

Religious Liberty and COVID-19 Restrictions in the State of California: A Case Study of Grace Community Church

Akinlabi Adewuyi

The ongoing pandemic has again brought religious freedom to the limelight as governmental restrictions hinder religious activities. The novel coronavirus disease, also known as COVID-19, is an infectious disease caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).¹ Due to its rapid spread worldwide, the World Health Organization (WHO) declared it a pandemic, and authorities are racing to combat it.² Americans possess fundamental rights to exercise religion and assemble as protected by the First Amendment of the United States Constitution.³ However, the government can temporarily restrict those rights to protect public health. The Constitution allows such restrictions as long as they are applied equally to secular activities.

When the deadly coronavirus arrived in the United States, both government and religious organizations took necessary actions to keep people safe. Many religious denominations complied with a government order to cease in-person worship as scientists projected high fatality rates. Many feared COVID-19 could turn out to be another major calamity like the 1918

Spanish flu that claimed millions of lives. After months of lockdowns, scientists began to publish data revealing that the virus was not as deadly as previously projected, and as such, governments began to relax some of their regulations. However, some religious leaders have questioned the legality of the early and ongoing government restrictions relating to religion and places of worship as they were concerned about unfair and discriminatory practices.

In the State of California, the leadership of the Grace Community Church (GCC) in Los Angeles published an article titled "Christ, not Caesar, Is Head of the Church."⁴ In this article, GCC argued that the State does not have the power to meddle in ecclesiastical matters. They believed that the Bible commands the Church to honor civil authorities unless "officials attempt to subvert sound doctrine, corrupt biblical morality, exercise ecclesiastical authority or supplant Christ as head of the church in any way."⁵ They claimed that some of the California governmental restrictions to protect public health during COVID-19 exercised ecclesiastical authority, which they are not authorized to do. Specifically, the government improperly placed a limit on gathering and ban singing and chanting at places of worship. Therefore, the leadership of GCC defied state and local regulations on the grounds of biblical and constitutional rights and resumed in-door services. The Los Angeles Times (L.A. Times) reported on "thousands of congregants sitting side by side" without masks as they "hugged and sang hymns and shook hands" during services.⁶

This paper will argue that the position of GCC is constitutionally sound but biblically deficient. This paper will first examine the arguments guaranteeing the separation of Church and State as expressed in the Bible and the Constitution. Secondly, the paper will examine recent opinions of the Supreme Court on the

State of California COVID-19 restrictions on religious activities. Thirdly, this paper will examine the actions of GCC with respect to the biblical command of love by looking at examples of the relationship between Church and State during the 1918 Spanish flu pandemic. Finally, this paper will conclude that GCC needs to balance its religious rights and freedom with biblical responsibilities toward others.

Separation of Church and State

The phrase “separation of Church and State” first appeared in the reply of Thomas Jefferson to the Danbury Baptists where he assured them that there would be no state-established church and the First Amendment of the Constitution would guarantee their freedom of religion without government interference.⁷ In this letter, Jefferson asserted that “religion is a matter which lies solely between Man and his God.”⁸ However, the concept of separation existed long before then and is rooted in biblical teachings. The Bible established three distinct institutions, echoing “separation” among them in its narratives.

Three Institutions

The Bible discusses establishing three institutions in any society: the family, the civil authority, and the Church. Each of these institutions serves God’s purpose with jurisdictional limits, and when any of these institutions overstep its boundaries, trouble is inevitable.

The institution of family was the first to be established. According to the record in Genesis, almost immediately after creating the universe, God established the home by creating male and female and placing them together in a conjugal union. Genesis 2:24 says, “This is why a man leaves his father and mother and bonds with his wife, and they become one flesh.” Several passages in the Bible address the purpose and the

practices of the family, such as Matthew 19:1- 9, Ephesians 5:22-33; 6:1-4; 1 Corinthians 7; 1 Peter 3:1-7.

