

BUTZEL LONG

ATTORNEYS AND COUNSELORS

a professional corporation

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December 20, 2011

Via Certified Mail and E-mail

Mayor James R. Fouts
One City Square Suite 215
Warren, MI 48093
mayor@cityofwarren.org

Re: Warren Resident Douglas J. Marshall and Freedom From Religion Foundation's
Request to Place Placard in Civic Center Atrium Next to the Nativity Display

Dear Mayor Fouts:

I write to you today on behalf of my clients Douglas J. Marshall and the Freedom From Religion Foundation ("FFRF"). As you know, FFRF and its local member, Mr. Marshall, have requested permission from the City of Warren to place a display in the Atrium of Warren's Civic Center, near the nativity scene display (photo enclosed). To date, my clients have not received any response regarding this request, which has been communicated to your office on several different occasions, and as recently as December 14, 2011. When Mr. Marshall and FFRF have contacted your office, they have simply been informed that you are in receipt of the request, and that you are considering it and should have a response soon. (They have also been told, at various times, that the Downtown Development Authority and/or the City Attorney's office have some decision-making authority on this matter, and I've therefore copied those offices on this correspondence). I enclose copies of the previous written communications between my clients and your office, although there have also been numerous phone calls on this topic, some of which have involved you, personally.

Of course, any delay in a determination by your office of my clients' request will prevent their proposed seasonal display from being placed in proximity to the nativity scene the City has permitted to be displayed in a prominent location in the Atrium of the Warren Civic Center. Therefore, any further delay in a response from your office will constitute a denial of my clients' Constitutional rights. Unless we receive notice by 10:00 a.m. on Wednesday, December 21, 2011 that my clients' proposed display shall be permitted to be displayed next to the nativity scene in the Civic Center for as long as the nativity scene shall remain on display there, or in any

other location on government property, we will be left with no choice but to file a lawsuit in the United States District Court for the Eastern District of Michigan against the City of Warren, the Mayor, and the Downtown Development Authority. We will also seek an injunction to halt the unlawful refusal to respond to my clients' request for permission to display their sign alongside the nativity scene or, in the alternative, that the nativity scene be removed from City property, as well as attorney's fees and other litigation expenses as authorized under 42 U.S.C. § 1988.

I remain hopeful, however, that we may hear from you very soon and may resolve this matter without the need for litigation. As you mentioned in your letter to Rebecca S. Markert, Staff Attorney for FFRF, dated December 8, 2010 and enclosed with this correspondence, "[t]he city of Warren in no way whatsoever shows any favoritism to any religion. All religions are welcome to celebrate their religious seasons with a display in city hall." We hope that you will follow through with your commitment to avoid even the appearance of government sponsorship of religion, and permit my clients' proposed display to occupy a position near the nativity scene in the Civic Center Atrium.

I also note that the City Council's Resolution of June 22, 2010, Re-Affirming the American Values of Freedom, Equality and Justice (also enclosed) states, among other things, that "the diversity of our world is a gift to be celebrated, honored, and protected," and that "it is not only our civic but also our moral responsibility to protect the right of all people to live, work, go to school, and worship freely within our cities without the threat of discrimination or harm as a result." Certainly, this Resolution supports my clients' position that the City of Warren should not discriminate against any individual or group based on religion. Unfortunately, the City's refusal to respond to my clients' repeated requests constitutes just such discrimination.

As you know, it is unlawful for the City of Warren to maintain, erect, or host a holiday display that consists solely of a nativity scene, thus singling out, showing preference for, and endorsing one religion. The Supreme Court has ruled that it is impermissible to place a nativity scene as the sole focus of a display on government property. See *County of Allegheny v. American Civil Liberties Union*, 492 U.S. 573 (1989); *Lynch v. Donnelly*, 465 U.S. 668 (1983). The City of Warren's nativity display is in all respects just as the nativity display in *County of Allegheny*, wherein the Court ruled that "no viewer could reasonably think it occupies this location without support and approval of the government." 492 U.S. at 599-600.

