

Religion Clause

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof... --US Const., Amend. 1

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Thursday, May 15, 2008

[University Fires Human Resources VP For Anti-Gay Statements](#)

Last month, Crystal Dixon, who was Associate Vice President for Human Resources at the [University of Toledo](#), wrote an [op-ed](#) in the Toledo (OH) Free Press which read in part: "I take great umbrage at the notion that those choosing the homosexual lifestyle are 'civil rights victims.' Here's why. I cannot wake up tomorrow and not be a Black woman. I am genetically and biologically a Black woman and very pleased to be so as my Creator intended. Daily, thousands of homosexuals make a life decision to leave the gay lifestyle..." University of Toledo President, Dr. Lloyd Jacobs, quickly [responded](#) in another column, saying: "Although I recognize it is common knowledge that Crystal Dixon is associate vice president for Human Resources at the University of Toledo, her comments do not accord with the values of the University of Toledo. It is necessary, therefore, for me to repudiate much of her writing and to make this attempt to clarify our values system."

The University also fired Dixon after she refused the alternative of a demotion and pay cut. ([Toledo Free Press.](#)) Today's [Toledo Blade](#) reports that Dixon now says that her First Amendment free speech and free exercise of religion rights were infringed by the University's actions. She says she had a divine mandate to write the column and that she was speaking as a private citizen. However a University spokesman said that Dixon's public expressions called into question her ability to perform in her human resources position.

Posted by Howard Friedman --PermaLink: [8:50 AM](#) [1 comments](#) [Links To This Post](#)

[Muslim Serviceman May Sue Army Over Its Autopsy of Infant](#)

The [AP](#) reported yesterday that a Muslim soldier and his wife, stationed at Fort Bragg, North Carolina, may join a [pending lawsuit](#) challenging the military's respect for religious diversity. Pfc. Eli Agee and his wife, Mackenzie, are upset that authorities insisted on performing an autopsy on their infant son who died May 3, likely from sudden infant death syndrome. Muslim beliefs prohibit autopsies. The Army expedited the autopsy so the child could be buried within 24 hours as required by Muslim law. However the parents later learned that some of the child's vital organs had been removed and would be sent later for burial. Mikey Weinstein, president of the [Military Religious Freedom Foundation](#), said there has been a consistent pattern of anti-Islamic prejudice in the Army.

Posted by Howard Friedman --PermaLink: [8:11 AM](#) [0 comments](#) [Links To This Post](#)

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J.M. Dawson Inst. of
Church-State Studies
Law & Relig.- Univ.
Siena (Italy)
Law & Religion
Studies
Pew Forum

[New Developments In FLDS Child Custody Cases](#)

Legal developments continue in Texas in the FLDS child custody cases. (See [prior posting](#).) Three FLDS fathers who are in monogamous marriages to women who are of legal age filed *habeas corpus* petitions in a court in San Antonio seeking return of their children. Today's [Salt Lake Tribune](#) reports that James Dockstader, Rulon Keate and LeLand Keate argue that their wives have the same rights to procreate and raise a family as does any other citizen, and the fact that one of their neighbors became pregnant as a minor does not justify removing their children.

Meanwhile, according to today's [Dallas Morning News](#), Texas Child Protective Services has drafted guidelines for "service plans" that parents will need to develop in order to regain custody of their children. CPS has set out 10 goals and 14 tasks that should be included. The guidelines question any form of communal living, require residential buildings to be open for unannounced visits by CPS workers, and mandate that the names of everyone in the home must be given to CPS. The guidelines also call for job training, schooling for children and knowing how to access community resources.

Posted by Howard Friedman --PermaLink: [7:59 AM](#) [2 comments](#) [Links To This Post](#)

[Split 9th Circuit Rejects En Banc Review In Sunrise Rock Cross Case](#)

Yesterday, a 3-judge panel of the U.S. 9th Circuit Court of Appeals issued an amended opinion in [Buono v. Kempthorne](#), (9th Cir., May 14, 2008), eliminating one footnote, but otherwise reaffirming its holding finding Establishment Clause problems with Congress' transfer of the Sunrise Rock Cross in the Mojave Preserve war memorial to the VFW. (See [prior posting](#).) The deleted footnote had indicated disagreement with a 7th Circuit case on land transfers undertaken to end Establishment Clause problems.

After the panel refused to grant a rehearing, the full court also refused to grant an *en banc* rehearing. However, in a [long opinion](#), six judges dissented from the denial *en banc* review. The dissent argues that there is no evidence that the government will maintain or support the Sunrise Rock Cross after its transfer, and says that the VFW should not be required to sacrifice its private rights in the Sunrise Rock land in order to cure an Establishment Clause violation by the government. [Thanks to [How Appealing](#) for the lead.]

Posted by Howard Friedman --PermaLink: [7:07 AM](#) [0 comments](#) [Links To This Post](#)

[New York Town Transfers Enforcement of Building Codes Against Amish to State](#)

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Study of Religious
Freedom

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Dept. Justice Faith-
Based Initiative Task
Force
Dept. Justice First
Freedom Project
Faith Based
Initiatives
State Dept. Office of
Intl. Religious
Freedom
U.N. Special
Rapporteur
U.S. Helsinki
Commission
US Dept. Justice
Special Counsel for
Relig. Discrim.

ADVOCACY GROUPS

Acton Institute
Advocates for Faith
and Freedom
Advocates
International
Alliance Defense Fund
Amer. Indian Religious
Rights Found.
American Atheists
American Civil
Liberties Union
American Ctr. Law &
Justice
American Jewish
Committee
American Jewish
Congress
Americans For
Religious Liberty
Americans United
Anti-Defamation
League

In the face of possible lawsuits by the Amish community over building code enforcement against them, the town board of Conewango, New York yesterday voted to opt out of code enforcement and turn enforcement over to state authorities. Thus any lawsuits will be filed against the state and not against the town. Yesterday's [Jamestown \(NY\) Post-Journal](#) reports that the Amish have concerns about both some of the substantive code requirements and about the mandate to furnish workers compensation insurance to those hired to help with the construction.

