

# FREEDOM FROM RELIGION *foundation*

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

May 9, 2016

SENT VIA U.S. MAIL AND FAX TO:  
(214) 671-4636

Dallas Police Department  
Open Records Unit  
1400 S. Lamar  
Dallas, Texas 75215

Re: Public records request: Dallas Police Department partnership with church

To Whom It May Concern:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) to obtain public records. FFRF is a national nonprofit organization with more than 23,500 members across the country, including over 900 members in Texas. Our purpose is to protect the constitutional principle of separation between religion and government.

It is our understanding that the Dallas Police Department has partnered with First Baptist Dallas. The partnership was announced on April 17, during the “Back the Blue” church event, in which Dallas Police Chief David Brown spoke. We understand that the partnership includes First Baptist Dallas providing counseling services to police department officers, weekly bible classes for officers, and money to be used in a “Chief’s Award Fund” that the church will give to Chief Brown to “honor those men and women in his department worthy of special recognition.”<sup>1</sup>

We write to ensure that the Dallas Police Department is not using its resources to endorse First Baptist Dallas, or to entangle itself in the church or religion. Such religious endorsement by a government entity would violate the Establishment Clause of the First Amendment.

In order to gain a better understanding about the nature of the police department’s ongoing involvement with this church and its involvement in the Back the Blue event, we are seeking records that clarify the arrangement. Pursuant to the Texas Public Information Act (Tex. Gov’t Code Ann. §§ 552.001– 552.353), I request a copy of all records related to the Dallas Police Department’s involvement with First Baptist Dallas or the Back the Blue event, including the following records, from January 2015 to present:

- 1) All written or recorded communications (including email) between any representative of the Dallas Police Department and any representative of First Baptist Dallas;

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<sup>1</sup> Fox 4 News, Coverage of First Baptist Dallas’ Back the Blue press conference, (Apr. 12, 2016) *available at* <https://www.youtube.com/watch?v=e2fEt66Mqw>.

- 2) All communications (including email and commonly posted notices) from any Dallas Police Department representative (including Chief Brown) to Dallas Police Department officers regarding: a) the Back to Blue event, b) First Baptist Dallas, or c) the services that First Baptist Dallas is now providing to the police department (including counseling services, bible classes, worship services, and the Chief's Award Fund);
- 3) All Dallas Police Department policies concerning the services that First Baptist Dallas is now providing to the police department (including, but not limited to, counseling services, bible classes, worship services, and the Chief's Award Fund); and
- 4) All receipts of payment from or to First Baptist Dallas (including for the Chief's Award Fund).

Per § 552.221(d), I request these copies as soon as possible, without delay. If you choose to deny the request, please respond in writing and state the statutory exception authorizing the withholding of all or part of the public record and the name and title or position of the person responsible for the denial. If your agency does not maintain these public records, please let me know the proper custodians of these records. Please provide their names and addresses.

If any of these records are available through electronic media, they may be e-mailed to [sgrover@ffrf.org](mailto:sgrover@ffrf.org). If I can provide any clarification that will help expedite your attention to my request, please contact me at (608) 256-8900. Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sam Grover', with a long horizontal line extending to the right.

Sam Grover  
Staff Attorney