To the extent that the Downtown Development Authority does have any decision-making authority over requests such as these, we enclose the completed form requesting permission to place the FFRF display in the Civic Center Atrium. However, because this form deals with the use of the space for gatherings, and not for the placement of a small, temporary sign such as the one at issue, I do not believe that the form adequately addresses requests such as this. Also, please find enclosed a copy of our FOIA request for all similar application forms or other

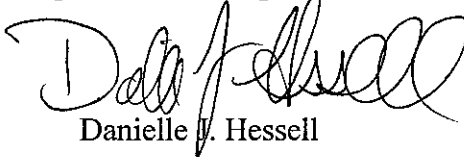
BUTZEL LONG

information submitted by the Warren Rotary Club or any other organization or governmental entity related to the nativity display which is currently located in the Civic Center Atrium.

Thank you and I look forward to hearing from you very soon.

Very truly yours,

BUTZEL LONG,
a professional corporation



Danielle J. Hessel

DJH:dll
Encls.

cc: Warren City Council Secretary, Warren Community Center, Second Floor
5460 Arden, Warren, MI 48092 (via Certified Mail)

Cecil St. Pierre, Council President (via e-mail to cdspjr@yahoo.com)

Patrick Green, Council Vice President (via e-mail to pgreen@cityofwarren.org)

Scott Stevens, Council Secretary (via e-mail to scs425@wowway.com)

Keith Sadowski, Council Assistant Secretary (via e-mail to ksadowski@cityofwarren.org)

Robert Boccomino, Councilman (via e-mail to boccomino2007@wowway.com)

Kelly Colegio, Councilwoman (via e-mail to kcolegio4@aol.com)

Steven Warner, Councilman (via e-mail to sgwarner1@yahoo.com)

Lloyd E. Brown, Chairperson, DDA (via e-mail c/o jhanway@cityofwarren.org)

Charles Earl Jr., Vice Chairperson, DDA (via e-mail c/o jhanway@cityofwarren.org)

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Jon Green, DDA Board Member (via e-mail c/o jhanway@cityofwarren.org)
Michael Wiegand, DDA Board Member (via e-mail c/o jhanway@cityofwarren.org)
David G. Spencer, DDA Board Member (via e-mail c/o jhanway@cityofwarren.org)
Oscar Zamora, DDA Board Member (via e-mail c/o jhanway@cityofwarren.org)
David Gorsich, DDA Board Member (via e-mail c/o jhanway@cityofwarren.org)
Bonnie McInerney, Director, DDA (via e-mail c/o jhanway@cityofwarren.org)
Rob Maleszyk, Treasurer, DDA (via e-mail c/o jhanway@cityofwarren.org)
Mark Liss, City Council Representative, DDA (via e-mail to Mark@MarkLiss.com)
Hon. James M. Biernat, Ret., Warren City Attorney (via facsimile to 586-574-4530)
Stephanie Schmitt, Esq. (via e-mail only)
Douglas J. Marshall (via e-mail only)
Jennifer Dukarski, Esq. (via e-mail only)
Taryn Asher (via e-mail to Taryn.Asher@foxtv.com)

BUTZEL LONG



FREEDOM FROM RELIGION FOUNDATION

P.O. Box 750 • Madison WI 53701 • (608) 256-8900 • www.ffrf.org

January 20, 2010

The Honorable John Fouts
Mayor
City of Warren
One City Square
Suite 215
Warren MI 48093-6726

Re: Nativity Scene Displayed in Lobby of City Hall

Dear Mayor Foust:

I am writing on behalf of a concerned City of Warren resident and taxpayer, who objects to the City's display of a nativity scene in the lobby of City Hall. The Freedom From Religion Foundation (FFRF) is a national nonprofit organization with over 14,000 members across the country including members in Michigan. Our purpose is to protect the constitutional principle of separation between church and state.

It is our information and understanding that during the month of December 2009, a crèche was erected on city property. Our complainant informs us that a nativity scene, depicting the birth of a Christian god, was located on the first floor of the city hall atrium. Upon further investigation, our complainant discovered that the crèche was given to the city years ago by some group but was indeed a city-sponsored display. We are unaware of other holiday displays in the same area.