Posted by Howard Friedman --PermaLink: [7:00 AM](#) [0 comments](#) [Links To This Post](#)

[Court Concludes Paratrooper Is Entitled To Conscientious Objector Status](#)

In [Barnes v. Green](#), (D AK, May 13, 2008), an Alaska federal magistrate judge concluded that an Army paratrooper's request for conscientious objector status be granted. The court rejected the Army's contention that Michael Barnes was not sincere in his claim that he was a conscientious objector, saying:

Much is made of the fact that Barnes did not attend church services in Iraq. While [this] ... might hold sway if there were other facts showing a sudden and convenient getting of religion, surely the Army agrees that it is not its province to suggest there is a proper way to be a Christian, or for that matter, to lay claim to or practice any other form of religion....

The fact that Barnes' thought processes may not have been "mature" is of no moment. One need not be a St. Augustine or a St. Thomas Aquinas to qualify as CO, indeed conscientious objection has no necessary relation to intellectual sophistication....

The evidence is overwhelming that Barnes - a motivated infantryman -is a person who takes his religious beliefs seriously, and there is strong evidence that his decision was motivated by those beliefs.... True, the timing of Barnes' decision is suspect. But that alone cannot be the basis for denying his application....

Instead of remanding the case to the Army's Conscientious Objector Review Board, the court concluded that Barnes' petition for *habeas corpus* and *mandamus* should be granted and the Army should be ordered to grant Barnes an honorable discharge. The Army has until tomorrow to appeal the magistrate's findings. Yesterday's [London Guardian](#) reports on the decision.

Posted by Howard Friedman --PermaLink: [6:45 AM](#) [0 comments](#) [Links To This Post](#)

[Massachusetts Agrees That Non-Jewish Prisoner Gets Kosher Diet](#)

Yesterday, the U.S. 1st Circuit court of Appeals dismissed as moot the case of [Guzzi v. Thompson](#), (1st Cir., May 14, 2008). A [release](#) by the Becket Fund explains that the dismissal comes after Massachusetts prison authorities agreed to allow a prisoner who requested kosher food for religious reasons to have access to it even though the prisoner is not Jewish. The Becket Fund had argued to the 1st Circuit that "governments should not be deciding whether a

Baptist Joint
Committee
Becket Fund
Catholic League
Center for Religious
Freedom
Christian Law
Association
Christian Legal
Society
Council on American-
Islamic Relations
DefCon
Faith and Action
Faith In Public Life
Fidelis
Foundation For Moral
Law
Freedom From
Religion Found.
Hindu American
Foundation
Hindu Human Rights
Independence Law
Center
Inst.on Relig. & Public
Policy
Interfaith Alliance
International Christian
Concern
Lady Liberty League
Liberty Counsel
Liberty Legal Institute
Military Religious
Freedom Found.
Muslim Public Affairs
Council
N.W. Religious Liberty
Assoc.
NARLA-West
Natl. Comm. for Amish
Relig. Freedom
North Amer. Relig.
Liberty Assoc.
Pacific Justice
Institute
PARL
People For the
American Way
SALDEF
Secular Coalition for
America

religious belief is orthodox."

Posted by Howard Friedman --PermaLink: [6:40 AM](#) [1 comments](#) [Links To This Post](#)

[No Summary Judgment In Colorado Episcopal Church Property Dispute](#)

In [Grace Church & St. Stevens v. Bishop and Diocese of Colorado](#), (CO Dist. Ct., May 13, 2008), a Colorado state trial court judge rejected summary judgment for either side in a counterclaim arising out of a lawsuit over ownership of an historic church building in downtown Colorado Springs. An article on [Virtue Online](#) sets out the background of the case. In May 2007, by a vote of 93% in favor, Grace Church and St. Stephen's voted to move its affiliation to the Convocation of Anglicans in North America. After the congregation sued asking a judge to declare that Colorado's Episcopal Diocese no longer owns the assets of the parish, the Diocese filed a counterclaim against vestry members. They in turn asserted a defense based on immunity of non-profit directors. At issue is whether the corporation that is plaintiff ever formally owned the property at issue. The court indicated that in Colorado, church property disputes are resolved through neutral analysis, but that no neutral analysis can be undertaken until the relevant facts are known. (See [prior related posting](#).)

Posted by Howard Friedman --PermaLink: [6:35 AM](#) [0 comments](#) [Links To This Post](#)

[Website Says Grassley's Investigation of Televangelists Reflects Religious Bias](#)

Yesterday's [Des Moines \(IA\) Register](#) reports that a sophisticated website has been set up to attack the investigation of six "prosperity gospel" televangelists by Sen. Charles Grassley. (See [prior posting](#).) The [Believers Stand United website](#) is sponsored by one of the groups under investigation-- Kenneth Copeland Ministries. The website argues that Grassley is "only targeting those Pentecostal-Charismatic churches who preach the 'Word of Faith' message and not any other churches.... It appears the inquiry is aimed at publicly questioning the religious beliefs of the targeted churches, their ministers, and their members while ignoring televangelists of other denominations. This violates the fundamental tenet of the First Amendment that the government should not single out any religion because of its beliefs. It also raises the question of religious bias against the Pentecostals and Charismatics who now number almost 70,000,000 Americans...."

Posted by Howard Friedman --PermaLink: [6:30 AM](#) [1 comments](#) [Links To This Post](#)

Wednesday, May 14, 2008

[Court Dismisses Free Exercise Challenge To Civil Commitment After Marijuana Charge](#)

Sikh Coalition
Texas Freedom
Network
The Rutherford
Institute
Thomas More Law
Center

JOURNALS

IJRR
Jour. of Law &
Religion (Hamline)
Journal of Church
and State
Liberty: Magazine of
Religious Freedom
Rutgers Jour. of Law
& Religion

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State Issues
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Bible Belt Blogger
Blog from the Capital
Christianity Today
Civil Commotion
Constitutionally
Correct
Contextual Criticism
Dallas News Religion
Dispatches From the
Culture Wars
Evangelical Right
Faithful Democrats
Firm Foundation
First Amendment Law
Prof
Front Pew
Get Religion
God & Culture
God and Country

In *Simmons v. Seal*, [2008 U.S. Dist. LEXIS 38355](#) (ND CA, April 24, 2008), plaintiff brought a federal civil rights action challenging his commitment to Napa State Hospital after he was arrested for marijuana possession and found incompetent to stand trial. Plaintiff alleged that his commitment violated his free exercise of religion because he is a member of the ministry of Cannabis and Rastafari Inc. and uses marijuana for religious purposes. Subsequently plaintiff was released on his own recognizance. The court dismissed plaintiff's claim without prejudice, holding that before he can bring a claim for damages under [42 USC Sec. 1983](#), he must first exhaust all available state court remedies and then seek habeas corpus relief in federal court. Only if he is successful in a challenge to his confinement in one of these proceedings may he proceed with his damage claim.

