

# FREEDOM FROM RELIGION *foundation*

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October 8, 2020

**SENT VIA EMAIL AND U.S. MAIL:**

**police@shreveportla.gov**

Ben Raymond  
Chief of Police  
Shreveport Police Department  
1234 Texas Avenue  
Shreveport, LA 71101

Re: Unconstitutional religious display

Dear Chief Raymond:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation occurring in the Shreveport Police Department (the Department). FFRF is a national nonprofit organization with more than 33,000 members across the country, including members in Louisiana. 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 community member contacted FFRF to report that a portrait depicting Jesus Christ has been set up in a hallway of the police department. It is our understanding that it is prominently displayed in a hallway where members of the public wait to be interviewed by police officers. Please see the enclosed image. Additionally, we have been made aware of a series of poems entitled “My Story of Jesus” that have been posted in common work spaces.

The Establishment Clause of the First Amendment to the U.S. Constitution prohibits government endorsement of religion. The Supreme Court has said time and again, that the “First Amendment mandates government neutrality between religion and religion, and between religion and nonreligion.” *McCreary County, Ky. v. American Civil Liberties Union of Ky.*, 545 U.S. 844, 860 (2005); *see also Wallace v. Jaffree*, 472 U.S. 38, 53 (1985); *Epperson v. Arkansas*, 393 U.S. 97, 104 (1968); *Everson v. Board of Ed. of Ewing*, 330 U.S. 1, 15–16 (1947).

It is inappropriate for the Department to display this religious content because it conveys government support for religion. The Supreme Court has ruled, “[t]he Establishment Clause, at the very least, prohibits government from appearing to take a position on questions of religious belief.” *County of Allegheny v. American Civil Liberties Union Greater Pittsburgh Chapter*, 492 U.S. 573, 593–594 (1989). Like the Ten Commandments posting in county buildings in *McCreary* and the crèche display on county land in *Allegheny*, this display is unconstitutional

under the precedent of *Lemon v. Kurtzman*, 403 U.S. 602 (1971). A reasonable observer would view the display as an endorsement of religion by the Department.

These displays convey a message to non-Christians that they are “outsiders, not full members of the political community and an accompanying message to adherents that they are insiders, favored members of the political community.” *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 309–10 (2000) (internal quotations omitted). These citizens should not be made to feel excluded, like outsiders in their own community, because the law enforcement they support with their taxes prominently displays religious iconography and poetry in its office. While many members of the community may support this religious sentiment, a significant proportion will feel alienated, including the 26% of American adults who identify as non-religious.<sup>1</sup>

The Department serves all citizens regardless of their personal religious beliefs. Neither the portrait of Jesus, nor the poetry relate to legitimate government business and sends a divisive message to many residents of Shreveport.

To avoid further Establishment Clause concerns, we ask that the portrait and poems be removed. Additionally, the Department should refrain from promoting religious displays of this nature in the future. Please inform us in writing of the steps taken to remedy this constitutional issue. Thank you for your time and attention to this matter, and I hope this letter finds you in good health.

Sincerely,

A handwritten signature in black ink, appearing to read 'BJ', with a long horizontal flourish extending to the right.

Brendan Johnson, Esq.  
*Robert G. Ingersoll Legal Fellow*  
*Freedom From Religion Foundation*

BCJ:kg

Enclosure

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<sup>1</sup> *In U.S., Decline of Christianity Continues at Rapid Pace*, PEW RESEARCH CENTER (Oct. 17, 2019), available at <https://www.pewforum.org/2019/10/17/in-u-s-decline-of-christianity-continues-at-rapid-pace/>.

