
In The
Supreme Court of the United States

Hendersonville Parks and Recreation BOARD,

Petitioner,

-against-

Barbara PINTOK,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS
FOR THE THIRTEENTH CIRCUIT

BRIEF FOR PETITIONER

Team 2513
Counsel for Petitioner

QUESTIONS PRESENTED

1. Does the Board's practice of member-led prayer comport with the history and tradition of legislative prayer recognized by *Marsh* and *Town of Greece*, absent a pattern that denigrates nonbelievers or religious minorities, threatens damnation or preaches conversion?
2. Does the identity of the prayer-giver somehow change an otherwise secular purpose?
3. Does the identity of the prayer-giver somehow endorse an otherwise impermissible message and place coercive pressures on adults to a greater extent than already recognized in *Town of Greece* when the pray-giver is a board member?

TABLE OF CONTENTS

QUESTIONS PRESENTED	i
TABLE OF CONTENTS	ii
TABLE OF AUTHORITIES	iv
JURISDICTION STATEMENT	vii
STATEMENT OF THE CASE.....	1
SUMMARY OF THE ARGUMENT	4
ARGUMENT.....	6
I. THE BOARD’S PRACTICE OF MEMBER-LED PRAYER DOES NOT VIOLATE THE ESTABLISHMENT CLAUSE BECAUSE IT COMPORTS WITH THE RICH, TIME-HONORED TRADITION OF SOLEMNIZING PUBLIC BUSINESS.....	6
A. <i>Marsh</i> and <i>Town of Greece</i> Provide No Basis for Holding that the Identity of Certain Prayer-Givers Creates a Per Se Establishment Clause Violation	8
B. The Identity of the Prayer-Giver is Irrelevant.....	10
C. The Board’s Practice of Member-Led Prayer Does Not Show a “Course and Practice” that Denigrates, Proselytizes, or Betrays an Impermissible Government Purpose.....	12
D. The Board’s Policy of Selecting the Prayer-Giver is Nondiscriminatory.....	13
II. THE BOARD’S PRACTICE HAS A CLEARLY SECULAR PURPOSE.....	14
III. THE BOARD’S PRAYERS DO NOT SERVE AN UNCONSTITUTIONAL RELIGIOUS PURPOSE, NOR ARE THEY UNCONSTITUTIONALLY COERCIVE.....	17
A. The Board’s Prayer-Practice Does Not Unconstitutionally Endorse Religion	17
B. The Board’s Prayer-Practice Does Not Place Coercive Pressures on Religious Minorities.....	20
1. The Coercion Test Generally Does Not Apply in Settings Where the Audience is Not Impressionable Minors.....	21

2. Mature Adults Have the Mind and Capability to Think for Themselves and Appreciate the History and Tradition of Legislative Prayer	22
3. Alleged Animus of One Board Member Does Not Amount to a Predicate Pattern of Government Abuse on Which to Hold the Board’s Prayer-Practice Coercive.....	26
CONCLUSION.....	27

TABLE OF AUTHORITIES

SUPREME COURT CASES

<i>County of Allegheny v. ACLU</i> ,	
492 U.S. 573 (1989).....	8, 15, 17, 18
<i>Harris v. McRae</i> ,	
448 U.S. 297 (1980).....	15
<i>Highmark, Inc. v. Allcare Health Mgmt. Sys., Inc.</i> ,	
134 S. Ct. 1744 (2014).....	3
<i>Jama v. Immigration & Customs Enforcement</i> ,	
543 U.S. 335 (2005).....	18
<i>Lee v. Weisman</i> ,	
505 U.S. 577 (1992).....	11, 20, 21, 23
<i>Lemon v. Kurtzman</i> ,	
403 U.S. 602 (1971).....	14
<i>Lynch v. Donnelly</i> ,	
465 U.S. 668 (1984).....	8, 15, 17
<i>Marsh v. Chambers</i> ,	
463 U.S. 783 (1983).....	<i>passim</i>
<i>McGowan v. Maryland</i> ,	
366 U.S. 420 (1961).....	18
<i>Permoli v. Municipality No. 1 of City of New Orleans</i> ,	
44 U.S. 589 (3 How.) (1845)	10
<i>Pleasant Grove City v. Summum</i> ,	
555 U.S. 460 (2009).....	11
<i>Rowan Cty. v. Lund</i> ,	
138 S. Ct. 2564 (2018).....	3
<i>Santa Fe Indep. Sch. Dist. v. Doe</i> ,	
530 U.S. 290 (2000).....	21
<i>Sch. Dist. of Abington Twp., Pa. v. Schempp</i> ,	
374 U.S. 203 (1963).....	3

<i>Town of Greece v. Galloway</i> ,	
572 U.S. __; 134 S. Ct. 1811 (2014).....	<i>passim</i>
<i>United States v. Diebold, Inc.</i> ,	
369 U.S. 654 (1962).....	3
<i>Wallace v. Jaffree</i> ,	
472 U.S. 38 (1985).....	15
<i>Zorach v. Clauson</i> ,	
356 U.S. 306 (1952).....	18
CIRCUIT COURT CASES	
<i>Am. Atheists, Inc. v. Davenport</i> ,	
637 F.3d 1095 (10th Cir. 2010)	20
<i>Am. Humanist Ass’n v. McCarty</i> ,	
851 F.3d 521 (5th Cir. 2017)	17, 20, 25
<i>Bormuth v. Cty. of Jackson</i> ,	
870 F.3d 494 (6th Cir. 2017)	16, 24, 25, 26
<i>Chaudhuri v. Tennessee</i> ,	
130 F.3d 232 (6th Cir. 1997)	15
<i>Ctr. For Inquiry, Inc. v. Marion Circuit Court Clerk</i> ,	
758 F.3d 869 (7th Cir. 2014)	11
<i>Ingebretsen ex rel. Ingebretsen v. Jackson Pu. Sch. Dist.</i> ,	
88 F.3d 274 (5th Cir. 1996)	8
<i>Lund v. Rowan Cty. N.C.</i> ,	
863 F.3d 268 (4th Cir. 2017)	<i>passim</i>
<i>Mellen v. Bunting</i> ,	
327 F.3d 355 (4th Cir. 2003)	21, 22
<i>Simpson v. Chesterfield Cty. Bd. Of Sup’rs</i> ,	
404 F.3d 276 (4th Cir. 2005)	16
<i>Turner v. City Council</i> ,	
534 F.3d 352 (4th Cir. 2008)	11
DISTRICT COURT CASE	
<i>Hinrichs v. Bosma</i> ,	

400 F. Supp. 2d 1103 (S.D. Ind. 2005)	11
---	----

SECONDARY SOURCES

Elizabeth B. Halligan, <i>Coercing Adults?: The Fourth Circuit and the Acceptability of Religious Expression in Government Settings</i> , 57 S.C. L. Rev. 923, 925 (2006).....	21
Leonard W. Levy, <i>The Establishment Clause</i> xxii (2d ed., rev. 1994)	10
Major David E. Fitzkee & Captain Linell A. Letendre, <i>Religion in the Military: Navigating the Channel Between the Religion Clauses</i> , 59 A.F. L. Rev. 1, 9 (2007).....	15

JURISDICTION STATEMENT

A Formal Statement of Jurisdiction has been omitted in accordance with the Rules of the Washington College of Law's Burton D. Wechsler First Amendment Moot Court Competition.