Posted by Howard Friedman --PermaLink: [10:34 AM](#) [1 comments](#) [Links To This Post](#)

[Texas Welfare Workers Criticized For Treatment of FLDS Children](#)

Yesterday's [Salt Lake Tribune](#) says that mental health professionals who were employed to care for the FLDS women and children after the April raid on their Eldorado, Texas ranch are critical of Texas Child Protective Services. Statements given by staff members to the board of Hill Country Community Mental Health and Mental Retardation Center say that the treatment of the women and children, and the conditions under which they were held, were harsh and unnecessary. The Tribune article has links to the full statements of the mental health workers regarding conditions in the shelter in which the women and children were held pending placement of the children in foster care. [Melissa Rogers](#) has additional coverage of the allegations on her blog.

Posted by Howard Friedman --PermaLink: [10:02 AM](#) [0 comments](#) [Links To This Post](#)

[Preachers' Suit Against Mississippi City Settled](#)

The Alliance Defense fund [announced](#) Monday that a settlement has been reached in *Wallace v. City of Wiggins*, a federal lawsuit against the city of Wiggins, Mississippi and various of its officials on behalf of two Christian preachers who were threatened with arrest for carrying signs and engaging in religious speech on a public sidewalk using a microphone and amplification system. (See [prior posting](#).) The settlement allows the the preachers, Shannon Wallace and Wesley Sewell, to preach on public sidewalks so long as no city ordinances are violated.

Posted by Howard Friedman --PermaLink: [7:22 AM](#) [3 comments](#) [Links To This Post](#)

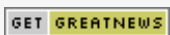
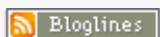
[Muslim Woman's Suit Against Judge Dismissed On Procedural Grounds](#)

In Detroit, Michigan on Monday, a federal district judge invoked unusual procedural grounds to dismiss a free exercise claim brought by a Muslim woman against a Michigan small claims court judge. Small Claims Judge Paul Paruk last October dismissed Ginnah Muhammad's suit against

God Web
God's Politics
Grieboski Report
Jesus Politics
Jews in Green
Mainstream Baptist
Melissa Rogers
Mirror of Justice
No Left Turns
On Faith
Religion and State In
Israel
Religion In American
History
Religion News Blog
Religious Right Watch
Religiously Affiliated
Law Schools
Secular Left
Straight, Not Narrow
Street Prophets
Talk To Action
The Center Blog
Wall of Separation



since April 17, 2005



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a car rental company when Muhammad refused to remove her niqab (full face veil) before she testified. Muhammad then sued in federal court alleging that she was denied her free exercise rights and access to the courts because of her religion. (See [prior posting.](#))

In [Muhammad v. Paruk](#), (ED MI, May 12, 2008), the federal court relied primarily on language in the Declaratory Judgment Act giving it discretion on whether or not to issue a declaratory judgment. The court said:

[I]f Paruk has a valid, neutral and generally applicable policy of requiring witnesses to keep their faces visible while giving testimony, that policy would not violate Muhammad's right to free exercise of her religion. Determining if Paruk has such a policy and, if he does, deciding whether it is valid, neutral and generally applicable would necessitate a detailed examination of how Paruk manages his court room as a state court judge. Conducting this type of review as a federal judge would undoubtedly increase friction in the relationship between our state and federal courts.... [R]espect for the relationship between our state and federal courts weighs heavily against exercising jurisdiction over Muhammad's declaratory judgment action for violation of her right to free exercise of her religion....

To establish a ... denial of access to the courts claim... could require me to determine whether Muhammad's state court claim was "non-frivolous" ... and to review

whether Judge Paruk's actions frustrated Muhammad's litigation. This kind of review also threatens to increase the tension between our state and federal courts and weighs against exercising jurisdiction over Muhammad's declaratory judgment action for denial of access to the courts.

The [AP](#) yesterday reported on the decision. [Thanks to [How Appealing](#) for posting the opinion.]

Posted by Howard Friedman --PermaLink: [6:36 AM](#) [4 comments](#) [Links To This Post](#)

[Indian Supreme Court Rejects Challenge To French Action Against Sikhs](#)

India's Supreme Court has dismissed for lack of jurisdiction a claim brought by a Sikh organization, Singh Legal Foundation, challenging France's law that prohibits Sikhs from wearing turbans or other religious symbols in public places in France. Apparently the suit is directed at the French ban on religious symbols in public schools. (See [prior posting.](#)) [Bombay News.net](#) reported yesterday that the suit before India's Supreme Court claimed that it was the duty of the Indian government to protect the fundamental rights of Indian Sikhs living abroad. The court ruled, however, that the issue could only be raised in French courts, or in the international or EU courts. Also the court pointed out that the Indian government has already raised the issue with France through diplomatic channels.

Posted by Howard Friedman --PermaLink: [6:30 AM](#) [1 comments](#) [Links To This Post](#)

Tuesday, May 13, 2008

[9th Circuit Upholds School Dress Policy Against Speech](#)

and Religion Challenges

In [Jacobs v. Clark County School District](#), (9th Cir., May 12, 2008), the U.S. 9th Circuit Court of Appeals, in a 2-1 decision, rejected a challenge to a Nevada school district's school uniform policy that precluded plaintiffs from wearing T-shirts with printed messages on them. At least one time this involved sanctions for wearing a T-shirt displaying a religious message. The majority found that the uniform policy was both viewpoint- and content-neutral, and need satisfy only an intermediate scrutiny standard. Here the policy furthered important governmental interests unrelated to the suppression of speech, and leaves open alternative channels of communication. The opinion also rejected the argument that the dress code compelled students to express a view in favor of uniformity. The majority additionally rejected plaintiff's free exercise of religion claim, finding that the uniform code was a neutral rule of general applicability.