It is unlawful for the City of Warren to maintain, erect, or host a holiday display that consists solely of a nativity scene, thus singling out, showing preference for, and endorsing one religion. The Supreme Court has ruled it is impermissible to place a nativity scene as the sole focus of a display on government property. See *Allegheny v. American Civil Liberties Union, Greater Pittsburgh Chapter*, 492 U.S. 573 (1989); *Lynch v. Donnelly*, 465 U.S. 668 (1983).

In *County of Allegheny v. ACLU of Pittsburgh*, 492 U.S. 573 (1989), the Supreme Court held that a county government's crèche displayed in the county courthouse was an unconstitutional endorsement of religion. The Court stated,

"Lynch v. Donnelly, confirms, and in no way repudiates, the longstanding constitutional principle that government may not engage in a practice that has the

effect of promoting or endorsing religious beliefs. The display of the crèche in the county courthouse has this unconstitutional effect." *Id.* at 621.

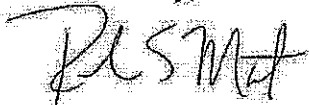
The Court further determined that the placement of the crèche on the Grand Staircase of the county courthouse contributed to its illegality because "no viewer could reasonably think it occupies this location without support and approval of the government." *Id.* at 599-600. Moreover, the Court found that the nativity scene "sen[t] an unmistakable message that [the county] supports and promotes the Christian praise to God that is the crèche's religious message." *Id.* at 600.

It is irrefutable that the crèche is a religious, Christian symbol. *See Lynch v. Donnelly*, 465 U.S. 668, 711 (1984) (Brennan, J. dissenting) (stating that the crèche is a "re-creation of an event that lies at the heart of the Christian faith"). Displaying an inherently Christian message in the lobby of city hall unmistakably sends the message that the City of Warren endorses the religious beliefs embodied in the display. When the government displays this manger scene, which depicts the legendary birth of Jesus Christ, it places the imprimatur of the city government behind the Christian religious doctrine. This excludes citizens who are not Christian—Jews, Native American religion practitioners, animists, etc., as well as the significant and growing portion of the U.S. population that is not religious at all (15% of adults), including complainants and taxpayers in Warren.

There are ample private and church grounds where religious displays may be freely placed. Once the government enters into the religion business, conferring endorsement and preference for one religion over others, it strikes a blow at religious liberty, forcing taxpayers of all faiths and of no religion to support a particular expression of worship.

We request that you immediate inform us in writing of the steps you are taking to remedy this violation of the First Amendment.

Sincerely,



Rebecca S. Markert
Staff Attorney



FREEDOM FROM RELIGION FOUNDATION

P.O. Box 750 • Madison WI 53701 • (608) 256-8900 • www.ffrf.org

March 4, 2010

The Honorable John Fouts
Mayor
City of Warren
One City Square
Suite 215
Warren MI 48093-6726

COPY

Re: Follow-up to Nativity Scene Display in Lobby of City Hall

Dear Mayor Fouts:

Our national organization, which works to protect the constitutional principle of separation between state and church, wrote to you on January 20, 2010, regarding the City's display of a nativity scene in the lobby of City Hall. To date, we have not yet received a response from you regarding our concerns.

We write again to request that you immediately inform us in writing of the steps you are taking to remedy this violation of the First Amendment. A copy of the original letter is attached for your review.

Thank you for your time and attention to this matter, we look forward to your prompt reply.

Sincerely,

Rebecca S. Markert
Staff Attorney

Enclosure

FREEDOM FROM RELIGION *foundation*

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

November 9, 2010

COPY

The Honorable John Fouts
Mayor
City of Warren
One City Square
Suite 215
Warren MI 48093-6726

Re: 3rd Follow-up to Nativity Scene Display in Lobby of City Hall

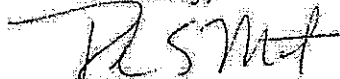
Dear Mayor Fouts:

Our national organization, which works to protect the constitutional principle of separation between state and church, wrote to you on January 20, 2010, and again on March 4, 2010, regarding the City's display of a nativity scene in the lobby of City Hall. To date, we have not yet received a response from you regarding our concerns. Enclosed please find copies of those letters attached for your review.

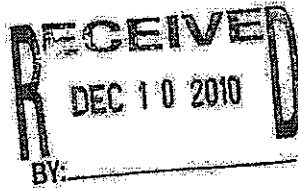
Given that the end of the year holidays are near, we renew our request for the City to refrain from displaying a nativity scene in the lobby of City Hall. We also request that you immediately inform us in writing of the steps you are taking to remedy this violation of the First Amendment.