After the establishment of the family, God established civil authority (government). Civil authority addresses human relationships with one another. The first hint of this institution was the establishment of capital punishment in Genesis 9:6, which says, “Whoever sheds human blood, by humans his blood will be shed, for God made humans in his image.” Rev. Timothy Benefield rightly asserts that the chief purpose of any civil authority is to protect its citizens, beginning with the precious life God gave as gifts.⁹ In his introduction to *Two Treatises on Civil Government*, Henry Morley says, “Men equal by nature seek communion and fellowship with others, to supply the defects that are in them when living singly and solely by themselves. This was the cause of men's uniting themselves at the first in politic societies: which societies could not be without government.”¹⁰ The Bible further affirms that God created civil authorities in Rom. 13 and exhorts Christians to submit to them (Rom. 13:1-7) as long as they do not violate God's commands (Acts 5:29).

The last of the three institutions established was the Church. This last institution addresses the relationship between man and God. The Church is an assembly of believers whom the blood of Christ has saved (Acts 2:47; Romans 6:1-11; Galatians 3:26-27; Colossians 1:13). It was formed on the “foundation of the apostles and prophets, with Christ Jesus himself as the cornerstone” (Eph. 2:20). The Scripture details the policies and the doctrines that govern the structures and operations of the Church.

The Theme of “Separation”

Beginning with Abraham, the Bible echoes the theme of separation. Abraham was told to separate from the corrupt idolatry environment in which he found himself (Gen. 12), the Levites

to separate from the people (1 Chr. 23:13; Deut. 10:8; Deut. 32:8) the Israelites, God's chosen race, to separate from the world around them by remaining pure in marriage, building and rebuilding fortified walls of protection from the outside world and so on (Ex. 34:11-16; Ezra 6:21, 10:1; 1 Kings 8:53).

The New Testament recognizes the separation between God and Caesar, a concept that furthers separating Church and State. Jesus instructed believers to "give, then, to Caesar the things that are Caesar's and to God the things that are God's" (Matt. 22:21). Caesar, meaning the civil government, and God, meaning the spiritual government. It can be deduced from Jesus' statement that both authorities are to be honored. The doctrine of two swords was later carved out of Jesus' discourse in Luke 22:38 to mean two separate but co-equal powers: the sacred authority of the priest and the State to govern the world.¹¹

Apostle Paul exhorts Christians not to conform to the world (Rom. 12:2) but "to come out and be separate" from the temptations of the world by living a pure and righteous life. To cap these thoughts, the Bible speaks of the State as an institution created by God, and believers must honor and obey its rulings (Rom. 13:1-7), except when it runs afoul of the laws of God (Acts 5:29).

The dualistic theme of separation such as Israel and the world, Spirit and Flesh, God and Satan, Heaven and Hell, and others continues to guide the Church's teachings. For example, the Didache calls for a separation from the world by choosing the way of life in contrast to death.¹² These separation teachings developed into monastic living, where believers withdrew from a hostile and sinful world governed by political authorities to quiet and pietistic living in monasteries. Augustine's book, *City of God*, echoed some of this thinking.¹³

The "two-swords" theory was further developed in Roman Catholic theology to mean the spiritual sword and the temporal sword. They

believed Christ handed both the spiritual sword and the temporal sword to "the highest being in the world – the pope, the vicar of Christ."¹⁴ The pope wields the spiritual sword and has delegated the temporal sword for civil leadership to civil authorities.¹⁵

Persecution and Separation

As history shows, the plea for church and state separation resounds continually as a basis to end persecution either from the tyrannical rule of the State or the overreaching arms of religious leaders vested with political powers. The persecuted Anabaptists, for instance, separated themselves into smaller communities governed by biblical principles without appeal to State and secular laws.¹⁶ Roger Williams, an Anabaptist separatist who founded Rhode Island, advocated for a "hedge or wall of separation between the Garden of the Church and the wilderness of the World" in 1643.¹⁷ These thoughts continued to guide American Baptists as "they strove for freedom from state control of their assembly and worship, and state regulations of their property and polity."¹⁸

