

# FREETHOUGHT TODAY



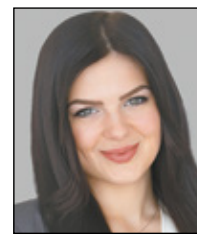
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is waging an  
American crusade**

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FFRF's legal  
essay contest**

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Vol. 41 No. 4

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May 2024

## School board in Indiana ends prayers at meetings

An Indiana school board has halted its ritual of starting off its meetings with a prayer after the Freedom From Religion Foundation warned it that the practice is unconstitutional.

A concerned community member informed the state/church watchdog that the Community Schools of Frankfort Board of Trustees opened each of its meetings with Christian prayer. For instance, its meetings in November and December began with a Christian prayer led by a board member following the Pledge of Allegiance. The November prayer was addressed to "Dear Heavenly Father" and given in the name of Jesus Christ.

FFRF wrote a letter in January to request that the board cease opening its meetings with prayer in violation of the Constitution.

"The Supreme Court has consistently struck down prayers offered at school-sponsored events," FFRF Anne Nicol Gaylor Legal Fellow Sammi Lawrence wrote to Community Schools of Frankfort Board of Trustees President Sandra Miller. "Further, federal courts have held that opening public school board meetings with sectarian prayer violates the Establishment Clause of the First Amendment."

In a recent case striking down a school board's prayer practice, the 9th U.S. Circuit Court of Appeals reaffirmed in *FFRF v. Chino Valley Unified School District Board of Education* that Establishment Clause concerns are heightened in the

See *Prayers* on page 7

### FFRF stands with the governor



Photo by Chris Line

**Wisconsin Gov. Tony Evers, second from left, stands with FFRF Senior Policy Counsel Ryan Jayne, FFRF Equal Justice Works Fellow Kat Grant and FFRF State Policy Manager Ryan Dudley on April 2 in the Wisconsin Capitol. Evers had just vetoed a bill that would have required transgender students to play on sports teams with students of the opposite gender. The FFRF Action Fund helped to oppose this bill because it is part of a religiously motivated assault on the rights of transgender children.**

## FFRF mourns death of Dan Dennett

By Dan Barker

The death of philosopher Daniel C. Dennett, who died at age 82 on April 19, is a deep loss, not just to the freethinking community, but to the world. Here at the Freedom From Religion Foundation, we feel like we have lost a member of the family.

Dan, who was professor emeritus at Tufts University, and had directed its Center for Cognitive Studies, did not believe in the transcendent. But his ideas and work truly transcend. The words of this humble yet world-renowned philosopher rose above differences in religion, politics and philosophy to touch all lives with clarity, reason and wit. The title of his memoir, *I've Been Thinking*, perfectly portrays a life of profitable pondering.

The title of perhaps his most famous book, *Breaking the Spell: Religion as a Natural Phenomenon* — which earned him a place as one of the "four horsemen" of the so-called "New Atheism" — also describes how Dennett's words have helped break the spells of complacency of thought and irrationality, challenging us to think, and think some more.

He was more than just a great philosopher who produced a treasure trove of very readable books. (My favorites are *Consciousness Explained*, *Elbow Room*, and *From Bacteria to Bach and Back*.) He was the kind of philosopher whom others wrote books about.

He was a giant in his field, but generously lent his name and academic celebrity to the cause of freethought. A longtime FFRF member, Dan Dennett even signed up as a Lifetime Member and long ago agreed to serve as one of our distinguished honorary directors. He spoke at three national conventions, and was a very deserving recipient of FFRF's Emperor Has No Clothes Award in 2008, reserved for public figures who make known their dissent from religion. Dennett wrote an influential "coming out as an atheist" piece for *The New York Times* in 2003, back in the day when it was still rare and brave for an eminent person to "come out of the closet" like that.



Photo by Ingrid Laas  
**Daniel C. Dennett**

## Elliott, Cavell lead FFRF's legal team

The Freedom From Religion Foundation is pleased to announce that FFRF Senior Counsel Patrick Elliott has been named FFRF's new legal director and FFRF Associate Counsel Elizabeth (Liz) Cavell is FFRF's first deputy legal director.

Elliott takes over the position previously held by Rebecca Markert, who left in mid-April after working for FFRF for 15 years. FFRF will be ever grateful for Rebecca's major contributions creating and managing FFRF's legal department and for serving as FFRF's first attorney.

Elliott, who was first hired in February 2010, became FFRF's second attorney, after graduating from the University of Wisconsin Law School in 2009 and has specialized in litigation. He has served as lead counsel in five cases and co-counsel in at least 14 FFRF lawsuits:



Photo by Chris Line

**Patrick Elliott**



Photo by Chris Line

**Liz Cavell**

- *Cragun v. Merrill*, in which Alabama agreed in 2021 to change its voter registration forms to permit secular affirmations (2021).

- *Mays v. Cabell County Board of Education*, successfully settling a lawsuit against an in-school revival with adoption of new school policies and payment of \$175,000 in fees (2023).

- *Parker v. McMaster*, stopping \$1.5

million in funding from South Carolina to a bible society (2023).

- *Tosone v. Way*, providing for a secular oath for New Jersey candidates (2023).

- *The Satanic Temple v. Shelby County Board of Education*, an ongoing lawsuit challenging discrimination against non-Christian after school clubs.

Patrick is co-counsel in the current federal court challenge against the creation of a Catholic charter school in Oklahoma. Patrick has written or co-authored at least 18 amicus briefs, most recently in the current *FDA v. Alliance for Hippocratic Medicine* case before the U.S. Supreme Court. His experience also includes presenting multiple legal education courses for the Wisconsin State Bar. He's been interviewed by the Associated

See *Legal Team* on page 7

See *Dennett* on page 2

## IN MEMORIAM

### Dennett

Continued from page 1

But he was more than that. He was a good friend.

Dan obliged us on many occasions to appear on our radio and TV shows. As recently as Nov. 2, 2023, Dennett joined us on “Freethought Matters,” FFRF’s TV show, to talk about his new memoir. That show was recorded remotely, but he joined us in our studio at Freethought Hall in Madison, Wis., in a 2019 TV interview, which was a thrill. (During one of these interviews, we learned that his father was the first CIA agent to be killed in the line of duty.)

I was privileged to work with Dan to co-found (with Richard Dawkins) The Clergy Project, an organization that helps ministers, priests and rabbis who no longer believe in the supernatural transition to a life of integrity. Dennett’s book, *Caught in the Pulpit: Leaving Belief Behind* (with Linda La Scola), showed his passion for assisting preachers who want to escape hypocrisy and dishonesty. He took such a caring interest in the plight of the many ministers who find themselves “caught in the pulpit” after rethinking religion.

He enjoyed creating some cognitive dissonance. Once, after he had been quite sick, he told us that every time someone would tell him they’d been

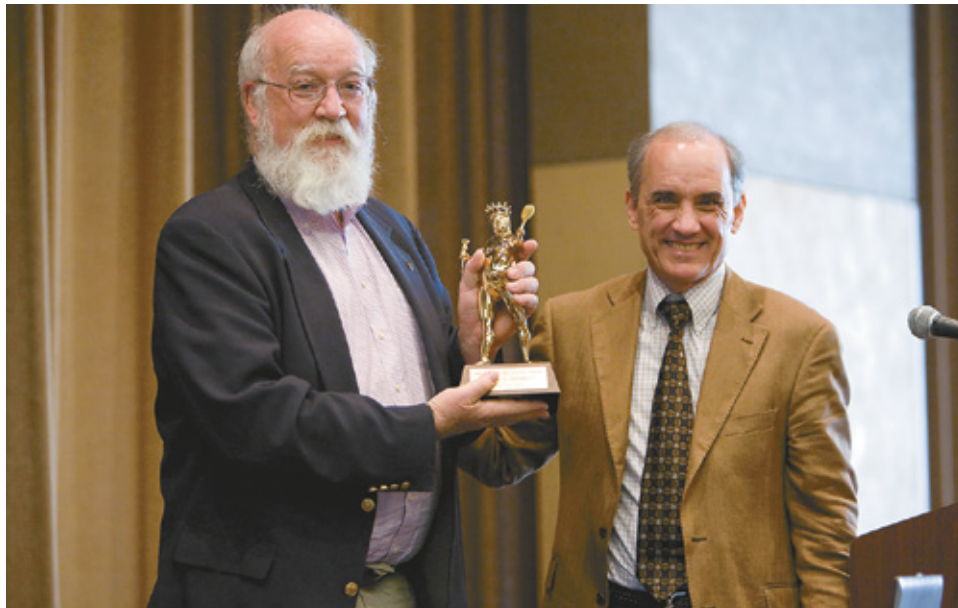


Photo by Brent Nicastro

**Daniel C. Dennett displays the Emperor Has No Clothes award he received from FFRF Co-President Dan Barker at the FFRF 2008 convention in Chicago.**

praying for him, he would reply, “I forgive you.” While ever-genial, he did not shy away from controversy. The New York Times headlined its obituary, “Daniel C., Dennett, widely read and fiercely debated philosopher.” The obituary quoted him saying, “There’s simply no polite way to tell people they’ve dedicated their lives to an illusion.” He also charged into the free will debate, rejecting it, but, like me, considering it a necessary illusion: “We couldn’t live the way we do without it.”

He was born March 28, 1942, and told us about spending some of his childhood in Beirut, where his father was a covert intelligence agent. The last time we spoke with him, he was enjoying his semi-retirement in Cape Elizabeth, Maine, with his wife, Susan Bell Dennett, as well as receiving visits from children and grandchildren. We were pleased to (remotely) meet and interview his sister, Charlotte Dennett, a lawyer and journalist, who wrote about *The Crash of Flight 3804* that killed their father, and also spoke about

her book *Follow the Pipeline* on missionaries and big oil. Our deepest sympathies are now with his family.

Dan and I discovered that we both loved anagrams. With the same first name, I reminded him that “DANIEL is a man with a DENIAL of the man who was NAILED to the cross.” He laughed, and then told me about a game he invented called “Frigate Bird” that uses Scrabble tiles without the board. (Like the frigate birds who swoop in and rob other birds, you can snatch an opponent’s word by adding one or more of your letters to create a new word.)

Dan graciously wrote the foreword for my 2015 book, *Life Driven Purpose*, which he recorded in his own voice for the audiobook. In it, he said:

“Yes, you can learn to ride a bike, and yes, you can become a good and meaningful person without bothering yourself with all the dark confusions and contradictions imposed on you by your heritage of irrationality and obfuscation.”

Dan ended that foreword by saying, “a very good person can get along fine without religion, inspiring others, accomplishing great works, and having a lot of fun in the bargain.” Yes. In all of our interactions with such a kind and brilliant man, we indeed saw that he was having the time of his life, as a freethinker, with a lot of fun in the bargain. Truly, a life well lived — and well thought.

*Dan Barker is co-president of FFRF.*

## David Wilkes was a problem-solver, activist

FFRF Member David D. Wilkes died of Covid-19 on Nov. 10, 2023, in Lexington, Ky. An exuberant atheist, David’s interest in the hereafter was perfunctory at best. In contrast, his interest in the here and now was passionate, and he lived his life with a thirst for knowledge and a commitment to the causes he believed in and the people he loved.

David was born Jan. 22, 1940, in Detroit to William Victor Wilkes Sr. and Eleanor Margaret Williamson Wilkes. He grew up in St. Louis, Drexel Hill, Pa., and Camden, N.J., before moving to Pittsburgh as a teenager, where he graduated high school in 1957. He then studied engineering at the University of Pittsburgh.



David Wilkes

David developed pleurisy as an infant, and the doctor, believing his young patient would not survive the night, signed his death certificate. Thus began a lifetime of defying the odds.

While still a preschooler, David watched World War II unfold in theater newsreels and was filled with questions adults refused to answer. As he grew older and the scope of his questions expanded, he discovered that most of the answers could be found in books. From then on, he became an avid and lifelong reader, researcher, and collector of volumes on subjects from amateur theater to zoology.

He was also a talented folk singer. In his late teens and early 20s, he performed at coffee houses in Pittsburgh and Philadelphia, accompanying himself on guitar and banjo and doing stand-up routines sophisticated enough to delight his audiences while foiling the censorship efforts of the local constabulary.

In 1961, David married Isabel Hoffman and they had three children: Barbara, Jason, and Brian.

His penchant for asking questions and thinking outside the box led to a successful career in medical field sales and service, during which he is said to have visited nearly every hospital in the country.

Later, he began a second career in data communications, allowing him to extend his problem-solving skills to the international market. He was also an enthusiastic ham radio operator.

In his personal life, David was an activist who worked tirelessly for those in need and to preserve this Earth we all call home. During the civil rights era, he traveled to the South to help people register to vote. Later, he and Isabel ran the San Jose chapter of American Atheists, providing a haven for those whose lives had been adversely affected by religious orthodoxy. He worked on a ballot initiative to

bring single-payer healthcare to California and on a movement to prevent a hospital in downtown San Jose from closing. He served on an environmental task force to reduce the proliferation of toxic chemicals in his county. And, every Saturday for years, he was a clinic defender at Planned Parenthood in San Jose, shielding patients from the protesters who harassed them as they sought reproductive care.

When Isabel developed cancer, David became her caregiver until she died in 1995. As a widower, he continued to be a vital part of his community, supporting his friends and remaining engaged in civic life. In 2006, he met Susan Owens, also widowed, on an online dating site. They married early in 2007 after a whirlwind courtship and made their home in Lexington, Ky., where they reveled in having a second chance at love and were thankful for their good fortune every single day.

## FFRF FREETHOUGHT TODAY

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*The only freethought newspaper in the United States*

## Diane Germain dies at 82

FFRF Member Diane Frances Germain, 82, died March 25 after a valiant effort to overcome complications of an elective surgery. She was surrounded by the love and comfort of friends, family and sweet pups.

Diane was born on Jan. 23, 1942, in Winooski, Vt., to Beulah (Clairmont) and Clement Germain. After attending Burlington High School and UVM, she received her master’s degree from UCLA. She made her way to San Diego and eventually set-

tled in the Ocean Beach area, where she flourished amid the fresh ocean air and welcoming community.

Diane was a self-described “little French lesbian activist.” She was at the forefront of the movement for women’s rights in general and lesbian equality in particular in the 1960s and ’70s. She was also an artist and used her talents in many mediums to not only further the causes that mattered to her, but to send thoughtful, handmade cards and random notes that brightened your day, if you were lucky enough to receive one. She was a lightning wit, fierce advocate and great storyteller with an unforgettable laugh.



Diane Germain

## FFRF convention — Denver, Sept. 27-28

# Human Rights Campaign to get FFRF Zumach award

FFRF is proud to announce that the Human Rights Campaign will be honored with the 2024 Henry Zumach Freedom From Religious Fundamentalism Award at FFRF's national convention.

The two-day convention on Friday, Sept. 27, and Saturday, Sept. 28, in Denver will include an impressive list of expert commentators on religion, politics and Christian nationalism, including author Bonnie Garmus and actor Jon Huertas as keynote speakers.

The Henry Zumach Freedom From Religious Fundamentalism Award, which comes with a monetary prize of \$35,000 (minimum), will be accepted by **Brandon Wolf**, the national press secretary for the Human Rights Campaign. Wolf is a nationally recognized advocate for LGBTQ+ civil rights and gun safety laws and a survivor of



Human Rights Campaign logo

the 2016 shooting at Orlando's Pulse Nightclub. He's a frequent face on MSNBC and CNN, and an opinion contributor in Oprah Daily, Newsweek, USA Today and others. He has been named one of Logo TV's 30 LGBTQ Changemakers and Out Magazine's 100 Most Influential LGBTQ People.

In 2019, Wolf became the first survivor of the Pulse tragedy to testify before Congress and returned in 2022 to testify on the rise of anti-LGBTQ hate violence before the House Oversight Committee. His debut memoir, *A Place for Us*, was released in July 2023 and became an instant bestseller.

The convention's evening keynote speakers will be **Bonnie Garmus** and **Jon Huertas**.

Garmus will accept FFRF's Emperor Has No Clothes Award. Her charming and thought-provoking novel, *Lessons in Chemistry*, has sold in the multi-millions. The award-winning global phenomenon, which has been translated into 42 languages and has been on the bestseller list for more than a year, was recently turned into a TV series on Apple TV starring Brie Larson. The novel, part romantic comedy and part satiric commentary, is about a determined chemist who encounters so much sexism in the 1950s that she turns to hosting a highly scientific TV cooking show. While the book's feminism has been much-remarked upon, almost every main character in it is a pronounced atheist.

Actor Jon Huertas is best-known for starring as Miguel Rivas for six seasons on NBC's popular "This Is Us." Audiences know him as Detective Javier Esposito from ABC's hit dramedy "Castle," as well as for a stand-out perfor-



Brandon Wolf

mance as Sgt. Tony "Poke" Espera in HBO's limited docu-drama series, "Generation Kill," where he offered a street-wise view of the Marine Corps invasion of Iraq. As an Air Force veteran himself, Jon calls that his most meaningful role. He is one of the few Latinx actors who has broken the ceiling in mainstream TV, portraying characters telling diverse but universal stories. He's an open atheist and will be speaking on "True Freedom: Breaking the Shackles of Religious Indoctrination." Jon explains: "Blacks and Latinos in the Americas have long been two of the most religious groups. I want to talk about how we can help people of color feel safe about facing their skepticism and allow people like me to feel free enough to be open about being non-believers."

**Katherine Stewart** will receive the "Freethought Heroine" award. Stewart has covered religious liberty, politics, policy and education in her various professional roles. Her latest book, *The Power Worshipers: Inside the Dangerous Rise of Religious Nationalism*, is a rare look inside the machinery of the movement that brought Donald Trump to power. The recent documentary feature movie "God

and Country," co-produced by Rob Reiner and Stewart, is based on *The Power Worshipers*. Stewart's journalism appears in the New York Times op ed, NBC, the New Republic, and the New York Review of Books. She last spoke at FFRF's convention in 2021 in Boston.

FFRF is also excited for the return of "unabashed atheist" **Ron Reagan**, who recorded FFRF's long-playing TV commercial, and last spoke at a conference in 2015. Reagan, a political commentator and broadcaster, is the freethinking son of President Ronald and Nancy Reagan.

Another crowd-pleaser returning to speak about religion and politics will be New York Times columnist **Michelle Goldberg**, whose book *Kingdom Coming: The Rise of Christian Nationalism* in 2006 was an early warning call. Goldberg, who is also an online contributor to MSNBC, will receive FFRF's Clarence Darrow Award and statuette.

Also addressing Christian nationalism is **Bradley Onishi**, who is on the faculty of the University of San Francisco and co-host of the top-ranked religion and politics podcast, "Straight White American Jesus." He is author of the timely book, *Preparing for War: The Extremist History of White Christian Nationalism — And What Comes Next*.

FFRF, which held the first-ever panel of nonreligious state legislators at its conference last year, is assembling for 2024 a panel of secular Colorado state legislators. Confirmed are: **Rep. Judy Amabile**, a businesswoman and progressive advocate, who represents the 49th district, and **Rep. Brianna Titone**, a geologist who represents the 27th district and was the state's first openly transgender state legislator.

"The Consequences of Religious Decline in the U.S." will be the topic of University of Tampa sociology Professor **Ryan T. Cragun's** speech. Cragun, who served as a Mormon missionary before leaving religion, is an expert on the rise of the "Nones" (religiously unaffiliated) and author or co-author of a host of books including *Beyond Doubt: The Secularization of Society, What You Don't Know About Religion (But Should), How to Defeat Religion in 10 Easy Steps* and *From One Missionary to Another*.

Last, but not least, FFRF Co-President **Dan Barker** will be speaking about his forthcoming new book, *Contradiction: The Death of the Design Argument*. After 140 debates for FFRF, Dan proposes a new way of looking at assumptions behind "fine-tuning" arguments for the existence of a god.

The convention will feature its usual reports by the co-presidents, the legal staff and legislative/lobbying team, plus a chance to peruse FFRF book and product tables and mingle with other freethinkers. The annual meetings of the state representatives and membership take place on Sunday morning, Sept. 29.

Turn to the back page to register and find complete information or check online at [ffrf.org/convention2024](http://ffrf.org/convention2024).

## CRANKMAIL

Please enjoy our latest batch of missives from the nether regions of reality. Printed as received.