Thank you for your time and attention to this matter, we look forward to your prompt reply.

Sincerely,


Rebecca S. Markert
Staff Attorney

Enclosure



OFFICE OF THE MAYOR
ONE CITY SQUARE, SUITE 215
WARREN, MI 48093-6726
(586) 574-4520
www.cityofwarren.org

December 8, 2010

Rebecca S. Markert, Staff Attorney
Freedom from Religion Foundation
P.O. Box 750
Madison, WI 53701

Re: Nativity Scene Display in Atrium of City Hall

Dear Ms. Markert:

I have received your November 9, 2010 letter to me objecting to the Nativity scene placed in the Warren city hall atrium.

Your objections focus on freedom of religion guaranteed by the U.S. Constitution and that the Nativity scene somehow was a violation of that constitutional right because it favors one religion over another.

I vehemently disagree with your objection.

The city of Warren in no way whatsoever shows any favoritism to any religion. All religions are welcome to celebrate their religious seasons with a display in city hall.

For example, the local Islam mosque celebrated Ramadan with a display at city hall this year. I did receive phone calls objecting to this display, but after I explained that all religions can have displays at city hall during their holy seasons, the persons objecting seem to understand.

I repeat, if any religion wants its display at Warren city hall, they are welcome.

We also have a prayer station in the city hall atrium for all religions to use. Furthermore, the National Day of Prayer is observed annually outside Warren city hall – again for **ALL** faiths. And we invite **ALL** Warren residents to use the Prayer Station and attend the National Day of Prayer ceremony.

Our Founding Fathers included freedom of religion in the Constitution to prevent any state-sponsored religion and rightly so, but to suggest that the Nativity scene implies a city-sponsored or city-promoted religion is simply inaccurate and an insult to all observers of all religions.

December 8, 2010

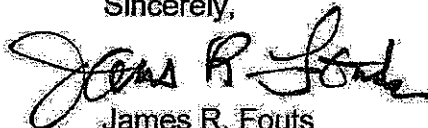
Page 2

The U.S. Supreme Court decision (County of Allegheny V. ACLU of Pittsburgh, 492 u.s. 573, 1989) does state: "... government may not engage in a practice that has the effect of promoting or endorsing religious beliefs." The city of Warren is NOT "promoting or endorsing religious beliefs." If we were doing this, other religions would not be allowed to display their religious holy seasons in our atrium. However, they have been allowed and will be allowed.

In no way, has ANY religion been excluded from displaying its holy season in city hall.

For this reason, the Nativity scene display will remain in the city hall atrium.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Fouts". The signature is stylized with a large, looped "J" and a cursive "F".

James R. Fouts
Mayor of the City of Warren

December 9, 2011

The Honorable John Fouts
Mayor
City of Warren
One City Square
Suite 215
Warren MI 48093-6726

Re: Formal Request to Display Sign

Dear Mayor Fouts:

On behalf of myself and other Warren residents who are members of the Freedom of Religion Foundation, I would like to formally request permission to display a sign near the nativity scene that is currently on display in the Atrium of the Civic Center. I request that the sign be displayed from December 12 – January 3, 2012.

The display is an attractive "sandwich board" and the dimensions are 40 ½ x 24 ½, and it reads as follows:

Front: "At this season of
The Winter Solstice
May reason prevail.
There are no gods,
No devils, no angels,
No heaven or hell.
There is only our natural world.
Religion is but
Myth and superstition
That hardens hearts
And enslaves minds."