Many thinkers and philosophers advocated for the separation between Church and State during this time. One of them is John Locke, whose *Letter Concerning Toleration* significantly influenced the Enlightenment era. Locke's work proposed religious toleration as the answer to the problem of religion and government.¹⁹ Several American founders benefited from his wisdom. Of particular reference is Thomas Jefferson, who fought for religious liberty and freedom in Virginia and ultimately for the United States.²⁰ Separating Church and State was a popular idea at the drafting of the United States Constitution. The founding fathers included the First Amendment as a protection for the Church from the State. They believe "every Church has (the) right to judge in what manner God is to be worshipped

by them, and what form of discipline ought to be observed by them.”²¹

The Constitution and Supreme Court Opinions

The First Amendment to the United States Constitution states that:

Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.²²

With the ratification of the Fourteenth Amendment of the United States constitution, this amendment takes precedence over any State constitutions on these issues.²³ The Supreme Court's decision in *Everson v. Board of Education* (1947) further holds that the First Amendment does not apply to Congress alone but to government at all levels.²⁴ Justice Hugo L. Black opined for the Court that "the first amendment has erected a wall of separation between Church and State.

That wall must be kept high and impregnable. We could not approve the slightest breach."²⁵ Justice Black, in subsequent cases, emphasized that "a union of government and religion tends to destroy government and to degrade religion."²⁶

The Supreme Court's decision in *Employment Division v. Smith* (1990) further upholds religious freedom. It held that any burden of free exercise of religion must be neutral and generally applicable.²⁷ In recent rulings, the Supreme Court sustained that government regulations must be "neutral and generally applicable." Where the regulations are found faulty, "a strict scrutiny under the Free Exercise Clause" will be triggered to determine if those regulations serve as disfavor to religious exercise in favor of secular activities (*Roman Catholic Diocese of Brooklyn v. Cuomo* (2020),

South Bay United Pentecostal Church v. Newsom (2021), and *Tandon v. Newsom* (2021).

Supreme Court and the State of California COVID- 19 restrictions

The State of California, like other states, took proactive measures in its fight against COVID-19. On January 26, 2020, California reported her first coronavirus case in Orange County. By the end of February, many counties had declared a state of emergency. Governor Gavin Newsom declared a state of emergency on March 4 due to the increasing menace of COVID-19.²⁸ On or about March 19, 2020, the State issued a stay-at-home order that prohibited all in-person worship services indefinitely until the pandemic subsided. Most churches complied with this directive without protest in their struggle against COVID-19. Many used technology to stream worship services, while others devised novel means of meeting the needs of their congregation.

As the pandemic progressed, scientists gathered additional data that significantly reduced the initial horrific projections of death.²⁹ In light of this, many believed things would ease up sooner. On or about May 25, 2020, the Californian government announced the re-opening of places of worship with prescribed guidelines to protect public health. However, the State updated its worship guideline on July 1, 2020, "to discontinue singing and chanting" which are essential activities for worship.

Upon issuing this directive, which many has tagged as a "worship ban," Christian leaders and Churches quickly petitioned the Court, arguing that such a directive is discriminatory and unconstitutional. They claimed such directives infringe on their constitutionally protected religious freedom because the same limitation does not apply to secular organizations.

Restaurants, hotels, malls, bars, and other establishments were not subjected to a ban on singing or chanting. It also did not help that

liquor stores and gun shops were considered "essential" while worship is considered "non-essential." So the ban on large gatherings, social distancing mandates, the ban on singing and chanting, as well as many others, some of which adversely affected religious worship, became the basis of contention.