Judge Thomas dissented arguing that the regulation was not viewpoint neutral since it permitted T-shirts with slogans supporting the school. He also argued that the government's purpose in imposing the uniform rule was not substantial enough to outweigh students' speech rights. Today's [Las Vegas Review Journal](#) reports on the decision.

Posted by Howard Friedman --PermaLink: [6:52 AM](#) [0 comments](#) [Links To This Post](#)

Virginia County Will Offer Bible In History Course

Earlier this month, the Craig County, Virginia, School Board approved an elective high school course titled "The Bible in History and Literature." [OurValley.org](#) reports on the discussion of the proposal at the May 6 board meeting. Several students attending the meeting supported it, even though in 2005 a similar class was dropped for lack of student interest. Board member Dawna McDowell abstained from voting on the ground that there had not been enough time to inform the community about the proposal.

Posted by Howard Friedman --PermaLink: [6:50 AM](#) [15 comments](#) [Links To This Post](#)

Cert Denied In O'Hare Expansion Challenge By Church

Yesterday the U.S. Supreme Court denied certiorari in *St. John's United Church v. Chicago, IL*, (Docket No. 07-1127) ([Order List](#)). In the case, the 7th Circuit had rejected a challenge to Chicago's use of eminent domain to take a church cemetery as part of the city's expansion of O'Hare Airport. The 7th Circuit found no free exercise violation in Illinois' amendment of its Religious Freedom Restoration Act to exclude from its provisions Chicago's actions in relocating cemeteries in the O'Hare project. (See [prior posting](#).) Yesterday's [Chicago Tribune](#) reports that two other challenges to the taking of the cemetery are still pending in the courts, including a federal Religious Freedom Restoration Act claim that is on appeal to the 7th Circuit.

Posted by Howard Friedman --PermaLink: [6:48 AM](#) [0 comments](#) [Links To This Post](#)

Group Charges SFO Targets Sikhs For Turban Searches

The Sikh Coalition says that San Francisco's International Airport is profiling Sikhs for searches. According to yesterday's [Contra Costa Times](#), the group charges that since a Transportation Safety Authority policy change last October (see [prior posting](#)), screeners in San Francisco are now routinely searching tubans of Sikh travelers. Apparently San Francisco airport security personnel are interpreting the policy regarding search of turbans differently than are security workers at other airports. As a result, some Sikhs now choose alternative airports in the area for their flights.

Posted by Howard Friedman --PermaLink: [6:38 AM](#) [0 comments](#) [Links To This Post](#)

Monday, May 12, 2008

[Archbishop Tells Kansas Governor Not To Take Communion](#)

Last Friday's [Kansas City Star](#) reports that Archbishop Joseph F. Naumann of the Archdiocese of Kansas City has told Kansas Governor Kathleen Sebelius that she should stop taking communion until she repudiates her support for abortion rights. In a [column in The Leaven](#), the official newspaper of the Kansas City Diocese, Naumann indicated that his latest concern was the [governor's April 21 veto](#) of the [Comprehensive Abortion Reform Act](#) passed by the Kansas legislature. He wrote:

Since becoming archbishop, I have met with Governor Sebelius several times over many months to discuss with her the grave spiritual and moral consequences of her public actions by which she has cooperated in the procurement of abortions performed in Kansas.... I wrote the governor last August requesting that she refrain from presenting herself for reception of the Eucharist until she had acknowledged the error of her past positions, made a worthy sacramental confession and taken the necessary steps for amendment of her life which would include a public repudiation of her previous efforts and actions in support of laws and policies sanctioning abortion.

Recently, it came to my attention that the governor had received holy Communion at one of our parishes. I have written to her again, asking her to respect my previous request and not require from me any additional pastoral actions.

Posted by Howard Friedman --PermaLink: [6:50 AM](#) [17 comments](#) [Links To This Post](#)

[Louisiana School Has Seniors Vote On Graduation Prayer](#)

[Sunday's Shreveport Times](#) reports that for the second year in a row, Ouachita Parish High School has had its graduating seniors vote on whether or not they wish to include a prayer as part of their graduation ceremony. By a nearly unanimous vote, the seniors opted for prayer. The school board says that its policy is consistent with with a statement issued in 2003 by the Department of Education in implementing the No Child Left Behind Act. DOE's [letter](#) and [guidance](#) say that any school receiving funds under the Elementary and Secondary Education Act must certify in writing that it has no policy that prevents or otherwise denies participation in constitutionally protected prayer in public schools. The ACLU disagrees with the school board's approach.

[Algerian Court Fines Christian Convert For Carrying Unauthorized Religious Books](#)

[Compass Direct News](#) reports that last Tuesday a court in Djilfa, Algeria imposed a fine of 300 Euros and a one year suspended prison sentence on a 33-year-old Muslim convert to Christianity who was charged with printing, storing and distributing illegal religious material. Charges were filed against the defendant after he was stopped at a police roadblock, and authorities found a Bible and several religious study texts in his luggage. He was also carrying a computer printer. Apparently during defendant's 5-day detention, authorities tried to convince him to convert back to Islam. Since January, at least five Christians from Tiaret have been detained or tried for their religious activities.

Posted by Howard Friedman --PermaLink: [6:42 AM](#) [10 comments](#) [Links To This Post](#)

[Texas Bigamy Prosecution Will Test Strengthened Law](#)

For the first time since the Texas prohibition on bigamy (Penal Code, title 6, [Sec. 25.01](#)) was strengthened by the legislature in 2005, a prosecution is about to take place. Sunday's [Dallas Morning News](#) reports that in February, 73-year old House of Yahweh prophet Yisrayl "Buffalo Bill" Hawkins was indicted on four counts of promoting bigamy. In addition, sect elder Yedidiyah Hawkins has been charged with sexual assault of his 14-year-old stepdaughter who authorities say he was planning to marry. Hawkins secretive sect lives on a compound of hundreds of acres near the town of Eula in Callahan County, Texas. The [House of Yahweh](#) sends its apocalyptic message to the world over satellite broadcasts, radio and the Internet.