**Just saying:** It's freedom OF religion, nor from religion. If you really believe in what you do, stop accepting and spending money that says IN GOD WE TRUST! You are the stupidist, most hypocritical people ever. — *Judi Peterson*

**Fools:** All that crap about protecting people. You fool only fools like yourself. You are protecting your own interests. Jesus saves lives. Not yours, maybe. Oh well. — *Theo Blankenburg*

**Read the Bible:** My heart hurts for you. You may not be afraid of burning in hell. But you will unless you read what the Bible says — *Beth Mulinski*

**Reagan:** Repent or you WILL burn in hell for evermore, stupid atheists. — *John Morehead*

**Hell is real:** I would like to have a meeting with Ron Reagan. A long meeting in a dark room, and I will show him what it means to be in hell. All ya'll will have to answer to God. Laugh all you want. We'll get the last laugh. — *Dave Voskamp*

**Get ready:** Yo, Ron, get a whole lot of sunscreen. I hear from a reliable source that you're gonna need it for where you're going. I pray you change your ways. — *Joseph R. James*

**It's gonna be hot!:** Ron Reagan Jr. will burn in hell for ever and ever and ever. He will burn in hell, as will all of you. Take your chances, you're gonna

lose. — *Roman Abernathy*

**Hell:** You say you're not afraid of hell. In 1978 I got a little glimpse of hell after a car accident. I got a little glance of hell, and you gonna burn and roast. It's real. I saw it. I felt it. I have medical reports that prove it. You're not really atheists because deep down you believe, but you're just weak and evil people. You're headed that way. — *Geoff Todd*

**Constitution:** Separation of church and state is not in the Constitution. I was hoping you could read it to me from the Constitution because I can't find that phrase anywhere and I've read every single word. What you are referencing is the First Amendment and I highly doubt our founding fathers would grant us the right to worship whatever religion we like and strip it from us in the next breath. Just curious, have you even read the Constitution? — *Sam Carstenson*

**UNAmerican:** How about you GO FUCK YOURSELF and Die. You're nothing but unAmericans that shouldn't be allowed to live in America...! Why don't you move to Russia or China where your unAmerican ideals are acceptable. — *Willard Edge*

**Ugliness:** As a general rule, it seems (at least anecdotally) that the farther left-leaning is a person, the more physically (and of course, psychologically) UGLY is that person. Unfortunately, that does not seem to prevent leftists from propagating their mutant genes. — *Vicar Thornton*

**AntiChrist!:** you all should just call yourselves the anti Christ foundation!! In the end God WILL WIN!! you will NOT! Tell it like it is...you would like

to steal our kids minds and thoughts. NO MORE!! — *Freddie Scanlon*

**Christianity:** This country was founded on Christian morals and values. God is on our money. Your ideological opposition is not a threat to our government or nation. — *Tony Young*

**Truth:** There is no such thing as freedom from religion. . Never has been in America. The principles of freedom of speech, freedom of the press, freedom of beliefs, etc are CHRISTIAN principles. They were first taught in churches. Citizens can practice religion anywhere , anytime, any place they want. Religion can be practiced say to put up a cross , or give a prayer etc ANYWHERE. even on government property. you guys are lying. You are the REAL ENEMIES OF FREEDOM., — *Terry Jackson*

**Follow the Commandments:** The Ten Commandments are common sense, to oppose them is idiocy the worlds judiciary law is based upon them . Without mosaic law there is no law — *David Ignatius*

**Trust in God:** I'm often reminded of the adage. "You can lead a horse to water, but you can't make it drink." There is more evidence for the existence of God than there is against. Albert Einstein was one such individual who was aware of this. By the way, he was an atheist in his early life. God bless — *Percy Smythe*

**Are you ready?:** Good for you I hope your journey at burning in hell lasts forever. I'm so happy for you. Thank my catholic parents I chose GOD. You should be very afraid read a Bible and see what torture you will be in for. — *Colleen Gatlin*

**Losing Faith in Faith: From Preacher to Atheist**  
By Dan Barker

How Dan "threw out the bathwater and discovered there is no baby there."  
—Published by FFRF  
392 pages / PB

**\$15** Item # FB145

Buy it from FFRF online  
[ffrf.org/shop](http://ffrf.org/shop)

**Just Pretend**  
*A Book For Young Freethinkers*

By Dan Barker  
Illustrated by Kati Treu

Revised and adorably illustrated classic. This fun book explores myths and religion from a freethought point of view, and promotes critical thinking.

**\$12** Published by FFRF Item #FB103

Buy it from FFRF online  
[ffrf.org/shop](http://ffrf.org/shop)

- Across**
- Hot Springs and such
  - Primary color
  - Professor Plum and Colonel Mustard game
  - Samoan currency
  - C in TLC
  - \*Atheist Hugh Laurie's TV character
  - \*Atheist Niels Bohr's concern
  - \*Freethinking John Steinbeck's "East of \_\_\_\_\_"
  - More ill
  - \*Government of divinely guided officials
  - Pleat, e.g.
  - Polo, e.g.
  - \*Irreverent Elton John's title
  - French port on Strait of Dover
  - Layered pasta dish
  - Kimono sash
  - Send troops
  - Membership cost, pl.
  - Dugout glider
  - Over, to a poet
  - Infant's woe
  - Got an A+
  - \*Atheist Rob Reiner's "This Is \_\_\_\_\_ Tap"
  - A try (2 words)
  - Adjournment \_\_\_\_\_, with no
- expiration day  
45. Nil  
47. Bert Bobbsey's twin  
48. Response to pain  
50. Sake, alt. sp.  
52. \*Freethought Today section that "can leave you frustrated, or laughing in tears"  
56. Tapiridae family member  
57. Bank on  
58. Additionally  
59. Each and all  
60. Big-ticket \_\_\_\_\_  
61. Unload on eBay  
62. Secretary station  
63. Type of relief  
64. Career
- Down**
- Number on a baseball card
  - Beaten by walkers
  - Medicinal house plant
  - Indian restaurant appetizer
  - "M\*A\*S\*H" character
  - Upright
  - Say it isn't so
  - \*2024 FFRF convention location
  - Downtime
  - Like a hand-me-down
  - Ever, to a poet
  - Blood-red
  - No-distortion sound
  - reproduction, pl.
  - Chew out
  - Declare
  - Cocaine plants
  - Olden day calculators
  - Wrinkle-prone fabric
  - Same as forlorn
  - Siberian prison
  - Secretariat's cry
  - Tie with a morning coat
  - \*He recently called surrogacy an "inhuman...practice"
  - Hula dancer's neckwear
  - \*Freethinker Bob \_\_\_\_\_ of "Better Call Saul"
  - Dagger's partner
  - Not cos
  - Nom de guerre
  - Ricotta and cream cheese aisle
  - Reveal true nature
  - \*Freethinking "Ninotchka" actress
  - Pneumonic lung rattling, pl.
  - Pinch pennies
  - Singes in "La Planète des singes"
  - Newborn's hangout
  - Away from wind
  - Archipelago unit
  - Bum around
  - \*Freethinking \_\_\_\_\_ Williams, baseball's Splendid Splinter

## Freethought Today Crossword

1	2	3	4		5	6	7		8	9	10	11
12					13				14			
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Answers on page 21 Puzzle courtesy of Katya Maes for FFRF

### Note to members

For those of you who get the PDF version of Freethought Today, there have been a few changes to the content you can see.

Because of privacy concerns — the PDF can be easily forwarded to non-members — FFRF has stopped including in the PDF version the Black Collar Crime report, names of new Lifetime members, and the names of the Letterbox contributors.

The online version at freethoughttoday.com also follows this protocol. Only the actual print newspaper contains all of these items.

If you would like to continue reading Black Collar Crime, see the names of FFRF's newest Lifetime members, or see the names of those who contributed to our Letterbox, you will need to change your preferences in how you receive Freethought Today.

In order to do that, follow these simple steps:

- Log into your FFRF.org account.
- Click on "Update your contact information."
- Go down to "Deliver Freethought Today by" and click on either "Newspaper by mail" or "Both PDF and paper copy."
- Click "Submit."

## OVERHEARD

Trump needs to shore up his base and this kind of Christian nationalist baby food will do the trick.

**Warren Throckmorton, a retired Grove City College professor, on former President Trump selling God Bless the USA Bible books.**

*Religion News Service, 3-27-24*

It's the literary adaptation of "In God We Trust" on the dollar bill. It is the perfect encapsulation of American Christianity. It is the inevitable climax of white evangelicalism. It's the bible America deserves.

**Tyler Huckabee, in his column making fun of the God Bless the USA Bible being hawked by Trump for \$59.99.**

*Religion News Service, 3-38-24*



Tina Smith

Americans deserve better. The Constitution demands better. And common sense dictates that we stop this outrageous backdoor ploy to eliminate abortion access in its tracks.

**Sen. Tina Smith, D-Minn., a former Planned Parenthood executive, on how the 1873 Comstock Act could be used to prevent mifepristone, a drug used in medication abortions, from being sent through the mail.**

*New York Times, 4-2-24*

The division of church and state is crucial for the religious freedom of everyone in the U.S. Yet some people hope for the undoing of this separation of religion and political power, mainly because they expect that those in power will share their particular religious beliefs. They should stop and think very carefully about the possible consequences of temporarily having their way.

**Amanda Townley, in an op-ed, after West Virginia Gov. Jim Justice signed a bill that would allow the teaching of intelligent design in public schools.**

*Scientific American, 4-1-24*

Doesn't matter if the fetus isn't viable; doesn't matter if the woman was raped; doesn't matter if her health might be wrecked. God wants you to have that baby: Shut up, push and pray.

**Diane Roberts, in her op-ed, "Florida blatantly mixes church and state in 'pregnancy crisis centers.'"**

*Florida Phoenix, 3-26-24*

If the Catholic Church wins its exemption here, it's undermining society as a whole. I really worry that if the [U.S.] Supreme Court takes this case up, it will lead to a very significant and dire change to how our society operates.

**Wisconsin unemployment attorney Victor Forberger, on the Catholic Charities appeal of a state Supreme Court decision that said Catholic Charities must continue to pay into the state's unemployment compensation fund because it is not operated primarily for religious purposes.**

*Religion News Service, 4-4-24*

Claiming godlike authority or an endorsement from God for a political candidate means that person cannot be questioned or opposed without also opposing God. That's a violation of the commandment to not take the Lord's name in vain.

**Russell Moore, former president of the Southern Baptist Convention's public-policy arm, warning that Trump's political rallies are veering into "dangerous territory by opening with prayers by preachers describing the candidate as "heaven sent" and closing with altar calls.**

*New York Times, 4-2-24*

America might not yet be ready for a presidential candidate who is openly not religious, but it might no longer tolerate a candidate who promises to do the bidding of the religious right.

**Perry Bacon, in his column, "America is less religious, but faith remains very powerful in politics."**

*Washington Post, 4-16-24*

### Freethought Today Cryptogram

O LUQCKWJAKD UAKOFAFA BTLJ AKKOA [JTA

LJTAOQJ LQJVCHCNAV OH JTA NCFOA "ZCHJLZJ"]

UAKOFAFAQ — JTLJ JTAVA OQ HC XOVAZJ AFOX

AHZA, QC TCB ZCWKX DCW LQI NA JC UAKOFAFA

OH RCX BTAH JTAVA'Q LUQCKWJAKD HC AFOXA

HZA JTLJ O ZLH QAA? — PCXOA YCQJAV

A cryptogram is a substitution puzzle in which one letter stands for another. If U equals T, it will equal T throughout the puzzle.

Example:

UOG RLQTM HYVBF DVP SLACN VWGY UOG KJEZ XVI.  
THE QUICK BROWN FOX JUMPS OVER THE LAZY DOG.

This month's clue: N => M. Answer is on page 21.

This puzzle is from *Freethinking Cryptograms* by FFRF member Brooks Rimes, available on Amazon.com for \$13.95.

## Student activist awards

# FFRF backs students' opposition to board prayer

Two student representatives on the school board in Prosser, Wash., have pushed back — with the Freedom From Religion Foundation's full support — against a suggestion to start school board meetings with prayer. Because of their successful activism in speaking out against the proposed prayer, FFRF has awarded monetary activism awards to the two high school students. (Their stories are recounted on this page.)

One of the students, Yoshimi Garcia, informed FFRF that the Jan. 24 School District Board of Directors meeting discussed whether to begin imposing prayer on students, parents and community members at its meetings.

Video shows that Director Frank Vermulm suggested: "Maybe during our meetings we would open in prayer, like after the pledge. I'd be willing to lead it, and I just think there's a lot of things and issues that we as a school district, a community even, you know, we think we could use some divine intervention. So, just a thought. Like I said, I would be willing to lead it."

Another director chimed in, stating, "That's a great idea." A third director offered to lead a prayer, too, and suggested that the board should "rotate," a plan that would allow each member of the board to promote personal religious beliefs at school board meetings. Vermulm then noted that some pastors had told him they would like to come to the meeting and lead students and commu-



Screen shot from Prosser School Board video

**Student representatives on the Prosser (Wash.) School Board Yoshimi Garcia (seated at the far left) and Noah Dempsey (seated third from the left) spoke up immediately denouncing a board member's request to begin each meeting with a prayer.**

nity members in prayer, as well.

Garcia bravely objected, saying that religion shouldn't be brought up in school board meetings and urging the board not to start imposing prayer. The student noted that they are an atheist and that people from a variety of different religious backgrounds attend school board meetings — and leading them in prayer would be disrespectful. Noah Dempsey, another student representative, agreed. Vermulm responded that he was a "man of faith" and believes in "divine intervention." Another director approved of this sentiment.

A school board prayer practice would violate the Establishment Clause of the

First Amendment, FFRF reminded the school district.

"The Supreme Court has consistently struck down prayers offered at school-sponsored events," FFRF Staff Attorney Chris Line wrote Prosser School District Board President Jason Rainer. "In each of these cases, the Supreme Court struck down school-sponsored prayer because it constitutes government favoritism towards religion."

It is important to highlight that Garcia and Dempsey immediately objected to the proposed prayer practice. This is significant because of court precedent. The 9th U.S. Circuit Court of Appeals emphasized

in FFRF's victory over Chino Valley Unified School District Board of Education a few years ago that even the 5th Circuit's American Humanist Association v. McCarty decision, the only appellate court decision that has upheld prayer at school board meetings under some circumstances, "suggested that where a student is a board member, prayer at board meetings may present constitutional difficulties." Here, not only are there student representatives at the board meetings, but they have directly asked the board not to impose prayer on them.

The student objections and FFRF's reinforcement seem to have given the Prosser School District pause. FFRF recently received a reply from the superintendent emphasizing that the board only discussed instituting prayer at its Jan. 24 meeting and noting that it hasn't taken any action. FFRF hopes that this response indicates that the Board of Directors is listening to its reasonable student representatives and that there will be no need for litigation to defend their constitutional rights.

"We are really thrilled when young activists come to the fore in opposing theocratic impositions," says FFRF Co-President Annie Laurie Gaylor. "We hope that the students' perspective has caused the board to permanently reconsider its unlawful prayer plan. School board members are free to pray on their own time and dime, but should not misuse their civil authority to impose prayer on others."

## Different where differences aren't accepted

*Yoshimi Garcia was given the Freedom From Religion Foundation Student Activist Award of \$2,000, endowed by a West Coast couple that prefers anonymity.*

By Yoshimi Garcia

I decided to comment on the prayer suggestion because I've had religion pushed on me since I was little, specifically by people in my school district. I've been bullied and left out of groups and social events because of my beliefs (or lack thereof).

The community I've grown up in has allowed other kids to do that to me. In fact, the community has encouraged shunning anybody who's different. But I do feel bad for the people who've encouraged the trash talking of me, a 16-year-old, just because I don't share their beliefs.

When the first news articles were released about this issue, I was genuinely scared for my life because I felt they had



Yoshimi Garcia

placed a target on me for being different in a place where differences aren't accepted.

I know I was doing my job correctly as a student board representative when I said, "I don't think religion should be brought in schools," because I've asked many students in our district for their opinion on the matter and most have agreed with me. Although there was a lot of fallout, I'm glad I said something.

Now, I've noticed teachers treating me differently, for better or worse. I am treated differently by board members; some of them refuse to look at me when I talk now. A community member even came up to one of my fellow board representatives after a meeting and asked if I believe in stealing and lying because of my unshared religious beliefs. That was incredibly ridiculous and inappropriate. This situation has taught me to always stand up for what I believe in.

*Yoshimi, 16, is a high school junior. Yoshimi is involved in wrestling, tennis and is a junior drum major for several of their school's bands. After high school, she plans to join the Air Force and work on college courses at the same time.*

## Speaking up is worth it

*Noah Dempsey has earned the Al Luneman Student Activist Award of \$2,000 for speaking up at the Prosser School Board meeting.*

By Noah Dempsey

I want to thank everyone for the kind words and support. This has truly been a transformative experience and it has helped strengthen my ambition to pursue public service and introduced me to so many similar-thinking individuals in my community. As an atheist and a socialist, it has been very hard to expose my views to the very conservative bible-thumping community in which I live.

That being said, the Prosser (Wash.) School Board meeting on Jan. 24 was going well until near the end. Director Vermulm suggested that meetings open with prayer. Yoshimi Garcia and I exchanged concerned looks and Yoshimi was the first to speak up. I followed directly afterwards. I argued that there is no need for more controversy and that I would be opposed to the inclusion of prayer. Vermulm doubled down and pushed the point once again.

Throughout the whole election season, I have been in strong opposition to Frank Vermulm's and Brian Weinmann's policies and positions on the board. Weinmann has positioned himself with a far-right congressional candidate and has espoused a traditionalist and conservative approach to education. Vermulm had, in previous interviews, mentioned his very conservative views, such as school personnel being armed, having education return to "back to basics" and "not getting diverted or sidetracked to the politically correct things of the day."



Noah Dempsey

And, as for Board President Jason Rainer, he has been a thorn in my side since he took office in 2021. He is very conservative and brackish.

At the next board meeting, individuals spoke in opposition to the board proposal and supported us for our comments. We got local press first and then national press from Hemant Mehta ("The Friendly Atheist") and FFRF, so the community started to become very vocal.

We had two individuals question our roles as student representatives and asked if we ran the meetings because we had managed to effectively kill the proposal on the spot. The board collectively decided they were going to let this issue die down, which, luckily, it did.

Vermulm now prays before the meetings in a corner of the library. Overall, this experience made me realize that I do have a voice and that speaking up, even if it seems you are in the minority, is worth it and the only way to effect real change.

*Noah Dempsey, 18, is a senior at Prosser High School and after graduation plans to travel and then wishes to attend the University of Washington.*

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"No Gods—No Masters"

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# IN THE NEWS

## Florida court allows 6-week ban on abortion

The Florida Supreme Court on April 1 overturned decades of legal precedent in ruling that the state Constitution’s privacy protections do not extend to abortion, effectively allowing Florida to ban the procedure after six weeks of pregnancy.

The conservative-leaning court found 6-1 that a 15-week abortion ban enacted in 2022 was constitutional. That ruling — in response to a lawsuit brought by Planned Parenthood, the American Civil Liberties Union and several abortion providers — allowed the six-week ban enacted last year to take effect May 1.

But, in a separate decision released at the same time, the court allowed Florida voters to decide this fall whether to expand abortion access. The court ruled 4-3 that a proposed constitutional amendment that would guarantee the right to abortion “before viability,” usually around 24 weeks, could go on the November ballot.

## LifeWise trying to bring God to public schools

LifeWise Academy is on a mission to reach public school children with the gospel, blurring the line between church and state.

LifeWise Academy is permitted under a pair of little-known, decades-old U.S. Supreme Court rulings that allow for off-campus religious instruction during school hours.

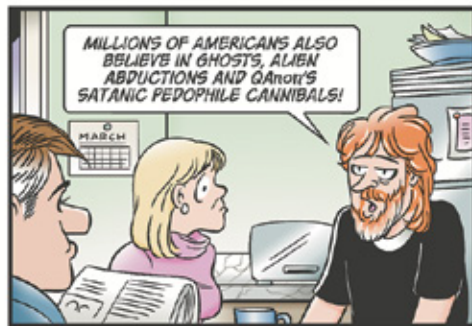
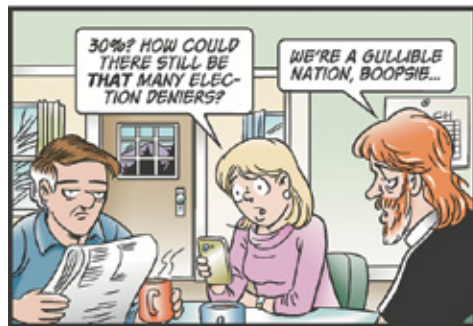
When LifeWise launched in 2018, the initial goal was to serve 25 schools by 2025, but it surpassed that long ago. By the start of this year, LifeWise had set up chapters in more than 300 schools in a dozen states, teaching 35,000 public school students weekly bible lessons that are usually scheduled to coincide with lunch or non-core courses such as library, art or gym class.

