First Amendment: COVID-19 and Freedom of Religion and Freedom of Assembly

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Constitutionality of Local COVID-19 Emergency Orders

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Overview

- Drafting Public Health Orders That May Impact First Amendment Gatherings
  - Answering Frequently Asked Questions
  - Notice of Violations
  - First Amendment Considerations
- Enforcing Public Health Orders Against Religious Institutions
- Lawsuits Across the Nation
- Lessons Learned

Drafting Public Health Orders

- **Basis for the Orders:**
  - **State Health and Safety Code:** CALIFORNIA HEALTH AND SAFETY CODE SECTIONS 101040, 101085, and 120175
  - **State Code of Regulations:**
    - TITLE 17 CALIFORNIA CODE OF REGULATIONS SECTION 2501
  - **State Constitution**
  - **Local Ordinances**

Drafting Emergency Orders

- **Basis for the Orders:**
  - **State:** GEORGIA MUNICIPAL HOME RULE STATUTE: **OCGA Sec. 36-35-3 State Constitution**
  - **Municipal Police Powers**
  - **Local Ordinances**

Drafting Emergency Orders

- **City of Atlanta Code of Ordinances:**
- Sec. 2-181. - Emergency powers of mayor regarding offenses.
- (a) In addition to any other emergency powers set forth in the ordinances of the city, the mayor, as chief executive of the city, shall have the emergency power to declare an emergency to exist when, in the mayor's opinion, any one or more of the following conditions exist:
  - (1) There is extreme likelihood of danger of destruction of life or property due to unusual conditions;
  - (2) Unusual or extreme weather conditions, making use of city streets or areas difficult or impossible;
  - (3) Civil unrest, commotion or uprising is imminent or exists; or
  - (4) There is a stoppage or loss of electrical power affecting a major portion of the city.

Drafting Emergency Orders

- (b) After declaration of such emergency, the mayor, as chief executive, shall have the right to exercise any or all of the following powers:
  - (1) To use employees of the city other than employees of the department of police to assist in the safety and preservation of life, limb and property of the citizenry of the city.
  - (2) To close streets and sidewalks and to delineate areas within the city wherein an emergency exists.
  - (3) To impose emergency curfew regulations.
  - (4) To close business establishments within the affected area.
  - (5) To close any and all city-owned buildings and other facilities to the use of the general public.
  - (6) To do any and all acts necessary and incidental to the preservation of life, limb and property of the citizenry of the city.
- No emergency power as set forth in this section may be effective for more than 72 hours after the declaration of an emergency. Powers as set forth in this section may be exercised during such further emergency period, but never for more than 72 hours in one declared emergency period. No emergency period shall extend beyond the next regular or special meeting of the council.

Drafting Emergency Orders

- (c) The declaration of an emergency as to a portion of the city shall specify with exactness the area in which the emergency is declared to exist.

  - **Consequences for Violation:**
  - 2-181 (d) Any person willfully and knowingly violating any curfew regulations or any other order of the mayor issued under this section shall be deemed guilty of an offense, and upon conviction thereof shall be punished as provided in section 1-8.

  - **Law Enforcement Quasi-Criminal Ordinance**

Drafting Emergency Orders

- **Consequences for Violation:**
  - **State Health and Safety Code:**
    - **California Health and Safety Code § 120295**: "Any person who violates Section 120130 or any section in Chapter 3 (commencing with Section 120175, but excluding Section 120195), is guilty of a misdemeanor, punishable by a fine of not less than fifty dollars ($50) nor more than one thousand dollars ($1,000), or by imprisonment for a term of not more than 90 days, or by both. He or she is guilty of a separate offense for each day that the violation continued."
  - **Penal Code**
  - **Local Ordinances**
  - **Law Enforcement Assistance**

Answering Frequently Asked Questions

- **State Department of Public Health Website**
- **Local Public Health Websites**
- **Court Websites**
- **Publicizing Frequently Asked Questions for Consistency**
- **Setting up a Process for Questions to be Posed and Addressed**

Learning About Violations

- **Anonymous Tip Lines**
- **Emails**
- **Alerts from Other Public Agencies**
- **Social Media**