Posted by Howard Friedman --PermaLink: [6:38 AM](#) [9 comments](#) [Links To This Post](#)

[Recent Articles and Book of Interest](#)

From SSRN:

- Donald R. Davis, [Maxims & Precedent in Classical Hindu Law](#), (Indologica Taurinensia, Vol. 33, pp. 33-55, 2007).
- Eric G. Andersen, [Protecting Religious Liberty Through the Establishment Clause: The Case of the United Effort Plan Trust Litigation](#), (U Iowa Legal Studies Research Paper No. 08-11, May 8, 2008).
- Craig A. Stern & Gregory M. Jones, [The Coherence of Natural Inalienable Rights](#), (2008).
- Haider Ala Hamoudi, [Baghdad Booksellers, Basra Carpet Merchants, and the Law of God and Man: Legal Pluralism and the Contemporary Muslim Experience](#), (U. of Pittsburgh Legal Studies Research Paper No. 2008-14, May 5, 2008).

From [SmartCILP](#):

- Steven D. Smith, *Our Agnostic Constitution*, 83 [New York University Law Review](#) 120-166 (2008).
- *Symposium on Religion, Religious Pluralism, and the Rule of Law*. [Contents](#): Introduction by Mark C. Modak-Truran; articles by Larry Cata Backer, Scott C. Idleman, Robin W. Lovin, Michael Novak, Jana Novak, Steven D. Smith and Mark C. Modak-Truran. 27 *Mississippi College Law Review* 1-233 (2007-2008).

Journal of Church & State, [Vol 50, No. 1](#), Winter 2008, has recently been published.

Recent Book:

- Alan Brownstein, [Establishment of Religion Clause](#), (Prometheus Books, 1st American Paperback Ed. Dec. 31, 2007).

Posted by Howard Friedman --PermaLink: [6:35 AM](#) [0 comments](#) [Links To This Post](#)

[Frankenmuth Resident Gives Up On Challenge To Cross On City Shield](#)

Frankenmuth, Michigan resident Lloyd Clark says he is giving up his effort to require the city to remove a Lutheran cross that appears on the city shield. (See [prior posting](#).) According to [NBC25 News](#), Clark made his decision after family and friends told him they were embarrassed by his efforts. [Ed Brayton](#) has posted a lengthy report on last Tuesday's Frankenmuth City Council meeting at which the mayor said that that city government was firmly committed to protecting the current version of the shield.

Posted by Howard Friedman --PermaLink: [6:32 AM](#) [2 comments](#) [Links To This Post](#)

[Sri Lankan Buddhists Protest Discriminatory Electric Rates For Temples](#)

In Sri Lanka, Buddhist clergy are calling the country's new electric rates religious discrimination. Colombo's [Sunday Times](#) reprints a statement from Ven. Galaboda Gnanissara Thera, head of Colombo's Gangaramaya Temple who says that the [Ceylon Electricity Board](#) has adopted a new [rate schedule](#) "that is aimed at a closure of all charitable institutions and places of worship. The new bill for these places exceeds that charged for hotels." The statement calls on all Buddhist places of worship to protest the new rates by using oil lamps instead of electricity on [Vesak Poya](#) day (May 19-20).

Posted by Howard Friedman --PermaLink: [6:30 AM](#) [0 comments](#) [Links To This Post](#)

Sunday, May 11, 2008

[FLDS Advocate Asks Bush To Intercede](#)

Willie Jessop, head of a group called Mothers and Children of YFZ, has written a letter dated

May 10 ([full text](#)) to President George W. Bush. The letter has been posted on the "[Captive FLDS Children](#)" website. The letter begins:

We appeal to you, as President of the United States of America and Leader of the Free World, to intercede in behalf of an American community which has been invaded and devastated by an armed militant force. Mr. President, it does not require a foreign country to commit terrorist acts on American soil. Terrorist acts can be committed by federal, local, and private entities that are operating under the guise of "protecting the public."

Near the end of his 10-page letter, Jessop says:

It has been customary for a President to visit the site of a disaster of this magnitude where so many innocent people are involved... We personally invite you, First Lady Laura Bush, and members of your staff to visit the YFZ community and witness firsthand the site of these gross violations of human rights that have occurred in your peaceful neighboring west-Texas community. Reunite these children with their loving parents, and return families to their homes!

We call upon you to ... hold accountable those who perpetrated these acts of terror and now are determined to save the state from embarrassment by selectively prosecuting members of the FLDS faith.

[Deseret News](#) says the letter was hand delivered to President Bush's staff yesterday near the Bush ranch in Texas where the President was attending the wedding of his daughter Jenna.

Posted by Howard Friedman --PermaLink: [3:20 PM](#) [9 comments](#) [Links To This Post](#)

[1990's Actions By Castro Helped Revive Cuban Jewish Community](#)

[Cox News Service](#) reports today that in Cuba, actions taken by Fidel Castro in the 1990's have encouraged revival of Cuba's Jewish community. Most of the island's Jews fled in the 1950's, and the community was once down to about 800. It has now grown to 1500. The country has 3 synagogues and a Jewish community center, though as yet no full-time rabbi. After Castro in the 1990's eased the government's opposition to organized religion, Jewish leaders began to seek out Cubans with Jewish roots, some of who were no longer formally Jews because of intermarriages in their families. Several dozen Cubans with such roots have formally converted back to Judaism.

Posted by Howard Friedman --PermaLink: [2:59 PM](#) [0 comments](#) [Links To This Post](#)

[Recent Prisoner Free Exercise Litigation](#)

In [Massingill v. Livingston](#), (5th Cir., May 8, 2008), the U.S. 5th Circuit Court of Appeals upheld a trial court's rejection of free exercise and RLUIPA claims by a prisoner who was a member of the Israyl Identity faith. Plaintiff had challenged the prison's grooming requirements, wanted to be kept separate from prisoners of other races, and wanted his Saturday meals delivered on Friday. In his appeal, plaintiff unsuccessfully raised several evidentiary issues. (See [prior](#)

[related posting.](#))

In *Blast v. Fischer*, [2008 U.S. Dist. LEXIS 36318](#), (WD NY, May 5, 2008), a New York federal magistrate judge refused plaintiff prisoner's request to appoint an expert witness to testify in his RLUIPA case about the Santeria religion and Western Cultural African Yoruba. The court said that the main issue is the sincerity of plaintiff's beliefs, not the objective importance of a particular practice within his faith system.