Public schools are not allowed to directly promote or fund the program, which is offered free to students whose parents sign permission slips.

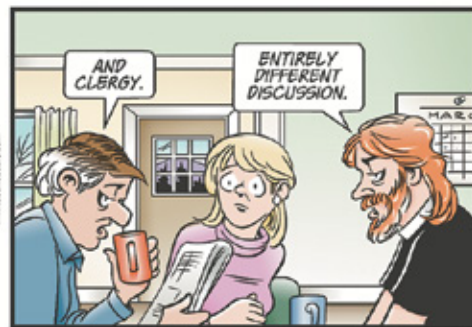
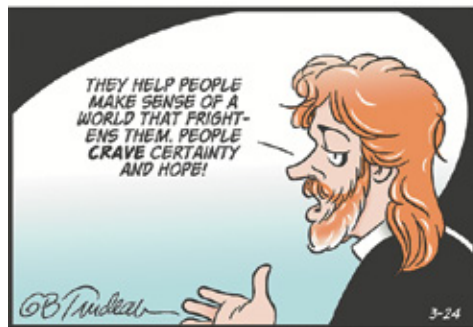
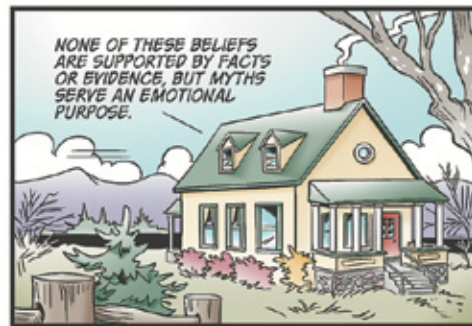
But parents and activists who’ve mobilized against LifeWise say that busing students to nearby churches, where they sometimes collect prizes and eat candy, has made some non-Christian children feel left out or pressured to attend.

Opponents have also documented several instances of teachers and administrators promoting LifeWise to students, either by allowing LifeWise volunteers to visit classrooms, hosting schoolwide assemblies or advertising the program in paperwork sent home to parents — actions that could violate the First Amendment.

### DOONESBURY



### BY GARRY TRUDEAU



## Gambia may overturn ban on female genital cutting

Religious lawmakers in the West African country of Gambia voted to advance a bill repealing a 2015 ban on female genital cutting. If it passes the final round of voting this summer, Gambia will become the first nation to roll back protections against the practice.

Of the 47 members of the Gambia National Assembly present on March 18, 42 voted to send a bill to overturn the ban onward to a committee for consideration before a final vote. Human rights experts, lawyers and women’s and girls’ rights campaigners say that overturning the ban would undo decades of work to end female genital cutting, a centuries-old ritual tied up in ideas of sexual purity, obedience and control.

Government committees will be able to propose amendments before it comes back to Parliament for a final reading in about three months — but analysts say that it has now passed the key stage: Its proponents will gain momentum and it will probably become law.

## Poll: 56% of Americans rarely/never go to church

More than half of Americans (56 percent) say they seldom or never attend religious services, according to a new poll from Gallup. Only 30 percent say they attend on a weekly or almost weekly basis.

Gallup found that almost all of the Nones (95 percent) say they seldom or never attend services. More than half of Jews, Buddhists, Hindus and Orthodox Christians say they rarely attend as well.

Among religious Americans, Latter-Day Saints (67 percent) are most likely to say they attend weekly or al-

most weekly, followed by Protestants (44 percent), Muslims (38 percent) and Catholics (33 percent).

Overall, the percentage of Americans who never attend services has more than doubled since the early 1990s, while the share of those who say they rarely attend has stayed stable, according to Gallup data.

## Woman wins appeal after denied morning-after pill

A woman who was denied a morning-after pill by a pharmacist in Minnesota due to his personal beliefs was discriminated against and should get a new trial to determine damages, judges ruled March 18.

The Minnesota Court of Appeals ruled that pharmacist George Badeaux discriminated against Andrea Anderson in 2019 when he refused to fill a prescription for an emergency contraceptive.

The case went to trial in the summer of 2022 and, while a jury found the ordeal caused Anderson \$25,000 in emotional harm, it decided that Badeaux didn’t discriminate against her. Because there was no finding of liability, that also meant Anderson wasn’t entitled to the \$25,000 payment, and she appealed.

“Today’s ruling sends a clear message that discrimination in reproductive health care for any reason is not only unacceptable, but illegal under Minnesota law,” said Jess Braverman, legal director for Gender Justice. “It’s a huge victory for every person who seeks care without prejudice or refusal based on beliefs held by others.”

## La. court: Priests have right not to be sued

The Louisiana Supreme Court has decided to strip sexual assault survivors of an avenue of justice, ruling 4-3 that it’s the due process rights of priests and their enablers to not be held accountable in instances of sexual assault.

The case, *Bienvenu v. Diocese of Lafayette*, was brought by Douglas Bienvenu and several other plaintiffs who claimed they were sexually molested by a Catholic priest during the 1970s, when they were between the ages of 8 and 14.

But in its majority opinion issued on March 22, the court argued that while the facts of the case were largely undisputed, the priest — and the religious institution he was a part of — was actually protected under the Constitution’s due process clause, which says that no one shall be “deprived of life, liberty or property without due process of law.”

The Louisiana Legislature passed an act in 2021 to establish a “look-back” window for sexual assault victims. The legislation provided victims of sexual abuse from any period with an opportunity to pursue justice against their alleged abusers, as long as they filed their lawsuits before June 2024. But the court basically ruled that the look-back window was unconstitutional.

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**Freedom depends on freethinkers**

# Godless Gospel to perform in NYC on June 24, 25

The Freedom From Religion Foundation is delighted to announce that its myth-dispelling ensemble, “Godless Gospel,” will perform in New York City on Monday, June 24, and Tuesday, June 25, at Theatre 555, 555 W. 42nd St. The opening act will be “Very Funny Lady” Leighann Lord, a well-known standup comedian and New York freethinker.

Doors will open at 7:30 p.m. both nights for the provocative show produced by FFRF Co-President Dan Barker and directed by former gospel artist Andre Forbes. Because the theater only seats 160, please register for Monday’s performance at [ffrf.us/godlessjune24](http://ffrf.us/godlessjune24), or Tuesday’s performance at [ffrf.us/godlessjune25](http://ffrf.us/godlessjune25). The cover charge is a suggested donation of \$20. Register today — and please tell your friends and family.

Singers include Tahira Clayton, a well-known New York City jazz singer who has her roots in gospel; Candace Gorham, author of *The Ebony Exodus Project*; Heather Kinley, a country artist; Cynthia McDonald, a Freedmen of Chicago activist; DeAngela Morant, a businesswoman; Steven Phelps, with the Nashville Sunday Assembly; and Mandisa Thomas, president and founder of Black Nonbelievers.

Godless Gospel has performed at FFRF’s 2022 and 2023 national conventions to great acclaim. Songs are



by Barker, who as a former evangelist had a musical ministry, and Forbes, a former gospel director, performer and composer. Songs include “Joy to the World,” “Let’s All Give Thanks,” “Never Be Ashamed,” “I Don’t Need Jesus,” “Life is Good!”, “I Believe in Honesty” and “The Natural World.”

Musicians include Andre Forbes on keyboard, Charles Wilson on drums, Amos Perry on bass and Aaron Hill on B3 organ. Barker and FFRF Co-President Annie Laurie Gaylor will be on hand to greet audience members.

Don’t miss this once-in-a-lifetime chance to witness Godless Gospel off-Broadway.

FFRF warmly thanks FFRF Member Eric Krebs, longtime off-Broadway and Broadway producer, for his generous offer to use the theater space. The suggested donation will help offset some of the costs related to expenses for musicians, equipment rental, flights and accommodations, and help FFRF keep taking Godless Gospel on the road. Look for future news on the Godless Gospel album release!

## Prayers

*Continued from page 1*

context of public schools “because children and adolescents are just beginning to develop their own belief systems, and because they absorb the lessons of adults as to what beliefs are appropriate or right.” The Chino Valley Unified School District was ordered to pay more than \$275,000 in plaintiffs’ attorney fees and costs to FFRF.

Unfortunately, the Frankfort board continued opening its meetings with prayer. The board attempted to “fix” the constitutional violation at the February and March meetings by asking a local pastor and community members to lead the prayer rather than a board member.

## Legal Team

*Continued from page 1*

Press, Washington Post, Sports Illustrated, Fox News and ABC News.

FFRF’s new deputy legal director, Liz Cavell, graduated from Tulane University Law School in 2009 and joined the FFRF staff in 2013, working as intake attorney before being put in charge of legal education and in-house legal matters.

Liz’s amicus briefs include three filed before the U.S. Supreme Court, including FFRF’s brief in the Dobbs abortion case. Her op-eds on behalf of FFRF have appeared in a variety of daily newspapers, and her appearanc-

FFRF again wrote to insist that the board cease opening its meetings with prayer in violation of the Constitution’s Establishment Clause.

“The board’s new practice of inviting clergy and community members to deliver religious invocations at the start of meetings unconstitutionally coerces attendees to participate in and observe religious exercise,” Lawrence wrote in the April 17 letter.

FFRF again asked that the board refrain from opening its meetings with prayer.

“The Community Schools of Frankfort Board of Education has ceased offering a prayer before our board meetings,” the board recently responded via email. Instead, the board has opted for a moment of silence as a substitute.

es have included “CBS This Morning.”

She is co-creator and co-host of “We Dissent,” a monthly podcast by secular women attorneys discussing religious liberty issues.

Liz has drafted several reports published by FFRF, including reports on the Trump judiciary, public school students’ rights, and prayer walks in public schools.

Liz has given continuing legal education presentations to fellow legal professionals (attorneys and judges), including the Dane County (Wis.) Bar Association, the Dane County Legal Association for Women, the State Bar of Wisconsin. She’s also given dozens of presentations on First Amendment topics to secular groups, FFRF chapters, student groups and others.

## THEY SAID WHAT?

Tennessee is a faith-based state: We trust God’s word and aim to lead lives that honor him. Our state seal should reflect those values.

**Tennessee state Rep. John Holsclaw, who sponsored and helped pass legislation in the House last year that added “In God We Trust” to the Great Seal of Tennessee.**

*The Tennessean, 1-27-24*

If people are being arrested for practicing F.G.M. [female genital mutilation], then that means they are being deprived of their right to practice religion.

**Gambian member of Parliament Lamin Ceesay. Although female genital mutilation was banned in 2015, the parliament is moving to overturn the ban, with critics saying pro-cutting imams are “hellbent on having a theocratic state.”**

*New York Times, 3-19-24*

I HATE BLACK PEOPLE. Like fuck them all . . . I hate blacks. End of story.

**Crystal Clanton, Justice Clarence Thomas’ announced new law clerk, in a text message she was accused of sending out laced with profanity in 2017. Justice Clarence Thomas and his wife Ginni**

**then “nearly adopted” her and she lived with them for one year. She enrolled in Antonin Scalia Law School at George Mason University in Virginia in 2019 at their urging. Thomas asked 11th Circuit Appeals Court Chief Justice William Pryor to hire her as his clerk. Thomas announced Clanton as one of his three clerks starting work in the fall.**

*New York Times, 3-29-24*



Mark Robinson

People talk about the separation of church and state. I’m trying to find that phrase somewhere in our Constitution. Trying to find it somewhere in our Declaration of Independence.

Trying to find it in the writings of any patriot, anywhere, and I cannot. And I cannot because it does not exist. There is no separation of church and state.”

**Mark Robinson, North Carolina’s lieutenant governor, in a speech given in October.**

*New York Times, 3-19-24*

Quit being lukewarm. Quit being so passive aggressive and mamby-pamby and spiritually sissified. OK? I’m telling you, they’re attacking churches in America.

**Greg Locke, pastor of Global Vision Bible Church in Mt. Juliet, Tenn., after someone allegedly burned a trailer full of bibles near his church on Easter.**

*Religion News Service, 4-1-24*

There’s no difference in the value of born people and preborn people. In short, abortion is murder. And that’s starting at the moment of fertilization even prior to implantation.

**Paul Brown, director of Abolish Abortion Texas, which supports the death penalty for women and minors who seek abortions.**

*The New Republic, 4-1-24*

Sin is the root cause. When God created this world, there was no sin, he created a perfect world, man ruined that by sinning, and we’ve seen the depravity and the decline of our world ever since then. So, when we talk about the root cause, if you really want to go back to why we have mental health issues, to why we have greed, to why we have people being mean to other people, it’s sin.

**Jeff Weigand, a member of the Dane County (Wis.) Board, in opposing funding for a homeless shelter, saying “sin is the root cause” of homelessness.**

*Madison365.com, 4-8-24*



Dawn Staley

If you don’t believe in God, something is wrong with you. Seriously!

**Dawn Staley, University of South Carolina women’s basketball coach, in a postgame interview with ESPN reporter Holly Rowe after her team advanced to the Final Four.**

*ESPN, 3-31-24*

God is sending America strong signs to tell us to repent. Earthquakes and eclipses and many more things to come. I pray that our country listens.

**Rep. Marjorie Taylor Greene, who believes natural phenomena are divine symbolism.**

*Time, 4-7-24*

God draws a line in the sand, and when we crossed that line, there’s consequences. . . Keep in mind that the law came into effect on Oct. 25. God heard you and the horrible events on Oct. 25 happened.

**Maine state Rep. Michael Lemelin, who was censured after claiming the deadliest mass shooting in the state was a sign of retribution from God over the passage of a law expanding abortion access. Eighteen people were killed on Oct. 25, 2023, when a man opened fire at a bowling alley in Lewiston.**

*NBC, 4-11-24*

It was the covenant that God made with Abraham, and that covenant was real clear: “If you bless Israel, I will bless you, if you curse Israel, I will curse you. Do you want Columbia University to be cursed by God?”

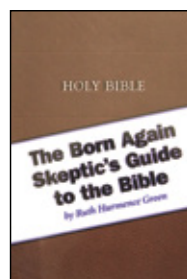
**Rep. Rick Allen, R-Ga., speaking to Columbia University President Nemat Shafik at a hearing before a House Committee on Education and the Workforce, claiming that she was insufficiently sensitive to episodes of antisemitism.**

*The American Prospect, 4-22-24*

Christians are called to work with excellence but also to rest in the knowledge that God is sovereign, and that we can trust the results to Him. To have the faith that all of it is in His hands, I think does help.

**Erin Hawley, who argued to ban mifepristone before the U.S. Supreme Court on March 26 on behalf of Alliance Defending Freedom, but says the decision is up to God. She clerked for Justice John Roberts and is married to Christian nationalist Sen. Josh Hawley.**

*New York Times 3-27-24*



**The Born Again Skeptic’s Guide to the Bible**  
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[ffrf.org/shop](http://ffrf.org/shop)

# VICTORIES

By Greg Fletcher

## Ohio district nixes Good News Club recruiters

FFRF fought to keep representatives of the Good News Club from recruiting elementary school students during their lunch hour in Jackson Local Schools in Massillon, Ohio.

A concerned parent reported that on Sept. 26, 2023, for the second year in a row, Lake Cable Elementary School allowed adult representatives of the Good News Club (GNC) to speak to students during the lunch hour in order to promote and encourage attendance at GNC. FFRF was informed that representatives had the opportunity to access and speak to over 400 students during the lunch period while on school property.

GNC representatives promised students, including the complainant's children, that they would be given "candy and ice cream" if they joined the GNC. Lake Cable Elementary also sent a GNC permission slip home with students stating that the permission slip was to be completed and returned to the office secretary at Lake Cable Elementary.

"It is inappropriate and unconstitutional for [Jackson Local Schools] to offer religious representatives unique access to elementary school students in order to recruit and proselytize them," FFRF Anne Nicol Gaylor Legal Fellow Sammi Lawrence wrote to the district.

John E. Britton, legal representative for the district, emailed FFRF, stating, "After reviewing the propriety of allowing this forum, the district determined (to their credit) to discontinue the practice altogether and have notified all groups, including the Good News Club, to that effect and without incident," he wrote. "In other words, the district has put an end to allowing access to outside groups at the elementary buildings during the school day (as is already the case in all other buildings)."

## N.C. teacher removes bible verses from office

FFRF convinced the ArtSpace Charter School in Swannanoa, N.C., to remove religious displays from a teacher's office where students could see them.

An employee reported to FFRF that a staff member displayed several bible verses in his office in plain view of students. The complainant reported that they could be seen from the hallway, as well. Additionally, the religious displays made other employees uncomfortable and raised concerns about whether the staff member was promoting his personal religious beliefs to students in other ways as well.

FFRF Staff Attorney Chris Line wrote to Executive Director Sarena Fuller, who wrote back to FFRF, informing that action had been taken.

"After receiving the complaint on Feb. 12, I met with [the staff member] to request that he move the bible verses. Although this area is his personal workstation, we understand that the verses were problematically displayed in a prominent location in his office where students and staff could see it and interpret his personal expression as an endorsement," she wrote. Fuller confirmed that the staff member removed the display. Additionally, Fuller met with faculty and staff in March to discuss constitutional rights and obligations.

## Action Fund gets in on the action



FFRF Action Fund Senior Policy Counsel Ryan Jayne and State Policy Manager Ryan Dudley (back right) were invited to attend a bill signing ceremony by Wisconsin Gov. Tony Evers for S.B. 333, which closed a loophole that allowed Wisconsin school employees to sexually harass students without legal consequence. This was necessary after police were unable to charge a private Christian school administrator who repeatedly harassed a student. The student later reached out to the Action Fund, which testified in support of the bill.

## Email signatures free from religion in Florida

Hillsborough County (Fla.) Public Schools employees will no longer be free to use their official email signatures to push religious beliefs on the community after FFRF took action.

A district community member contacted FFRF to report that an employee included a biblical reference in her official school email signature. The complainant reported that they received an email from a staff member that included a reference to "Psalm 46:5," reading, "God is within her, she will not fall; God will help her at break of day."

FFRF Staff Attorney Chris Line wrote to the district and received a response from Jeffrey W. Gibson, legal representative for the district. "As of today, March 19, 2024, the personalized content has been removed by the district employee," Gibson wrote. Additionally, Gibson informed that the district finalized procedures to ensure uniformity of the content of email signature blocks across all employees of the district.

## Religious symbols removed from treasurer's office

FFRF has ensured that the King and Queen County Treasurer's Office in Virginia will no longer display religious symbols for all to see.

A concerned King and Queen County resident reported that a Latin cross was prominently displayed on the front door to the Treasurer's Office on March 21.

"Easter is neither a federal holiday or a Virginia state holiday. It is unconstitutional for a government entity to observe a Christian holy day, which celebrates Jesus's resurrection," FFRF Staff Attorney Chris Line wrote to Treasurer Stephanie Sears.

After receiving FFRF's letter, Sears

took action. "The wreath has been taken down. Thank you for informing me about the appropriate separation of church and state," she wrote back in an email.

## FFRF stops LifeWise from recruiting in Ohio school

FFRF has made sure students in Fredericktown, Ohio, will not be pressured to participate in an evangelical release time bible study program.

A concerned district community member informed FFRF that schools within the district had been promoting and encouraging students to attend LifeWise Academy's release time bible study classes.

FFRF was informed that schools in Fredericktown Local School District allowed representatives of LifeWise to come into the schools last fall to promote LifeWise and recruit students. In one instance, Fredericktown Elementary School's principal, Matthew Caputo, led LifeWise's representatives around the school during the school day and allowed representatives to recruit elementary school students to attend LifeWise's bible classes.

Additionally, when a student informed one of LifeWise's representatives that they are Hindu, the representative responded by telling the student that they needed Jesus and to ask their parents to come to LifeWise's classes. Reportedly, LifeWise's representatives pressure students to ask their parents for permission to attend these classes.

FFRF Anne Nicol Gaylor Legal Fellow Sammi Lawrence wrote to the district and demanded that it ensure its schools cease illegally promoting and encouraging student attendance at this evangelical Christian bible study class.

After months of silence, FFRF received an email from District Superintendent Gary Chapman.