STATEMENT OF THE CASE

Summary of the Facts. This case is about whether the identity of the prayer-giver alone is enough to distinguish a legislative-prayer-practice from settled constitutional law. Since at least 2005, the Hendersonville Parks and Recreation Board (“The Board”) has had an *unwritten practice* of beginning each meeting with a prayer, led by one of the five board members, and the Pledge of Allegiance. J.A. at 6. These prayers are typically short, “do not resemble any type of church service,” and are not a form of “religious worship.” J.A. at 3. Board members have compared the prayer-practice to “reciting the Pledge of Allegiance.” J.A. at 6. Additionally, the Board claims its prayer-practice “lends gravity to [its] proceedings,” J.A. at 4, and is not intended to “coerce anyone with regard to religious belief.” J.A. at 2.

The opening prayer of each meeting varies in subject matter from month-to-month. However, board members typically include a portion that emphasizes “guidance as [they] conduct the public’s business and serve all people.” J.A. at 9. Additional subjects have included guidance for “impartiality over all petitions,” moments of silence for “peace and togetherness,” and “bless[ing] our troops and their family members.” J.A. at 9. For example, board members have given the following prayers before conducting public business:

“Almighty God, we ask for thy blessings as we conduct our work. May we act in your spirit of benevolence and good will. We know that we need your spirit watching over us as we conduct the public’s work. May you guide us to preside fairly and impartially over all petitions, grievances, and arguments brought before us.”

“May we reflect on the awful violence and mass shootings in this country. May God place His Healing Hand on the hurt communities and families who suffered grievous losses. We know that evil exists in the world, but we humbly ask for peace and togetherness in this trying time. We ask for a moment of quiet reflection to allow all present in this room to reflect on the pressing moments of their day. We pray that we can all come together in a spirit of unity despite whatever differences we may have.”

“Heavenly Father, we ask for your guidance as we conduct the public’s business and serve all people—no matter what religion, faith, or lack thereof. May we conduct ourselves in the proper manner at all times. Father, the world seeks to divide often on the basis of race. Let us treat all persons with the dignity and respect that they deserve—no matter their race, sex, religion, sexual orientation, or gender identity. We are all God’s people.”

“Please bow your heads. Lord, help us to make good decisions. Bless our troops and their family members who are missing their loved ones who are making sacrifices for us all. Please bless our community with peace. We know that we are tasked with making decisions that impact the lives of members of our community. Please bless everyone that comes before us and give peace to them in their daily lives.”

“We are all sinful but as the book of Isaiah reads, though our sins are like scarlet, they shall be as white as snow. We all fall short of the glory of God. We must strive to conduct our business in a way consistent with the careful hand of the Father and His son Jesus Christ.”

J.A. at 9.

The Board is comprised of five members of differing Christian denominations, J.A. at 8, and represents all residents from the “religiously devout” to the “fiercely atheistic.” J.A. at 2. Barbara Pintok (“Pintok”) is a resident of Hendersonville and is a follower of Wicca. J.A. at 1. Pintok filed a lawsuit seeking declaratory and injunctive relief against the Board for its “use of sectarian prayers.” J.A. 10. Pintok alleged that the prayers caused her to become “distraught” and “nervous” when presenting before the Board. J.A. at 1. She claimed that she “[felt] like an outsider” after hearing the prayers. J.A. Pintok voiced her concern on a single occasion to one board member and claimed to have received an offensive response. J.A. at 1.

Summary of the Proceedings. The district court properly granted the Board’s motion for summary judgment by analyzing the Board’s practice against the backdrop of “history and tradition [relied on] in *Marsh* and *Town of Greece*.” See J.A. at 15. The district court found the Board’s practice (1) was consistent with historical practices, (2) did not denigrate any religion, and (3) was not coercive. J.A. at 15. On appeal, the Thirteenth Circuit erroneously reversed and

remanded the case with instructions to enter summary judgment for Pintok. J.A. at 24. The circuit court held that the Board's practice violated the Establishment Clause, J.A. at 24, reasoning that the Board's practice amounted to an unconstitutional endorsement of religion. J.A. at 24. The circuit court's decision is both "unfaithful to [this Court's] precedents and ahistorical." *Rowan Cty. v. Lund*, 138 S. Ct. 2564, 2566 (2018) (Thomas, J. dissenting). The Board asks this Court to reverse the circuit court's decision, in keeping with this country's unbroken and unambiguous history and tradition of member-led prayer.

Standard of Review. A question regarding the establishment of religion is a question of law. *See Sch. Dist. of Abington Twp., Pa. v. Schempp*, 374 U.S. 203, 277 (1963). The Court may review issues of constitutional law using a de novo standard of review. *Highmark, Inc. v. Allcare Health Mgmt. Sys., Inc.*, 134 S. Ct. 1744 (2014). Where both sides moved for summary judgment, this Court can not only reverse but also render judgment. *United States v. Diebold, Inc.*, 369 U.S. 654, 655 (1962) (per curiam). "On summary judgment the inferences to be drawn from the underlying facts . . . must be viewed in the light most favorable to the party opposing the motion." *Id.*

SUMMARY OF THE ARGUMENT

This case falls squarely within the *Marsh* and *Town of Greece* framework and should have been resolved accordingly. Instead, the lower court erroneously distinguished this case by making the identity of the prayer-giver a dispositive factor. This ruling not only ignores the long history of member-led prayer in our country but contradicts the Establishment Clause guidepost that legislative prayer—regardless of the identity of the prayer-giver—is government speech. What is more, the lower court’s endorsement and coercion analysis consisted entirely of parsing the content of the prayers. In doing so, the lower court impliedly overrules *Town of Greece*.

Marsh and *Town of Greece* give no basis to hold that the identity of a prayer-giver creates a per se Establishment Clause violation. There is an unambiguous and unbroken history of member-led prayer in this country. In *Marsh*, the Court acknowledged a historical gloss of religion and legislative prayer as old as the founding era. The Framers themselves accepted member-led prayer at the state and local level. That practice continues to this day.

There is no positive authority to support the argument that the identity of the prayer-giver is relevant. A prayer-giver creates government speech when acting under color of government authority. Chaplain-led prayer closely associates the government with religion because chaplains are deputized. Chaplain-led prayer, then, is government speech. Therefore, focusing on the identity of the prayer-giver, and not the prayer-practice as a whole, would render all legislative prayer violative of the Establishment Clause.

The Board’s practice does not show a “course and practice” that denigrates, proselytizes, or betrays an impermissible government purpose. The constitutionality of legislative prayer turns on the objective analysis of the practice over time. The Board’s practice of leading prayer has a defined secular purpose of solemnizing public business and lends gravity to the seriousness of the

subsequent proceedings. The Court must give great deference to the secular purpose of the practice so long as the practice's stated purpose is not a "sham." The Board's practice prepares attendees for the matters ahead as well as adds dignity and formality to the meeting. Simultaneously, the practice prepares the Board itself to approach public business with wisdom and impartiality. The Board's practice does not favor any one religion but is in fact neutral. Sectarian prayer is a constitutional way of solemnizing public business.