Several courts had opined on these lawsuits to the Supreme Court over the last year. However, recent Supreme Court rulings found that specific aspects of California's COVID-19 restrictions on places of worship and religious activities were not "neutral and generally applicable"³⁰ as they should be under the Free Exercise Clause of the First Amendments. The Court emphasized the following four main points in reaching its decision as established in *Roman Catholic Diocese of Brooklyn v. Cuomo* (2020), *South Bay United Pentecostal Church v. Newsom* (2021), and *Tandon v. Newsom* (2021), the most recent.

First of all, the Supreme Court stated that when government guidelines "are not neutral and generally applicable," they "trigger strict scrutiny under the Free Exercise Clause," primarily "whenever they treat any comparable secular activity more favorably than religious exercise."³¹ The Court observed that the Californian government treated secular and religious activities differently by approving businesses (such as hair salons, retail stores, personal care services, and movie theaters) to gather more than three households at a time but denying at-home religious activities such as group Bible studies and prayer meetings.³²

Secondly, the Supreme Court stressed that the yardstick for determining risk should be comparable for secular and religious activities under the Free Exercise Clause. In defining comparability, the Court said, "comparability is concerned with the risks various activities pose, not the reason why people gather."³³ The Court noted that the State of California had not sufficiently proven that public health is at risk if specific religious activities were allowed. Instead, the State was concerned that those

participating in religious activities in private settings were not exercising sufficient caution. However, the Court questioned why the ban on singing and chanting activities targeted religious institutions, but such activities were left untouched in secular settings such as restaurants and karaoke.

Thirdly, the Supreme Court noted that since the regulations were found not to be "neutral and generally applicable" as explained above, the state government had the responsibility of satisfying the strict scrutiny law requirement of the Free Exercise Clause but had failed to do so. The Court asserted that strict scrutiny would require the government to prove that religious activities pose more risks than similar secular activities or that less restrictive regulations would jeopardize public health, but it had not done so. Instead, the Government of California estimated significant risks from religious gatherings and lesser risks from the secular gatherings of comparable numbers.

Fourthly, the Supreme Court asserted that the withdrawal or the modification of COVID-19 restrictions by the government, while a case is in litigation, cannot moot a case entitled to emergency injunctive relief. The Court reasoned that if a decision is not reached, the State may impose harsher or stricter regulations later. This fourth consideration was necessary because even though the guidelines were not presently in effect, the Court's opinions will guide future situations.

Beyond the walls of Church, the Court noted other regulations that failed the criteria as mentioned above. In *Tandon v. Newsom* 593 U.S.____(2021), the Supreme Court ruled against a California directive that placed a limit on gatherings of religious activities such as at-home Bible studies and prayer meetings in private homes to less than four families at a time. The Court opined that such regulations treat similar secular activities (such as hair salons, retail stores, and concerts) kindlier than at-home religious exercise."³⁴

The Church and the 1918 Spanish Flu

The last severe pandemic, known as the Spanish Flu, swept over the United States about 100 years ago. This disease claimed the lives of about 50 million people worldwide and about 675,000 in the United States.³⁵ Many states and localities ordered the temporary closure of churches as part of their effort to slow the spread of the disease. Most pastors and churches agreed to suspend services.³⁶ The L.A. Times reported on October 13, 1918, that "church doors are closed today to assemblages for public worship for the first time in the history of Los Angeles. In compliance with the demands of health authorities, to which the churches have given cheerful acquiescence."³⁷

While most pastors and churches complied with the ordinance to close churches, some challenged the legality of the imposed regulation in their various cities as the number of new cases began to decline. They claimed a violation of their God-given right and the Constitution of the United States. For example, the pastor of Murray Baptist Church, Reverend Harvey Boyce Taylor, in Murray, Kentucky, was arrested in his pulpit for violating the state order closing churches and other amusement places.³⁸ In his defense before the jury, he pleaded not guilty because he believed the State order violated his God-given rights and the Constitution of the United States. However, he requested the jury to declare the Judge and other county officials guilty of disturbing religious worship "because they had violated the laws of God and federal constitution." At the end of the court proceedings, the jury found Rev. Taylor guilty, and he was fined \$100.³⁹