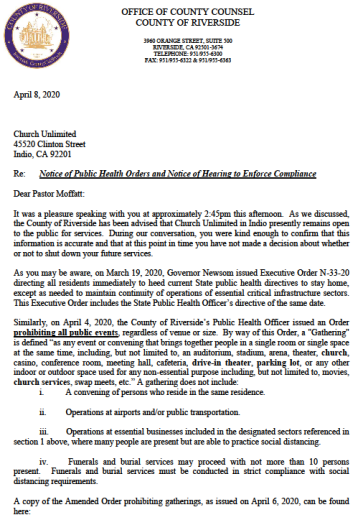
- **Once the alleged violation is discovered, two questions arise:**
  - **(1) Is this a violation of the Public Health or Emergency Order?**
  - **(2) If yes, who will enforce the Order?**
    - **If law enforcement declines to enforce the order, then what?**
    - **Role and impact of civil investigators**

First Amendment Considerations

- **Does the Violation Have a Tie to the First Amendment?**
- **Is the Violation of a Local or State Order?**
  - **If Local – Are You Being More Restrictive than the State and Making Yourself a Target for a Lawsuit? Is There a Less Restrictive Alternative?**
  - **If State – Do You Enforce or Refer to the State for Enforcement?**
- **Is Enforcement Consistent Across the Board?**
  - **Ex: Is a Prohibition on Live Music Enforced Equally at a Church Service and at a Winery?**

Cease and Desist Letters

- **Step One: Send a demand for the violation to stop, and provide notice of a hearing in the event that compliance is not achieved.**



OFFICE OF COUNTY COUNSEL
COUNTY OF RIVERSIDE

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RIVERSIDE, CA 92501-3674
TELEPHONE: 951/955-6300
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April 8, 2020

Church Unlimited
45520 Clinton Street
Indio, CA 92201

Re: ***Notice of Public Health Order and Notice of Hearing to Enforce Compliance***

Dear Pastor Moffatt:

It was a pleasure speaking with you at approximately 2:45pm this afternoon. As we discussed, the County of Riverside has been advised that Church Unlimited in Indio presently remains open to the public for services. During our conversation, you were kind enough to confirm that this information is accurate and that at this point in time you have not made a decision about whether or not to shut down your future services.

As you may be aware, on March 19, 2020, Governor Newsom issued Executive Order N-33-20 directing all residents immediately to heed current State public health directives to stay home, except as needed to maintain continuity of operations of essential critical infrastructure sectors. This Executive Order includes the State Public Health Officer's directive of the same date.

Similarly, on April 4, 2020, the County of Riverside's Public Health Officer issued an Order **prohibiting all public events**, regardless of venue or size. By way of this Order, a "Gathering" is defined "as any event or convening that brings together people in a single room or single space at the same time, including, but not limited to, an auditorium, stadium, arena, theater, **church**, casino, conference room, meeting hall, cafeteria, **drive-in theater**, **parking lot**, or any other indoor or outdoor space used for any non-essential purpose including, but not limited to, movies, **church services**, swap meets, etc." A gathering does not include:

i. A convening of persons who reside in the same residence.

ii. Operations at airports and/or public transportation.

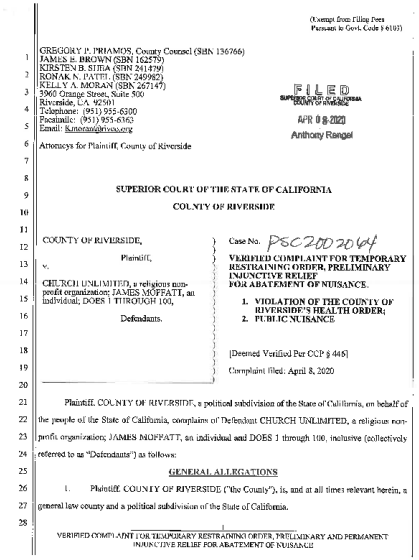
iii. Operations at essential businesses included in the designated sectors referenced in section 1 above, where many people are present but are able to practice social distancing.

iv. Funerals and burial services may proceed with not more than 10 persons present. Funerals and burial services must be conducted in strict compliance with social distancing requirements.

A copy of the Amended Order prohibiting gatherings, as issued on April 6, 2020, can be found here:

Filing a Complaint and Civil TRO

- **Step Two: File both a Complaint for violation of the Public Health Order (as well as any applicable local ordinance) AND an Ex Parte Application for a Temporary Restraining Order**



(Exempt from Filing Fees Pursuant to Govt. Code § 6103)

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
APR 08 2020
Anthony Rangel

Attorneys for Plaintiff, County of Riverside

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

COUNTY OF RIVERSIDE,

Plaintiff,

v.