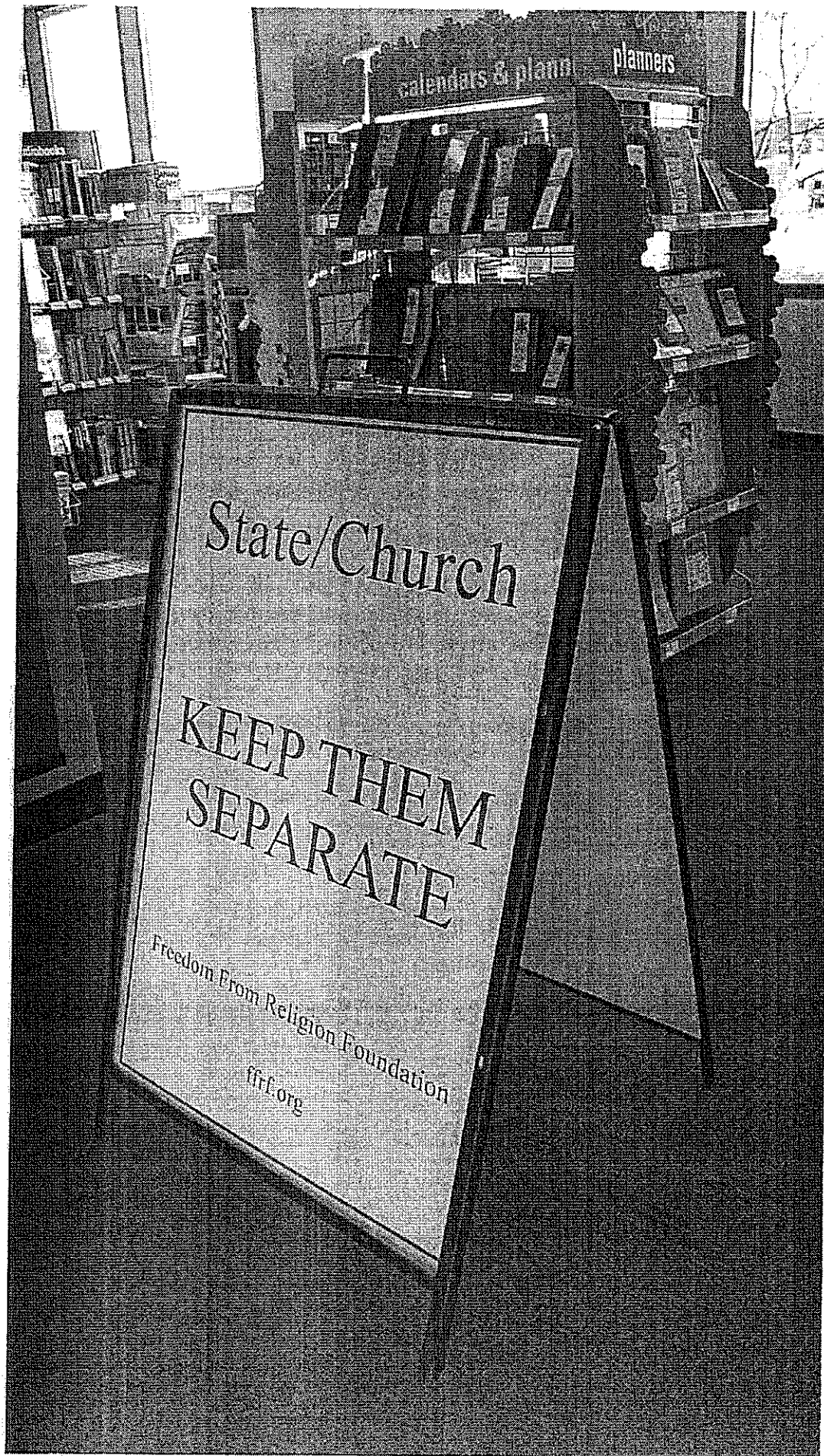
"Placed by the Freedom From Religion Foundation
On behalf of its State Members.
Ffrf.org"