In *El-Tabech v. Clarke*, [2008 U.S. Dist. LEXIS 36793](#), (D NE, May 5, 2008), a Nebraska federal district court awarded \$196,605 in attorneys' fees and \$8,380 in costs against defendants in a lawsuit in which a Muslim prisoner won his claim to receive a kosher diet, and his request that the prayer schedule be posted so that guards are aware of it. In awarding the fees, the court said: "Significant and complicated constitutional issues and statutory issues were adjudicated and El-Tabech vindicated not only his own rights, but those of similarly situated prisoners." (See [prior related posting.](#))

In *Lakhumna v. Friel*, [2008 U.S. Dist. LEXIS 37859](#), (D UT, May 8, 2008), a Utah federal district judge permitted a prisoner to proceed against most of his named defendants in a lawsuit claiming that authorities failed to accommodate his Hindu dietary requirements, and that Hindu inmates are not given the same access to the prison chapel as are others.

Posted by Howard Friedman --PermaLink: [12:19 PM](#) [1 comments](#) [Links To This Post](#)

[Korean Court Rejects Damage Claim By Expelled High Schooler](#)

In Korea, the Seoul [High Court](#) has reversed a trial court's award of damages to a student who, in 2004, was expelled from his Christian high school after he refused to attend required chapel services. Friday's [Korea Times](#) reports that Kang We-suck announced his refusal to attend chapel at Daegwang High School though an announcement over the school's loudspeakers and at a one-person rally in front of the school. Kang claimed that the school infringed his freedom of religion and inflicted mental suffering on him by expelling him. The High Court disagreed.

Posted by Howard Friedman --PermaLink: [1:23 AM](#) [4 comments](#) [Links To This Post](#)

[Romney Addresses Importance of Religious Freedom To Non-Believers](#)

On Friday, former presidential candidate Gov. Mitt Romney and his wife Ann were awarded the Becket Fund's Canterbury Medal for "Courage in the Defense of Religious Liberty." ([Press release](#)). In his acceptance speech ([full transcript](#)), Romney reflected on his now-famous speech about religious liberty and his religious beliefs delivered last December during his unsuccessful campaign for the Republican presidential nomination. (See [prior posting.](#)) In one portion of his address at the Becket Fund dinner, Romney responded to criticism that he had not mentioned the rights of non-believers in December. Romney told the Becket Fund audience:

upon reflection, I realized that while I could defend their absence from my address, I had missed an opportunity...an opportunity to clearly assert the following: non-believers have just as great a stake as believers in defending

religious liberty.

If a society takes it upon itself to prescribe and proscribe certain streams of belief - to prohibit certain less-favored strains of conscience - it may be the non-believer who is among the first to be condemned. A coercive monopoly of belief threatens everyone, whether we are talking about those who search the philosophies of men or follow the words of God.

We are all in this together. Religious liberty and liberality of thought flow from the common conviction that it is freedom, not coercion, that exalts the individual just as it raises up the nation.

Romney also strongly defended his December statement that "freedom requires religion." Saturday's [Salt Lake Tribune](#) reports on the Becket fund speech.

Posted by Howard Friedman --PermaLink: [1:05 AM](#) [1 comments](#) [Links To This Post](#)

[Court says RLUIPA Applies To Zoning Limits On 12-Step Program](#)

Friday's [Prescott \(AZ\) Daily Courier](#) reports on an unusual RLUIPA decision by an Arizona Superior Court judge in Yavapai County. The case involves attempts by an AA 12-step program, known as Safe Harbor, to operate out of a neighborhood location in north Prescott. The city claimed that AA needed a special use permit to operate. In rejecting that claim, the court, noting AA's spiritual nature, applied the federal [Religious Land Use and Institutionalized Persons Act](#). It held that "the city's effort to 'zone' the AA members of Safe Harbor out of the property is a land-use regulation which imposes a substantial burden on the religious exercise of the AA members of Safe Harbor and of AA..."

Posted by Howard Friedman --PermaLink: [12:30 AM](#) [3 comments](#) [Links To This Post](#)

Friday, May 09, 2008

[Next Steps In FLDS Custody Proceedings Described](#)

Yesterday's [Ft. Worth Star-Telegram](#) reports on what to expect at the next round of hearings, scheduled to begin May 19, in the cases of 464 children taken into state custody from the FLDS compound in Eldorado, Texas. In simultaneous hearings in 5 San Angelo courtrooms, children will be grouped by family so that siblings will have hearings together. The hearings are likely to continue the children in state custody while parents work on "service plans" to meet Child Protective Service guidelines for return of their children. The court will attempt to complete all hearings by June 5, the 60-day deadline as required by law.

Posted by Howard Friedman --PermaLink: [1:19 PM](#) [6 comments](#) [Links To This Post](#)

[Faith Group Sues Over California Limits On Its Use of](#)

Park To Feed Homeless

In Orange County, California, an interfaith religious group, Welcome INN (Interfaith Needs Network), has filed a federal lawsuit challenging the constitutionality of the state's limits on public assemblies and demonstrations in state parks. According to a [press release](#) by the ACLU, when the group attempted to set up supplies in a [Doheny State Park](#) picnic area in order to offer a meal to the homeless, a park ranger told them to disperse, citing [California Administrative Code, Title 14, Sec. 4321](#) that requires permission of the Department of Parks and Recreation in order to hold an assembly there. This action came after the group, on two previous days, used the park to conduct a prayer, serve donated food to about 20 homeless people, distribute Bibles and refer those who requested it to local social service agencies. The complaint ([full text](#)) in *Welcome INN, Inc. v. Coleman*, (CD CA, filed 5/7/08) alleges that the permit provision is an unconstitutional prior restraint on speech in a traditional public forum, and its enforcement against the group infringes their speech, associational and free exercise rights.