CHURCH UNLIMITED, a religious non-profit organization; JAMES MOFFATT, an individual; DOES 1 THROUGH 100,

Defendants.

Case No. PSC 20 20 20 64

VERIFIED COMPLAINT FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTIVE RELIEF FOR ABATEMENT OF NUISANCE.

1. **VIOLATION OF THE COUNTY OF RIVERSIDE'S HEALTH ORDER;**
2. **PUBLIC NUISANCE**

[Deemed Verified Per CCP § 446]

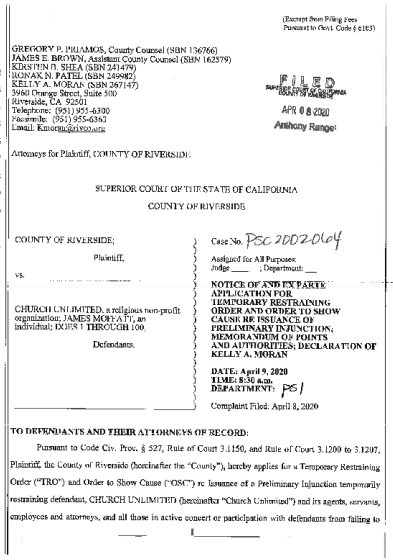
Complaint filed: April 8, 2020

Plaintiff, COUNTY OF RIVERSIDE, a political subdivision of the State of California, on behalf of the people of the State of California, complains of Defendant CHURCH UNLIMITED, a religious non-profit organization; JAMES MOFFATT, an individual and DOES 1 through 100, inclusive (collectively referred to as "Defendants") as follows:

GENERAL ALLEGATIONS

1. Plaintiff, COUNTY OF RIVERSIDE ("the County"), is, and at all times relevant herein, a general law county and a political subdivision of the State of California.

VERIFIED COMPLAINT FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF FOR ABATEMENT OF NUISANCE



(Exempt from Filing Fees Pursuant to Govt. Code § 6103)

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Anthony Rangel

Attorneys for Plaintiff, COUNTY OF RIVERSIDE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

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COUNTY OF RIVERSIDE,

Plaintiff,

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CHURCH UNLIMITED, a religious non-profit organization; JAMES MOFFATT, an individual; DOES 1 THROUGH 100,

Defendants.

Case No. PSC 20 20 20 64

Assigned for All Purposes:
Judge ____ ; Department: __

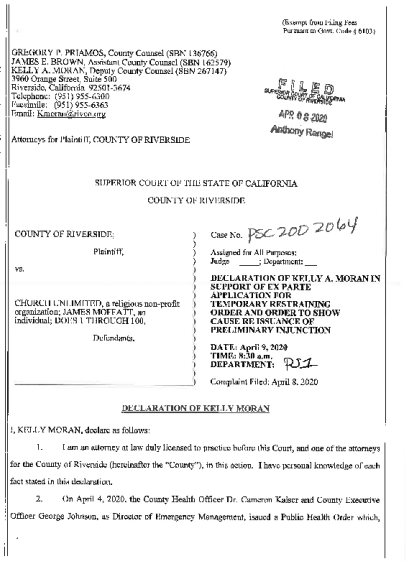
NOTICE OF EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE ISSUANCE OF PRELIMINARY INJUNCTION; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF KELLY A. MORAN

DATE: April 9, 2020
TIME: 8:30 a.m.
DEPARTMENT: P51

Complaint Filed: April 8, 2020

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

Pursuant to Code Civ. Proc. § 527, Rule of Court 3.1150, and Rule of Court 3.1200 to 3.1207, Plaintiff, the County of Riverside (hereinafter the "County"), hereby applies for a Temporary Restraining Order ("TRO") and Order to Show Cause ("OSC") re Issuance of a Preliminary Injunction temporarily restraining defendant, CHURCH UNLIMITED (hereinafter "Church Unlimited") and its agents, servants, employees and attorneys, and all those in active concert or participation with defendants from failing to



(Exempt from Filing Fees Pursuant to Govt. Code § 6103)

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
APR 08 2020
Anthony Rangel

Attorneys for Plaintiff, COUNTY OF RIVERSIDE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

COUNTY OF RIVERSIDE,

Plaintiff,

vs.

