

# FREEDOM FROM RELIGION *foundation*

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April 1, 2024

SENT VIA EMAIL & U.S. MAIL: [president@sc.edu](mailto:president@sc.edu)

Michael Amiridis  
University of South Carolina  
Osborne Administration Building  
Columbia, SC 29208

Re: Basketball Coach Promoting Religion and Denigrating Non-Christians

Dear President Amiridis:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding serious constitutional concerns with Dawn Staley's ongoing promotion of her personal religious beliefs and her denigration of non-Christians through the women's basketball program. FFRF is a national nonprofit organization with more than 40,000 members across the country, including members in South 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.

First, we would like to congratulate the South Carolina Women's Basketball team for making the Final Four. Coach Staley and every player on the team undoubtedly worked very hard and deserves the praise they have received for their incredible season.

We write, however, because Coach Staley continues to violate the Constitution and the rights of players by promoting her personal religious beliefs through the women's basketball program. We first wrote to the University regarding this issue in 2021. We wrote again in 2022. Since we first brought this issue to the University's attention, Coach Staley has only ramped up her use of religious rhetoric in official communications through her role as a university employee, including insulting those who don't believe in the Christian god.

On Sunday, Dawn Staley spoke with ESPN reporter Holly Rowe courtside following the game where "she gave all glory to God," and said that there is something "wrong" with those who don't believe in God:<sup>1</sup>

"God is really funny," Staley said with confetti in her hands. "He's really funny. The devastating loss that we had last year, he put us back here with a totally different team. **If you don't believe in God, something is wrong with you. Seriously! I'm a believer.** I'm a believer because he makes things come true. When you're at your worst, he's at his best. Look at him!"

She has also continued her practice of preparing "gameday devotional" for players and sharing these chosen bible verses on her social media pages as "Head Coach of South Carolina Women's Basketball." Her X account is directly linked to the South Carolina Women's Basketball account. She continues to

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<sup>1</sup> <https://www.foxcarolina.com/2024/04/01/staleys-praises-god-post-game-comments-sparking-conversation/>

describe each game as “Jesus versus” whoever the team’s opponent is. Please see the enclosed screenshots.

Coach Staley’s inappropriate and unconstitutional actions are common throughout college sports. FFRF released a report in 2015 entitled “Pray to Play” that condemned more than 25 public universities for allowing football coaches to impose their personal religion on players by hiring Christian chaplains.<sup>2</sup> It seems that in this case, Coach Staley has not hired a Christian chaplain to impose religion on her players, but has done so herself, creating a Christian environment within the basketball program that excludes non-Christian and non-religious players. Her recent comments directly target non-Christians.

As you are aware, the University of South Carolina “values diversity, equity and inclusion,” and recognizes that its “campus community can truly thrive only when those of all backgrounds and experiences are welcomed and respected.”<sup>3</sup> We wholeheartedly agree. Current and future non-Christian and nonreligious players should feel welcome and respected as part of the women’s basketball team, not be told by their coach that they are on a team that is representing Jesus and that “if you don’t believe in God, something is wrong with you.”

The Supreme Court has continually struck down school-sponsored proselytizing in public schools. *See, e.g. Abington Township Sch. Dist. V. Schempp*, 374 U.S. 203 (1963) (declaring unconstitutional devotional Bible reading and recitation of the Lord’s Prayer in public schools); *Engel v. Vitale*, 370 U.S. 421 (1962) (declaring prayers in public schools unconstitutional); *Lee v. Weisman*, 505 U.S. 577 (1992) (ruling prayers at public school graduations an impermissible establishment of religion); *Sante Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290 (2000) (striking down a school policy that authorized students to vote on whether to hold a prayer at high school football games). In all of these cases, the federal courts have struck down school prayers because it constitutes a government advancement and endorsement of religion, which violates the Establishment Clause of the First Amendment.

In *Mellen v. Bunting*, the Fourth Circuit Court of Appeals, which has jurisdiction over South Carolina, extended the scope of the aforementioned cases from primary and secondary schools to college-aged students when institutional circumstances create a coercive religious environment. *Mellen v. Bunting*, 327 F.3d 355 (4th Cir. 2003). The court found that mealtime prayer at a state military college (VMI) was an unconstitutional violation of the Establishment Clause given the coercive atmosphere.