The L.A. Times reported the arrest of five Christian Scientists on December 12, 1918, for violating the Los Angeles' ban on public gathering.⁴⁰ They claimed the ordinance violated their constitutionally protected rights as stated in

the Fourteenth Amendment. The Police Judge that presided over their case dismissed their charges because the ban "was arbitrary, special legislation, and violative of the constitution." The Judge held that the city had "a legal right to prevent gatherings and to prohibit meetings," but that the passed ordinance "was faulty in that it singled out churches, theaters, and certain amusements, and did not make illegal gatherings in hotel lobbies, stores, streetcars, etc." The ordinance "illegally conferred upon the Health Commissioner the right to determine which public gatherings are dangerous to public health and which could be permitted."⁴¹ In today's legal verbiage, the Judge would say the order is neither neutral nor generally applicable.

The closure of churches does not mean the end of worship—preachers devise novel ways of ministering to the needs of their parishioners. For example, some pastors in the District of Columbia obtained permits and worshiped outside their building before outdoor gatherings were banned. Several pastors printed portions of their sermons in the newspaper.⁴² The Reverend J.F. Hoick of St. Paul's Lutheran Church employed the service of Boy Scouts to deliver Sunday School lessons and sermon scripture references for the spiritual growth of his congregation.⁴³ It appears that those pastors did not view the temporary ban on gathering as a hindrance to worship; instead, they were concerned about the physical and spiritual health of their parishioners. They encouraged home to worship and hoped "that the temporary prohibition of the assemblage of people for religious meetings will tend to revive practical home worship, which has become a sadly-neglected function in religious life."⁴⁴

In October 2020, a Methodist District in Minnesota reviewed their records to learn how the Methodist Church weathered the 1918 Spanish flu in their State. In their account, they noted that the "quarantine regulations demobilized Sunday School, Epworth Leagues, and church services but did not stop the pastors"

from ministering to the souls and bodies of their parishioners.⁴⁵ Despite the restriction on church services, the pastors “cared for the sick, buried the dead, and comforted the sorrowing.”⁴⁶

While the pandemic lasted, most pastors and elders of the Church cooperated with the government to protect public health from rampant influenza that plagued their communities. When the ban was lifted, they rejoiced in thanks to God as they again had fellowship together. Reverend J. Francis Grimke remarked in his first sermon after the ban was lifted that “if avoiding crowds lessens the danger of being infected, it was wise to take the precaution and not needlessly run-in danger and expect God to protect us.”⁴⁷

Polarized Community

Why would Grace Community Church take such a bold stand amid the pandemic? Could it be a direct result of the polarization caused by the political atmosphere in the country? Before the COVID pandemic, the already polarized groups in American society had shifted even further apart with the election of the former president of the United States, Donald Trump. His grandiloquence and agendas had immense effects on religious freedom. From his declaration that Jerusalem was the capital of Israel to bans of visitors and immigrants from primarily Muslim countries, Muslim-Americans were losing their constitutionally protected religious freedom.

Conservative Christians concerned that the LGBTQ movement will eventually interfere with religious liberty under the leadership of the Democratic Party saw Trump as their savior and voted for him. Despite his lifestyle being at odds with Christian beliefs, many evangelicals embraced him and emitted sighs of relief as he was reversing ‘the devil’s agenda’ propagated by the Democratic Party under Trump’s predecessor, Barack Obama. To Conservative Christians, Republican leadership is the savior, and Democratic Party leadership the foe.