The endorsement test is not the appropriate test to analyze legislative prayer cases. The government endorses religion when it makes a citizen's religion or irreligion relevant to their standing in the community. This can manifest when the government sends a message to religious dissidents that they are outsiders or not full participants in the public square. These general guideposts serve to identify the message the government intends to communicate to citizens and the message that is actually conveyed. Yet, *Town of Greece* already makes clear that legislative prayer can, and mostly does, communicate to the public that government officials are religious people with devotion to a Supreme Being not necessarily held by other citizens. It is also clear that the purpose of legislative prayer is to align the minds of government officials with the seriousness of public business before them and connect them with the deep history and tradition of religion in public life that stretches back to the founding of our country. This is why *Town of Greece* renders the guideposts of the endorsement test nullities when applied to legislative prayer. *Town of Greece* embraces individual religious expressions from lawmakers and the like as part of the time-honored tradition of religion in American political life. The message conveyed by legislative prayer might ordinarily establish religion, but *Town of Greece* carves out a clear exception for that practice. That is why the guideposts of the endorsement test are nullities in this context because the otherwise suspect messages conveyed by legislative prayer are expressly embraced by *Town of*

Greece. Importantly, the lower court did not identify a predicate pattern of government abuse in and therefore had no basis to hold that the Board’s prayer practice falls outside of the *Marsh* and *Town of Greece* framework.

The coercion test is inapplicable to legislative prayer absent a pattern of government abuse. Instead, that test is used primarily in the context of school children and minors. This is due to the heightened risk of indirect coercion on impressionable children. Children and minors are more susceptible to coercion from public and peer pressure, a problem that this Court said is not present with mature adults. The coercion test is improperly applied to the Board’s practice because the prayers are given outside of the school setting and are given to reasonable adults.

It is well established that legislative prayer is not coercive for adults due to a mature audience’s ability to comprehend the unifying intent of the prayers. The Court presumes an adult knows that legislative-prayer is not intended to proselytize citizens. To rebut that presumption, an individual must show a pattern of prayers that denigrate, proselytize, or betray an impermissible purpose. Additionally, subtle coercion does not rise to the level of coercion with which the Framers were concerned; the Framers were worried about actual legal coercion. The Board’s practice does not show a pattern of prayers that denigrate, proselytize, or betray an impermissible purpose. While there may be the occasional offense, the practice does not routinely single out opponents or give any indication that opponents will be treated differently.

ARGUMENT

I. THE BOARD’S PRACTICE OF MEMBER-LED PRAYER DOES NOT VIOLATE THE ESTABLISHMENT CLAUSE BECAUSE IT COMPORTS WITH THE RICH, TIME-HONORED TRADITION OF SOLEMNIZING PUBLIC BUSINESS.

For at least thirteen years, and probably many more, one of the Board’s five members opens its monthly meeting by asking everyone in the room to stand, recite the Pledge of Allegiance, and

hear a short prayer. J.A. at 8. One of the five board members delivers the prayer. J.A. at 8. The prayer serves a clear, bifurcated purpose: to “[1] solemnize public business and to [2] offer citizens a chance to reflect quietly on matters before the Board or whatever else is going on in their lives.” J.A. at 2. On one hand, “[t]he principle audience” of the prayer is the “lawmakers [themselves] . . . who may find that a moment of prayer or quiet reflection sets the mind to a higher purpose and thereby eases the task of governing.” *Town of Greece v. Galloway*, 572 U.S. __; 134 S. Ct. 1811, 1826 (2014). On the other hand, citizen-attendees of the Board meeting have an opportunity to stand in recognition of the solemn occasion of governance and reflect on the gravity of the occasion if they so please. *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1827. Importantly, like the practice in *Town of Greece*, the prayer “largely accommodate[s] the spiritual needs of [the] lawmakers and connect[s] them to a tradition dating to the time of the Framers.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1825 (opinion of Kennedy, J.).

It is “presumed that the reasonable observer is acquainted with this tradition and understands” that it serves a lawful purpose and acknowledges “the place religion holds in the lives of many private citizens.” *Id.* Just because “many appreciate these acknowledgments of the divine in our public institutions does not suggest that those who disagree are compelled to join the expression or approve its content.” *Id.* (citing *West Virginia Bd. of Ed. v. Barnette*, 319 U.S. 624, 642 (1943)). Notably, the Board has never “directed the public to participate in the prayers, singled out dissidents for opprobrium, or indicated that [the Board’s] decisions might be influenced by a person’s acquiescence” *Id.* at 1826.

This Court in *Town of Greece* also emphasized, “[f]or the members of the town boards and commissions, who often serve part-time and as volunteers, *ceremonial prayer may also reflect the values they hold as private citizens.*” *Id.* (emphasis added). Legislative prayer therefore allows the

Board members to “show who and what they are without denying the right to dissent by those who disagree.” *Id.* *Town of Greece* embraces the identity of a government official as a religious individual, called both in devotion to her god and in service to her government. Here, the lower court erroneously read this essential embrace out of the *Town of Greece* framework by applying the endorsement test. This error makes the identity of the prayer-giver a per se Establishment Clause violation. The lower court should be reversed for that reason.¹

A. *Marsh* and *Town of Greece* Provide No Basis for Holding that the Identity of Certain Prayer-Givers Creates a Per Se Establishment Clause Violation.

Marsh and *Town of Greece* recognize the history and tradition of legislative prayer, in its various forms, as per se constitutional. The Establishment Clause is interpreted by reference to historical practices. *County of Allegheny v. ACLU*, 492 U.S. 573, 670 (Kennedy, J., concurring in judgement in part and dissenting in part) (1989). It is of no moment that the identity of the prayer-giver is the only difference between this case and *Marsh* and *Town of Greece* because the Board’s practice still boasts an obvious connection to the rich history and tradition of legislative prayer. The lower court, then, essentially holds that the identity of the prayer-giver is a dispositive factor. *See Lund v. Rowan Cty. N.C.*, 863 F.3d 268, 277 (4th Cir. 2017). *Town of Greece* makes it permissible for legislative prayer to “reflect the values the [board members] hold as private citizens,” and offers “an opportunity for them to show who and what they are.” *Town of Greece*,

¹ Under the endorsement test, a “[g]overnment unconstitutionally endorses religion whenever it appears to take a position on questions of religious belief, or makes adherence to a religion relevant in any way to a person’s standing in the political community.” *Ingebretsen ex rel. Ingebretsen v. Jackson Pu. Sch. Dist.*, 88 F.3d 274, 280 (5th Cir. 1996). “The government creates this appearance when it conveys a message that religion is unfavored, preferred, or promoted *over other beliefs*.” *Id.* (emphasis added). Although the U.S. Supreme Court has expressed its “unwillingness to be confined to any single test or criterion” in Establishment Clause cases, *Lynch v. Donnelly*, 465 U.S. 668, 679 (1984), no other court has resolved a legislative prayer case by applying the endorsement test. Instead, the starting point for the analysis in this case is the legislative prayer exception. *Town of Greece*, 134 S. Ct. at 1825. Only upon finding a pattern of denigration, proselytization, or an otherwise impermissible purpose does the case fall outside of the exception.