CHURCH UNLIMITED, a religious non-profit organization; JAMES MOFFATT, an individual; DOES 1 THROUGH 100,

Defendants.

Case No. PSC 20 20 20 64

Assigned for All Purposes:
Judge ____; Department: __

DECLARATION OF KELLY A. MORAN IN SUPPORT OF EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE ISSUANCE OF PRELIMINARY INJUNCTION

DATE: April 9, 2020
TIME: 8:30 a.m.
DEPARTMENT: P51

Complaint Filed: April 8, 2020

DECLARATION OF KELLY MORAN

I, KELLY MORAN, declare as follows:

1. I am an attorney at law duly licensed to practice before this Court, and one of the attorneys for the County of Riverside (hereinafter the "County"), in this action. I have personal knowledge of each fact stated in this declaration.

2. On April 4, 2020, the County Health Officer Dr. Cameron Kaiser and County Executive Officer George Johnson, as Director of Emergency Management, issued a Public Health Order which,

Enforcement of Emergency Order

- Issuance of a quasi-criminal citation adjudicable in Municipal Court against the individual violators;

- Closure of non-compliant business pursuant to the Mayor's Emergency Powers Order; done in the manner of shuttering an illegal business by police.

Civil Action Across the Country

- *Abiding Place Ministries v. Wooten et al*

  3:20-cv-00683-BAS-AHG

  - Abiding Place Ministries filed a temporary restraining order to prohibit San Diego County from enforcing its public health directives against the congregation's planned Easter Sunday gathering. The church argued that the County's order is an unconstitutional violation of the right to freely exercise one's religion.
  - On April 10, 2020, the U.S. District Court Southern District of California denied the church's request for a TRO, saying that though it was unfortunate the peak of the virus coincided with religious holidays, the County was within its authority to "reasonably restrict" constitutional rights in the face of a public health emergency. "The right to practice religion freely does not include the right to expose the community … to communicable disease …" *Prince v. Massachusetts* (1944) 321 U.S. 158, 166.
  - Second Amended Complaint dismissed by Joint Stipulation on September 3, 2020.
- *First Baptist Church et al v. Kelly et al*

  6:20-cv-01102-JWB-GEB

  - On April 18, 2020, U.S. District Court District of Kansas granted a TRO, preventing enforcement of the governor's public health order against two churches. The Court later extended the TRO until May 16 but it was voluntarily dismissed by plaintiffs when the original governor's order expired and was replaced with a new order allowing for church gatherings.
  - "Given the circumstances, Plaintiffs have made a substantial showing that development of the current restriction on religious activities shows religious activities were specifically targeted for more onerous restrictions than comparable secular activities. The Governor previously designated the attendance of religious services as an "essential function" that was exempt from the general prohibition on mass gatherings. That designation has not been rescinded or modified, yet in EO 20-18 and EO 20-25 churches and religious activities appear to have been singled out among essential functions for stricter treatment. It appears to be the only essential function whose core purpose – association for the purpose of worship – had been basically eliminated."
  - On May 5, 2020, Plaintiffs ' voluntarily dismissed the case.

Civil Action Across the Country

- *Legacy Church, Inc. v. Kunkel et al*

  1:20-cv-00327-JB-SCY

  - On April 17, 2020, the U.S. District Court District of New Mexico denied the church's request for TRO and permanent injunction preventing enforcement of state emergency orders against church gatherings.
  - The Court concluded that: (i) the Order did not violate Legacy Church's First Amendment religious freedom rights, because the Order is neutral and generally applicable; and (ii) the Order is a reasonable time, place, and manner restriction, and thus did not violate Legacy Church's First Amendment rights to assemble.
  - Motion to Dismiss filed by the State and granted on July 13, 2020
- *Maryville Baptist Church, Inc. v. Andy Beshear*

  6th Circuit Case No: 20-5427 (DC: 20-00278)

  - On May 2, 2020, the 6th Circuit Court of Appeal granted in part plaintiff's motion for injunction, enjoining the governor from enforcing public health orders preventing church from holding drive-in services. A prohibition on in-person services was allowed to continue.

