

FREEDOM FROM RELIGION *foundation*

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

March 20, 2023

SENT VIA FAX & U.S. MAIL: (731) 425-8514

Thom Corley
Chief of Police
Jackson Police Department
234 Institute St.
Jackson, TN 38301

Re: Unconstitutional religious promotion on social media

Dear Chief Corley:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation occurring in the Jackson Police Department. FFRF is a national nonprofit organization with over 39,000 members across the country, including more than 400 members and a local chapter in Tennessee. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

A concerned complainant reported that the Jackson Police Department (“the Department”) celebrated Women’s History Month on its official Facebook page by highlighting its female law enforcement officers, including officers’ favorite bible verses. It appears that each female officer was asked to share their favorite biblical scripture as part of the Department’s Women’s History Month social media campaign. Please see the enclosed screenshots.

We write to request that you remove these references to religious scripture from the Department’s official Facebook page and refrain from using official social media pages to promote religion in the future.

It is inappropriate and unconstitutional for a police department to post biblical scripture on its official social media pages. The Supreme Court has long held that the Establishment Clause requires “government neutrality between religion and religion, and between religion and nonreligion.” *McCreary Cty., Ky. v. ACLU 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 displaying Christian scripture on its official Facebook page, the Jackson Police Department conveys a message to all non-Christians in Jackson that they are disfavored members of the community. While it is laudable that the Department wants to honor its female officers on social media, it should seek to do so in ways that are inclusive and do not needlessly include the often exclusionary topic of religion.

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. As Chief of Police, you serve a diverse population that consists of not only Christians, but also minority religious and nonreligious citizens. We hope you will agree that the police department must be even-handed and avoid any appearance of bias toward some citizens or hostility toward others. Promoting Christianity through the Department’s official social media suggests

that your office prefers Christianity over all other religions and nonreligion. This alienates Jackson citizens who are part of the 35 percent of Americans who are non-Christians.¹

The Supreme Court has described the power of social media sites as “the principal sources for knowing current events, checking ads for employment, speaking and listening in the modern public square, and otherwise exploring the vast realms of human thought and knowledge.” *Packingham v. North Carolina*, 137 S. Ct. 1730, 1737 (2017) (internal citations omitted). Government entities must be particularly diligent not to entangle religious messages with official government pronouncements made in this “modern public square.”

We ask the Jackson Police Department to respect the diversity of its citizens. We request that you remove all divisive religious posts and biblical scripture from official social media pages and avoid making similar posts in the future. Please respond in writing with the steps your department is taking to remedy this matter so that we may inform our complainant.

Sincerely,

A handwritten signature in black ink that reads "Samantha F. Lawrence". The signature is fluid and cursive, with the first name being the most prominent.

Samantha F. Lawrence
Anne Nicol Gaylor Legal Fellow
Freedom From Religion Foundation

Enclosures

¹ *The 2020 Census of American Religion*, Public Religion Research Institute (July 8, 2021), available at <https://www.prii.org/research/2020-census-of-american-religion>.



City of Jackson, TN - Police Department ✓

March 2 at 8:59 AM · 🌐

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In Honor of Women's History Month, the Jackson Police Department will celebrate the contributions and achievements of women throughout our agency.

"There is no limit to what we, as women, can accomplish."

— Michelle Obama

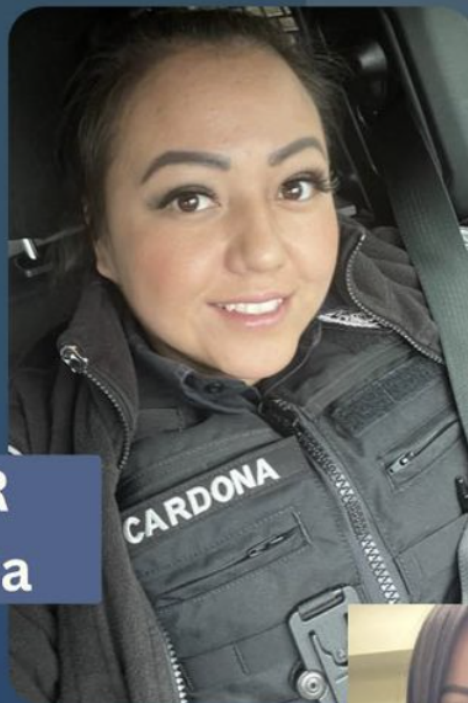
Meet Investigator Yesenia Cardona

[#WomensHistoryMonth](#)

Women's History Month



Yesenia is an Investigator
in the
Domestic Violence Unit at
the Jackson Police
Department.
Her daily
duties include
investigating domestics,
sexual assaults, and child
abuse cases.