572 U.S. __; 134 S. Ct. at 1826 (opinion of Kennedy, J.). Thus, it is incoherent to conclude that *Marsh* and *Town of Greece* are inapplicable to member-led prayer. *Id.* In fact, such a holding would render every personal display of religious devotion by an individual acting under color of government authority an establishment of religion, including recent prayers given at a ceremony for the late Senator John McCain.²

A look into the history and tradition of legislative prayer in our country unveils a long-standing practice of government officials opening public business with sectarian prayer that has withstood the test of time. In fact, recent litigation over this issue in the Sixth Circuit revealed that 73 percent of counties (104 counties) in the jurisdiction have a practice of legislator-led prayer³. *Marsh* and *Town of Greece* interpret the constitutionality of legislative prayer by reference to history. *See Town of Greece*, 572 U.S. __, 134 S. Ct. at 1813; *Marsh v. Chambers*, 463 U.S. 783, 791 (1983). *Town of Greece* makes it clear that “[a]ny test the Court adopts *must acknowledge a practice that was accepted by the Framers and has withstood the critical scrutiny of time and political change.*” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1819 (emphasis added). *Marsh* acknowledges that legislative prayer dates back to the Continental Congress in 1774 and the First Congress in 1789, which opened meetings with a prayer given by a paid chaplain. *Marsh*, 463 U.S. at 787-88; *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1818, 1823. Moreover, in the year that the

² For example, on August 29, 2018, Senator Jeff Flake of Arizona offered a prayer during a ceremony for Senator John McCain at the Arizona State Capital Building. Sen. Flake prayed, “Our Heavenly Father, We are grateful to be gathered here in the Arizona state capital to honor the life and memory of thy servant, John Sydney McCain. We are grateful for his life and for his sacrifice. Gathered here in this spot, we are especially grateful that John made this his home. *More than seven million of thy children have done likewise, and all of them, all of us, are grateful* for John’s able representation over these many years. We ask for thy spirit to abide with us as we mourn his passing. We ask for an added measure of thy spirit to be with John’s family . . . Send the comforter so that they might be reminded that joy cometh in the morning. Now as we go forward, let us remember our humble servant with gladness and cheerfulness; to answer his call to summon the better angels of our nature; to see and appreciate the humanity in our opponents; to more freely forgive that we may be forgiven. *Of this we pray in the name of Jesus Christ, amen.*”

³ Brief of Amici Curiae State of Michigan and Twenty-One Other States in Support of Jackson County and Affirmance at 2, *Bormuth v. City of Jackson*, 870 F.3d 494 (6th Cir. 2017) (No. 15-1869)

First Amendment was ratified, “[s]even of the fourteen states that comprised the Union . . . authorized establishments of religion by law.” Leonard W. Levy, *The Establishment Clause* xxii (2d ed., rev. 1994). Although this era of American jurisprudence was clear that the First Amendment was not applicable to the States, *Permoli v. Municipality No. 1 of City of New Orleans*, 44 U.S. 589 (3 How.) (1845), it is nonetheless clear that legislator-led prayer at the state and local level was “accepted by the Framers.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1819.

States have continued the time-honored practice of legislator-led prayer as constitutional law has changed. Appendix A-F (excerpts of legislative journals from various states).⁴ This practice began long before the passage of the Fourteenth Amendment, Appendix A-E, and continues well after. Appendix F-H. What is more, a 2002 survey shows that thirty-six states allow legislators to offer an opening invocation in at least one chamber.⁵ In fact, even more recent 2015 and 2016 studies shows that those numbers have remarkably increased. Appendix Q-S. This is precisely the kind of historical evidence held by *Marsh* and *Town of Greece* as the dispositive measure of history and tradition. Altogether, the analysis of history and tradition among the several states affirms an “*unambiguous and unbroken history of more than 200 years*” of legislator-led prayer that, like general legislative prayer, “*presents no . . . potential for establishment.*” *Marsh*, 463 U.S. 783, 791-92 (1983) (emphasis added).

B. The Identity of the Prayer-Giver is Irrelevant.

⁴ Materials cited as Appendices A-F, as well as other materials and studies cited in Section I.A., were largely taken from the following Amici briefs: Brief of Amici Curiae State of Michigan and Twenty-One Other States in Support of Jackson County and Affirmance, *Bormuth v. City of Jackson*, 870 F.3d 494 (6th Cir. 2017) (No. 15-1869); Brief of Amici Curiae State of West Virginia and 12 Other States Supporting Defendant-Appellant, *Lund v. Rowan County*, 863 F.3d 268 (4th Cir. 2017) (No. 15-01591); Supplemental Brief of Amici Curiae State of West Virginia and 12 Other States Supporting Defendant-Appellant Seeking Reversal, *Lund v. Rowan County*, 863 F.3d 268 (4th Cir. 2017) (No. 15-01591); and others cited in footnotes herein below.

⁵ See NATIONAL CONFERENCE OF STATE LEGISLATURES, “Prayer-practices,” Table 02.5.52 at 5-151 (2002), available at: <http://www.ncsl.org/documents/legislmgmt/ilp/02tab5pt7.pdf>.

A prayer-giver, whether a chaplain or a legislator, creates government speech when acting under color of government authority. *Turner v. City Council*, 534 F.3d 352, 355 (4th Cir. 2008) (O'Connor sitting by designation) (holding that legislative prayer is "government speech"); *Hinrichs v. Bosma*, 400 F. Supp. 2d 1103, 1104 (S.D. Ind. 2005) (Legislative "prayers are deemed government speech for purposes of applying the Establishment Clause."), *rev'd on other grounds*, 506 F.3d 584 (7th Cir. 2007). This is the foundation of any legislative prayer case because the Establishment Clause only forbids certain government speech. *Cf. Pleasant Grove City v. Summum*, 555 U.S. 460, 468 (2009) ("Government speech must comport with the Establishment Clause."). If legislative prayer did not create any government speech, there would be no Establishment Clause claim. *Id.* Therefore, making a constitutional distinction based on the identity of the prayer-giver is erroneous. For the purpose of applying the Establishment Clause, a volunteer, a paid cleric, and a legislator are all considered the same because all three offer prayer under color of government authority. *Cf. Lee v. Weisman*, 505 U.S. 577, 589-90 (1992). *Marsh* and *Town of Greece* concern general restrictions on the speech of a chosen government agent. *See Ctr. For Inquiry, Inc. v. Marion Circuit Court Clerk*, 758 F.3d 869, 874 (7th Cir. 2014) (*Marsh* and *Town of Greece* "concern what a chosen agent of the government says as part of the government's own operations."). Indeed, even the dissent in *Town of Greece* remarked that using a volunteer chaplain still makes the prayer closely associated with the government because the volunteer is effectively "deputized." *See Town of Greece*, 572 U.S. __; 134 S. Ct. at 1850 (Kagan, J., dissenting).

