

FREEDOM FROM RELIGION *foundation*

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

March 10, 2022

SENT VIA EMAIL & U.S. MAIL: doug.doughtie@darenc.com

Sheriff Doug Doughtie
Dare County Sheriff's Office
Dare County Justice Center
962 Marshall C. Collins Drive
P.O. Box 757
Manteo, NC 27954

Re: Unconstitutional "faith based" camp

Dear Sheriff Doughtie:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation occurring in the Dare County Sheriff's Office. FFRF is a national nonprofit organization with more than 36,000 members across the country, including more than 800 members and a local chapter in North Carolina. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

Multiple concerned Dare County residents have reported that the Sheriff's Office is planning to hold a "faith based" camp for children this summer called "Camp S.A.L.T." It is our understanding that this camp has been run by the Sheriff's Office for many years, and includes religious worship:¹

Before breakfast and lunch, campers volunteer to pray for the meal. About the faith aspect of the camp, "If you want to be a part of that you are," said Doughtie. "Kids will pray and thank God for the day, that nobody got hurt. It's amazing to hear what these kids actually pray for. They pray for each other – that's the amazing part. They know what's going on, they pray about health, even at the young age that they are. It's incredible how much they think of one another," he said.

The Sheriff's Office's official Facebook page declares that this is a "faith based" camp. Please see the enclosed screenshot.

We write to ensure that the Dare County Sheriff's Office will no longer use its resources to promote and endorse religion. While we understand the importance of providing children with

¹<https://www.thecoastlandtimes.com/2021/08/12/camp-s-a-l-t-celebrates-10-years-if-they-can-do-these-challenges-at-camp-they-can-meet-challenges-in-life/>

opportunities to make new friends, learn ways to deal with challenges, and create proud memories, the Sheriff's Office cannot host a "faith based" camp that includes religious worship and prayer. It must either remove any government-sponsored religious activities, prayer, and worship from the camp, or it must cease hosting the camp altogether.

The Dare County Sheriff's Office's apparent endorsement of religion poses serious constitutional concerns. The Establishment Clause of the First Amendment prohibits the government from hosting or endorsing religious events or activities. As the Supreme Court has put it, the Establishment Clause "mandates government neutrality between religion and religion, and between religion and nonreligion." *McCreary Cty., Ky. v. Am. Civil Liberties Union of Ky.*, 545 U.S. 844, 860 (2005); *Wallace v. Jaffree*, 472 U.S. 38, 53 (1985); *Epperson v. Ark.*, 393 U.S. 97, 104 (1968); *Everson v. Bd. of Educ. of Ewing*, 330 U.S. 1, 15-16 (1947). By hosting a "faith based" camp that includes religious worship, the Sheriff's Office creates the appearance that it endorses religion.

It is irrelevant whether the faith aspects of the camp are "voluntary." The Sheriff's Office clearly advertises this camp as "faith based," and provides for religious components. Courts have summarily rejected arguments that voluntariness excuses a constitutional violation. *See, generally, Lee v. Weisman*, 505 U.S. at 596 ("It is a tenet of the First Amendment that the State cannot require one of its citizens to forfeit his or her rights and benefits as the price of resisting conformance to state-sponsored religious practice."); *Abington Sch. Dist. v. Schempp*, 374 U.S. 203, 288 (1963)(Brennan, J., concurring)("Thus, the short, and to me sufficient, answer is that the availability of excusal or exemption simply has no relevance to the establishment question..."); *Mellen v. Bunting*, 327 F.3d at 372 ("...VMI cannot avoid Establishment Clause problems by simply asserting that a cadet's attendance at supper or his or her participation in the supper prayer are 'voluntary.'").

As you are aware, citizens interact with and rely on law enforcement officers during some of the most urgent and vulnerable times of their lives. Minority religious and nonreligious citizens should not be made to feel excluded, like outsiders in their own community, because the Sheriff's Office that they support with their taxes oversteps its power by hosting a faith-based event for the County's children. Nor should the Sheriff's Office suggest that it favors religious citizens. We hope you'll agree that law enforcement must be even-handed and avoid any appearance of bias toward some citizens, or hostility toward others.

Official Dare County Sheriff's Office "faith based" programs and events explicitly exclude the 24% of Dare County residents who are nonreligious.² Any program which marginalizes a significant segment of Dare County's residents is not a program appropriate for the Sheriff's Office to run.

We ask that the Sheriff's Office immediately end all government-sponsored religious activities or worship events from the camp and cease advertising it as "faith based." It must be completely

² The 2020 Census of American Religion, Public Religion Research Institute (July 8, 2021), available at <https://www.ppri.org/research/2020-census-of-american-religion>.

secular, and welcoming to all Dare County residents regardless of religious or nonreligious beliefs, or it must be discontinued. Please inform us in writing of the steps taken to respect the right of conscience of all Dare County residents and to send a message that is inclusive of the minority religious and nonreligious citizens in your community.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Line", with a long horizontal flourish extending to the right.

Christopher Line
Staff Attorney
Freedom From Religion Foundation

Enclosure



Dare County Sheriff's Office

Yesterday at 9:55 AM · 🌐



Dare County Sheriff's Office
Public Service Announcement
March 9, 2022

The Dare County Sheriff's Office will be holding the Sheriff's 2022 Camp S.A.L.T. for children ages 8 to 14. This is a faith-based camp with activities that may include fishing, climbing the Alpine Tower, rock wall, educational field trips and going to the sound. Each child will have opportunities to make new friends, learn ways to deal with challenges, and will create proud memories.

The Sheriff's Office will also offer transportation from Manteo to the Alpine Tower for those who need it. Each camp will be limited to 30 participants. Registration forms can be found at the link below and must be read and signed by each child and parent (or guardian). If you have any questions, please call us at (252) 475-5980.

The summer camp sessions will be:

Session 1 June 13 to July 01

Session 2 July 05 to July 22

Session 3 July 25 to August 12

You may sign up for one of the camps.

Please send applications to Sergeant Greg Padilla via mail or fax to (252) 441-9437.