"The district promptly investigated the allegations detailed by FFRF in your letter dated Oct. 25, 2023. Following the

investigation, we reminded administrators to refrain from actions that could be viewed as promoting or discouraging participation in any religious release time program," Chapman wrote. "In addition, the district reaffirmed its policies with the local LifeWise officials, including the prohibition of soliciting student participation during school hours or at school-sponsored events."

## FFRF helps ensure invocations open to all

FFRF has taken action to ensure that all residents of a Michigan county are treated on par with Christian prayer-givers.

The Ottawa County Board of Commissioners, which opens its board meetings with invocations, agreed that a member of The Satanic Temple could deliver an invocation at its April 23 meeting. On March 21, Commissioner Jacob Bonnema claimed, however, that "satanists" shouldn't be allowed to do this because it violates "Christian values."

Singling out a religious denomination by denying them an opportunity to deliver an invocation despite allowing similarly situated Christian leaders to offer invocations

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amounts to a clear violation of the First Amendment, FFRF Staff Attorney Chris Line reminded the board.

FFRF urged the Ottawa County Board of Commissioners to uphold the constitutional rights of all residents of Ottawa County by allowing invocations from any resident regardless of personal religious beliefs — or better yet, to eliminate the practice entirely.

It has received a response from Ottawa County Board Chair Joe Moss acknowledging that “board leadership prioritizes freedom of speech, freedom of conscience, and religious freedom.” FFRF is confident this response indicates that members of The Satanic Temple, other religious minorities and the nonreligious will be permitted to deliver invocations in Ottawa County.

### FFRF stops prayer walk in Ga. school district

Bremen City Schools in Georgia canceled a prayer walk in an elementary school after FFRF fought to protect students’ First Amendment rights.

A concerned parent reported that the district had planned to allow outside adults to enter Jones Elementary School on April 21 in order to hold a “prayer walk.”

FFRF was informed that this was not the first time the school had inappropriately blurred the lines between church and

state. The complainant stated that they and their family are members of a minority faith and that their child is “constantly being othered in [their] own classroom.” The complainant reported that the school permits students to bully their child by regularly telling their child that they are “going to hell.” The complainant was upset that Jones Elementary was planning to allow outside adults to hold a Christian prayer walk in the school building and include their child’s name in a religious ritual that they do not believe in.

FFRF Anne Nicol Gaylor Legal Fellow Sammi Lawrence wrote to the district, telling it that by allowing outside adults to host a prayer walk in one of its elementary schools, the district displayed blatant favoritism toward religion over nonreligion.

In a letter from Pereira, Kirby, Kinsinger & Nguyen LLP, legal representative for the district, Cory O. Kirby informed FFRF that the district had taken action: “The principal has decided not to allow a prayer walk through the school.”

### Fla. elementary school religious club disbanded

FFRF has ensured that the Fellowship of Christian Athletes will not be able to organize and run a religious club for students at an elementary school in Hamilton County School District in Florida.

FFRF was informed that Hamilton County Elementary School had permitted the North Central Florida Fellowship of Christian Athletes to begin a new club at Hamilton Elementary. A Jan. 27 post from the official North Central Florida FCA Facebook account announced the “New Huddle” at the elementary school.

Additionally, on Feb. 9, the district’s assistant superintendent informed FFRF’s complainant that the Fellowship of Christian Athletes is an official “student-led” organization at Hamilton Elementary. The complainant was told that there were no records of the Fellowship or an affiliated group renting space at Hamilton Elementary. The response made it clear that the school was allowing a religious club for children at an elementary school during the school day.

FFRF Anne Nicol Gaylor Legal Fellow Sammi Lawrence contacted the district about FFRF’s concerns, and, thankfully, the district was willing to listen to reason and obey the law.

“The district has investigated the allegations of your letter and concluded that there was a small group of fifth grade students participating in such a club at the school,” the legal counsel for the school district recently responded to FFRF. “While these same students will be eligible to participate in FCA on the campus of Hamilton County High School in a few short months as six graders, in an effort to

avoid any perception that such a gathering on the campus of Hamilton Elementary is being organized, promoted or endorsed by the district or its employees, the club has been dispersed.”

### FFRF has OK district remove bible verse

An Oklahoma school system took down a massive biblical display after FFRF objected that it was unconstitutional.

A concerned Putnam City Schools employee informed the state/church watchdog that Western Oaks Middle School was prominently displaying a bible verse in one of its hallways. FFRF’s complainant stated that many employees were concerned about this inappropriate religious display but had not brought it up because of a fear of retribution.

FFRF Staff Attorney Chris Line wrote to Superintendent Fred Rhodes, asking the district to remove the bible verse display immediately in order to protect the First Amendment rights of students.

FFRF’s constitutional lesson was well received by the school district.

“Please be advised that, during Spring Break, Putnam City Schools has removed the Bible verse posted on the wall at Western Oaks Middle School,” the district recently responded.

## Ozark chapter’s secular activities



The Ozark Chapter of FFRF has had a busy year so far.

Top left: On April 13, Ozark chapter members George Naidl, James Brazeal and Chris Sweeny (pictured with daughter Indie McGuire) worked a booth at the Bentonville, Ark., farmers market.

Top right: Members of the Ozark chapter stand in front of the FFRF billboard they installed.

Left: On March 24, the Ozarks chapter did a highway clean-up in collaboration with NWA Freethought.

Also, the chapter helped at the NWA Women’s Shelter on Jan. 27 and Feb. 24 by sorting through donated clothes, cleaning the sales areas and arranging clothing racks.

On Feb. 10, the chapter assisted individuals with learning disabilities at the Elizabeth Richardson Center in Springdale, Ark.

# Shadow network waging an American crusade

This is the speech (lightly edited) given by Andrew L. Seidel at FFRF's national convention in Madison, Wis., on Oct. 14. He was introduced by FFRF Associate Counsel Sam Grover. You can watch the video of the speech (and all other convention speeches) at [ffrf.us/con23](https://ffrf.us/con23).

**Sam Grover:** We're going to have a panel of speakers on Christian nationalism, and the first speaker this morning is Andrew Seidel, who will be a familiar face for many of you.

While his humble beginnings were as a Grand Canyon tour guide, Andrew eventually found his way to FFRF, where he worked as a constitutional attorney and the director of our strategic response team. He now works as the vice president of strategic communications for Americans United for Separation of Church and State. Other notable things: Andrew officiated my wedding, and, perhaps more on topic, he's also written two incredibly enlightening books on Christian nationalism and the radical redefinition of religious freedom — *The Founding Myth: Why Christian Nationalism is Un-American* and *American Crusade: How the Supreme Court is Weaponizing Religious Freedom*. Please welcome to the stage Andrew Seidel.

## By Andrew Seidel

Thank you, it's lovely to be back. To all the Christian nationalists out there in America, we are not coming for your rights, we are coming for your privilege. That's the dedication of my latest book, *American Crusade: How the Supreme Court is Weaponizing Religious Freedom*.

Religious freedom protects everybody here in this room. It guarantees your right to be blasphemous, godless heathens. In other words, religious freedom has long been a shield. A hallowed protection against government overreach. The minority's protection from the tyranny of the majority. And it's a right that has been guaranteed by a strong separation of church and state.

But not anymore.

A well-funded powerful network of Christian nationalist organizations and judges — I'm talking about a billion-dollar shadow network here — is working to turn that protection of religious freedom that's supposed to be enjoyed by all of us into a weapon of privilege and supremacy for the few.

And, thanks to this packed Supreme Court, they are winning case after case. Now, religious freedom is the tool, the weapon, of Christian privilege, of Christian supremacy.

This shadow network really is waging a crusade to weaponize religious free-



Photo by Chris Line

Andrew Seidel talks about elements of his book, *American Crusade: How the Supreme Court is Weaponizing Religious Freedom*, during FFRF's national convention in Madison, Wis., on Oct. 14, 2023.

dom and I'm going to keep coming back to this phrase. This is a war of conquest. They are not trying to conquer land, but they are trying to conquer our Constitution and remake it in their image.

America was not in any sense founded on the Christian religion. We are not a Christian nation, but they would make us so. And the weapon that they are forging to bring about that constitutional apocalypse is religious freedom. But the question I want to answer first is the why. Like Sauron and the Ring, Voldemort and the Elder Wand or Thanos and his Gauntlet and the Infinity Stone, they are seeking a weapon of power. But the question is "why?" Why are they so scared?

It's because of you. Do you know that? Because the Nones are on the rise, because Americans are leaving religion behind, because we elected our first Black president, because we have a Black female vice president, because of marriage equality, because every day we are closer to racial and gender and LGBTQ equality, and more specifically, because they are so accustomed to seeing a narrow world that only reflects their straight, white, conservative Christian patriarchy, that the existence, let alone the equality, of anybody else, feels like a threat to them.

So why the crusade? Why are the Christian nationalists seeking this weapon? It is largely a backlash against equality realized.

Conservative white Christian Americans' status as the dominant group in this country is threatened, and it has been for some time. They're losing the culture wars, a phrase that I kind of hate because it masks attacks on human rights. Their benighted ideas and ideology are unpopular. They're losing the privilege and the deference which they believe they are due. When a dominant group or a caste in a society feels threatened or feels left behind by circumstances, it reacts or it overreacts by seeking a way to retain that status.

## Christian nationalism

And that is why you're seeing them turning to Christian nationalism, turning to tearing down democratic norms, to the so-called strong men, to things like Jan. 6. And that is why they are seek-

ing this weapon — their fear of equality.

Studies actually back this up. They show that these Christian nationalists conflate demographic loss with a threat to their freedom — specifically to their religious freedom. That tells us that they fundamentally misunderstand religious liberty as privilege.

But we know that equality, even when it means the erosion of a privilege, is not discrimination. We're not actually expanding rights or giving out new rights. We are recognizing rights that have always existed under the law, but were never enforced. We are affirming the humanity of our brothers and sisters and admitting that we've been wrong.

As we realize the values implicit in "we the people," and "equal justice under law" and these other founding maxims, as we recognize that human beings are worthy of rights, conservative white Christian America is dying a slow demographic death and rebelling. They are raging against the dying of their privilege.

So, they declared war.

And the crusade is a quest to find the weapon that will win them this war. A weapon for regaining that once-dominant group's status. And again, when I say they are weaponizing religious freedom, that is not a frightful turn of phrase. I mean precisely that. In case after case, they are litigating the le-

gal meaning of religious freedom as a constitutional right and in the process, redefining it, perverting the meaning. The crusaders' religious freedom challenges are superficially about Christian crosses and veterans or playgrounds and skinned knees or private school vouchers or bakeries and website designers who just want to exercise their art and coaches who just wanna pray.

## Christianity above law

But, really, they are about privilege and supremacy — literally about privileging the "right" kind of conservative Christian over everyone else. The goal there is to use religious freedom to elevate conservative Christianity above the law.

I tell the story of this decades-long campaign to forge this in *American Crusade*. I genuinely do not think you can understand what is happening in this country right now without understanding this fight, this attack.

As many of you know, I have lived these cases. This fight has been my whole career. I've litigated some of them, I've briefed others, I've defended this country from this assault.

In my book, I tell you the true stories behind each of the Supreme Court cases that have advanced this campaign. I promise you that whatever you think you know, and as informed as every one of you are in this room, there is so much more to the tale — and things are so much worse than you realize.

The legal media prizes balance over truth. Balance over truth. They tend to treat all players as genuine and honest and fair-minded, though that's starting to finally crack. The crusaders, the groups and the people behind this crusade, are none of those things.

In *American Crusade*, I didn't do what a lot of pop law books do, which is repeat the facts as stated by the Supreme Court, because on these issues, the justices themselves will manipulate the facts and the law to reach a desired outcome.

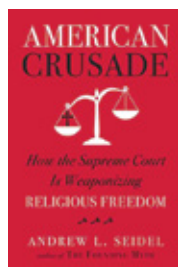
You all laughed at the case of the coach imposing his prayer on students. I mean, this is a coach imposing his prayer on other people's children, and the lower court judges warned in that case that the crusader was spinning a deceitful narrative. A judge said that about what the other side was doing in that case, and the Supreme Court rubber stamped it.

In *American Crusade*, I dug deeper, I interviewed people involved in these cases, I scoured dusty archives, I did everything I could so you could



Photo by Chris Line

Andrew Seidel chats with an FFRF member during the book-signing event following his talk.



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learn the truth. Because it's not just the facts, but the law itself can also be manipulated. I think a lot of times that we legal professionals can get buried under legalese and civil procedure and levels of scrutiny and precedents. I think sometimes we hide behind them. Often it is better to just shed all of those trappings and get back to the basics, to cut through all of that bullshit that lawyers and judges build up around their profession — the jargon, the case names and even the legal tests. I wrote *American Crusade* so that everybody can understand the threat and see how radical and dangerous these crusaders and these Supreme Court opinions truly are. Because when you cut through all of that prattle and piffle, a simple truth becomes fairly obvious. The questions presented, when religion and the law collide, are not that hard. They're not that complicated and they're actually pretty easy to resolve. Especially to cases that have come before this court. Unless, of course, there's some ulterior motive behind those cases.

### Three lines

All you have to do is draw three basic lines. In the book, I creatively refer to these as lines No. 1, lines No. 2 and lines No. 3. This is what I mean about shunning jargon.

First, we distinguish between belief and action. Your right to believe is absolute. Your right to act on that belief is not. I open the book with several stories about drivers who let Jesus take the wheel. This happens. They are free to believe that Jesus is a back-seat driver, but if they act on that belief, the civil law can step in and say no. We can fine them, we can take away their license, maybe even send them to prison or maybe some therapy. Belief is unlimited. Action is limited.

And that brings us to the second line. If it is limited, then where can the government step in and say no? Where is it appropriate for the government to enter into the equation? The answer here is also pretty simple. It's where the rights of other people begin. You've all heard that your right to swing your fist ends at the other person's nose. Your right to freely exercise your religion ends where the rights of other people begin. Period. Full stop. Religion is not a license to harm others or infringe their rights in any way.

And then line No. 3 is also pretty easy and it should be a favorite of everybody here, and that's the separa-

tion of church and state. Our government has no religion to exercise. Nor, may government officials abuse their power to impose their personal religion on other people, like that public school coach abusing his power to impose his personal religion on other people's children.

With those three basic lines, the questions that are posed in these Supreme Court cases that I go over in *American Crusade* again become pretty easy to answer. These three lines really do get you most of the way.

Can a limited liability corporation refuse to serve a gay couple in violation of civil rights laws because the owner of that business is a conservative Christian? Can a government official refuse to issue a lawful license because she's born again? Can a business owner thwart laws that grant employees health care rights because of what the owner's holy book dictates? Can Christian foster-care agencies take public funds and then refuse to serve Jewish foster-care families? Can churches flout public health measures and risk the lives and safety of entire communities? Do Christian parents have a right to use the government's taxing power to fund their children's Christian schools? Can they do that even though our taxes already paid for public schools that are already open? And what if those Christian schools are bigoted and discriminatory? Can one narrow religious belief be given the force of law to deny half the population bodily autonomy?

### Court got it wrong

These are not hard questions. But, the court got all of those wrong. And this didn't happen overnight. The crusaders laid the groundwork for this crusade for decades, beginning after *Brown v. Board of Education*, with the religious right and "moral majority" choosing abortion as the wedge issue to avoid sounding like the racists they were.

The Supreme Court issued a call to arms in a 2010 opinion involving a cross in the Mojave Desert, and it was really the start of this crusade. And the crusaders, the legal groups that make up this billion-dollar shadow network — groups like Alliance Defending Freedom and the American Center for Law and Justice and the First Liberty Institute and Liberty Council — they heard the call to arms and then they filed case after case and opened the floodgates. I detail those in *American Crusade*.

The crusaders set the cases up, and then the conservative judges and the Trump judges come and knock them down. That accelerated after Trump took over, and it really begins to look a lot like collusion, especially when we find out that the justices are fundraising for the same donors and they're wining and dining on these super yachts and fishing trips. It really



Photo by Chris Line

Andrew Seidel gestures while speaking during a panel Q&A session on Christian nationalism with Samuel L. Perry and Amanda Tyler.

does begin to look like collusion, or a different word for that same thing: corruption.

But the conservative justices are not impartial jurists carefully working to determine a legal meaning of the Constitution without bias. They're not calling balls and strikes. The crusaders didn't pack the court to put impartial jurists on the bench.

### Enter Leonard Leo

Leonard Leo of the Federalist Society is universally recognized as the guy who orchestrated the hostile takeover of the Supreme Court. A former employee of his described Leo's mission like this: "He figured out 20 years ago that conservatives had lost the culture wars, abortion, gay rights, contraception. Conservatives didn't have a chance if public opinion prevailed, so they needed to stack the courts." And that's what they did. Just notice the antidemocratic admission and the goal inherent in that quote. If they don't stack the court, the majority would rule. If they don't stack the court, democracy would work.

And this goes back to the "why" — why is this happening? The rising equality and the waning supremacy that motivates this crusade, and overall, Leo's group spent \$540 million, that we know of, packing the court through 2020. And, you simply do not spend that kind of money to get an impartial court. They bought a court. And Leo's job was described as "the monitor of the nominees' ideological purity," talking about the judicial nominees. All told, he's responsible for the nomination and confirmation of John Roberts, Samuel Alito, Neil Gorsuch, Brett Kavanaugh and Amy Coney Barrett. And Clarence Thomas is an old friend. All of them were members of the Federalist Society. That's six votes on the Supreme Court who were chosen for their crusader ideology.

And this worked. We have stats to show, and the stats I'm about to show you don't even show the two most re-

cent terms, which were pretty exciting for Christian nationalists. One study found that before Roberts was on the court, religion won about half the time. But after Roberts, that jumps to 81 percent. This is not a pro-religion shift, but a pro-Christian shift. Christianity won before Roberts 44 percent of the time and then nearly double under Roberts up to 85 percent of the time.

Religious freedom has become a weapon of Christian privilege. *American Crusade* puts a face on those numbers and proves that the new guiding principle of this captured Supreme Court is not the Constitution or the law, but simply this: Christianity wins.

And despite that, I have hope. And the wellspring of my hope is this basic definitional truth: Their power-hungry aggression is growing our movement. Their wins in the abortion case and the 303 Creative case and the coach case swell our ranks. And remember the "why." The whole reason for this crusade in the first place is the shifting demographics. White Christian nationalists are working to privilege the chosen few. Every legislative and legal victory they notch alienates more people, wakes more people up to the danger and drives more people away from their movement and into our welcome, open arms.

They're crusading because we are working to meet the unmet promise in the U.S. Constitution, the simple idea that "we the people" means all people.

As we continue to march toward that progress, Christian nationalists are fighting ever harder against it. They will not go gently; they will rage, rage, against the dying of their privilege. But, in the end, we will win, because they fight only for themselves and where they are selfish, we can be selfless. They want supremacy, we want equality. And that's why in the end we'll triumph. Not because our position is better than their's, though it definitely is, but we have the numbers on our side. And you can't fight math.

There are concrete solutions I offer in *American Crusade*, but none of them are quick or easy.

The crusaders played a long game, they captured the highest court in the land and those justices, they're drunk with power. We have to play a long game. We must shatter the myth that the judicial system is going to fix this for us. We have to organize and message in ways that build power and that fight to realize the aspirational ideals of freedom, equality and democracy. That's the work I do every day at Americans United and that's what *American Crusade* aims to do. Thank you.

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# Finding the hidden roots of white supremacy

*This is the speech given by Robert P. Jones at FFRF's national convention in Madison, Wis., on Oct. 14. He was introduced by FFRF Co-President Dan Barker. You can watch the video of the speech (and all other convention speeches) at [ffrf.us/con23](https://ffrf.us/con23).*

**Dan Barker:** Now, for a real treat, I have to say that our next speaker's book is truly special. For me, *The Hidden Roots of White Supremacy and the Path to a Shared American Future* was a true page-turner, and I'm sure many of you are going to feel the same way when you read this amazing book.

Robert P. Jones is the founder and president of PRRI, the Public Religion Research Institute. It's a nonprofit, nonpartisan organization that conducts independent research about the intersection of religion, culture and public policy. At FFRF, we often refer to the excellent studies and research and graphs and information that the PRRI puts out. With a Ph.D. in religion from Emory University, Robert Jones writes regularly on politics, culture and religion. His books include *The End of White Christian America* and *White Too Long*.