The lower court effectively held that the identity of the prayer-giver is dispositive because the prayer is given in the shoes of the government. J.A. at 21. However, that is true regardless of the identity of the prayer-giver. *See Turner, supra* at 355. The lower court's holding is profound

because it requires only two possible coherent conclusions: either (1) the identity of the prayer-giver is irrelevant, or (2) the identity of the prayer giver is relevant and all legislative prayer would violate the Establishment Clause. This is because a legislator, a chaplain, and a volunteer are similarly situated for the purposes of the Establishment Clause, and if the identity of one establishes religion then so must the others. This would require this Court to overturn all of its legislative prayer jurisprudence.

C. The Board’s Practice of Member-Led Prayer Does Not Show a “Course and Practice” that Denigrates, Proselytizes, or Betrays an Impermissible Government Purpose.

Pintok’s claim rests on her testimony that the recitation of sectarian prayers made her “feel like an outsider, humiliated [her], and caused [her] significant distress.” J.A. at 1. Although the law is not indifferent to suffering, the constitutionality of legislative prayer does not turn on a subjective analysis of personal feelings or motivations. *See Town of Greece*, 572 U.S. __; 134 U.S. at 1819. Instead, the relevant question is whether the practice, over time, shows a pattern that “denigrate[s] nonbelievers or religious minorities, threaten[s] damnation, or preach[es] conversion.” *Id.* at 1823. This makes the objective characteristics of the practice itself, not the personal feelings of the hypothetical religious minority, the center of analysis. *See id.* at 1825 (“It is presumed that the *reasonable observer is acquainted with this tradition* and understands that its purposes are to lend gravity to public proceedings and to acknowledge the place religion holds in the lives of many private citizens, not to afford government an opportunity to proselytize or force truant constituents into the pews.”). Unless the practice shows a pattern, over time, that betrays this permissible government purpose, it is *per se* constitutional. *See id.* at 1824.

The Board’s practice of member-led prayer does not reveal a pattern of impermissible conduct necessary to render it unconstitutional. Every member of the Board clarifies that they intend the prayers to solemnize public business. J.A. at 2-6. The Board’s prayer-practice “as a

whole” bears this out. *Id.* at 1824; J.A. at 2 (“[T]he intent of these prayers is to solemnize public business.”); J.A. at 3 (“They are not a form of religious worship.”); J.A. at 4 (“[T]his prayer is not a religious exercise. It is an attempt to lend gravity to our proceedings.”). The record shows that the prayers were consistently solemn and respectful, inviting the board members to reflect upon the virtue of rising above petty differences. J.A. at 9. Prayers consisted of statements like, “[w]e ask for your guidance as we conduct the public’s business and serve all people—no matter what religion, faith, or lack thereof.” J.A. at 9. One will search in vain for a “course and practice” that the reasonable observer would find to “denigrate religious minorities, threaten damnation, or preach conversion.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1824.

D. The Board’s Policy of Selecting the Prayer-Giver is Nondiscriminatory.

Given that no material constitutional distinction exists whether the prayer-giver is a paid chaplain, volunteer, or legislator for the purposes of applying the Establishment Clause, *Marsh* and *Town of Greece* do not require religious diversity on the Board.⁶ *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1824 (The municipal body need not “promote a diversity of religious views” or make an “effort to achieve religious balancing.”). The Board must merely avoid a practice that, over time, shows a pattern of conduct that tends to “exploit” the legitimate government end by using the prayer-practice to “proselytize or advance any one, or to disparage any other, faith or belief.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1821-22, 1824 (quoting *Marsh*, 463 U.S. at 794-95).

The present case is different from *Marsh* and *Town of Greece* in a way that makes it even less likely to establish religion. In *Marsh*, the Nebraska legislature employed one chaplain of a

⁶ In fact, *Marsh* and *Town of Greece* are more plausibly read to proscribe the kind of judicial decision-making required to achieve a desired goal of religious inclusivity because that would require the Board to choose who speaks based off of their religion, and what they say. See *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1824 (citing *Lee*, 505 U.S. at 617).

single faith—chosen by a simple majority vote—who opened sessions with sectarian prayers of a single faith for over sixteen years. *Marsh*, 463 U.S. at 785. Even though the electorate had little influence over the content of the prayer, this Court held up Nebraska’s practice as constitutional. *Id.* at 786. Likewise, in *Town of Greece*, the prayer-giver selection process was heavily controlled by policy guidelines promulgated and managed by the government. *Id.* at 783. Here, selecting the prayer-giver is determined by the fact that the prayer-giver is a member of the Board, and nothing else. J.A. at 8. If a Board member is a Sikh, then it follows that the Board would periodically open its business with a Sikh invocation. It stands to reason, that the Board would forgo an opening prayer entirely if all its members were atheists. Thus, the power of the electorate to affect the diversity of religious viewpoints is at its highest ebb because people of any faith—or no faith at all—may be elected to the Board, which makes this practice unlikely to raise a constitutional issue.

II. THE BOARD’S PRACTICE HAS A CLEARLY SECULAR PURPOSE.

Courts generally apply the *Lemon* test to cases arising under the Establishment Clause. The first prong of the *Lemon* test requires that “the statute [or government practice] . . . have a secular legislative purpose.” *Lemon v. Kurtzman*, 403 U.S. 602, 612-13 (1971). The Board’s practice has a defined secular purpose of solemnizing public business by lending gravity to the seriousness of the occasion of governance. The lower court even conceded that the Board’s practice has a secular governmental purpose, therefore passing the first prong of the *Lemon* test. However, the *Lemon* test is not used in evaluating legislative prayers, as demonstrated in *Marsh* and *Town of Greece*. See *Marsh*, 463 U.S. at 801; *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1819.

This Court invalidated a government action that lacked a secular purpose, but only when it also concluded that there was “no question that the statute or activity was motivated wholly by religious considerations.” *Lynch v. Donnelly*, 465 U.S. 668, 680 (1984). Courts give great

“deference to the government’s statement of its secular purpose—provided that the stated purpose is ‘sincere and not a sham.’” Major David E. Fitzkee & Captain Linell A. Letendre, *Religion in the Military: Navigating the Channel Between the Religion Clauses*, 59 A.F. L. Rev. 1, 9 (2007) (citing *Edwards v. Aguillard*, 482 U.S. 578, 586 (1987)). A practice will not be struck down under the Establishment Clause simply because the government action coincides with the tenets of some religion. *Harris v. McRae*, 448 U.S. 297, 319 (1980). In determining a practice’s purpose, the court should inquire into “whether the government’s actual purpose is to endorse or disapprove of religion.” *Wallace v. Jaffree*, 472 U.S. 38, 56 (1985). The practice’s purpose need not be exclusively secular. *See Lynch*, 465 U.S. at 681 n.6.