The University of South Carolina’s authority over student athletes is similar to that of VMI in that much of the players’ conduct is closely monitored, directed and critiqued by coaching staff. Players trying to please the coach of a highly successful basketball program surely will feel immense pressure to participate in religious activities and go along with Coach Staley’s proselytizing. Non-Christian players would not dare to make their personal beliefs known because Coach Staley has made it known that USC’s women’s basketball program is for Christians.

It is no defense to call these religious messages and activities “voluntary.” In *Mellen v. Bunting*, the court explained that “...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.’” 327 F.3d at 372. The Supreme Court has summarily rejected arguments that voluntariness excuses a constitutional violation. In *See, generally, Lee v. Weisman*, 505 U.S. at 596 (“It is a tenet of the First Amendment that the State

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<sup>2</sup> <https://ffrf.org/images/PraytoPlayReport.pdf>

<sup>3</sup> <https://sc.edu/experience/diversity-inclusion/index.php>

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...”).

Coach Staley’s team is full of young and impressionable student athletes who would not risk giving up their scholarship, giving up playing time, or losing a good recommendation from the coach by speaking out or voluntarily opting out of her unconstitutional religious activities—even if they strongly disagreed with her beliefs. Coaches exert great influence and power over student athletes and those athletes will follow the lead of their coach. This is especially true for powerhouse programs like the University of South Carolina’s women’s basketball team that have had so much success. Using a coaching position, especially one of this stature, to promote Christianity amounts to religious coercion.

The University of South Carolina should not lend its power and prestige to religion. Thirty-seven percent of the American population is non-Christian, including the almost 30 percent<sup>4</sup> who are nonreligious. At least a third of Generation Z (those born after 1996) have no religion,<sup>5</sup> with a recent survey revealing almost half of Gen Z qualify as “nones” (religiously unaffiliated).<sup>6</sup> Staley’s religious activities and denigrating comments alienate and exclude a significant portion of your students.

The University of South Carolina must take action to protect its student athletes and to ensure that Staley understands that she has been hired as a basketball coach and not a pastor. We once again request that Staley be educated as to her constitutional duties under the Establishment Clause. She may not promote religion in her capacity as head coach. We further request notification in writing of the actions the University is taking to ensure that Staley will not continue to proselytize to her players.

Sincerely,



Christopher Line  
Staff Attorney  
Freedom From Religion Foundation

Enclosures

Cc: Julian R. Williams, VP Office of Access and Opportunity, via  
**julian.williams@sc.edu**

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<sup>4</sup> Gregory A. Smith, *About Three-in-Ten U.S. Adults Are Now Religiously Unaffiliated*, Pew Research Center (Dec. 14, 2021), [www.pewforum.org/2021/12/14/about-three-in-ten-u-s-adults-are-now-religiously-unaffiliated/](http://www.pewforum.org/2021/12/14/about-three-in-ten-u-s-adults-are-now-religiously-unaffiliated/).