His newest book is *The Hidden Roots of White Supremacy and the Path to a Shared American Future*, in which he refocuses our attention on the 1493 Doctrine of Discovery, and he paints a broad historical canvas of white supremacy by focusing on three very poignant and tragic episodes in American history, but the book ends with hope. He does offer a path to fixing our broken nation.

Please welcome Robert P. Jones.

By Robert P. Jones

Well, thank you so much. I'm very honored to be in such great company — some friends, some people I'll hope to make new connections with, and especially this conversation about white Christian nationalism and its connections to our current political situation. A lot of the previous conversations focused on the rise of the Christian right, particularly of the last 50 years or so, rightly so. That's a good perch where we can see it most clearly and discern its most visible manifestation.

James Baldwin was once asked about how he and many other African Americans saw white Americans, and he ended up saying something profound that has stayed with me. He said, "Well, we do know them pretty well. We know them, one might say, how a mother knows her children." And he said, "We've come to consider them as the slightly mad victims of their own brainwashing."

Before Donald Trump entered the political scene, I remember sitting at a conference table at PRRI, thinking about policy questions for an upcoming survey. And it just became clear that the biggest divides that we were all wrestling with were less about this policy or that policy, they were so much more about American identity. "Who is this country for? Who is a true American?"

These were the questions that were really demarcating the fault lines, and even the policy questions were proxies for those bigger debates in the country.

## Origin stories

Recently, there was a nationwide debate sparked by the New York Times' 1619 Project. Why is this? Why was the suggestion that we need to reframe our origin story such a controversial thing? It's because our genesis stories are never neutral.

Our beginnings contain the seeds of the broader story we're going to tell about ourselves.

I used to collect postage stamps. So when I think of 1776, there's a postage stamp that comes to my mind depicting all those white dudes in their colonial finery, all posing around a table with their quill pens. If that is the origin story, who's in the frame and what other things do we have to account for in the rest of our story?

Well, that image produces a pretty straightforward story of the virtues and freedoms of white people. That's the only story you have to tell if that's who's in the frame at the beginning.

The most powerful and important thing about



Photo by Steve Solomon

At FFRF's national convention on Oct. 14, 2023, in Madison, Wis., PRRI's Robert P. Jones talks about the problems with the white Christian supremacy origin story of American history.

the 1619 Project wasn't just the date, but a new founding image for the country. The original publication in the New York Times contained an accompanying monochromatic image of a vast ocean with an infinite horizon line. Dark water filled the bottom half of the image and a gray sky filled the top. That image evokes colonialism and the transatlantic slave trade. If that's our founding image, we have to tell a different story about ourselves. I think that's important. But I suggest in the book that we actually need to bring the lens back even further.

## Turning back further

By 1619, the European interactions with Indigenous people in this country were more than a century old.

So, in the book, I suggest another significant date: 1493. We could pick other dates, but we all learned some version of how Columbus sailed the ocean blue in 1492.

But, in 1493, Columbus returns to Spain, and he says, "I'm going to go back and I need more. I need more ships, I need more soldiers, I need more missionaries."

But, the other thing that often is overlooked, and I'm going to suggest is very important for our current situation, is that he asks for one more thing: a moral mandate to justify the whole colonial enterprise. Who does he turn to to get that moral mandate? He turns to the head of the Western Christian Church at the time. This is 15th-century Europe, before the Protestant Reformation. There are no Protestants in the world. It's before the break of the Church of England with the Catholic Church.

So, Columbus asked the Pope to resolve a theological and moral dilemma: "What is our moral responsibility toward these people on lands we didn't know existed? What human rights do they have that we are bound to respect?"

The church's answer to this question began to be developed in these papal bulls, official opinions issued by popes, which have become known collectively as the Doctrine of Discovery. They essentially answered this moral question about human rights with their own theological question: Are these new peoples Christian?

And if the answer was no, which, of course, it was, then a whole series of consequences followed. First, these peoples were to be considered — and these were the bellicose words used in the documents — "enemies of Christ."

Moreover, Europeans had the authority of the Church and the power of the state to go in and to occupy their land, to take their goods, and, if they resisted, to use force. The church documents explic-

itly call for the Christian occupiers to "reduce their persons to perpetual slavery." This is the language coming out of the person that they considered to be the vicar of Christ on Earth, the pope, the head of the Western Catholic Church, and it applied to all of Christendom in western Europe.

This is the way that the moral compass was set for the dominant version of Christianity that landed on these shores and that we have inherited as a culture here. It predates the country by hundreds of years.

These documents claimed that anything Indigenous people lost — land, lives, property — were justified by their gaining two superior things: European civilization and Christianity.

This theological and moral calculus sets up not only the genocide and removal of Indigenous people, but the whole transatlantic slave trade.

## Embedded in documents

From the beginning, it's a theological project backed by political power. And this idea — this assertion of European superiority and Christian civilization over Indigenous people and Africans — is embedded in our founding documents.

The Declaration of Independence has principles that we're rightly proud of. But a list of grievances against the king of England also includes these words: "He has excited domestic insurrections amongst us and has endeavored to bring against us the merciless Indian savages whose known rule of warfare is an undistinguished destruction of all ages, sexes and conditions." That's in the Declaration of Independence, and by the way, the reference to "excited domestic insurrections" refers to slave rebellions.

In law, *Johnson v. McIntosh* in 1823, just a few decades after that, Chief Justice John Marshall says this: "The character and religion of the new world's inhabitants afforded an apology for considering them as a people over whom the superior genius of Europe might claim an ascendancy."

The potentates of the old world found difficulty in convincing themselves that they made enough compensation to the inhabitants of the new world by bestowing them civilization and Christianity." That's Supreme Court law.

The Doctrine of Discovery was cited in a Supreme Court decision as recently as 2005, in a majority opinion by none other than Ruth Bader Ginsburg.

Historically, it was common even for well-meaning liberal whites to talk about solving the so-called "Negro problem" or the so-called "Indian problem" that the United States had created with these policies. But I think what this analysis reveals is if we push past the so-called "Negro problem" and

the “Indian problem,” at the headwaters, what we really find is a white Christian problem.

What I’m trying to do is reframe the story of American origins to explain how the founders of the United States could build the framework for a democratic society on a foundation of mass racial violence.

### Built on racial violence

In my book, I show the connections between Emmett Till in the 1950s and the Spanish conquistador Hernando de Soto in the Mississippi delta that was 500 years before, and between the lynching of three Black circus workers in Duluth, and the mass execution of 38 Dakota men in Mankato, Minn., and between the murder of 300 African Americans during the burning of Black Wall Street in Tulsa and the Trail of Tears.

While it may sound far-fetched that a 500-year-old church doctrine can be fueling America’s current troubles today, the influence of the Doctrine of Discovery can still be seen in contemporary public opinion. PRRI recently asked Americans: “Do you agree or disagree that America was designed by God to be a promised land for European Christians?” We find that a significant number of Americans, 30 percent of the population, still affirm that idea. That means that two-thirds of the country rejects this idea, but 30 percent of the country affirms this. The reason why that is so powerful today is because that belief is not just evenly distributed in all groups around the country.

There are two groups where a majority affirm that idea that America was designated by God as a promised land for European Christians. Those two groups are self-identified Republicans and white evangelical Protestants who are the base of that political party. Self-identified Republicans today are 70 percent white and Christian in a country that is only 42 percent white and Christian. The Democratic Party is about a quarter white and Christian. So part of the fierce visceral fights we’re having on partisan grounds is because they’re being played out along racial and religious lines in this country. Increasingly, we have a Republican Party that’s defending a white Christian nationalist vision of the country, a vision that is older than the country itself and stems from these 15th-century doctrines.

### Saying quiet part out loud

In the book, I’m trying to uncover this history and to say out loud what often just gets subtly asserted.

I’m going to read an excerpt from my book. I think there are only about a dozen states that have not had anti-critical-race bills introduced into our legislatures in one way or another, trying to ban the teaching of a certain kind of history. Why now? Because we’re at this moment of reckoning and those beginnings matter.

In this passage, I tried to channel what I think white Christians are really saying when they are opposing the teaching of African American history, or trying to ban so-called critical-race theory. What are they really saying?

Here is my best attempt to try to just put it into words and say the quiet part out loud.

**W**e would like to hold these truths to be self-evident:

That we bear no responsibility for the actions of our ancestors, nor for the effects of their actions on the present. That hard work and individual merit are the keys to understanding both the path to the present and the possibilities of the future. The haves and the have-nots of today receive what they deserved based on the virtues of their individual past actions.

It follows that no one, particularly hard-working white Christian people, should be made to feel uncomfortable because of what we now have. If anyone asserts otherwise, we are the ones being discriminated against.

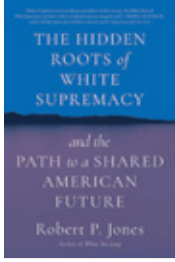
This land is our land. From California to the New York islands. We deserve to keep everything we’ve worked so hard to take. We have deeds and safe deposit boxes with our names on them, the veracity of which are guaranteed by a notary seal and a state we created for this purpose. We have histories that document our industriousness and our cunning. Furthermore, what we have done, we have done with the ultimate authority. Jesus is one of us. In case there was any doubt, we made a likeness of Jesus in our image, the most widely distributed portrait in human history.

We insist, both for ourselves and for others, on an inevitable present, one in which what was leads to what is and what is will always be. It is not that we’re against history. We know the importance of a good origin story. History, done rightly, explains how we got here — with our fences transforming land into property, our ledgers turning labor and crops into capital, and our hands holding the receipts. The history of America, founded in 1776, is a genesis story justifying the divinely ordained now, not a sloppy mess of narratives with multiple beginnings and contingent outcomes.



Photo by Chris Line

Robert P. Jones signs a copy of his book, *The Hidden Roots of White Supremacy and the Path to a Shared American Future*, for an FFRF convention attendee following his talk on Oct. 14, 2023.



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happened to the Indians. But we also share Laura Ingalls Wilder’s sentiments about the land in the early days of the country. ‘There were no people there. Only Indians live there.’ In any case, we weren’t personally a part of all that. And, it was, after all, our missionaries who brought the Indians, with their primitive and savage ways, out of the darkness and into the light of Christian salvation. It was our government and our churches that coaxed those lost children out of the woods and into boarding schools. We still honor their history with our athletic team names, mascots, and, more recently, with ‘land acknowledgment’ rituals at public events.

Finally, though, of course, there have been some times when some Christians acted badly — they were acting against and not with the spirit of our faith. No true Christian would kill or steal or lie.

This is the history we want our tax dollars to teach public schoolchildren. (Many of our children are already getting this history in private Christian academies.) We want our children to know that America is good. Just like us.

I think at the heart of our democracy is this unresolved question: Are we a divinely ordained promised land for European Christians, or are we a pluralistic democracy, where everyone, regardless of race or religion or nonreligion, stands on equal footing as citizens? I think it’s as simple as that.

Now, we’ve never fully resolved that question in all of our history and even in our prehistory. It’s been with us and it’s in our laws, it’s in our DNA, it’s in our culture. These competing streams of American identity. In a legislative session, one of the ways you end a debate that might go on forever is for somebody to call for the question. And when you call for the question, you have to stop debating and you have to take a vote.

I think we’re at a moment in our history today where the question is being called on this fundamental question about who we are as a nation. The demographic shifts, the tireless efforts of prophets and activists are calling the question and affirming that latter vision today is really the only way to live America’s promise and finally find the path to a shared American future.

Thank you.

Those who looked like us owned the publishing companies who hired our writers to tell us our story of how we became America. Those executives also had the right connections to sell those packaged narratives to our public schools, who handed books and lesson plans to our teachers, who in turn faithfully taught those stories to our children. And the circle remained unbroken, by and by, Lord, by and by.

We know that slavery was a blemish on the country’s record, and that this was, mostly, the cause of the Civil War. Still, there were good and noble people fighting on both sides. Even though slavery wasn’t always as brutal as Hollywood depicts it, we’re glad that sinful practice was ended and that the whole unfortunate episode is behind us now. What we didn’t get right after the Civil War was finally rectified by the good Martin Luther King Jr., whose eloquent words we now read in our churches and whose birthday we celebrate alongside Robert E. Lee’s.

On the occasion when we think about it, we also feel bad about what

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# FFRF's 2024 law student essay contest winners

The Freedom From Religion Foundation is proud to announce the three winners of the Diane and Stephen Uhl Memorial Essay Competition for Law Students.

FFRF paid out a total of \$9,000 to the winners of this year's contest.

Law school students were asked to write an essay on this topic: "If you could create a 28th Amendment, what would it

be?" The essay prompt the students were given was: "During its most recent terms, the Supreme Court has issued decisions that more or less ignore the Establishment Clause and favor an extreme interpretation of free exercise rights. Propose language for a constitutional amendment that would bring the Establishment and Free Exercise Clauses back into balance

and then analyze how your proposed language would alter the result in a recent Supreme Court case."

For ease of reading, the essays published here do not include the footnotes and citations that were included in the authors' submissions. Grading and selecting of the winners were done by the FFRF Legal Team.

Winners are listed below and include the law school they are attending and the award amount.

**First place:** Arielle Allen, University of Texas School of Law, \$4,000.

**Second place:** Jake Goodwin, University of Cincinnati Law School, \$3,000.

**Third place:** Alexander Worrell, West Virginia University College of Law, \$2,000.

## Diane and Stephen Uhl Memorial Essay Contest winner

# 'Hey, teacher, leave them kids alone'

By Arielle Allen

It was my first day of sixth grade when my history teacher introduced herself and exclaimed, "I simply cannot teach you history without teaching you His Story." Clever, right? Now, I grew up in the Bible Belt, namely South Carolina, so this did not surprise me. What did surprise me was the rapture book series, "Left Behind," she later encouraged us to read — and we did. What this had to do with history, I still do not know. But I do know that as a student, I immediately feared being left behind, when, instead, I should have just been left alone.

If this sounds familiar, you either also grew up in the Bible Belt or you heard stories like Coach Joe Kennedy's. It all started when the school district that Kennedy worked for as a high school football coach in Bremerton, Wash., discovered he was praying with the players at games. Abiding by the Establishment Clause, the district told Kennedy to stop praying with the student players at games and suggested alternative ways to express his religion.

Initially, he accepted the district's accommodations and complied by praying after the game ended and the players had left the field. But, discontented, Kennedy would go on to publicly express his dissatisfaction and advertise his plan to pray at the upcoming game through media, stirring his community. Then, almost like a deity himself, he knelt midfield surrounded by visiting students and community members immediately after the game and prayed, as advertised. Shortly after, he was placed on paid administrative leave.

But you would only appreciate these facts if you read the 9th U.S. Circuit Court of Appeals opinion, read the Supreme Court's dissenting opinion, or listened to Kennedy's media tour. The Supreme Court majority, on the other hand, accepted Kennedy's account that he quietly and briefly prayed at the end of the game alone. And, paradoxically, because had the court operated on the facts in the 9th Circuit's record, how much further would it have gone to erode the Establishment Clause? Moreover, what could the Constitution say that would protect the Establishment Clause from an even more audacious Supreme Court?

### Proposed amendment

In 1971, Chief Justice Warren Burger wrote for the majority in *Lemon*: "In the absence of *precisely stated constitutional prohibitions*, we must draw lines with reference to the three main evils against which the Establishment Clause was intended to afford protection: 'sponsorship, financial support, and active involvement of the sovereign in religious activity'" (emphasis added). At that time, the court understood secularism as neutrality and determined that secularism is exactly what the Establishment Clause requires.

Recently, the Supreme Court inverted

this analysis by characterizing exclusively secularist involvement as religious discrimination. This is what the Bremerton court did by elevating Kennedy's free exercise protections over the Establishment Clause's requirements, effectively sidestepping precedent while propagating a rule that provides no guidance for school districts. This essay seeks to answer Burger's call for precisely stated constitutional prohibitions.

Any amendment restoring the Establishment Clause must start with recognizing the decades-old School Prayer Cases precedent. In doing so, this 28th Amendment should incorporate elements of the *Lemon* and endorsement tests and return to acknowledging implicit coercion as a concern among impressionable primary and secondary school children. Indeed, although imperfect, the *Lemon* and endorsement tests appear crystal clear when contrasted to the ambiguous and murky "historical practices and understandings" *Bremerton* test.

This is especially true since the Supreme Court does not consistently apply "historical practices and understandings" in all Establishment Clause cases. For example, the court fails to apply this test in *Carson v. Makin*, where the result would have been less favorable to Christian nationalism. With this context in mind, the proposed amendment is as follows:

"No state shall promote, sponsor, disseminate or otherwise endorse any expression of religion nor shall any state permit conduct that a reasonable observer would conclude elevates a public servant's free exercise protections over a K-12 student's unconditional freedom from religious coercion."

This amendment dispenses with determining whether speech was made as a private citizen or as an employee, addresses both coercion and endorsement, and focuses protection on the people required to attend compulsory public school (students) rather than people that elect to work there (teachers).

### Applying the amendment

Much of the confusion with the *Bremerton* holding is that it is both simultaneously broad and narrow, depending on which set of facts apply. The first set, the majority's account, is that the district suspended Kennedy only for praying quietly after games "without his students." The second is that the district placed Kennedy on paid leave after he ignored multiple requests to stop praying with students, failed to compromise with his employer, and instead conducted a media campaign advertising his refusal to abide district policy. Moreover, *Bremerton* left open what the Establishment Clause condemns, requires or permits, only seeming to elaborate on what the Free Exercise Clause requires for teachers. The proposed 28th Amendment resolves this gap.



Arielle Allen

Significantly, this amendment would provide direction to public school employers for policymaking. This is accomplished by eliminating the need for the court to decide whether Kennedy's speech was as a private citizen or as a government employee. The court ultimately held that Kennedy spoke as a private citizen on matters of public concern, which resolved Kennedy's free speech claim in his favor. Little consideration was given to the district's interests as an employer in maintaining order and positive relationships with the community.

Like the plaintiff in *Connick v. Meyers*, Kennedy's conduct greatly undermined the employer's authority, disrupted operations, and diminished positive work relations. This proposed amendment deprives Coach Kennedy of the opportunity to "constitutionalize the employee grievance." Instead, Kennedy would be required to participate in the many opportunities provided by the district to accommodate his religious beliefs while respecting the students' constitutional rights.

Critically, the "historical practices and understandings" rule is far too ambiguous to facilitate sound policymaking. It is unclear at which point districts are abiding the Establishment Clause while not running afoul of a teacher's free exercise rights. By contrast, the endorsement test is anchored by what a reasonable observer would determine with "the history and context of the community and forum in which the religious display appears."

This is precisely what the district considered when they requested that Kennedy stop praying with students, since a reasonable observer would conclude that the group prayer is state-sanctioned religious activity at a school event. Sotomayor's dissenting opinion discusses how the court erred by assessing the school district's Establishment Clause concerns "divorced from the context and history of Kennedy's prayer practice," which explains, at least in part, why the majority misconstrues the facts.

Accordingly, the school district is not required to permit insubordinate conduct in contravention of students' rights,

since the district's concerns are sufficient grounds to reprimand Kennedy under this amendment. Moreover, the district no longer needs to walk the tightrope in policymaking while in the impossible position of deciding which costly and protracted litigation to prepare for — free exercise or Establishment Clause violations. Teachers will also be empowered by knowing when they are crossing the line prior to employer intervention.

After "abandoning" the endorsement test, the *Bremerton* court proceeded to burden the district with proving coercion, rather than asserting "phantom constitutional violations."

This is a stark contrast to *Lee v. Weisman*, where the court did not require proof of coercion, and instead focused on what a reasonable student would feel under the circumstances. Indeed, while education is compulsory for K-12 students, including those public school students in *Bremerton*, Kennedy could seek employment at various private institutions. Alternatively, Kennedy could have continued with the accommodations offered by the district, or suggested his own alternatives in compliance with the school's policies.

Accordingly, it is reasonable to presume coercion when an adult in a position of authority promotes their own religious beliefs to students in school-sanctioned environments. A football coach with the ability to reward or punish players certainly stands in a position of authority. Furthermore, students and their parents should not be burdened with opting-out of prayer to participate in school-based events. As such, players should not be in the position of standing off from their teammates and coach to avoid participation in a religious exercise. This amendment accounts for this reality by acknowledging the students' unconditional freedom from religious coercion based on what a reasonable observer would believe.

### Conclusion

In sum, this amendment will restore the Establishment Clause by prohibiting states from elevating teachers' free exercise rights over parents' and students' rights. This amendment will also ensure that the Establishment Clause is not interpreted differently based on the political and ideological shifts of the Supreme Court bench, as the current historical practices and understanding test has already illustrated. As a result, this amendment promotes judicial economy and ensures more predictability for public school employers and their employees.