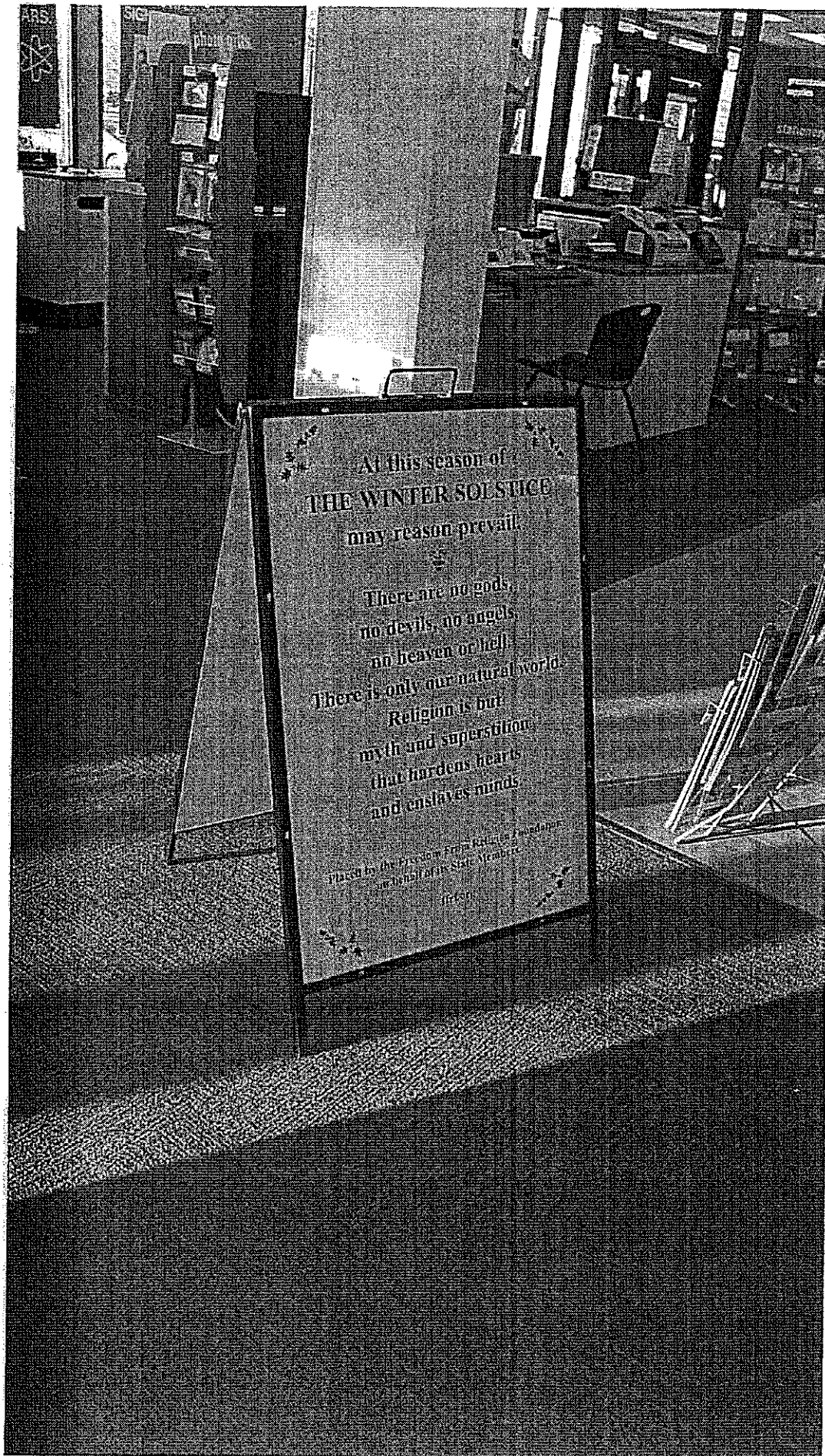
Back: "State/Church
Keep them Separate
Freedom From Religion Foundation
Ffrf.org"

Attached are photos for your convenience. Thank you for your time and attention to this matter, I look forward to your prompt reply.

Sincerely,

Douglas Marshall
Resident of Warren, MI
FFRF Member





At this season of
THE WINTER SOLSTICE
may reason prevail.

There are no gods,
no devils, no angels,
no heaven or hell.
There is only our natural world.
Religion is but
myth and superstition
that hardens hearts
and enslaves minds.

Placed by the Freedom From Religion Foundation
in honor of its State Members

11/15/01

December 14, 2011

The Honorable James R. Fouts
Mayor
City of Warren
One City Square
Suite 215
Warren, Mi 48093-6726

Re: Formal Request to Display Sign

Dear Mayor Fouts:

On December 9, 2011, I hand delivered a request (copy included) for permission to display a holiday sign in the Atrium of the Civic Center near the nativity display. I was assured by the person whom I presented the request that I would receive a response no later than December 12, 2011. Upon checking with your office in person on December 13, 2011 I am still without a response. You assured me last year, when I complained about the city allowing religious displays, that the city would allow any reasonable seasonal display. Please respond to the status of my request. At this time, I also request that the time period be extended to make up for the delay in handling this matter. Your speedy response will be appreciated.

