

FREEDOM FROM RELIGION *foundation*

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

August 23, 2022

SENT VIA EMAIL & U.S. MAIL: mayorsph@cmvny.com

The Honorable Shawyn Patterson-Howard
Mayor
City of Mount Vernon
1 Roosevelt Square N
Mount Vernon, NY 10550

Re: Unconstitutional City-Sponsored Worship Event

Dear Mayor Patterson-Howard:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation in Mount Vernon. FFRF is a national nonprofit organization with more than 38,000 members across the country, including over 2,000 members in New York. 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 Mount Vernon resident and taxpayer contacted us to report that the City is hosting a Night of Praise and Worship at City Hall Plaza on August 23, 2022 at 6:30 p.m..¹ Please see an enclosed screenshot of the event flier. The flier features the religious imagery of hands clasped and raised in prayer. It is our understanding that this Praise and Worship event is sponsored by the Mayor's Office, the Department of Recreation, and the City's Athletics and Program Services.

We write to request that you cease using your government office and City resources to promote, host, and organize religious events.

The City of Mount Vernon's apparent favoritism towards religion poses serious constitutional concerns. The Establishment Clause of the First Amendment prohibits the government from hosting, promoting, or showing favoritism towards religious events or activities. The Establishment Clause requires government neutrality towards one religion over others and between religion and nonreligion. *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). When the City shows preferential treatment towards religion by devoting official resources to sponsoring and organizing a religious event, the City has failed to remain neutral.

¹ CMVNY Facebook Page (Aug. 19, 2022),
<https://www.facebook.com/photo/?fbid=384414797174867&set=ecnf.100068190484710>.

By hosting, promoting, and devoting City resources to the organization of a Praise and Worship event, your office and the City signals a clear preference for religion over nonreligion and Christianity over all other faiths. This needlessly alienates the Mount Vernon residents and community members belonging to the thirty-seven percent of Americans who are non-Christians, including the nearly one in three Americans who now identify as religiously unaffiliated.² City events are meant to provide residents with a sense of community and inclusion. For the Mount Vernon residents who subscribe to a minority religion or no religion at all, religious events like this Praise and Worship night are exclusionary and broadcast the message that the City of Mount Vernon favors community members who follow the dominant, preferred religion.

The City of Mount Vernon must refrain from including religious worship events in its official city-sponsored events and devoting City resources, and taxpayer money, to the hosting and organization of such events. Please respond in writing with the steps you are taking to ensure that this constitutional violation does not recur so we may inform our complainant.

Sincerely,

A handwritten signature in black ink, reading "Samantha F. Lawrence". The signature is fluid and cursive, with the first name "Samantha" being more prominent and the last name "Lawrence" following in a similar style.

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

Enclosure

² Gregory A. Smith, *About Three-in-Ten U.S. Adults Are Now Religiously Unaffiliated*, Pew Research Center (Dec. 14, 2021), available at www.pewforum.org/2021/12/14/about-three-in-ten-u-s-adults-are-now-religiously-unaffiliated/.

Summer Breeze | A Night of Praise and Worship



CITY OF MOUNT VERNON, NEW YORK
SHAWYN PATTERSON-HOWARD
MAYOR
DEPARTMENT OF RECREATION
SYLVIA GADSON
COMMISSIONER
RIC WRIGHT
ATHLETICS AND PROGRAM SERVICES
DIRECTOR

ARTSW
ARTSWESTCHESTER

Summer
Breeze

MOUNT VERNON CONCERT SERIES

CITY HALL PLAZA
1 ROOSEVELT SQUARE NORTH
MOUNT VERNON, NY 10050

TUESDAY AUGUST 23RD 2022
TIME: 6:30PM - 8:30PM



NIGHT OF PRAISE & WORSHIP

NIGHT OF PRAISE
& *Worship*



 MOUNTVERNONRECREATION
 MOUNTVERNONRECREATION
 RECREATION@CMVNY.COM
FOR MORE INFORMATION CALL
914.665.2420