*Arielle Allen is a student at the University of Texas School of Law, where she has focused her curriculum on civil litigation and worked as a student attorney in the Children's Rights, Disability Rights, and Actual Innocence clinics. After graduation, Arielle is opening a trial firm with another lawyer, serving clients across central Texas.*

## Second place

## The dissenters' amendment

By Jake Goodwin

When considering the Supreme Court's disparate treatment of the Establishment and the Free Exercise Clauses of the First Amendment, there is a trap one can fall into. The trap is reading the court's radical decisions and using its analysis to draft some solution or amendment that negates these decisions. This is a trap because centering the court's opinions concedes too much to the Christian extremist majority that currently controls the court. They are not engaging in any reasonable analysis in their Free Exercise opinions.

The likes of Justice Samuel Alito, who, at the beginning of the year, bemoaned the treatment of "Americans who do not hide their adherence to traditional religious beliefs about homosexual conduct," and Justice Clarence Thomas, who has argued for over a decade that the Establishment Clause doesn't apply to states at all, are not engaging in good faith constitutional scrutiny. The current cabal of justices is so dishonest in their analysis that in 2019 they argued that a 40-foot cross on government property did not violate the Establishment Clause based on the absurd reasoning that the cross was not actually a religious icon.

It is not as if these justices have found some unique peculiarity in the Constitution — their leaps of logic are a farce and to draft a constitutional amendment in response to them gives them far more legitimacy than they deserve.

Luckily, there is another source of jurisprudence which contemplates these same decisions much more honestly: the dissents. Within the dissents, the balance between the Free Exercise and Establishment Clause is still alive and well, and they acknowledge the majority's work to establish Free Exercise supremacy.

For instance, in 2022, Justice Sonia Sotomayor noted in her dissent to *Kennedy v. Bremerton School District* that the conservative majority on the court was increasingly "giving short shrift to the Establishment Clause's prohibition on state establishment of religion." So, instead of drafting an amendment to counter the most extreme majority opinions, a 28th Amendment should seek to restore balance between the Free Exercise and Establishment Clauses by bolstering the arguments of the minority opinions that have been advocating for a restored Establishment Clause.

When consulting the dissents, three main themes or concerns connect them all.



Photo by Shutterstock



Jake Goodwin

The first is that when balancing the two clauses, it is of the utmost importance to consider the broader context of the practice or symbol. This theme can be seen in Sotomayor's dissent in *Kennedy v. Bremerton*, where she criticizes the court for "drawing a bright line between" a high school coach's years of leading his students in prayers and focuses on his three most recent prayers which did not include his students; as well as, in Justice Ruth Bader Ginsburg's dissent in *American Legion v. American Humanist Association*, where she stresses that using a cross as a war memorial "does not transform it into a secular symbol," or remove its sectarian context.

The second theme is that religion does not turn a business' discriminatory acts into free exercise. This second theme is most clearly articulated in Sotomayor's dissent in *303 Creative LLC v. Elenis*, where she maintains that "the act of discrimination has never constituted protected expression under the First Amendment."

The third theme is that the government must not be mandated to support religious organizations. This principle is plainly articulated in Justice Stephen Breyer's dissent in *Carson v. Makin*, which held that when balancing the Establishment and Free Exercise Clauses, courts "need not, and should not, answer with 'must,'" when "may" would suffice. Breyer worries about the dangerous erosion of the Establishment Clause the majority creates by transforming the precedent that states may provide support to religious institutions into a ruling that states must not withhold support for a religious institution to use for religious purposes. He distinguishes between denying support for organizations with a religious status and denying support for organizations which will use the sup-

port for sectarian ends. Sotomayor takes this a step further, arguing that a state need not provide support to institutions because of either its religious use or its status.

Considering these dissents and the themes that connect them, I propose the following constitutional amendment: Amendment XXVIII, Whenever a concern arises regarding the first clause of Amendment I, the religious practices, symbols or organizations in question must be considered in their broadest context, with specific attention to any sectarian connotations. The first clause of Amendment I permits and protects from requirement the federal and state governments the ability to uniformly deny support, monetary or otherwise, to organizations because of their characters as religious organizations, and forbids the federal and state governments from providing support, monetary or otherwise, to an organization that serves sectarian purposes. The protections of the second clause of Amendment I shall not be extended to instances of discrimination regarding race, religion, national origin, sexual orientation, gender identity, disability, or marital status by either the federal or state governments or by businesses open to the public. These entities must provide their services, no matter how expressive, to all members of the public equally.

This 28th Amendment is aptly composed of three sentences, each reflecting a core theme from the dissents. The first sentence is straightforward, and prescribes that questions regarding the Establishment Clause be examined with a broad context. It also does not explicitly refer to the courts, thus providing guidance to other governing bodies. The second sentence is more complex and can be broken into two parts; the first essentially allows the government to withhold support from organizations because of their religious status; the second essentially forbids the government from supporting religious causes.

These two types of religious organizations are treated differently because the goal of this amendment is to restore balance between the two clauses, not trade Free Exercise supremacy for Establishment supremacy. And, in order to preserve this balance, there must be room for flexibility. Thus, rather than remove the flexibility altogether, this second sentence merely seeks to define the limits of this flexibility. The third sentence straightforwardly clarifies that the Free Exercise Clause cannot be used to sanction discrimination.

Applying this 28th Amendment to a recent case, we can see how, if at all, it would alter the outcome. *303 Creative v. Elenis*, a 2023 case in which the court found that a company is allowed to refuse services to homosexuals on account of their deeply held religious convictions, entirely relies on Lorie Smith's free speech/free exercise protections. Thus, one would think the third sentence of the amendment, which precludes these protections from extending to businesses engaging in discrimination, would radically alter the court's decision. However, that may not be the case. The majority would likely maintain its claim that there is nothing discriminatory about Smith's actions, as she will still take LGBTQ+ clients as long as they design a website for a wedding between a man and a woman. Of course, one could point out that these services are inherently not equal and violate the last clause of the proposed amendment, or that a business cannot simply define its expressive conduct as not including a protected group to get around the 28th Amendment.

In fact, someone essentially already did, that being Sotomayor in her dissent. Practically, nothing would change in the *303 Creative* decision with inclusion of this 28th Amendment. Maybe, it is a drafting issue. Maybe, the amendment should specifically say "Businesses who make wedding websites must do so for both same-sex and opposite-sex weddings." Maybe. However, before it comes to passing specific amendments to line by line repudiate rogue Supreme Court decisions, I propose one more sentence to this amendment:

"All justices of the Supreme Court at the time of the passage of this amendment shall be removed from their positions and replaced with nine new justices."

A drastic measure to be sure, however, if balance is to be restored between the Establishment and Free Exercise clauses, it is a desperately needed one. The trap that Christian extremists have crafted is a snare filled with derivative logic and, at the center, their targets are the civic and religious freedoms our country was founded on.

As articulated in the beginning of this essay, the current Supreme Court majority are the ones responsible for imbalance in the first place, and they will not let precedent, the Constitution, or even the meaning of words get in the way of their cause. In their court, denying services to a protected group isn't discrimination, a prayer in front of an audience is private, and the cross isn't Christian. For balance to truly be achieved, the court must undergo a cultural reset. Of course, this includes the minority, the dissenters cited throughout this very essay, and as disappointing or unfair as that may be, this is not a moment that calls for half-measures. A restorative amendment cannot be one that leaves the court in the hands of any "victors."

*Jake Goodwin is a second-year law student at the University of Cincinnati. Jake serves on the executive board for the University of Cincinnati's International Law Society, edits for the Human Rights Quarterly, is an Urban-Morgan Institute of Human Rights fellow, and works at the law school's Legal Access Clinic.*

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## Third place

# Reevaluating the ministerial exception

By Alexander Worrell

I propose a 28th Amendment to the U.S. Constitution which reads as follows: “No law shall, on account of its religious status, afford any special rights or privileges to religious institutions not afforded to secular institutions.” Though this should already be implicit in a plain reading of the Establishment Clause, the explicit language of this new amendment would emphasize the principles already enumerated in the Establishment Clause and bring the Establishment and Free Exercise Clauses (the “religion clauses”) back into balance. The First Amendment to the Constitution holds, in pertinent part, “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof.”

But a troubling recent trend seeks to undermine the protections established by the religion clauses — the so-called “ministerial exception,” which has been fully embraced by recent U.S. Supreme Court decisions. The ministerial exception is an affirmative defense to liability under which a “ministerial employee” is barred from bringing certain suits against their religious employer, typically those involving employment disputes under Title VII of the Civil Rights Act of 1964. As it currently exists, the ministerial exception essentially ignores the Establishment Clause in favor of a broad reading of the Free Exercise Clause. The ministerial exception affords rights and privileges to religious institutions that are far too broad in scope and accordingly undermines the protections that the religion clauses seek to create.

### A brief history

The Supreme Court first embraced the ministerial exception in *Hosanna-Tabor Evangelical Church and School v. E.E.O.C.* There, the petitioner fired one of its teachers, Cheryl Perich, after she took disability leave. Perich filed a complaint under the Americans With Disabilities Act with the E.E.O.C., who then brought suit against the petitioner. The case made its way to the Supreme Court, where the court curiously held that Perich’s ADA claim was barred against her religious employer because Perich was one of the petitioner’s ministers. In reaching its decision, the court emphasized that the religion clauses purportedly empower churches with near-absolute authority to “select and control” their ministerial employees because the imposition of liability against a religious organization is tantamount to imposing a “penalty on the church for terminating an unwanted minister.” That power, therefore, prevents courts from deciding any “employment discrimination suit brought on behalf of a minister.”

The scope of the ministerial exception evidently expanded dramatically in *Our Lady of Guadalupe School v. Morrissey-Berru*, decided eight years later. There, two teachers at two different Catholic schools brought claims under the Age Discrimination in Employment Act and Americans with Disabilities Act, respectively. Although one plaintiff was discharged shortly after requesting leave for breast cancer treatment and the other was elderly, the court declined to reach the merits of either claim because it held that both plaintiffs were minis-



Photo by Shutterstock



Alexander Worrell

ters. The scope of the ministerial exception was then greatly broadened when the court noted that “courts are bound to stay out of employment disputes involving those holding certain important positions with churches and other religious institutions.” No longer are mere ministerial employment decisions shielded from judicial scrutiny. Rather, courts are broadly prohibited from probing “employment disputes” among any employee holding an “important position” within a religious institution.

Read together, *Hosanna-Tabor* and *Morrissey-Berru* stand for several propositions. First, the ministerial exception operates as an affirmative defense to an “otherwise cognizable claim.” That is, the ministerial exception prevents plaintiffs from reaching the merits of the claim regardless of whether they could otherwise prevail on the merits. Second, “ministerial employee” is defined very broadly — nearly any employee who works for a church could conceivably be a ministerial employee under these two decisions. In *dicta*, the *Morrissey-Berru* court further noted that an employee needn’t even be a practicing adherent of the religious organization to be that organization’s “minister,” because a court deciding whether an aggrieved plaintiff practices the organization’s religion would risk government “entanglement” in the organization’s affairs.

Finally, ministerial employees are categorically barred from bringing suit against their employers when the resolution of the claim would require judicial scrutiny of the religious employer’s ability to “select and control” its ministerial employees — this remains true regardless of whether the adverse employment action was made for a religious reason. The ministerial exception applies even when the plaintiff alleges discharge for reasons explicitly prohibited by Congress, including age

discrimination, disability discrimination and retaliation, and Title VII employment discrimination suits broadly. The federal circuit courts have used the ministerial exception to bar lawsuits alleging age and disability discrimination, discrimination based on sexual orientation, racial discrimination, hostile work environment claims, and claims arising under the Equal Pay Act. Evidently, the ministerial exception therefore requires courts to turn a blind eye to violations of federal anti-discrimination law in the name of “religious freedom,” but in doing so runs afoul of the Establishment Clause by respecting an establishment of religion.

### Exception is incompatible

The First Amendment prohibits any “law respecting an establishment of religion,” but this is precisely the outcome created by the ministerial exception. The ministerial exception plainly allows religious institutions to escape liability for conduct that would be otherwise prohibited by secular institutions. In doing so, the court has essentially bestowed a doctrinally sanctioned privilege upon religious institutions by virtue of their religious status. The policy underlying the ministerial exception is the recognition of a religious institution’s right to “select and control” its own ministers — that is, the idea that “the First Amendment protects the right of religious institutions to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine.” But, at best, the ministerial exception tangentially serves this goal. Employment discrimination lawsuits do not hinder a religious institution’s ability to decide matters of its own “government” any more than it would for a secular institution. In both cases, there is a legitimate legal restraint on an employer’s ability to discharge an employee. But there is no legitimate reason why religious institutions should be entirely immune from scrutiny for their ministerial employment decisions when a prohibited, discriminatory motive is alleged.

Rather, the use of the ministerial exception amounts to a blind eye in the enforcement of federal anti-discrimination law. Religious institutions can always discharge ministerial employees for legitimate, nondiscriminatory reasons, just as any other institution may do as well. But the ministerial exception’s categorical protection of all employment decisions, including those that are prohibited by law, is a protection that is far too broad in scope and is not in accordance with the First Amendment’s Establishment Clause. A court’s inquiry should not fo-

cus on the degree of “selection and control” of purported ministers that it feels a church deserves, but rather should focus its inquiry on the ultimate question — that is, whether the institution treated its employee in a manner that the law has forbidden. Evidently, *Hosanna-Tabor* and *Morrissey-Berru* would have been decided differently under the proposed 28th Amendment. In both cases, judgment was entered against the plaintiffs entirely because the ministerial exception barred their claims — all plaintiffs were ministerial employees bringing employment dispute claims. The proposed 28th Amendment’s prohibition on differential rights and privileges afforded to religious and secular institutions would bar courts from using the ministerial exception because the ministerial exception plainly affords privileges to religious institutions. In the absence of the ministerial exception, the court would have reached the opposite results in these cases. This is the best outcome because the ministerial exception’s categorical bar on employment discrimination suits by ministerial employees against their religious employers is plainly incompatible with the Establishment Clause’s prohibition on laws “respecting an establishment of religion.”

### Conclusion

As it currently exists, the ministerial exception requires courts to turn a blind eye to violations of federal anti-discrimination law in the name of “religious freedom.” Accordingly, the ministerial exception provides religious institutions with privileges not provided to their secular counterparts. The proposed 28th Amendment should be enacted because it would no longer provide courts with the discretion to treat religious and secular institutions differently with regard to liability for prohibited conduct. Correcting this problem would help to restore the balance between the First Amendment’s Religion clauses by empowering the Establishment Clause and reigning in the current court’s emphasis on the Free Exercise Clause.

*Alexander Worrell is a student in the West Virginia University College of Law’s Class of 2025. He graduated summa cum laude from West Virginia University in 2022 with a degree in philosophy and political science. He is passionate about causes promoting the secularization of the United States and intends to use his law degree accordingly.*

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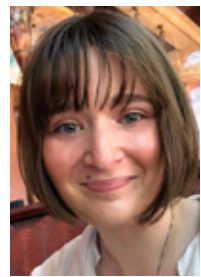


# Despite courts, abortion access is improving

By Caitlin Berray

Even with seeming legal threats to medication abortion, there is still good news.

The U.S. Supreme Court heard oral arguments March 26 on the high-stakes abortion case centered around mifepristone, the most commonly used abortion pill, after a Christian nationalist district judge attempted to ban mifepristone last year. Thankfully, the Supreme Court has temporarily allowed the needed abortion pill to remain on the market until it makes its decision. Hopefully, this means that even the ultraconservative Supreme Court does not want to partake in this orchestrated attack on medication abortion.



Caitlin Berray

And there is further reason to cheer. CVS and Walgreens are both set to start dispensing abortion pills in states where it is currently legal to do so. Massachusetts, Rhode Island, New York, Pennsylvania, California and Illinois will facilitate access to abortion medication at the leading pharmacy chains, with more states to come. This was made possible when the FDA passed a rule last year allowing pharmacies to dispense abortion medication, removing the long-standing requirement that patients had to pick up abortion pills directly from their doctors. With the onslaught of states banning abortions, this will be crucial to expanding abortion accessibility.

President Biden said recently that ensuring the largest pharmacies can fulfill abortion medication requests was “an important milestone in ensuring access to mifepristone. . . I encourage all pharmacies that want to pursue this option to seek certification.”

On the anniversary of Roe, Biden issued a presidential memorandum to affirm access to safe and legal abortion medications and safeguard patient safety and security. Biden directed the secretary of Health and Human Services to “consider new guidance to support patients, providers, and pharmacies who wish to legally access, prescribe, or provide mifepristone — no matter where they live.” This access will be a major focus moving forward, for both abortion advocates and opponents.

Abortion pills have become the most accessible way for pregnant people to get abortions nationwide after the fall of Roe. In states where abortion is legal, doctors are using new legislation, coined telemedicine abortion shield laws, to send out abortion pills to the vulnerable women who live in states where the procedure is illegal in an honorable example of “medical civil disobedience.” States participating in these efforts are Massachusetts, Washington, Colorado, Vermont, New York and California.

The shield laws require that officials and agencies of states will not cooperate with another state’s efforts to investigate or penalize providers who prescribe abortion pills. These laws will likely be challenged in federal court on the grounds of supposed state sovereignty violations, but their brief enactment to date has facilitated tens of thousands of needed abortions in states with restrictive abortion bans. Shield laws are undoubtedly helping pregnant patients who are low-income or cannot travel to procure abortions, removing barriers

“The drastic reduction of abortion access is being offset by the notable efforts of clinics, abortion funds and nonprofit organizations that help facilitate abortions through financial and functional support.”

in very restrictive states. One organization is currently using shield laws to serve an estimated 7,000 patients per month, with nearly 90 percent of the abortions taking place in states with encompassing bans.

Despite the overturning of Roe and implementation of abortion bans throughout the nation, an estimated 1,026,690 abortions took place in 2023, which was a 10 percent increase from 2020 and was the highest number measured in the United States in over a decade.

Clearly, Americans with unwanted pregnancies will continue to seek abortion care, even when states are doing everything they can to restrict access. The drastic reduction of abortion access is being offset by the notable efforts of clinics, abortion funds and nonprofit organizations that help facilitate abortions through financial and functional support.

States without total abortion bans saw a 25 percent increase in abortions in 2023 from 2020, especially in the states bordering ban states.

This is encouraging news, but we cannot ignore that Dobbs and subsequent anti-abortion policies have drastically exacerbated the health inequities marginalized communities face in this country, especially for Black, Brown and low-income communities. States with abortion bans have fewer maternal care providers and higher maternal death rates, which disproportionately impacts Black and Brown people.