Sincerely

Douglas J Marshall
27750 Roan
Warren, MI 48093
758-0061

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mayor
City of Warren
One City Square
Warren, MI 48093

2. Article Number
(Transfer from service label)

7010 3090 0001 4999 5533

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *Lisa Morrison* ☐ Agent ☐ Addressee

B. Received by (Printed Name) *LISA MORRISON* C. Date of Delivery *12/15/11*

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

**RESOLUTION RE-AFFIRMING THE AMERICAN VALUES OF
FREEDOM, EQUALITY AND JUSTICE**

At a regular meeting of the City Council of the City of Warren, County of Macomb,
State of Michigan, held on June 22, 2010, ^{Daylight Savings} Eastern ~~Standard~~ Time, in the Council
Chamber at the Warren Community Center Auditorium, located at 5460 Arden, Warren,
Michigan.

PRESENT: Councilpersons Kamp, Caumartin, Sadowski, Stevens, Boccomino,
Green, Liss, Vogt, and Warner

ABSENT: Councilpersons none

The following preamble and resolution were offered by Councilperson
Sadowski and supported by Councilperson Liss.

WHEREAS, as people of the diverse community of the City of Warren, Michigan,
we offer this statement in support of freedom, equality and justice, and together share a
commitment to the well-being of every person in our community, and

WHEREAS, the City of Warren believes, as stated in the Declaration of
Independence, that all people are created equal and we champion the inherent worth
and dignity of every person. We assert that ultimately all people of the world belong to
ONE HUMAN RACE. And we declare that the diversity of our world is a gift to be
celebrated, honored, and protected, and

WHEREAS, the City of Warren believes that all deserve the opportunity to reach
their full potential and that all should have equal opportunity for access to education,
health care, housing, and employment. We also believe that it is not only our civic but
also our moral responsibility to protect the right of all people to live, work, go to school,
and worship freely within our cities without the threat of discrimination or harm as a
result. And we pledge to work cooperatively in order to foster peace and build harmony,
and

WHEREAS, the City of Warren is united in speaking out against any expression of prejudice, intimidation, hate, or violence that is aimed at hurting or excluding an individual, a family, or a group of people because of who they are. We are committed to nonviolent solutions to human suffering and injustice, and join together to work for economic well-being and justice for all, and

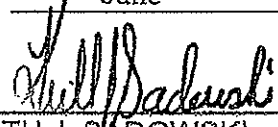
WHEREAS, let it be declared that the City of Warren believes that freedom, equality, and justice are core values of our City which need to be proclaimed, taught, and practiced in our homes, schools, and in daily lives for the health and quality of our community, and ultimately, our world.

NOW, THEREFORE, let it be resolved that the City of Warren City Council:
Stands together in support of freedom, equality and justice, and to speak out against prejudice, discrimination, and violence; works together for the betterment of our entire community; promotes nonviolence, justice, and respect for all; supports all local governments, police, schools, businesses, congregations, and non-profit organizations' efforts to protect the rights of all people and, supports the idea of community events to build bridges of understanding, relationships, and trust among people of different cultures and faith traditions.

AYES: Councilpersons: Kamp, Caumartin, Sadowski, Stevens, Boccomino,
Green, Liss, Vogt and Warner

NAYS: Councilpersons: none

RESOLUTION DECLARED ADOPTED this 22nd day June, 2010.