John MacArthur is one of those conservatives. His position on the 2020 election was that Christians should punch the Republican ticket at the ballot box because the agenda of the Democratic Party is gruesome. MacArthur defended his position, saying, “there is no way that a Christian could affirm the slaughter of babies, homosexual activity, homosexual marriage or any kind of gross immorality.”⁴⁸

It appears that the alignment of MacArthur with the leadership of Trump strengthened his decision to defy government authority. Shortly after the commencement of their civil disobedience, MacArthur said, “he has received encouragement from President Donald Trump and cannot think why any thinking Christian could vote for a Democrat.”⁴⁹

Analysis of GCC’s position

The position of Grace Community Church is constitutionally sound. As noted earlier, the Supreme Court has opined that California’s regulation was not neutral nor generally applicable. GCC should be commended for taking a bold stand for religious liberty. In recent years, much legislations has been passed making it difficult for Americans to follow the dictates of their conscience as the founders intended. For example, if the current version of the Equality Act before the Senate is passed, religious freedom may not be guaranteed in some issues. Two legal experts with the Heritage Foundation have commented that if the current version is passed, it will “prohibit anyone from even arguing that its enforcement interferes with the fundamental right to practice religion.”⁵⁰

While GCC’s position may be constitutionally sound, it does not perfectly align with the Church’s mission. The mission of the Church is to evangelize the world (Matt. 28:19-21). Engaging in civil disobedience as the response to the temporary and purposeful restriction may hinder evangelism in the community. The second

most significant law Jesus gave the Church is the command to love neighbors. Apostle Paul encouraged the Church to see others as more important and look out for their interest (Phil. 2:3-4).

GCC seems to be more concerned about having in-door worship at the expense of public health by worshiping without masks and social distancing. Although they claimed to “care about people” and “believe guarding public health against serious contagions is a rightful function of Christians,” their actions undermined these statements.⁵¹ Along with other reputable health organizations, the CDC has emphasized the importance of wearing masks to protect oneself and others. The CDC noted in their research that a “mask substantially reduces exhaled respiratory droplets and aerosols from infected wearers and reduces exposure of uninfected wearers.”⁵² Jenna Ellis, Church attorney (also Trump attorney), argued against the need to wear masks by stating that the virus is not deadly and the rate of survival from infection is 99.8%.⁵³ Nevertheless, the question we should be concerned with is – what about the remaining 0.02%, or over 500,000 people who have died from COVID-19? Are their lives not meaningful? Biblical teachings champion the phrase “all lives matter,” and every life is meaningful before God. Jesus told parables of the “Lost Coin” that teaches of God’s special love that goes the extra mile to find the lost people. How are those values portrayed in these actions? Should the community become a hot zone for COVID-19? How will the church witness Christ to a bereaved community suffering from recklessness?

Several community members protested to remind the Church of their biblical responsibilities, but they are too concerned about claiming their constitutional rights. The Los Angeles Times reported that “outside the church walls, neighbors plead with congregants to consider the health implications” for their community.⁵⁴ One of them held signs outside the

Church each Sunday that states her interpretation of the Bible “love thy neighbor and wear a mask.” True love is often displayed when Christians put the needs of others first. Garvin Ortlund was right when he said, “one way [Christians] can love [their] neighbors is by helping to stop the spread of a dangerous and highly infectious disease.”⁵⁵

GCC claimed jurisdictional overreach by the government. They said that by imposing temporary restrictions on gathering and worship, the government has “exceeded their legitimate jurisdiction.” The wall of separation between State and Church becomes more fragile when public health is involved because the two institutions of Church and State overlap and make demands of the same people. In other instances, related to health, however, the Church abides by State mandates. For example, churches observe the State’s health code concerning the handling of food to protect the public. Whereas the Church is autonomous, they abide by state codes and regulations of their locality. Why is GCC picking and choosing the safety and health mandates by which it will abide?

The problem of COVID-19 affects everyone, and churches are not immune. National Public Radio reported that the congregation of Christ Church Georgetown was asked to self-quarantine after the presiding Church rector was diagnosed with COVID-19.⁵⁶ GCC is not an exemption. L.A. Times reported that when GCC members contracted coronavirus after the Church re-opened in defiance of state guidance, the county health officials were saddled with contact-tracing responsibility.⁵⁷ This fact is another example of how the two institutions overlap.