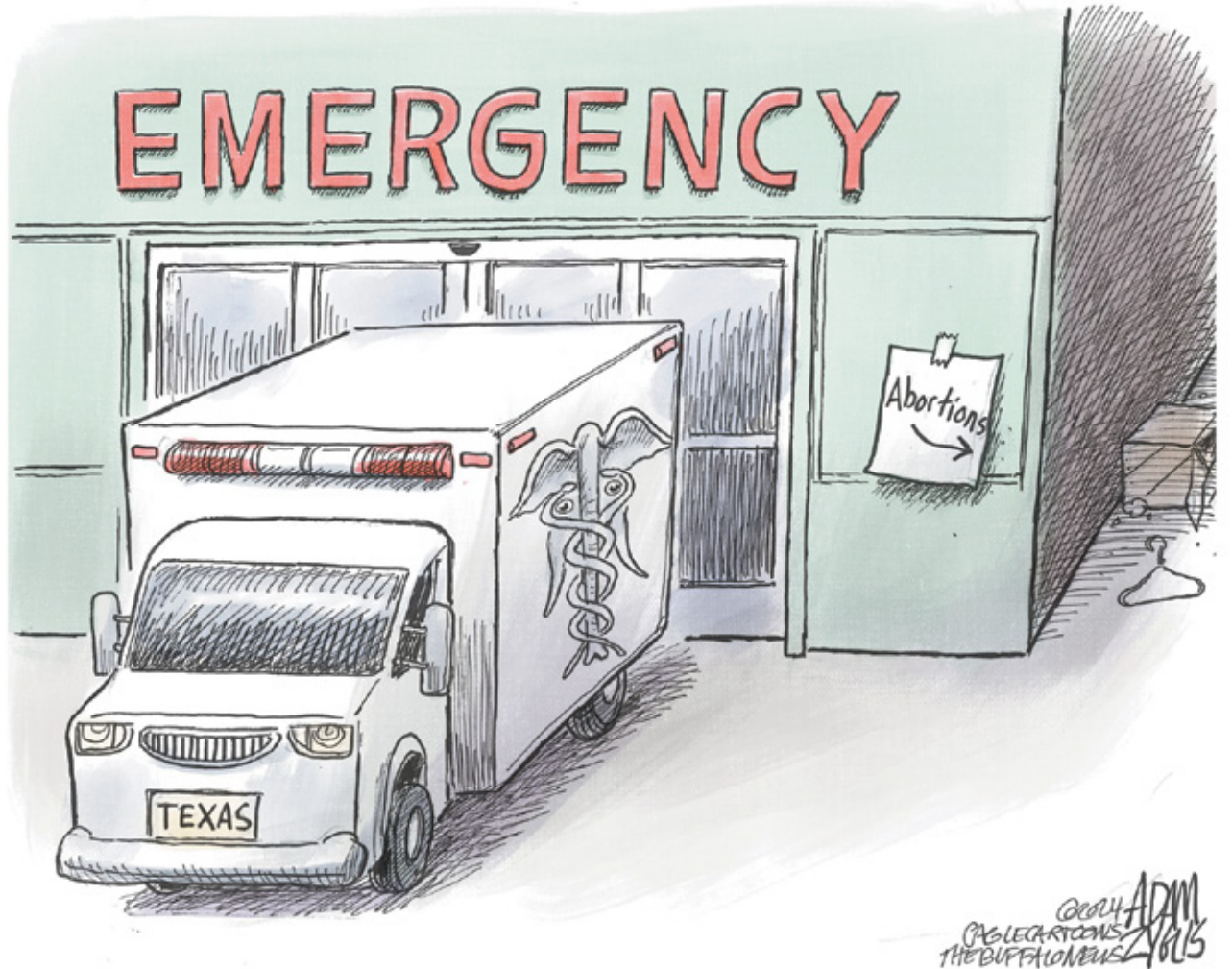
And with Louisiana’s abortion ban, standard pregnancy care has perilously been disrupted. A report titled “Criminalized Care: How Louisiana’s Abortion Bans Endanger Patients and Clinicians,” outlines how pregnant patients have been given risky, unnecessary surgeries, denied treatment for miscarriages and ectopic pregnancies and are forced to wait for abortions until they are at the brink of death. Doctors operat-

ing in states with abortion bans are doing everything they can to avoid the penalties of facilitating abortions. Doctors are using extreme and dangerous caution to avoid even the slightest appearance of providing an abortion. This is because Louisiana’s doctors providing abortion care face up to 15 years in prison and \$200,000 in fines under the state’s abortion ban.

Consequently, some Louisianian women who experienced preterm premature rupture of membranes, before the fetus was viable, have been forced to undergo impromptu cesarean section surgeries instead of receiving abortion care. One New Orleans OB-GYN said, “I want to emphasize that this is not what’s in the best interest of the patient. This is what’s in the best interest of . . . the physician in protecting themselves from criminal prosecution.” Out of fear of breaking Louisiana’s law, doctors are delaying routine prenatal care until the risk of miscarriage drops and pushing back treatment for miscarriages and ectopic pregnancies. One ectopic pregnancy patient said that her care was so delayed that her fallopian tubes ruptured and that she could have died. Louisiana suffers from some of the highest rates of maternal mortality and morbidity in the United States, and Black women are more than twice as likely to die because of their pregnancy as compared to white women there.

With the Supreme Court set to decide on the future of mifepristone in the nation, we can only hope the conservative majority court will side with reason and morality. Restricting abortion medication will not stop abortions, it will only kill women, with reproductive health suffering nationwide. Abortions continue despite severe restrictions nationwide and the Biden administration and abortion advocates are taking effective steps to ensure abortion accessibility is protected as possible. The Supreme Court needs to rule against the unfounded attempted mifepristone ban.

Caitlin Berray is governmental affairs coordinator for FFRF.



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## Proselytizing at the polls

# Why churches make bad venues for voting

By Sammi Lawrence

Every election season, FFRF receives numerous complaints from citizens across the country who are forced to vote in a house of worship.

With the 2024 election season already under way, we at FFRF are waiting for what feels like an inevitable uptick in church polling place complaints. For context, in many counties or municipalities, one-third to one-half of all polling locations are Christian churches. Nationwide, about one in five polling places is a church. In FFRF's hometown of Madison, Wis., one-fourth of current polling places are churches. This is a problem.

Simply put, houses of worship make bad polling locations.



Photo by Chris Line  
Sammi Lawrence

For one, it seems wrong on an intuitive level to force citizens to enter a house of worship in order to perform one of their greatest civic duties: voting. Each election, atheists, agnostics and members of minority faiths are coerced into entering a church in order to vote on Election Day. If you're currently forced to vote at a church, we urge you to complain to your local election officials. If you believe you've experienced a state/church violation, you can report to FFRF to see if we can assist.

Voting in Christian churches is so common that many citizens don't even stop to think about how problematic the practice is — at least not until they're required to vote in a minority religion's house of worship. In 2016, Palm Beach County removed a mosque as a polling location after receiving complaints from voters who felt uncomfortable voting there. Yet, no one batted an eye at the fact that Palm Beach County was using 90 Christian churches and Jewish synagogues as polling locations at that time. FFRF wrote a letter to the county pointing out the hypocrisy of deciding that a Muslim house of worship was unacceptable while allowing counterparts for other religions to continue serving as polling locations.

FFRF considers this practice unconstitutional, but in terms of the state of the law whether the use of churches as polling places violates the First Amendment is still technically unsettled. Only a few state and federal courts have ruled on the issue, and in those cases the courts determined that using a house of worship as a polling place can be permitted as long as there is a secular justification and voters have alternative ways to cast their ballots, such as absentee voting. Until state supreme courts or the Supreme Court of the United States hands down a ruling, the use of houses of worship as polling places is still an open question. Like many other recurrent state/church violations, church polling places serve as a reminder that court reform is an essential part of preserving and rebuilding the wall of separation between state and church.



Image by Shutterstock

Citizens wait in line to vote at a Catholic church.

Even though many places now offer more voting latitude, such as voting early at a central library or voting by mail, government bodies shouldn't be selecting polling places that signal that some voters are insiders and others are outsiders — and which necessitate voting by mail to avoid a hostile polling place. Many citizens still take civic pride in voting in person at their neighborhood polling place, enjoy interacting with polling place volunteers and neighbors, and getting the "I voted" sticker on Election Day.

Beyond inherently violating the consciences of nonbelieving voters, houses of worship often abuse their status as polling places to further their own goals. The various complaints FFRF receives every election season are proof that churches are not suitable polling locations. FFRF has received complaints of churches using Election Day as a chance to illegally proselytize voters and poll workers, advertise Sunday services, display religious imagery, hand out religious literature, do fundraisers through sale of baked goods or other items and attempt to persuade voters on key issues.

For example, in 2023 we received a complaint that a church in Dearborn County, Ind., displayed political signs promoting specific candidates while

serving as a polling place. Further, the church allowed candidates to loiter on the property and solicit voters as they were entering the church to vote.

Last year, FFRF also took action after receiving a report that a church polling place in Lake County, Ohio, has a habit of using elections as an opportunity to promote religious messages to voters. The church apparently sets up tables with advertisements encouraging voters to attend services at the church. Additionally, the area used for voting is filled with religious imagery and literature that the church refuses to remove during elections, and the church displays Republican "voting guides." Even more egregious, our complainant reported that the church's pastor would linger around the polling location and proselytize voters and poll workers.

FFRF will continue to urge election officials to ditch houses of worship in favor of secular voting locations that will not violate any citizen's First Amendment rights. Even if election officials insist on using a church as a polling place, the church cannot be allowed to promote candidates to voters, display religious imagery or messages in the voting area, proselytize or advertise to voters, attempt to sway how voters cast their ballots or violate

any other federal or state election law safeguards.

Apart from the clear constitutional problems with forcing citizens to enter a house of worship to vote, there is also a growing body of social science research showing that polling locations have an impact on how people vote. A 2008 study by Stanford Graduate School of Business researchers found that voting in a church could affect how citizens vote on propositions, such as influencing citizens to vote against stem cell research initiatives. A 2010 study by Professor Abraham M. Rutchick demonstrated that people voting in churches were more likely to vote for a conservative candidate and support a ban on same-sex marriage. Finally, a study updated in 2020 by Professor Jordan P. LaBouff also concludes that voting in churches sways people to vote more conservatively: "Even if not religiously inclined, respondents [voter study participants] at churches supported more conservative approaches to issues such as immigration, taxes, drug policies, warfare and abortion."

As the 2024 election season continues, FFRF stands ready to push back against church polling places that defy the law and abuse their access to voters. With primaries, caucuses and the presidential election all taking place amid the rise of Christian nationalism, former President Trump's ongoing legal battles and increasing scrutiny of the U.S. Supreme Court, it won't be surprising if we see emboldened church polling places bending and breaking the rules in attempts to sway voters and gain new members.

It's shameful and, frankly, absurd that in the year 2024 Americans are still being coerced to enter houses of worship in order to perform their most basic and essential civic duty. FFRF will continue to fight for secular polling places, and we encourage all secular Americans to contact their election authorities and let them know that they do not want to be forced to vote in a church.

Voting should not come at the cost of any citizen's First Amendment rights.

Sammi Lawrence is FFRF's Anne Nicol Gaylor Legal Fellow.

“Even if not religiously inclined, respondents [voter study participants] at churches supported more conservative approaches to issues such as immigration, taxes, drug policies, warfare and abortion.”

— Professor Jordan P. LaBouff



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# ‘God doesn’t give you more than you can handle’

By PJ Slinger

I’m not the best at holding my tongue when I hear (or read) bullshit. I tend to call it out and force the discussion.

I decided years ago that I could no longer abide nonsense, which is why I’ve lost a number of “friends” on Facebook by calling out their lunacy, be it religious, political, scientific or medical (e.g., anti-vaxxers). However, I attempt to do it in a diplomatic and nonoffensive manner, using reason and logic, hoping the other person would respond in kind. If there’s any name-calling or belittling of me or my ideas without foundational reasons, I quickly call them out or end the discussion. I try to keep the dialogue on track.



PJ Slinger

Several years ago, one such Facebook friend, whom I last saw in person when I was probably about 15, even tried to get me to go visit him three hours away so that he could talk to me about, yes,

“our savior and Lord Jesus Christ.” Now, as much as I thought about how fun that would be to question him on all manner of biblical contradictions and religious inconsistencies, I highly doubt I would have made a dent in his worldview. And, no doubt, he would have been disappointed that I did not see “the way, the truth and the life” of Jesus. Of course, that meeting never happened, and, shortly thereafter, he unfriended me on Facebook.

This brings me to a story from a real-life friend who is not normally prone to bullshit. Until I heard this . . .

She was telling a story to a group of us one night about her former co-worker who lost a child and husband within a year of each other, and how this woman held up so well during that awful time. Unfortunately, my friend then said, “Well, as they say, God doesn’t give people more than they can handle.”

Who, whoa, whoa . . . hold up. Any time the word “God” is used in a conversation with me (other than “Oh, my God” or any other such uses where they aren’t really talking about God), my bullshit radar starts flashing. But, because I was in a group of friends and didn’t want to take over or redirect the conversation, I kept silent (as hard as that was to do!). However, my mind then basically exited the conversation as I began to ponder the reasons that this statement was incorrect.

So, let’s break it down.



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“God doesn’t give anyone more than they can handle.” This implies that everyone can handle anything that is thrown their way, which, even on the surface, is clearly not true.

OK, so what if I’m just told by my doctor that I have an inoperable and malignant cancer that is metastasizing and will kill me within weeks? Is that something I can handle? Obviously, my body can’t. But the phrase in question almost certainly refers to the mental ability to handle situations.

Knowing that my life is coming to a quick end, how do I mentally handle that? Probably not well. Did God give me more than I can handle? Well, yes. (Of course, we’re pretending here that God is actually an entity that has omnipotent control over everything.)

Sure, there are several ways to think about your imminent mortality when faced with such a dire prognosis. You can cry and feel sorry for yourself, which seems like a very human and normal thing to do. I imagine that’s how I would react. Does that mean it’s more than I can handle? Seems like it. But, since there is no alternative, you HAVE to handle it one way or another, because the only other options are to have a complete mental breakdown or resort to suicide. (More on that in a moment.)

So, in this story of the woman who lost her husband and child in separate incidents, she seemed to have held up well emotionally after that, which is why my friend made the claim in the first place. But, I would think that many other people in that situation may not fare nearly as well, perhaps retreating into themselves, perhaps lashing out,

perhaps having that mental breakdown. Who knows? There are a multitude of emotional outcomes from something as devastating as that, and certainly many of them are what I believe could be described as “more than they can handle.”

And, what if you are “brave” or “strong” or “courageous” in the face of such a tragedy? Does that mean that you have handled it well? What does that even mean, to be brave or strong or courageous in the face of horrible personal news? You hear/read that a lot when people have died from some form of cancer. “Oh, they were very brave through this long fight with cancer.” Does it just mean that they never gave up hope? Is hope the same thing as being able to handle it?

So, malignant cancer is probably something that “God” has given that is more than most people can handle. But, even more than malignant cancer, the thing that no doubt shows how people are often given more than they can handle is the prevalence of suicide.

According to the World Health Organization, there are more than 700,000 suicides every year. Why do people commit suicide (generally)? I would venture to say that it’s because they have been dealt (or put themselves in) a situation that was too overwhelming or overbearing for them to handle and they believe death is a better result than dealing with that situation. So, clearly, “God” gives some people more than they can handle.

Now, getting back to the original story with the woman whose husband and child died. The crux of that story is that the wife is the prime player in this situation. But

what about the husband and child who died? Where was their God at that point? Isn’t that a much worse outcome than whether someone can handle the ensuing terrible news? If we’re crediting the omnipotent God for not allowing people to experience anything they can’t handle, shouldn’t he also be blamed for the death of those two? (For the sake of brevity, I won’t go down the rabbit hole of God’s benevolence or lack thereof.)

It reminds me of a personal situation that occurred shortly after my mother died more than a decade ago. She had severe multiple sclerosis that started out gradually in her 30s and became fully debilitating by her late 50s. She survived a few near-death experiences (pneumonia-related) in that time and eventually had to have both of her legs amputated (which wasn’t a huge deal since they were nonfunctional by then).

After her death, one person at the funeral said to me that God put her on this Earth to inspire others because of how hard she battled through her disease, how she kept going in the face of such overwhelming physical infirmities. (Indeed, several people told me at her funeral and later how she was such an inspiration to them.)

So, according to this person, God’s plan for my mom’s life was to become bedridden and barely communicative so that a few people could be mildly inspired? (Inspired how? Inspired to do what?) Obviously, I know this person meant well and was attempting to put a positive spin on a negative situation, but, as an atheist, I found it to be more confounding than comforting.

Anyway, getting back on topic, I googled the phrase “God never gives you more than you can handle” to see what I could find. The first thing I noticed is that the phrase comes from 1 Corinthians 10:13 in the bible: “God is faithful, and he will not let you be tested beyond your strength, but with your testing he will also provide the way out so that you may be able to endure it.”

OK, that sure sounds a lot like “God doesn’t give you more than you can handle.” But, here’s the thing: It all depends on which biblical translation you read. Many versions, including the two most popular ones (King James Version and New International Version) use the word “tempted” in place of “tested,” which completely changes the meaning of the phrase.

Try it: “He will not let you be tempted beyond your strength,” or “He will not let you be tested beyond your strength.” There’s a big difference.

If you search online for “tempted vs. tested,” almost all of the results are from religious websites or have religious responses, which in itself is interesting.

But, the even more interesting thing is that they all state the differences between the two, rather than the similarities. So, using the word “tempted” in the phrase instead of “tested” does change the entire meaning of the passage.

(Side note: People try to claim the bible is the inerrant word of God, yet there are two completely different meanings coming from even a single passage?)

So, while I wholeheartedly dismiss the idea of a god who controls the fates of every living thing, there are many people who do believe it. But, still, do they really think their God doesn’t give anyone more than they can handle when the evidence points to the contrary? That’s religion for you.

PJ Slinger is editor of *Freethought Today*.

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## LETTERBOX

### How does the Catholic Church get away with it?

I really enjoyed Ryan Jayne's column, "Churches: We can't pay for the harm we've done," in the Jan/Feb issue. But there is one element of the story that was not explained and that I've never understood.

The Catholic Church is a seemingly gigantic monolithic international organization, with national councils of bishops making decisions for churches in their countries, and all ultimately subject to the policies and commands of the world headquarters in the Vatican.

And, yet, when individual churches are sued for things like child sexual abuse, all of a sudden, they are separate regional operations, such as the ones mentioned in the column — the Archdiocese of Santa Rosa, the Archdiocese of Oakland, etc., which promptly file for bankruptcy to avoid paying for their sins.

This would be something like the local CVS pharmacy being sued for harming customers and the "CVS Outlets of Santa Rosa" filing for bankruptcy to avoid paying judgments against them. How does the Catholic church get away with this?

Connecticut

### We can still find many reasons for hope

My hopes that reason will ultimately prevail come from several fronts, especially reinforced by recent Freethought Today issues.

First, I'm hopeful because of the very diverse group of enthusiastic young people, through their writings and actions they have taken throughout every part of our country.

Second, I'm so grateful for the continued initial feelings since first joining FFRF of not being alone in the hope for a future governed by reason and our growing knowledge. This cannot be stated often enough, especially when our numbers keep growing every year.

Third, I have been pleasantly surprised these days to occasionally find a report warning all of us to the evolving danger of Christian nationalism included in several of the national news shows, especially CNN and MSNBC. I hope that all the national networks will continue to point out that the erosion of the separation of church and state will surely lead to the loss of the freedom of choice for our fellow citizens that choose to believe.

Delaware

### I have been spiritual but not religious

I was raised in a church that had a pipe organ, on which classical music was played for 30 minutes before the service and also accompanied the congregation as they sang traditional songs. To me this was spiritual, but even as a kid I didn't believe in God. I wanted to, and, at age 10, I yelled in my bedroom, looking up, "God, if you're real, let me feel you!" I never could feel what Christian believers did.

As an adult, I participated in the Presbyterian Church bell choir and



Bruce Johnson, FFRF's video producer, snapped a photo of this church marquee, and said, "It's nice of these folks to boil down everything wrong with Christianity (and, indirectly, religion in general) into two lines."

took my kids to church and Sunday school, but I haven't been a church member for years.

My married kids today are (1) an ex-Scientologist, (2) another who never believed in God, and (3) one who married a Mormon. (He was a member of that church for a while, but when his kids grew up and married, he stopped going to church.)

Thank you for Freethought Today!  
California

### 'God & Country' shows religion's dark underbelly

I concluded some time ago that there is an inverse relationship between religiosity and rational thinking. The more one engages in the former, the less capacity one has for the latter. Having just watched the informative and disturbing documentary, "God & Country," I certainly feel validated.

The film is a fascinating and unnerving look at the dark underbelly of a large subset of evangelical Christianity, which has become known as Christian nationalism. FFRF members will recognize Andrew Seidel, who appears in the film along with other commentators, including two or three self-described current or former evangelical Christians who are critical of the anger and fear which form the foundation of Christian nationalism, and express their dismay at its departure from the Jesus-based teachings of welcoming the stranger, caring for the sick and needy, and being compassionate and inclusive.

The documentary features video footage of evangelical churches whose main dogma is political, rather than religious, a clear abuse of their tax-exempt status. Liberal Americans are demonized, with one preacher actually yelling during his sermonizing, "If there are any Democrats in here, get out!"

Trump and his enablers have effectively tapped into the grievance-based ideology of these evangelical Christians, and played upon their fears in stoking

the racist, homophobic, xenophobic divisiveness that has morphed into white Christian nationalism. This eye-opening film also addresses some very interesting historical background on the anti-abortion movement.

California

### I will continue to call myself an atheist

I'm sorry, but the term "religion-free" doesn't do it for me. I am a proud atheist if anyone asks. If they have a problem with my answer, so be it.

Wisconsin

### Walker's column good except for one sentence

I was agreeing with everything Barbara Walker was claiming in her opinion piece: "Does religion make people kind, generous?" in the March issue until she asserted that animals demonstrate a natural respect for their fellow beings all the time. The predator/prey dynamic in nature would surely contradict such a generality. More to the point, some animals prey on their own kind. For instance, when stressed, ferrets will eat their own young. I can attest to this morbid phenomenon based on a personal experience in grad school involving some neuroscience test subjects.