Civil Action Across the Country

- *Beloved Church et el v. Pritzker et al*

  3:20-cv-50153
  - On May 3, 2020, the U.S. District Court Northern District of Illinois denied church's request for TRO and preliminary injunction and ruled that governor's April 30th order satisfies minimal constitutional muster.
  - "But even the foundational rights secured by the First Amendment are not without limits; they are subject to restriction if necessary to further compelling government interests—and, certainly, the prevention of mass infections and deaths qualifies. After all, without life, there can be no liberty or pursuit of happiness."
  - Appeal filed and pending before 7th Circuit.
- *Friends of Danny Devito et al v. Wolf, Gov. of PA, et al*

  68 MM 2020
  - Though this case does not involve religious institutions, it does involve constitutional claims. Filed on behalf of several local businesses, the case sought an emergency application for extraordinary relief seeking to invalidate Gov. Tom Wolf's executive order that shut down the physical operations of all "non-life-sustaining" business in response to the COVID-19 epidemic
  - On April 13, 2020, the Pennsylvania Supreme Court Middle District denied the request from Petitioners, a group of business and other entities, to vacate or strike the governor's executive order. On May 6, 2020, the application to the U.S. Supreme Court for stay was denied.
  - Petition pending before the U.S. Supreme Court

Civil Action Across the Country

- *Antietam Battlefield KOA et al v. Hogan et al*

  1:20-cv-1130

  - On May 2, 2020, a complaint for TRO was filed in US District Court District of Maryland by a group of state lawmakers, businesses, veterans, and pastors alleging governor's orders violate the U.S. and Maryland Constitutions.
  - On May 20, 2020, U.S. District Judge Catherine C. Blake rejected the constitutional challenge, saying the governor's directives are narrowly tailored to achieve Maryland's compelling interest of protecting the public from the deadly COVID-19 virus.
  - "Public officials cannot reasonably exercise their broad authority to protect the health of the entire community without considering the data, the science and the advice of experienced public health officials. Gov. Hogan, exercising the powers given to him by the legislature in the face of the COVID-19 crisis, has made reasonable choices informed, if not dictated by, such data, science and advice."
  - Motion to Dismiss pending before the District Court.
- *Lighthouse Fellowship Church v. Ralph Northam*

  2:20-cv-00204-AWA-RJK

  - The pastor of Lighthouse Fellowship Church in Chincoteague was charged April 5 with violating Gov. Ralph Northam's order that limits gatherings across the state — including at churches — to 10 people to contain the coronavirus spread.
  - On May 1, 2020, the U.S. District Court Eastern District of Virginia denied an emergency restraining order sought by a religious liberties group that contends Northam's 10-person limit infringes on the Lighthouse Fellowship's constitutional rights. The US DOJ had filed a statement of interest in support of the church's claims.
  - Motion to Dismiss pending before the District Court.

Civil Action Across the Country

South Bay United v. Newsom, et al.

- District Court No. 3:20-cv-00865-BAS-AHG
- Ninth Circuit No. 20-55533

- Plaintiff South Bay United Pentecostal Church and Bishop Arthur Hodges challenged the State and County of San Diego's stay-at-home orders.

- The District Court denied Plaintiffs' TRO and the 9th Circuit also denied the emergency motion for injunctive relief pending appeal.

- Published 2-1 decision with a lengthy dissent filed by the Honorable Judge Collins.

Civil Action Across the Country

- **Riverside County Actions:**
  - **Civil Enforcement:**
    - *County of Riverside v. Church Unlimited, et al.*
      PSC 2002064
    - *County of Riverside v. Grace Baptist Church, et al.*
      RIC 2001286
  - **Defending Litigation:**
    - *Gish v. Newsom, et al.*
      5:20-cv-00755-JGB-KK
    - *Gondola Adventures, Inc., et al. v. Newsom, et al.*
      2:20-cv-03789-CBM-MAA

Civil Action Across the Country

Gish v. Newsom, et al.

- Plaintiffs, including faith leaders, filed a federal lawsuit alleging violation of the U.S. and California Constitutions.
  - Eleven total causes of action, but relying heavily on the First Amendment.
- Plaintiffs requested a TRO, and a permanent injunction, against enforcement of the State's stay-at-home order as well as the stay-at-home orders issued by San Bernardino County and Riverside County
  - Court denied the TRO and did not schedule a hearing on a permanent injunction.
  - The State and County Orders satisfied a "deferential standard" and a rational basis standard. No application of strict scrutiny
- County's Motion to Dismiss granted on mootness grounds
  - Motion for Reconsideration filed by Plaintiffs.