Today's [Los Angeles Times](#), reporting on the case, quotes ACLU attorney Hector Villagra who compares the gathering of homeless at the state beach to picnics and barbecues that are allowed there. Park officials say this is different because it is an organized feeding event that requires a special use permit, like all other formal gatherings.

Posted by Howard Friedman --PermaLink: [8:48 AM](#) [24 comments](#) [Links To This Post](#)

Group Seeking To Set Up Test Case On Tax Code Non-Profit Limits

Today's [Wall Street Journal](#) reports that [Alliance Defense Fund](#) is attempting to create a constitutional test case to challenge the tax code limits on church involvement in political campaigns. It is seeking 40 to 50 houses of worship to take part in a protest on Sept. 28. ADF is asking clergy to preach sermons on that day about candidates in the November election. Under the Internal Revenue Code, churches and other charitable groups can be fined or lose their non-profit tax status if they endorse or oppose political candidates.

Posted by Howard Friedman --PermaLink: [7:50 AM](#) [13 comments](#) [Links To This Post](#)

Oregon Supreme Court Clarifies Standard For Religious Discrimination

In [Nakashima v. Oregon State Board of Education](#), (OR Sup. Ct., May 8, 2008), the Oregon Supreme Court clarified the test that is to be used in determining whether a public school program is "fair in form but discriminatory in operation" so that it violates Oregon's anti-discrimination statutes. At issue was an attempt by Portland Adventist Academy (PAA) to get the Oregon School Activities Association to alter the schedule of the 2A State High School Boys' Basketball Tournament. PAA requested the change so that its basketball team would not be required to compete on their Sabbath. The court remanded the case to the Oregon State Board of Education for it to determine whether the challenged scheduling policy that adversely impacts PAA is "reasonably necessary" to the successful administration of the Tournament. The [AP](#) yesterday reported on the decision. (See [prior related posting](#).)

[10th Circuit Upholds Bald Eagle Protection Against RFRA Challenge](#)

In [United States v. Friday](#), (10th Cir., May 8, 2008), the U.S. 10th Circuit Court of Appeals rejected a challenge under the [Religious Freedom Restoration Act](#) to the government's enforcement of the [Bald and Golden Eagle Protection Act](#) ("Eagle Act"). The case involved the prosecution of Winslow Friday, a member of the Northern Arapaho Tribe, for killing a bald eagle so he could use it in his tribe's Sun Dance. Friday had never applied for a permit under the Eagle Act. The district court had held that the government's permit process was so maladministered that it would have been futile for Friday to apply for a permit. The Court of Appeals disagreed with this finding. It went on to hold that "the Eagle Act and its regulations are the least restrictive means of pursuing the government's compelling interest in preserving the bald eagle." The [AP](#) yesterday reported on the decision. (See [prior related posting](#).)

UPDATE: The [May 13 San Diego Union-Tribune](#) follows up on the decision with a mixed reaction to it from Sarah Krakoff, an associate professor of law at the University of Colorado. It also reports that Winslow Friday's attorney is considering seeking *en banc* review of the 3-judge panel's decision.

Posted by Howard Friedman --PermaLink: 6:35 AM 0 comments [Links To This Post](#)

[Two Schools Want Exemption From Quebec's Religious Culture Course](#)

As [previously reported](#), Quebec's Education Department is requiring, starting next fall, all public and private religious schools to offer a new course in Ethics and Religious Culture. Yesterday's [Montreal Gazette](#) reported that two schools have asked for an exemption from the requirement. Loyola High School, a Jesuit institution in Notre Dame de Grâce, told the Education Department that its students are already "strongly formed" in the key values to be taught in the new course. The other school seeking an exemption is Emmanuel Christian School in Dollard des Ormeaux. The Education Department says that the new course is intended to teach religious culture so students will be able to understand the importance of places of worship, beliefs and religious institutions in the province.

Posted by Howard Friedman --PermaLink: 6:30 AM 1 comments [Links To This Post](#)

[Feds Appoint Prosecutor To Focus On Polygamy Issues](#)

Today's [Salt Lake Tribune](#) reports that the U.S. Justice Department has appointed a senior, career prosecutor to work with Utah, Arizona and Nevada to combat polygamy related crimes. This disclosure came in letters that Nevada Sen. Harry Reid sent this week to the attorneys general of Utah and Arizona. Today's [Toronto Globe and Mail](#) says that the U.S. investigation may extend to combating the so-called "polygamy underground railway" across the Canada-U.S.

border through which young women are sent to marry older men. Women are sent between FLDS communities in British Columbia, Utah and Arizona. This action by the Justice Department may be the first step toward appointing a special task force. Last week, the [Deseret News](#) reported that Sen. Reid had long been pushing for the Justice Department to take action. Utah Attorney General Mark Shurtleff, while welcoming federal involvement, took issue with Reid's criticism of Utah's law enforcement. Shurtleff said Utah has done much to combat polygamy.

Meanwhile yesterday in St. George, Utah, some 200 people attended the annual conference presented by the Utah-Arizona Safety Net Committee to hear presentations by members of polygamous communities, news media, social service providers and law enforcement. Yesterday's [Salt Lake Tribune](#) quotes conference participant Anne Wilde from the "fundamentalist Mormon" advocacy group, [Principle Voices](#), who said that fundamentalist Mormons represent a wide diversity of beliefs, and should not all be lumped together with the FLDS.

Posted by Howard Friedman --PermaLink: [6:25 AM](#) [1 comments](#) [Links To This Post](#)

Thursday, May 08, 2008

[Malaysian Sharia Court Agrees To Cancel Woman's Prior Conversion To Islam](#)

[AFP](#) today describes as "rare" a decision handed down in Malaysia by Penang Sharia Court judge Othman Ibrahim. He permitted a Buddhist woman who had converted to Islam to revert to Buddhism. Islamic courts usually do not permit renunciations of Islam, but here the court said that Siti Fatimah only converted in order to be able to marry a Muslim man. She never practised Islam. Now that her husband has left her the judge said he had no choice but to order her original conversion certificate nullified since she had continued to practice Buddhism anyway. The woman now still has to convince authorities to change her identity card so she will no longer be classified as a Muslim on it.