Tom Drolsum  
Wisconsin

### Guilt slipped away once I stopped believing

Some years ago, after my lack of faith became known, a friend of mine said to me, "Your 'conversion' to atheism has contaminated the faith pool." I was stunned to hear a friend characterizing me as if I were an enemy of the church. He was not only ada-

### Write to us

To send a letter to the editor for Freethought Today, please email it to [editor@ffrf.org](mailto:editor@ffrf.org).

mant about his observation, but he also made it clear he was loathe to be a friend. I got the message. Our relationship was never the same.

There were others who applauded my decision to leave the faith, but they were far and few between. One of them became a kind of mentor for me. Though he still attended church for "business reasons," he was a stable thinker and gave me a slew of ideas to help me deal with the "contaminants" in my life. The end of that professional relationship led me to a number of authoritative resources that helped me deal with my conversion.

As the days turned into months and years, I began to realize that I had lost my fear of the "man in the sky." I discovered living a lie is not easy. Upon leaving the church, I eventually came to accept my new role as a "freethinker." But not at first. It took a while for my new-found identity to fully surface and it was part of a discipline I, in part, learned how to absorb.

Once I did, it was as if a huge burden of guilt and other unfathomable constraints had slipped away and the replacement to those constraints were enough to launch a kind of joy, even a peace. I was no longer in the clutches of theological gymnastics or the rambling carnival-like worship services with mosh pit attachment.

Try to preach, teach and counsel in an evangelical church with huge doubts racking your brain. It isn't easy. Take charge of a communion service and authorize the distribution of symbols representing the body and blood of a central figure in Christian hierarchy. Heavily feel the emotion that goes with a reflection on just what we were doing. It makes for a strange scene as presented to the body of believers with blood and body parts as the transformational objects of the practice. If I didn't grow up and into these practices, I don't think I would find them at all palatable. What a difference thought makes.

Minnesota

### Humanity belongs to Earth, not the other way around

We live in the natural world; we know no other. As science, human history and common sense tell us, humans are not special, not set apart, but are part of and interdependent on nature's balance. That is to say, the Earth does not belong to us, we belong to Earth.

In nature there are neither rewards nor punishments, there are consequences. We should remind ourselves that if we fail or refuse to respect the Earth and our environment, a variation of John Donne's "Axiom of Death" may prove to be our legacy. Our final epitaph: "No man is an island, entire of itself. Every man is a piece of the continent, a part of the main; nature's death diminishes me, because I am part of nature; and therefore, never send to know for whom the bell tolls, it tolls for thee!"

Florida

### ‘Godless communists’ phrase will be heard soon

I am going to predict what I see as something that will come out of the MAGA world soon. They are already beginning to throw around the word “communist.” What is missing so far is the phrase “godless communist,” as that was the buzz phrase when unions were forming in U.S. history. Part of the motivation to add “In God We Trust” to currency was to show whose side God was on. That was the era when William Randolph Hearst plucked Bill Graham from an obscure bible college and marketed him to combat all that godlessness, as good Christians would never overstep the boundary with their bosses and form a union. (Taken from Cecil Bothwell’s book, *Prince of War: Billy Graham’s Crusade for a Wholly Christian Empire*.)

I happen to have a copy of an obscure book by Leo Tolstoy – *The Kingdom of God and Peace Essays* — that outlines how the communists got that label. He writes that the Russian Orthodox Church became so powerful and was dominating the government, so the oligarchs outlawed the church; hence, the word “godless” was combined with the “communist” label. That is history that we in the West never study, but think of the hysteria that generated in the minds of the oligarchs here.

If I am wrong, you can chastise me, but if I am right, the phrase “godless communist” will be used as an obvious pejorative to protect the evangelical/theocrats from criticism as they forge ahead with their 2025 agenda to make their version of Christianity the religion and law of the land.

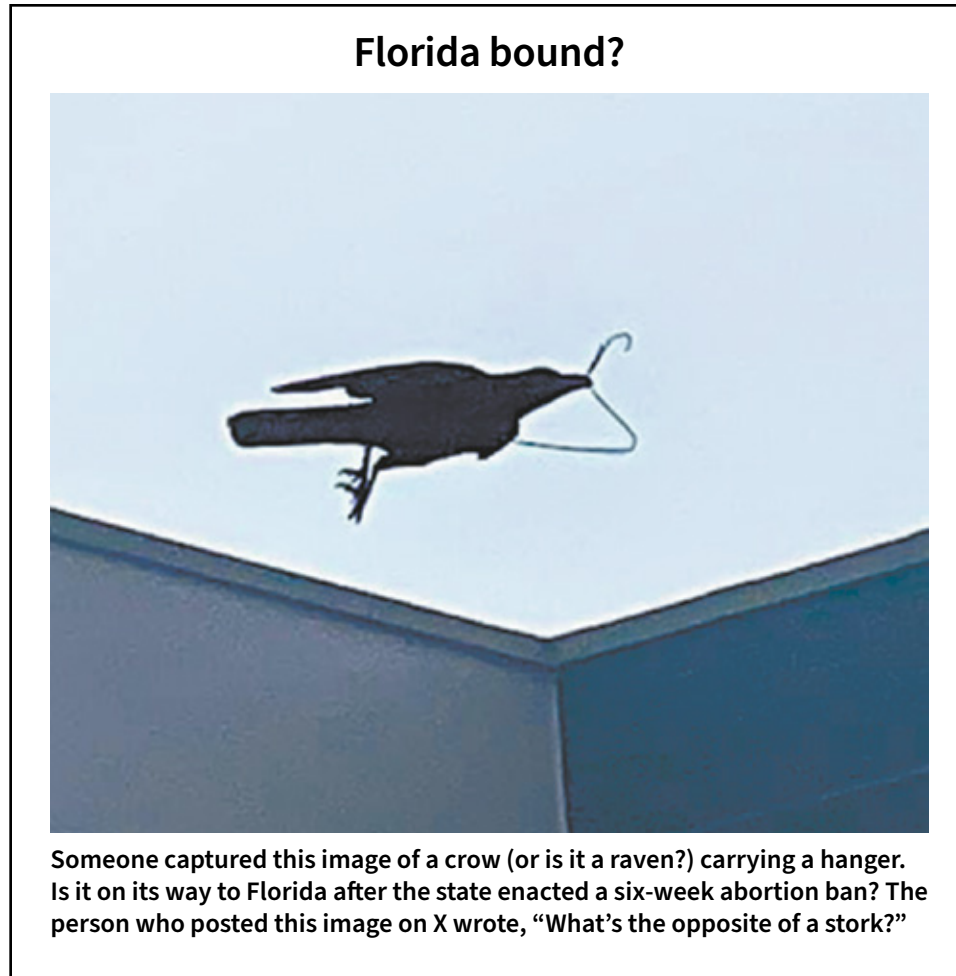
North Carolina

### Mom’s last bit of advice was surprisingly simple

My 104-year-old mother, knowing she was getting closer to dying, asked me to get a pencil and paper to write down something important. I was filled with trepidation as I complied. You see, I was reared in a very religious family (no dancing, family devotions every night, etc.). I, on the other hand, had evolved into an atheist. I began college as a firm believer but ended college as an agnostic. That’s another story, though.

My mom is the sweetest, most loving person in the world, and I have made her cry too many times by talking with her and my father about my religious views. For decades, I’ve simply tried to avoid the topic, even though I still played hymns for her on the piano and sang them with my sisters in three-part harmony. Somehow, I could justify the music, but lying in conversation seemed more intentional.

After retrieving a pencil and paper, I asked my mom what she wanted to tell



Someone captured this image of a crow (or is it a raven?) carrying a hanger. Is it on its way to Florida after the state enacted a six-week abortion ban? The person who posted this image on X wrote, “What’s the opposite of a stork?”

me. She hesitated for several moments. Then she said, “Stay busy,” much to my surprise and relief. I asked her if there was anything else, and she replied, “No.”

Although I knew my mom had spent her life doing good for others, working for family, neighbors and as a dedicated nurse aide, I had expected her to tell me to accept Jesus as my savior so we could meet in heaven. When I asked my sisters about this, they were uncertain, but they suggested that perhaps she had mellowed in her religious ideas to some extent. Perhaps she decided to not push me, not wanting more conflict between us, bringing more sadness to both of us.

For whatever reason, I’m grateful my mom’s last advice was “stay busy.” That’s advice I can happily try to follow in my life and believe that it is part of what for me contributes to a happy life. After all, as the old saying goes, “Idle hands are the devil’s workshop.” Perhaps that thought was in the back of my mom’s mind when she gave her last advice to me, meeting me on middle ground acceptable to both of us.

Texas

### Abortion, homosexuality make strange bedfellows

Abortion and homosexuality make strange bedfellows, but they are interwoven ideas in both Christianity and government. Prohibitions on each are actually based on money, the “filthy lucre” that makes the world spin. They trace back to the days when Israel wanted a king. The prophets warned the Israelites that having a king would be costly. Among other things, they would have to pay taxes and send their sons to battle. Supporting the government and having an army requires money and lots of it.

An army not only protects the peo-

ple, but also provides the means for expanding their territory and having more resources for the people. Battle, plunder, rape and steal. If you don’t kill the conquered people, hold them for ransom, sell or use them as slaves, or incorporate the good ones into your society. It’s all about money.

The larger the population, the more laborers to work fields and do service in the army. More crops meant paying more taxes. Children and slaves (from conquered people) were the primary means of increasing the population, the work force and expanding the army. Children come through heterosexual relationships.

Homosexual relationships do not produce the resource of children. Good citizens had large families. Being barren was considered a curse from God, was a social stigma, and carried a lot of guilt. Not having children was seen as a curse that worked against State objectives. The church cannot exist without guilt. Homosexuality came to be equated with barrenness and seen as anti-state and anti-God. Abortion denies the state of workers and tithers to the church.

The “church” subtly perpetuates this idea today. More workers still means more money in tithes and offerings. The more guilt the church can impose, the greater the tithes and offerings. To impose guilt, convince people that they are sinful or that something they do is a sin. Keep them uneducated, poor and hungry. Indoctrinate them with your religious teachings in public schools, discourage free thought and make sure they are thankful for every bite of food they consume. Then, bombard them with lies. (If you hear something often enough, you tend to believe it.)

So, if the church or state says something is wrong – follow the money. It leaves a trail of hatred — hatred of homosexuals and pro-choice ideas. Indeed, they do make strange bedfellows.

Oklahoma

### What’s the real value of thoughts and prayers?

Two cents of actual assistance is worth two cents more than two million thoughts and prayers.

Virginia

### ‘Come Sunday’ tells of preacher’s ‘revelation’

“Come Sunday” tells the real-life story of Carlton Pearson, an evangelical preacher and protégé of Oral Roberts, who heads up a fundamentalist church of 6,000. One day, he has a momentous realization: If God is supposed to be so loving of mankind, why would he send all the “unsaved” people in the world — for instance, babies born in Africa that have no chance of evangelical ministrations — straight to hell?

After much tormented thought and prayer, Pearson “hears” God speak, telling him that, yes, God does love everyone, and those African babies do get to go to heaven. And, of course, Pearson finds justification for this revelation in various bible verses, that book being so fluid in its text so as to find justification for just about any interpretation. For example, are you against homosexuality? Check. Are you for slavery? Check. But, if you condone homosexuality and condemn slavery, check that, too.

The preacher is so overjoyed with this conclusion that he has the audacity to preach this radical proposition to the congregation, much to the shock of most of the congregants upon hearing such a blasphemous contention. The church elders, including Roberts himself, tell him that he is mistaking the voice of God for that of the devil, and they seek to purge him of this dangerous thinking. But, fortunately for Pearson, after his ostracization from this church, he finds resurrection in the form of another ministry, one that is welcoming to all.

Pearson died in November at age 70. (It’s unclear where God sent him.) Though he continued to suffer from what Richard Dawkins calls the “God delusion,” he at least had the courage to unchain himself and many of his followers from the fallacy that only “saved” evangelicals can enter heaven, while the rest of the world goes to hell.

One wonders how many other evangelical ministers or priests and ministers of the more “normal” Christian denominations go the next step and come to the realization that not only does God not send people to hell, but that there is no god to send them anywhere, and that the bible is not the divine word of a deity, but merely a collection of ancient fabulist stories crafted by committee; that all there is to life is life itself, made from the waste products of combusted stars.

Maine

### There’s no shortage of biblical hypocrisy

I just spotted a major hypocrisy in the bible in Leviticus 18:21: “You shall not give any of your children to sacrifice them to Molech, and so profane the name of your god: I am the Lord.”

Contrast that with John 3:16: “For god so loved the world that he gave his only son.”

So, no sacrifice to Molech, but God can sacrifice his offspring, Jesus, to himself!

Also, right after, is Leviticus 18:22: “You shall not lie with a male as with a woman; it is an abomination.” Compare that to John 13:23: “The disciple whom Jesus loved, was reclining next to him.”

Straight out hypocrisy! No males lying together — unless it’s Jesus!

Indiana

**Crossword answers**

S	P	A	S		R	E	D		C	L	U	E		
T	A	L	A		C	A	R	E		H	O	U	S	E
A	T	O	M		E	D	E	N		I	L	L	E	R
T	H	E	O	C	R	A	C	Y		F	O	L	D	
			S	H	I	R	T			S	I	R		
C	A	L	A	I	S		L	A	S	A	G	N	A	
O	B	I		D	E	P	L	O	Y		D	U	E	S
C	A	N	O	E		O	E	R		C	O	L	I	C
A	C	E	D		S	P	I	N	A	L		A	G	O
S	I	N	E	D	I	E		N	O	U	G	H	T	
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S	A	K	I		C	R	A	N	K		M	A	I	L
T	A	P	I	R		R	E	L	Y		A	L	S	O
E	V	E	R	Y		I	T	E	M		S	E	L	L
D	E	S	K		B	A	S			K	E	E	L	

**Cryptogram answer**

I absolutely believe what Ellie [the atheist astronomer in the movie “Contact”] believes — that there is no direct evidence, so how could you ask me to believe in God when there’s absolutely no evidence that I can see? — Jodie Foster



The convention will be held at the Sheraton Denver Downtown.

# FFRF convention, Sept. 27-29 Denver, here we come!

Join the Freedom From Religion Foundation in Denver for its 47th annual convention from Sept. 27-29 at the Sheraton Denver Downtown. For information about the convention speakers, turn to page 3, or go to [ffrf.org/convention2024](http://ffrf.org/convention2024).

## General schedule

There will be a Thursday afternoon complimentary Welcome Reception (see registration form). Convention registration will re-open at 8 a.m. Friday morning. The program will begin at 9 a.m. that morning and will run through Saturday evening.

On Sunday morning, the membership and State Representatives meetings will take place, ending by noon.

## Registration

Registration for the convention is \$100 per FFRF member, \$105 for a companion accompanying a member, \$160 for nonmembers (or, you can save money by becoming a member for just \$40). High school students or younger are free and the college student rate is \$25.

Return the registration form on the right, or sign up at [ffrf.org/convention2024](http://ffrf.org/convention2024).

## Optional Group Meals

For organized group meals, there will be a Friday dinner buffet, a Saturday "Non-Prayer" breakfast and a Saturday dinner.

Vegetarian, vegan and gluten-free menu options are available. Please specify specialty requirements on the registration form.

### Friday dinner

Entree 1: Pan-seared chicken with roasted red pepper sauce and brown butter gnocchi and snap peas.

Entree 2: Pan-seared salmon with charred corn soubise, snap pea and farro succotash and charred tomato beurre blanc.

Entree 3: Veggie/Vegan option.

Starter selection: Boston Bibb

wedge salad, pancetta, heirloom tomatoes, Sedona blue cheese with a creamy chive dressing.

Dessert: Carrot cake with mascarpone whip, bourbon caramel sauce, candied pecans. GF, VG: Coconut chia pudding with fresh berries.

### Saturday breakfast

Scrambled eggs, bacon, potato cubes with parm and green onion. All plated breakfast selections include your choice of a starter, fresh orange juice, array of breakfast pastries, Starbucks regular and decaffeinated coffee, selection of Tazo teas, sugar three ways, milk and cream.

Starter choice: Yogurt, berry compote, granola

### Saturday dinner

Entree 1: Beef

Entree 2: Seared steel head trout, green onion beurre blanc, snap peas, and vegetable medley farro.

Entree 3: Veggie/Vegan

Includes: Your selection of starter, entree and dessert, includes oven baked rustic rolls and sweet creamy butter, freshly brewed Starbucks regular and decaffeinated coffee and specialty Bigelow teas. No soda/juice.

Starter selection: Colossal shrimp cocktail with house poached prawns, cucumber, mango, and Jicama salad with pineapple sweet chili dressing.

Dessert: Chocolate cheesecake with raspberry sauce. GF, VG: Cassis mousse with peach compote.

## Hotel

We encourage you to register and book your hotel room as soon as possible. If you need an accessible room, please state your needs when making the reservation.

### The Sheraton Denver Downtown

1550 Court Place, Denver, CO 80202  
Phone: 303-893-3333. State that you are with the "Freedom From Religion" room block.

<https://ffrf.us/hotelFFRFCon2024>

Rates are \$249 for a standard guest room.

FREEDOM FROM RELIGION FOUNDATION **2024**  
**NATIONAL CONVENTION**  
**DENVER** SEPTEMBER 26-29

## CONVENTION REGISTRATION FORM

Or register online: [ffrf.us/convention2024](http://ffrf.us/convention2024)

### REGISTRATION FEES

	Number Registering	Cost
Member	___ \$100	\$ ___
Spouse or Companion (Non-member accompanying member)	___ \$105	\$ ___
Child (High school or under accompanying registrant)	___ Free	\$ ___
College Student with ID	___ \$25	\$ ___
Non-member	___ \$160	\$ ___
<input type="checkbox"/> Or, I will join FFRF for \$40 (and save \$20)	___ \$140	\$ ___

### OPTIONAL MEALS / EVENTS

Please specify your dietary requirements below, under ADA or food allergy accommodations. FFRF does not make money on convention meals. Prices include the 8% sales tax and 27% service charge.

#### Thursday, September 26th

Welcome Reception [Must register to attend] \_\_\_ Free

Check box if attending  Registrant 1  Registrant 2

#### Friday, September 27th

Friday Night Plated Dinner \_\_\_ \$95 \$ \_\_\_

Registrant 1  Chicken  Fish  Vegetarian  Vegan

Registrant 2  Chicken  Fish  Vegetarian  Vegan

#### Saturday, September 28th

Non-Prayer Breakfast \_\_\_ \$55 \$ \_\_\_

Registrant 1  Regular  Vegetarian  Vegan  Gluten Free

Registrant 2  Regular  Vegetarian  Vegan  Gluten Free

Saturday Night Plated Dinner \_\_\_ \$100 \$ \_\_\_

Registrant 1  Beef  Fish  Vegetarian  Vegan

Registrant 2  Beef  Fish  Vegetarian  Vegan

► Total \$ \_\_\_\_\_

Please describe your ADA or food allergy accommodations needed in order to fully participate:

Registrant 1  None  Vegetarian  Vegan  Gluten Free

Other (Please specify): \_\_\_\_\_

Registrant 2  None  Vegetarian  Vegan  Gluten Free

Other (Please specify): \_\_\_\_\_

(Make check payable to FFRF) Return with payment to:

**FFRF, Attn: Convention | P.O. Box 750 | Madison, WI 53701**

I attest that I and my guests will be fully vaccinated for Covid-19 as of 9/12/24.

I attest that I have a physician's order against my Covid-19 vaccination.

Name of Registrant 1 \_\_\_\_\_ Pronouns (optional) \_\_\_\_\_

Name of Registrant 2 \_\_\_\_\_ Pronouns (optional) \_\_\_\_\_

I am including additional registrants (enclose your additional list, with meals, if any).

Address \_\_\_\_\_

City \_\_\_\_\_ State / ZIP \_\_\_\_\_

Phone\* \_\_\_\_\_ Email\* \_\_\_\_\_

Credit Card Number \_\_\_\_\_ Expiration Date / Security Code \_\_\_\_\_

Billing Name / Signature \_\_\_\_\_ \*Contact information for in-house use only

Registration and cancellation deadline is September 13th, 2024.  
Registration cancellations received after September 13th, 2024 will not be refunded.