Civil Action Across the Country

Gondola Adventures, Inc., et al. v. Newsom, et al.
2:20-cv-03789-CBM-MAA
Filed: April 24, 2020

- Gov. Gavin Newsom, the counties of Los Angeles, Orange and Riverside and dozens of officials from those regions were sued Friday by seven business owners who allege the forced closure of their shops and eateries in accordance with public health guidelines violates their civil rights.
- The lawsuit, filed in the United Stated District Court- Central District, sought an order to stop the enforcement of Governor Newsom's Executive Order closing "non-essential" businesses.
- On May 18, 2020, Plaintiffs entered a voluntary dismissal of the lawsuit in its entirety.

Civil Action Across the Country

County of Butler v. Wolf

- Local counties and businesses brought a lawsuit against Gov. Wolf arguing violation of various constitutional rights including the First Amendment and Fourteenth Amendment
- Trial conducted in June and July 2020
- 66 page ruling issued by Hon. Judge William Stickman in favor of the Plaintiffs.
  - Congregate gathering limitation violated right to assembly
  - Stay-at-home and business closure violated Due Process Clause of the Fourteenth Amendment
  - Business closure requirement violated Equal Protection Clause
- Gov. Wolf plans to file an appeal.

Civil Action Across the Country

- **City of Atlanta Actions:**
  - **Defending Litigation:**

- Governor Brian P. Kemp

vs.

- The Honorable Keisha Lance Bottoms, Mayor of the City of Atlanta; Atlanta City Council President Felicia Moore, and the members of the Atlanta City Council.

Filed in the Superior Court of Fulton County

07/16/2020

Civil Action File Number 2020-CV-338387

Civil Action Across the Country

- **City of Atlanta Actions:**
- **Kemp vs. Bottoms, et al.**

- On July 16, 2020, Governor Brian Kemp filed suit against the Mayor of the City of Atlanta and the President and every Member of the Atlanta City Council. The Governor sought an injunction and declaratory judgment to enjoin City officials from mandating masks in the City and from the issuance of recommendations that the City of Atlanta return to Phase I of reopening its economy resulting from the COVID-19 shutdown, and from issuing recommended guidelines in relation thereto. Gov. Kemp's lawsuit also asked the Court to enjoin the Mayor from issuing press releases or otherwise speaking about the City's COVID-19 response.

- On July 17, 2020, Gov. Kemp moved for an emergency interlocutory injunction. Two superior court judges recused themselves from hearing the case, and on July 23, the third judge, the Honorable Judge Barwick ordered the parties to mediate before the Honorable Judge Cynthia Wright.

- Prior to the mediation the City of Atlanta filed a response which included arguments that the Governor's Claims were barred by sovereign immunity, that the Governor's actions failed to promote and secure the safety and protections of Georgians as required by state law, that Mayor Bottoms' ability to issue press releases or public statements was protected by the First Amendment to the Constitution, and that the Atlanta City Council and the pursuant to Georgia Supreme Court precedent dating back to the 19th Century, Mayor cannot be enjoined from voting on or the passage or adoption of a law, resolution, ordinance or order by the Council and Mayor.

- After the first day of mediation began and submission of the City's response brief on July 27, Gov. Kemp withdrew his motion for an emergency interlocutory injunction. Thereafter, following additional rounds of unsuccessful mediation, on August 13, Gov. Kemp suddenly dismissed his suit in its entirety. On August 15, Gov. Kemp issued a new Executive Order which expressly permits local governmental entities in counties which have a certain threshold level of coronavirus cases to institute mask mandates. This Order remains in place today.

Lessons Learned

Litigation Takeaways:

- ✓Make sure that local public health orders are facially neutral when drafted.
- ✓Coordinate with your Court on the process for filing of ex parte applications.
- ✓Apply, and enforce, orders universally.
- ✓Don't overreach in your requests to the Court -
- ✓Work with other local municipalities to have a united message on enforcement when possible.
- ✓When sued, coordinate with your co-defendants – EARLY!
- ✓Prepare for Public Records Act Requests.
- ✓Stay on top of State and Federal trends.

Contact Info

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QUESTIONS?