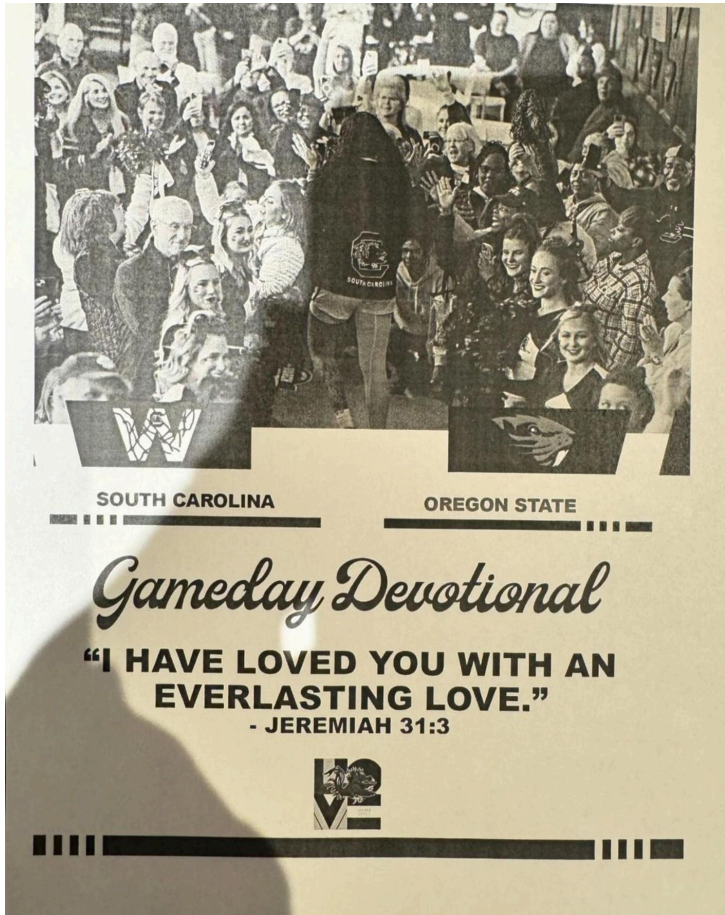
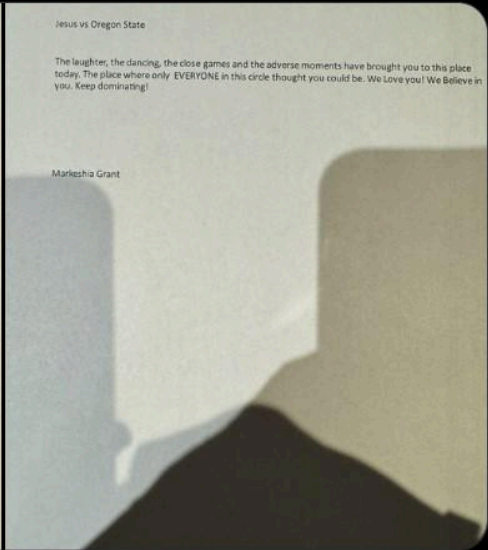
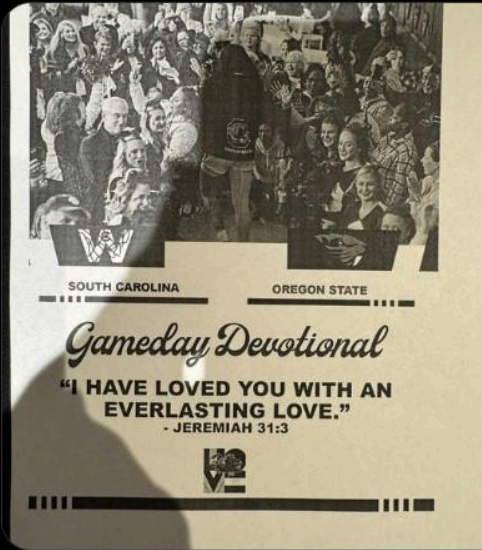
<sup>5</sup> Samuel J. Abrams, *Perspective: Why even secular people should worry about Gen Z’s lack of faith*, Deseret News (Mar. 4, 2023), [www.deseret.com/2023/3/4/23617175/gen-z-faith-religious-nones-civic-life-volunteers-charity](http://www.deseret.com/2023/3/4/23617175/gen-z-faith-religious-nones-civic-life-volunteers-charity)

<sup>6</sup> 2022 Cooperative Election Study of 60,000 respondents, analyzed by Ryan P. Burge  
[www.religioninpublic.blog/2023/04/03/gen-z-and-religion-in-2022/](http://www.religioninpublic.blog/2023/04/03/gen-z-and-religion-in-2022/).



dawnstaley @dawnstaley · Mar 31

Pregame meal done. Check! @GamecockWBB #love



## Jesus vs Oregon State



**dawnstaley**   @dawnstaley · 17h

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To God be the Glory!! Thank you to all of our prayer warriors who call on the main line to help get us to another final four. I am not ashamed to praise him for what he continues to do for me and mine. If you're a nonbeliever it wasn't for you-wish you well with your beliefs 🙏