GCC claimed that the “gathering restriction” and “ban on in-door singing” make it impossible to worship God. However, the question to ask is, “is in-door worship the only acceptable worship God commands?” Are there ways that the Church can accommodate the government temporarily without hindering worship? Pastor Ortlund seems to answer with a

resounding “yes.” He said, “[their] church has chosen to meet outdoors, while providing video options for those who choose to stay at home.” Ortlund remarks that outdoor worship is not the best option, but they would rather risk outdoor heat and noise to worship God than risk the lives of their neighbors.⁵⁸ Jonathan Leeman commenting on the situation, said, “Christians have long worked to accommodate government restrictions on gatherings, both when those requirements have seemed fair and when they do not.”⁵⁹ As discussed earlier, Churches and Christian leaders cooperated with the government during the Spanish Flu to protect lives. The government ban did not include outdoor worship as it did during the Spanish Flu pandemic, and other churches in the area are worshipping without hindrance. Leeman gave an example of how a church in D.C. is managing the situation. “Pastor J.D. Greear and the elders of Summit Church decided to “turn the 12,000-member Summit Church into hundreds of house churches for the remainder of the year.”⁶⁰

Another issue raised by the Grace Community Church is that “the unity and influence of the church have been threatened.”⁶¹ What are the unity and the influence of the Church? William Stringfellow says, “the unity of the Church of Christ is a gift of God bestowed in the birth and constitution of the Church at Pentecost.”⁶² The unity is also the witness or the influence of the Church to the world. The unity was bestowed on Pentecost so that the watching world may witness God, and in fact, the Bible detailed thousands of people that came to faith. Stringfellow explains that “the unity of the Church is given to be the content and shape of the Church’s love for and service to the world.”⁶³ The Coronavirus pandemic created opportunities to help those in need. Many were jobless, sick, hungry, isolated, suicidal, stranded, and so on. These situations provide the Church the opportunity to be united in love and compassion for the service of the world. ABC 7 News reported that Antioch Church in Long Beach,

California, was very busy during the pandemic “even with indoor services prohibited.” They teamed up with other organizations in the community “to provide toys, household items, and more to those in need.”⁶⁴ Pastor Wayne Chaney Jr., the pastor of Antioch Church, said, “the weight of the pandemic [is] causing overwhelming hardships for many..., [and] the church is spreading a message of neighbor helping neighbor.”⁶⁵ Unlike Antioch Church, GCC claims governmental restrictions must be removed before they can meet the needs of others.

Conclusion

In summary, GCC provided faulty arguments in its statement against government-imposed restrictions because it focused solely on the issue of unconstitutional restrictions, in other words, on its rights to religious worship and separation of state and church. GCC, however, has not discussed the responsibilities inherent in the freedom to worship. It has overlooked its biblical responsibilities. Alternatives to indoor worship have been adopted by many churches, both historically and during the current pandemic. By helping those hurt by the pandemic, GCC, like other churches strengthens its unity and influence.

Furthermore, the Church already follows State health and safety mandates related to food and building code issues. Why is it picking and choosing the regulations designed to inhibit the spread of COVID-19? Most crises have a silver lining. Let this pandemic be an opportunity for inclusive and supportive worship service that aligns with biblical commands.

¹ “Naming the Coronavirus Disease (COVID-19) and the Virus that Causes it,” World Health Organization, accessed April 15, 2021, [https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/naming-the-coronavirus-disease-\(covid-2019\)-and-the-virus-that-causes-it](https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/naming-the-coronavirus-disease-(covid-2019)-and-the-virus-that-causes-it).

² “WHO Director-General’s Opening Remarks at the Media Briefing on COVID-19 – March 11, 2020,” World Health Organization, accessed on April 15, 2021, <https://www.who.int/director-general/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19> 11-march-2020.