Posted by Howard Friedman --PermaLink: [5:46 PM](#) [0 comments](#) [Links To This Post](#)

[Christian Student Group Sues to Challenge University Speech Code](#)

On Wednesday, a student group, the Christian Fellowship, filed suit in federal court against Pennsylvania's Shippensburg University challenging university rules that plaintiff claims chills free speech and infringes its free exercise of religion. The complaint ([full text](#)) in *Christian Fellowship of Shippensburg University of Pennsylvania v. Rudd*, (MD PA, filed 5/7/08) alleges that "Christian Fellowship is a religious expressive student organization whose members hold and seek to advance Biblically-based opinions and beliefs regarding issues of race, gender, politics, and religion that may be objectionable or offensive to other students and sanctionable under applicable University speech codes." According to a [release](#) by the Alliance Defense Fund, a similar 2004 lawsuit was settled when the University agreed to revoke challenged provision in its speech code, but since then it has re-enacted many of the same policies. Today's [Hagerstown \(MD\) Herald-Mail](#) reports on the lawsuit.

Posted by Howard Friedman --PermaLink: [4:48 PM](#) [16 comments](#) [Links To This Post](#)

Evangelical Manifesto Released Urging A "Civil Public Square"

Yesterday in a Washington, DC press conference, over 70 religious leaders endorsed a document titled *An Evangelical Manifesto* ([full text](#), [summary](#)). Here is a small part of what it had to say about the place of Evangelicals in public life:

[W]e repudiate two equal and opposite errors into which many Christians have fallen. One error is to privatize faith, applying it to the personal and spiritual realm only.... The other error, made by both the religious left and the religious right, is to politicize faith, using faith to express essentially political points that have lost touch with biblical truth. That way faith loses its independence, Christians become the "useful idiots" for one political party or another, and the Christian faith becomes an ideology. Christian beliefs become the weapons of political factions....

[W]e repudiate the two extremes that define the present culture wars in the United States.... We are committed to a civil public square - a vision of public life in which citizens of all faiths are free to enter and engage the public square on the basis of their faith, but within a framework of what is agreed to be just and free for other faiths as well....

[W]e are concerned that a generation of culture warring ... has created a powerful backlash against all religion in public life among many educated people.... [W]e are concerned that globalization and the emerging global public square have no matching vision of how to live with our deepest differences on the global stage.... [W]e warn of the danger of a two-tier global public square. This is a model of public life which reserves the top tier for cosmopolitan secular liberals, and the lower tier for local religious believers.

The [Associated Press](#), reported on the document, pointing out that a number of Christian religious leaders on the political right do not support it. [Americans United for Separation of Church and State](#) gave the Manifesto qualified praise, or, as it said, it gave it "one amen". More information on the Manifesto, including a lengthy [Study Guide](#), is available on the [Evangelical Manifesto website](#).

Posted by Howard Friedman --PermaLink: [7:55 AM](#) [21 comments](#) [Links To This Post](#)

Religious Monuments Case Delays Army Memorial To Plane Crash Victims

June 14 is the 65th anniversary of the World War II "Bakers Creek" plane crash in Australia that killed 40 U.S. troops. Families of the soldiers, veterans' organizations, and others have contributed money for a monument to the soldiers that they want the Army to place at Ft. Myer, near Arlington National Cemetery in Virginia. [Scripps Howard News Service](#) yesterday reported that the Army however is holding off on accepting the monument because of a pending Supreme Court case on religious monuments. In *Pleasant Grove City v. Summum*, the Supreme Court will decide whether a city created a "public forum" open to others as well by accepting a donation of a 10 Commandments monument put up in a city park. (See [prior posting](#).)

In reporting to Congress last week, an Army spokesman wrote: "Due to the ramifications that this case may have on the Army's acceptance of the Bakers Creek Memorial or any other monument funded by private funds, the Army will await the Supreme Court's decision to assess its options." Robert Cutler, executive director of the Bakers Creek Memorial Association, suggested a solution-- have the Army buy the memorial for a nominal amount so it is not "donated". Meanwhile the memorial remains temporarily at the Australian Embassy in Washington. (A posting at [Texomas](#) carries a photo of the memorial.)

Posted by Howard Friedman --PermaLink: [7:50 AM](#) [2 comments](#) [Links To This Post](#)

[McCain Speaks Out On International Religious Freedom](#)

Yesterday, Republican presidential candidate John McCain spoke at Oakland University in Rochester, Michigan on "his vision for defending the freedom and dignity of the world's vulnerable." In his speech ([full text](#)) he had this to say about religious freedom:

There is no right more fundamental to a free society than the free practice of religion. Behind walls of prisons and persecuted before our very eyes in places like China, Iran, Burma, Sudan, North Korea and Saudi Arabia are tens-of-thousands of people whose only crime is to worship God in their own way. No society that denies religious freedom can ever rightly claim to be good in some other way. And no person can ever be true to any faith that believes in the dignity of all human life if they do not act out of concern for those whose dignity is assailed because of their faith. As President, I intend to make religious freedom a subject of great importance for the United States in our relations with other nations.

In the speech he also focused on the evils of human trafficking and use of the Internet by child predators. [CNN](#) reported on the speech.

Posted by Howard Friedman --PermaLink: [7:45 AM](#) [10 comments](#) [Links To This Post](#)

[San Angelo Mayor Writes of Logistical Challenges After FLDS Ranch Raid](#)

[Scripps Howard News Service](#) yesterday carried a piece by J.W. Lown, the 31-year old mayor of San Angelo, Texas, the town located some 45 miles north of the FLDS Ranch that [was raided](#) by authorities last month. Lown gives a candid account of how he dealt with the demands placed on his city for space to house the over 400 children taken into state custody along with many of their mothers. Lown also looks at the deluge of media that appeared, saying "Every media outlet complimented me and the city of San Angelo for the Port-A-Potties and refreshments we delivered." Lown concluded: "Though our role as 'host' is drawing to an end, you will still see plenty of San Angelo on TV. All those mothers you've seen strolling up courthouse steps in their pastel prairie dresses? That's the Tom Green County Courthouse in San Angelo. And their day in court isn't over."

Posted by Howard Friedman --PermaLink: [7:40 AM](#) [0 comments](#) [Links To This Post](#)

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