The Board’s prayer-practice prepares board members for the thought serious matters but primarily focuses on solemnizing public business. This Court held that “government acknowledgement of religion serve[s] . . . the legitimate secular purpose of solemnizing public occasions, expressing confidence in the future, and encouraging the recognition of what is worthy of appreciation in society.” *Lynch*, 465 U.S. at 693; *see also Chaudhuri v. Tennessee*, 130 F.3d 232, 237 (6th Cir. 1997). Legislative prayer also reminds lawmakers to “transcend petty differences in pursuit of a higher purpose and express a common aspiration to a just and peaceful society.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 134 S.Ct. 1811, 1818 (2014). The history and tradition of legislative prayer suggest that “those practices are not understood as conveying government approval of particular religious beliefs.” *Allegheny*, 492 U.S. 573, n.46.

In *Town of Greece*, the Court upheld a town board’s monthly practice of beginning the assembly with a prayer or invocation. *Town of Greece*, 572 U.S. __; 134 S. Ct. at 132 S.Ct. at 1816. The practice was meant to place the town board members in a “solemn and deliberative frame of mind, invoke divine guidance in town affairs, and follow a tradition practiced by Congress

and dozens of state legislatures.” *Id.* Additionally, the Court held that “[p]rayer that is solemn and respectful in tone, that invites lawmakers to reflect upon shared ideals and common ends before they embark on the fractious business of governing, serves [a] legitimate purpose.” *Id.* at 1823.

The Sixth Circuit allowed a board of commissioners to deliver prayers that were “solemn, respectful, and reflective” at the opening of their meetings. *Bormuth v. Cty. of Jackson*, 870 F.3d 494, 498 (6th Cir. 2017). The recited prayers used to begin the meeting were generally Christian in nature and ensured that every member was in the right head space to conduct subsequent public business. *Id.* at 512. The court correctly concluded that the “all-Christian makeup of the Commissioners is immaterial” because their interests as legislators are aligned with the public’s interests. *Id.* at 514. Further, the Fourth Circuit affirmed a board’s prayers that were strictly Judeo-Christian in nature and did not violate a Wiccan member’s rights. *Simpson v. Chesterfield Cty. Bd. Of Sup’rs*, 404 F.3d 276, 288 (4th Cir. 2005). These prayers were “appropriately ecumenical invocations” and “solemnize[d] occasions that highlight beliefs widely held.” *Id.* at 287.

In the present case, the Board’s practice clearly comports with the secular purpose of solemnizing public business. Like *Town of Greece*, the prayers at the board meetings provoke conscious thoughts about the matters of the meeting and lend gravity to its seriousness. *See Town of Greece*, 572 U.S. __; 134 S.Ct. at 1816; *see also* J.A. at 4. Like in *Bormuth* and *Simpson*, the mere fact that the Board members are all Christian, and the prayers are Judeo-Christian in nature, is immaterial. *See Bormuth*, 870 F.3d at 498; *Simpson*, 404 F.3d at 288. The facts of the current case absolutely lend themselves to a purely secular purpose of solemnizing public business. Since the practice has always been conducted with the intention of opening the meeting in a solemn and serious manner, it is obvious that it achieve this secular purpose.

III. THE BOARD’S PRAYERS DO NOT SERVE AN UNCONSTITUTIONAL RELIGIOUS PURPOSE, NOR ARE THEY UNCONSTITUTIONALLY COERCIVE.

A. The Board’s Prayer-Practice Does Not Unconstitutionally Endorse Religion.

The Board’s legislative prayer-practice does not unconstitutionally endorse religion because it does not “make adherence to a religion relevant in any way to a person’s standing in the political community.” *Lynch*, 465 U.S. at 687 (O’Connor, dissenting). Under the endorsement test, “a government unconstitutionally endorses religion whenever it appears to take a position on questions of religious belief or makes adherence to a religion relevant in any way to a person’s standing in the political community. The government creates this appearance when it conveys a message that religion is favored, preferred, or promoted over other beliefs.” *Am. Humanist Ass’n v. McCarty*, 851 F.3d 521, 526 (5th Cir. 2017) (internal citation omitted). The endorsement test is meant to clarify how the Lemon test relates to the “principles enshrined in the Establishment Clause.” *Lynch*, 465 U.S. at 668-89. A government unconstitutionally endorses religion when it “sends a message to nonadherents that they are outsiders, not full members of the political community, *and* an accompanying message to adherents that they are . . . favored members of the community.” *Id.* at 688. (emphasis added). Those general guideposts serve to identify the “purpose and effect” of a government practice. *Id.* To discern whether the Board’s prayer-practice unconstitutionally endorsed religion, the court should ask what the Board “intended to communicate” and what “message” the practice “actually conveyed.” *Id.*

Importantly, the constitutionality of legislative prayer does not hinge on whether it has the “effect of affiliating the government with any one specific faith or belief,” as some courts have posited. *Allegheny*, 492 U.S. at 603 (citing *Marsh*, 463 U.S. at 794-95). For example, *Lund v. Rowan Cty. N.C.*, 863 F.3d 268 (4th Cir. 2017), relied on the “fleeting persuasiveness [of the

Allegheny] dicta.” *Id.* at 303 (remarking that the *Allegheny* dicta was “unequivocally rejected in *Town of Greece*”) (Agee, J., dissenting). The *Allegheny* Court reasoned that *Marsh* could not justify prayers that “demonstrate the government’s allegiance to a particular sect or creed.” *Allegheny*, 492 U.S. at 603. But to the extent *Allegheny* intended to modify or re-articulate the holding in *Marsh*, that is all dicta. The constitutionality of legislative prayer was not before the Court in *Allegheny*, so the Court did not have the power to announce a new standard for analyzing challenges to legislative prayer. To be sure, “dict[a] settles nothing, even in the court that utters it.” *Jama v. Immigration & Customs Enforcement*, 543 U.S. 335, 351 n.12 (2005).

The rules of dicta notwithstanding, *Allegheny* was patently wrong about *Marsh*, anyway. According to *Allegheny*, *Marsh* stands for the proposition that the Establishment Clause prohibits “legislative prayers that have the effect of affiliating the government with any one specific faith or belief.” *Allegheny*, at 603 (citing *Marsh* at 794-95). But *Marsh* had nothing to do with “effect” or “affiliation.” Instead, *Marsh* officially recognizes the deep history of religion in American political life. *See Marsh* at 793-95; *see also Zorach v. Clauson*, 356 U.S. 306, 313 (1952) (“We are a religious people whose institutions presuppose a Supreme Being.”). In fact, *Town of Greece* sanctions certain government practices that might otherwise endorse religion. *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1819-1820. In other words, *Marsh* and *Town of Greece* carve out a historical exception to modern Establishment Clause jurisprudence. *Id.*; *cf. McGowan v. Maryland*, 366 U.S. 420, 431-449 (1961) (An original religious purpose does not invalidate government action if the modern purpose has become predominantly secular). Instead, the operative question in legislative prayer cases is whether the prayer-practice shows a pattern of exploitation to proselytize or advance religion. *Town of Greece*, 463 U.S. at 795-95; *see Marsh* at 793-95. No such pattern has been shown here. To the contrary, the Board’s prayer-practice is for the benefit of the board

members, respectful in tone, and nondiscriminatory. *See supra* Section I.C. Even so, the lower court failed to identify a predicate pattern of government abuse that would justify parsing the contents of the Board’s prayers—the only basis on which it held the Board’s practice an establishment of religion. J.A. at 23. Still more surprising, the lower court did not find the alleged exchange between Ms. Pintok and Mr. James Lawley of any significance, as its opinion does not even mention it. J.A. at 1, 6, 16-25. Instead, the lower court ignores *Town of Greece* by parsing the contents of the Board’s prayers to discern what the Board intended to communicate to citizen attendees and what message it actually conveyed, without first identifying a predicate pattern of government abuse required by *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1824.