KEITH J. SADOWSKI
Secretary of the Council

BUTZEL LONG
ATTORNEYS AND COUNSELORS

Danielle J. Hessell
248 258 2924
hessell@butzel.com

Stoneridge West
41000 Woodward Avenue
Bloomfield Hills, Michigan 48304
T: 248 258 1616 F: 248 258 1439
butzel.com

December 20, 2011

Annette Gattari-Ross
FOIA Coordinator
City of Warren
One City Square
Warren, MI

**Re: Freedom of Information Act
Warren Atrium Nativity Scene**

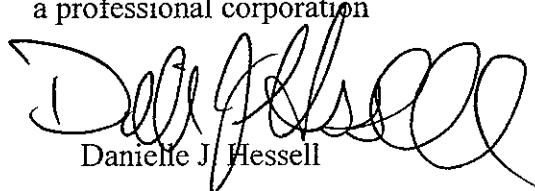
To Whom It May Concern:

Pursuant to the Michigan Freedom of Information Act ("FOIA"), MCL 15.231 *et seq.*, as amended, we hereby request a copy of the application for the Nativity Scene located in the Atrium and any related documentation demonstrating City approval and fees or monies collected including but not limited to discussion by the Downtown Development Authority, meeting minutes and written communications.

I trust this information will be supplied within the ten (10) days time limit of the Act. If the cost of this request exceeds \$100.00, please contact me in advance of any copying. Thank you for your assistance in this matter.

Respectfully submitted,

BUTZEL LONG,
a professional corporation



Danielle J. Hessell

DJH/jad



WARREN Civic Center Facilities Rental Application (574-4676)

Name Douglas J Marshall Title _____ Organization Freedom From Religion

Address 27750 Roan Dr City Warren Zip Code 48093

Phone: (home) _____ (work) _____

(cell) _____ (fax) _____

Email: _____ Expected Attendance Open to Public for Ed

Room/Facility requested & type of activity: Display in Atrium

Dates and Times Requested:

Dec 20, 2011 to Jan 8, 2012

Special Equipment Fees:

TV/VCR/DVD \$15.00/day
OH Projector \$15.00/day
Screen \$ 5.00/day
Podium w/ Mic \$25.00/day
PC Cart \$25.00/day
Internet Access \$ 5.00/day
Platform/Stage \$20.00/day

Additional Fees:

Kitchen Access \$30.00/day
Weekend Rental \$10.00/hr
(Circle Items Needed)

(Note: Additional days should be placed on a blank sheet of paper and attached to this application)

Room Set-Up Selection (Circle One) (See attached Set-up Sheet)

Conference - U-Shape Style

of Chairs 0 # of Tables 0

Conference - Square Table Style

of Chairs 0 # of Tables 0

Dining/Banquet Style

of Chairs 0 # of Tables 0

Theater Style

of Chairs 0 # of Tables 0

Classroom Style

of Chairs 0 # of Tables 0

Other

of Chairs 0 # of Tables 0

Will Food Be Served? YES NO X Catered? YES NO X (License and Insurance Required)
Will Alcohol Be Served? YES NO X If Yes, by whom _____ (Liquor License Required)
Will You Require Use of the Kitchen? YES NO X
Will You Require Communications Assistance? YES NO X

I hereby make this application for the use of a Warren Civic Center Building facility on the date and hours stated. I also verify that the information on the application is true and I have read and agree to abide by the rental policy pertaining to the use of said facility as adopted by the Warren Downtown Development Authority. I also agree to the fee charged, and shall be responsible pertaining to the use of the facility in accordance with the rental policy. I have read and agree to the Warren Civic Center Building Rental Policies and Rules which were provided to me at the time that my rental application was submitted.

ALSO NOTE: The renter will be held responsible and charged a fee for any missing equipment such as cables, after use of any of the rooms. I further agree to indemnify, defend and save harmless the Warren Downtown Development Authority and the City of Warren, its officers, agents and employees from and against all loss or exposure (including costs and attorney fees) by reason of liability imposed by law upon the Warren Downtown Development Authority and the City of Warren, its officers, agents and employees for damages because of bodily injury, including death at any time resulting therefrom, sustained by any person or persons, or on account of damage to property including loss of use thereof, arising out of or in consequence of the performance of this application, whether such injuries to persons or damage to property is due or claimed to be due to the negligence of the contractor, the Warren Downtown Development Authority, the City of Warren, its officers, agents and employees, excepting only such injury or damage as shall have been occasioned by the sole negligence of the Warren Downtown Development Authority, the City of Warren, its officers, agents and employees.

SIGNATURE Douglas J Marshall DATE 12/20/11

APPLICANTS DRIVERS LICENSE# _____

(Must be 21 years of age or older)