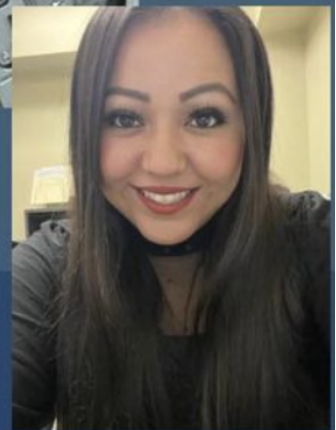


INVESTIGATOR
Yesenia Cardona

YEARS AT JPD:
11 Years

FAVORITE
SCRIPTURE

**"It is God who arms me with
strength and keeps my
way secure"~Psalm 18:32**



👍❤️ 162

12 comments 7 shares



City of Jackson, TN - Police Department ✓

March 6 at 10:21 AM · 🌐



In Honor of Women's History Month, the Jackson Police Department will celebrate the contributions and achievements of women throughout our agency.

"Nothing is impossible, the word itself says 'I'm possible'!" — Audrey Hepburn

Meet Officer Andrea Davis

[#WomensHistoryMonth](#)

Meet Officer Andrea Davis

Officer Davis joined the Jackson Police Department in April 2009. She was assigned to the Patrol Department, then later served as a Resource Officer. Officer Davis is currently assigned to the Warrants/Court Security Division.

Something you may not know:

Officer Davis started her career in Law Enforcement with Milan PD. While at Milan PD, she was the first black female to earn the rank of Lieutenant in Gibson County.

Favorite scripture: Philippians 4:13

Women's History Month

👍❤️ 180

57 comments 12 shares



City of Jackson, TN - Police Department ✓

March 1 at 7:30 AM · 🌐

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In Honor of Women's History Month, the Jackson Police Department will celebrate the contributions and achievements of women throughout our agency.

"If you truly pour your heart into what you believe in, even if it makes you vulnerable, amazing things can and will happen."

— Emma Watson

Meet Patrice Anderson

[#WomensHistoryMonth](#)

WOMEN'S HISTORY MONTH

PATRICE ANDERSON

Patrice Anderson began her tenure at the Jackson Police Department in April 1984 as a part-time clerk in the Criminal Investigation Division. She was on a work-study program from West Tennessee Business College. In January of 1985, Chief Ed Alderson offered her a full-time position in Central Records and the rest is history.

In 1999, Patrice was officially appointed to the position of Executive Secretary to the Chief of Police making her the first black to hold the position. During her current tenure, Patrice has provided direct assistance to five Chiefs of Police, which are Chief Rick Staples, Interim Chief Larry Price, Chief Gill Kendrick, Chief Julian Wiser, and current Chief Thom Corley. Patrice has a respected working rapport with dignitaries within city, county, state, and federal governments.

**Favorite
Scripture:
Proverbs 3:5-6**



Executive Secretary to the
Chief of Police



121

30 comments 10 shares



City of Jackson, TN - Police Department

March 9 at 11:20 AM · 🌐



In Honor of Women's History Month, the Jackson Police Department will celebrate the contributions and achievements of women throughout our agency.


"You only live once, but if you do it right, once is enough." ~Mae West

Meet Latoya Boyd

[#WomensHistoryMonth](#)

women's
history
month

FAVORITE SCRIPTURE:
"BE JOYFUL ALWAYS; PRAY
CONTINUALLY; GIVE THANKS IN
ALL CIRCUMSTANCES, FOR
THIS IS GOD'S WILL FOR YOU
IN CHRIST JESUS
1 THESSALONIANS 5:16-18




OUR INSPIRING WOMEN

JACKSON POLICE DEPARTMENT

Say hello to
Latoya Boyd

Latoya is the Executive Secretary for the Criminal Investigation Division. She provides administrative and clerical support that includes processing payroll, bookkeeping, answering emails and messages. Latoya has worked for the Jackson Police Department for 9 years.

Wife and mother of four



EXECUTIVE SECRETARY
Criminal Investigation
Division

  51

9 comments 11 shares



City of Jackson, TN - Police Department ✓

22h · 🌐

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In Honor of Women's History Month, the Jackson Police Department will celebrate the contributions and achievements of women throughout our agency.

"At the end of the day, we can endure much more than we think we can." — Frida Kahlo

Meet Kathy Smith

[#womenshistorymonth](#)



Women's HISTORY MONTH

Meet Kathy Smith

Kathy Smith started working in Central Dispatch in October 1995. She was promoted to Central Dispatch supervisor in 2010. Kathy was the employee of the Month in September 2003.

Favorite Scripture:
Philippians 4:13



Central Dispatch Supervisor

👍❤️ 100

30 comments 12 shares



City of Jackson, TN - Police Department ✓

March 7 at 10:02 AM · 🌐



In Honor of Women's History Month, the Jackson Police Department will celebrate the contributions and achievements of women throughout our agency.

"Fight for the things that you care about, but do it in a way that will lead others to join you."

Meet Sergeant Julie Mullikin

[#WomensHistoryMonth](#)

Women's History Month

MEET

**SERGEANT
JULIE
MULLIKIN**

- 15 years with the Jackson Police Department
- Currently supervising Rotation 4 night shift
 - Crash Reconstructionist
 - Negotiator
- 10 years experience as a Field Training Officer
 - Husband, Richard Mullikin
 - Daughter, 10-year-old Penny

"My top priority is to support and assist our officers in any way possible, to ensure their success in the field" ~ Sgt. Mullikin

**Favorite scripture:
Matthew 11:28-29**



148

22 comments 25 shares