Assessing the constitutionality of legislative prayer under the endorsement test is also deeply problematic because, among other reasons, it cannot reliably guide government officials, *ex ante*, to know whether their policies comport with the Constitution. The only difference between the Board’s prayer-practice and the facts of this Court’s legislative prayer precedents is the identity of the prayer-giver. *See supra* Section I.B. Yet, the lower court and the Fourth Circuit invalidated the *same practice* on the grounds that prayers were sectarian in nature. J.A. at 23; *Lund*, 863 F.3d 284-85. Those courts, then, make the identity of the prayer giver dispositive as to which Establishment Clause test applies but then invalidate the prayer-practices for the same reasons *Town of Greece* hold that legislative prayer is constitutional. That reasoning is not only unsupported by this Court’s precedents but is unwise because “it is unlikely that prayer will be inclusive beyond dispute Even seemingly general references to God or the Father might alienate nonbelievers or polytheists.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1822. Such a ruling will also have a chilling effect on legislative prayer. The lower court essentially rejects the fact that member-led prayer is “a part of the fabric of our society.” *Marsh*, 463 U.S. at 492.

Decisions like the lower court's and the Fourth Circuit's means that "governments face a Hobson's choice: foregoing [legislative prayer] or facing litigation. The choice most cash-strapped governments would choose is obvious, and it amounts to a heckler's veto." *Am. Atheists, Inc. v. Davenport*, 637 F.3d 1095, 1106 (10th Cir. 2010) (Kelly, J., dissenting from denial of rehearing *en banc*). As already discussed above, for the purposes of the Establishment Clause, the reasonable observer would still observe impermissible endorsement of religion regardless of the prayer-giver because all legislative prayer is government speech. *See supra* Section I.C.

B. The Board's Prayer-Practice Does Not Place Coercive Pressures on Religious Minorities.

The Board's prayer-practice does not show a pattern of government abuse and is therefore categorically noncoercive. Town of Greece is the proper analytic framework to assess whether the Board's prayer practice is constitutional. "Courts remain free to review the pattern of prayers over time to determine whether they comport with the tradition of solemn, respectful prayer approved in *Marsh*, or whether coercion is a real and substantial likelihood." *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1826-1827. Under the coercion test, "unconstitutional coercion occurs where '(1) the government directs (2) a formal religious exercise (3) in such a way as to oblige the participation of objectors.'" *McCarty* 851 F.3d at n.12 (internal citation omitted). Notably, however, "in the general course legislative bodies do not engage in impermissible coercion by merely exposing constituents to prayer they would rather not hear and in which they need not participate." *Id.* at 1827. It is not contested that "the Constitution guarantees that government may not coerce anyone to support or participate in religion or its exercise, or otherwise act in a way which 'establishes a [state] religion or religious faith, or tends to do so.'" *Lee v. Weisman*, 505 U.S. 577, 587 (1992) (quoting *Lynch*, 465 U.S. at 678). Challenges based "solely on the content of a prayer will not likely establish a constitutional violation." *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1824

(“Marsh . . . requires an inquiry into the prayer opportunity as a whole rather than into the contents of a single prayer.”). However, the coercion analysis is fact sensitive. *Id.* at 1825. Mature adults are presumably “not readily susceptible to religious indoctrination or peer pressure.” *Id.* at 1827.

1. The Coercion Test Generally Does Not Apply in Settings Where the Audience is Not Impressionable Minors.

The coercion test is an integral component in any public-school prayer analysis. See Elizabeth B. Halligan, *Coercing Adults?: The Fourth Circuit and the Acceptability of Religious Expression in Government Settings*, 57 S.C. L. Rev. 923, 925 (2006). School-prayer cases carry a particular risk of indirect coercion. *Lee*, 505 U.S. at 590. What is ordinarily a permissible religious expression among reasonable adults might “in a school context . . . appear to the nonbeliever or dissenter [as] an attempt to employ the machinery of the State to enforce a religious orthodoxy.” *Id.* at 592. There is an extreme lack of precedent using the coercion test in the adult prayer context. *See Hall, supra* at 925.

In *Lee*, this Court held that an invocation at a high school graduation ceremony was unconstitutional because it placed “public pressure, as well as peer pressure, on attending students.” *Lee*, 505 U.S. at 593. The Court held that a minor can feel subtle coercive pressures, but agreed that the same is not the case with respect to an adult audience. *Id.* In the same way, *Santa Fe* held that a pregame prayer at a high school football game was unconstitutional, rejecting the argument that attendance at such events is voluntary, and therefore not coercive. *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 312 (2000). The Court reasoned that “high school students . . . feel immense social pressure, or have a truly genuine desire, to be involved” and therefore the pregame prayer becomes coercive in nature. *Id.* at 312. Notably, the Fourth Circuit applied the coercion test to a prayer-practice at a state-operated military college. *Mellen v. Bunting*, 327 F.3d 355, 371 (4th Cir. 2003). Adults at the college were expected to participate in a “supper prayer”

led by a chaplain. *Id.* at 362. The Court held that military settings are presumptively coercive. *Id.* As such, it followed that the “supper prayers” caused immense pressure to conform, “even for mature adults.” *Id.* at 372. Unlike *Town of Greece*, however, the holding in *Mellen* rests on a presumptively coercive military setting where adults are unusually susceptible to subtle coercive pressures.

This Court’s coercion test precedents concern settings in which the government sanctions prayer in the presence of susceptible minors and at events in which their attendance is not involuntary. Legislative prayer, however, does not take place in a presumptively coercive setting, and courts will not strike down a prayer-practice of that sort without first identifying a predicate pattern of government abuse. The Board conducts meetings in the presence of adults. The district court correctly rejected the invitation to apply the coercion test to the Board’s prayer-practice because it falls squarely within the *Marsh* and *Town of Greece* framework and there is no pattern of government abuse—the Board’s practice did not “denigrate nonbelievers or religious minorities, threaten damnation, or preach conversion.” J.A. at 14. This Court should emphatically reverse the lower court’s contrary holding.

2. Mature Adults Have the Mind and Capability to Think for Themselves and Appreciate the History and Tradition of Legislative Prayer.

The Board’s practice of member-led prayer prepares the board members for the seriousness of governing and the incidental audience of adult attendees are able to fully comprehend the unifying intent of the prayers.⁷ This Court presumes that reasonable adult observers are accommodated with the deep history and tradition of legislative prayer, and that it is not intended

⁷ Instead of something more sinister, legislative prayer combined with patriotism—absent a pattern of government abuse—promotes political unity. Indeed, the specter of a room with citizens of all creeds observing an appeal to a Supreme Being in the spirit of tolerance and solemnity animates the highest of uniquely American aspirations: *e pluribus unum*—from many, one.

