its target audience and purported secular activities.