³ “Laws that Facially Discriminate Against Religious Practices,” Constitution Annotated: Analysis and Interpretation of the U.S. Constitution, Library of Congress, accessed April 18, 2021, [https://constitution.congress.gov/browse/essay/amdt1-1-4-2-3/ALDE_00000733/\['free%20exercise%20clause'\]](https://constitution.congress.gov/browse/essay/amdt1-1-4-2-3/ALDE_00000733/['free%20exercise%20clause']).

⁴ “Christ, Not Caesar, Is Head of the Church: A Biblical Case for the Church’s Duty to Remain Open,” Grace Community Church, last modified December 11, 2020, <https://www.gracechurch.org/news/posts/1988>.

⁵ Grace Community Church, “Christ, Not Caesar, Is Head of the Church: A Biblical Case for the Church’s Duty to Remain Open.”

⁶ Jaclyn Cosgrove, “L.A. Megachurch Pastor Mocks Pandemic Health Orders, Even as Church Members Fall Ill,” Los Angeles Times, November 8, 2020, <https://www.latimes.com/california/story/2020-11-08/la-pastor-mocks-covid-19-rules-church-members-ill>

⁷ “Jefferson’s Letter to the Danbury Baptists,” Library of Congress, assessed April 1, 2021, <https://www.loc.gov/loc/lcib/9806/danpre.html>.

⁸ Library of Congress, “Jefferson’s Letter to the Danbury Baptists.”

⁹ The Rev. Timothy Benefield, “God’s Three Institutions,” *Irrigator.com*, June 8, 2017, https://www.ttownmedia.com/patterson_irrigator/community/faith/god-s-three-institutions/article_5dbcc146-4bd6-11e7-9721-c3dfc9ec6de1.html.

¹⁰ John Locke, *Two Treatises on Civil Government 2nd Edition*, (London: George Routledge and Sons, 1887), 7, <https://play.google.com/books/reader?id=N2C4nhxW6asC&hl=en&pg=GBS.PA3>.

¹¹ “Doctrine of the Two Swords,” Oxford Reference, assessed April 22, 2021, <https://www.oxfordreference.com/view/10.1093/oi/authority.20110803110403409>.

¹² Philip Schaff, *The Teaching of the Twelve Apostles* (New York: Funk and Wagnalls, 1889), 162-63.

¹³ Augustine of Hippo, *City of God*, trans., Gerald G. Walsh et al., ed., Vernon J. Bourke (Garden City, N.Y.: Image Books, 1958), 460-73.

¹⁴ John Witte, Jr., “Facts and Fictions About the History of Separation of Church and State,” *Journal of Church and State* 48, no. 1 (Winter 2006): 15-45, <https://doi.org/10.1093/jcs/48.1.15>.

¹⁵ Brian Tierney, *The Crisis of Church and State 1050-1300* (Englewood Cliffs, N.J.: Prentice-Hall, 1964), 53.

¹⁶ Howard J. Loewen, *One Lord, One Church, One Hope, and One God: Mennonite Confessions of Faith in North America* (Elkhart, Ind.: Institute of Mennonite Studies, 1985), 79-84.

¹⁷ Roger Williams, “Letter from Roger Williams to John Cotton (1643),” in *The Complete Writings of Roger Williams*, 7 vols. (New York: Russell and Russell, 1963), 1:392.

¹⁸ Witte Jr., “Facts and Fictions,” 15-45.

¹⁹ John Locke, *Letter Concerning Toleration*, (A. South Bend: Infomotions, Inc., 2000), 10, accessed April 30, 2021, ProQuest Ebook Central.

²⁰ “Thomas Jefferson and Religious Freedom,” Monticello, assessed April 20, 2021, <https://www.monticello.org/site/research-and-collections/thomas-jefferson-and-religious-freedom>

²¹ Witte Jr., “Facts and Fictions,” 15-45.

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