“to afford government the opportunity to proselytize or force truant constituents into the pews.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1825. At the very least, there is absolutely “no support for the proposition that the Framers . . . embraced uniquely modern notions that the Establishment Clause is violated whenever an observer feels subtle pressure, or perceives governmental endorsement.” *Id.* at 1838 (internal quotation marks omitted). “The municipal prayers at issue . . . bear no resemblance to the coercive state establishments that [used to] exist[]” which reared their ugly heads as “coercion of religious orthodoxy and of financial support by force or threat of law and threat of penalty.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1837 (Alito, J., concurring). “To the extent that coercion” is relevant to the analysis of a legislative prayer and absent a predicate pattern of government abuse, “it is actual legal coercion that counts—not the subtle coercive pressures.” *Id.* In particular, personal “offense does not equate to coercion...since adults often encounter speech they find disagreeable.” *Id.* (opinion of Kennedy, J.). Additionally, “peer pressure, unpleasant as it may be, is not coercion either.” *Id.*

A constitutional violation will only be found when there is a “pattern of prayers that denigrate, proselytize, or betray an impermissible purpose” *Id.* at 1824. The predicate pattern of government abuse is necessary because “*Marsh* . . . requires an inquiry into the prayer opportunity as a whole, rather than into the contents of a single prayer.” *Id.* “The inquiry . . . remains a fact sensitive one that considers both the setting in which the prayer arises and the audience to whom it is directed.” *Id.* at 1825. Courts have even found that directing the audience to stand or rise for the invocation is purely voluntary and not exclusive at all. *Id.* at 1826. Offense alone is insufficient to show a violation of one’s rights under the Establishment clause. *See Lee*, 505 U.S. at 598.

Courts have failed to find that legislative prayer places coercive pressure on adults because they are presumed to have the knowledge and capability to think for themselves, and the legislative

prayer environment is not one that places pressures on religious minorities. In *Town of Greece*, the Court rejected the argument that “intimate setting of a town board meeting differs in fundamental ways from the invocations delivered in Congress and state legislatures, where the public remains segregated from legislative activity” because it is “presumed that the reasonable observer is acquainted with this tradition and understands that its purposes are to lend gravity to public proceedings.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1825. The party alleging coercion carries the burden to provide evidence sufficient to “set aside . . . [the] presumption that reasonable observers know legislative prayer” is intended to lend gravity to the proceedings. *Bormuth*, 870 F.3d at 519. Importantly, the “principal audience for these invocations [was] not . . . the public but lawmakers themselves, who may find that a moment of prayer or quiet reflection sets the mind to a higher purpose and thereby eases the task of governing.” *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1826. Essential to legislative prayer is the “opportunity for [lawmakers] to show who and what they are without denying the right to dissent by those who disagree.” *Id.* at 1826.

This Court has also rejected the argument that the “public may feel subtle pressure to participate in prayers that violate their beliefs in order to please . . . board members from who they are about to seek a favorable ruling.” *Id.* But absent evidentiary support for a finding that the commission exploited the opportunity to pray by proselytizing, denigrating non-believers, or preaching damnation, there is no basis on which to hold that legislative prayer is unconstitutionally coercive to otherwise mature adults. *Id.* The analysis would definitely be different if “town board members directed the public to participate in the prayers, singled out dissidents for opprobrium, or indicated that their decisions might be influenced by a person’s acquiescence in the prayer opportunity,” but that simply was not the case. *Id.* Lastly, the Court acknowledged the ability of the courts to assess “whether coercion is a real and substantial likelihood . . . [b]ut...legislative

bodies do not engage in impermissible coercion merely by exposing constituents to prayer they would rather not hear and in which they need not participate.” *Id.* at 1827.

The Sixth Circuit applied the *Town of Greece* framework and upheld a prayer-practice nearly identical to the one here. *Bormuth*, 870 F.3d at 517. In that case, plaintiffs complained that the commissioners invitation for citizens to stand and assume a reverent position as one of the commissioners prayed established religion. *Id.* The Court held that “soliciting adult members of the public to assist in solemnizing the meetings by rising and remaining quiet in a reverent position” is in no way coercive. *Id.*; *See Am. Humanist Ass’n. v. McCarty*, 851 F.3d 521, 526 (5th Cir. 2017). Although there were times when “Commissioners . . . turned their backs on [the plaintiff] . . . [as] likely an unfortunate expression of their own personal sense of affront,” the course and practice of prayer, over time, nonetheless did not establish a “pattern and practice of coercion against nonbelievers of religion.” *Bormuth*, 870 F.3d at 517. Instead, the Court regarded these disrespectful actions as isolated incidents. *Id.*

The Fourth Circuit held that legislative prayer was coercive when extensive measures were taken to ensure exclusivity and religious minorities were treated with extreme disrespect in Rowan County. *Lund*, 863 F.3d at 290. A religious minority member was appallingly “booed and jeered” after quietly raising concerns about the Board’s prayer-practice. *Id.* at 288. The Board provided few alternatives to citizens who did not want to participate in the prayer, such as leaving the room before the prayer began. These options were not created out of respect for opponents but instead “served only to marginalize.” *Id.*

In the present case, there are no incidents of singling out dissidents and the Board has never given any indication that a citizen’s standing before the Board is affected by their adherence or nonadherence to a particular religion. J.A. at 4; *see Town of Greece*, 572 U.S. __; 134 S.Ct. at

1826. Again, if Pintok had alleged that she felt “singled out . . . for opprobrium” then there would be a different analysis, but there is simply no evidence in the record to indicate such an abuse by the Board. J.A. 2-6; *Town of Greece*, 572 U.S. __; 134 S.Ct. at 1826. The Board’s prayers, like *Town of Greece*, are intended to solemnize the meeting, and Pintok is presumed to be acquainted with this as a matter of constitutional law. *Id.* at 1825. The facts of this case simply do not show a predicate pattern of abuse needed to justify the lower court’s holding.

3. Alleged Animus of One Board Member Does Not Amount to a Predicate Pattern of Government Abuse on Which to Hold the Board’s Prayer-Practice Coercive.

Similar to *Bormuth*, the attendees of the meetings are asked to rise for a recitation of the pledge and a brief prayer, which *Bormuth* held insufficient to amount to coercion. *See* J.A. at 8; *see also Bormuth*, 870 F.3d at 517. Pintok alleges that Board Member James Lawley accosted her for complaining about the Board’s prayer-practice, but this was denied by Mr. Lawley. J.A. at, 2, 6. Even so, a single allegation of animus by a Board member does not justify a this Court in holding that the Board’s practice, as a whole, is unconstitutionally coercive, absent a predicate pattern of government abuse. *Town of Greece*, 572 U.S. __; 134 S. Ct. at 1824. Additionally, Pintok carries the burden of demonstrating a predicate pattern with evidence, and her affidavit falls short of this. *See* J.A. at 1; *see Bormuth*, 870 F.3d at 519.

The present case is distinguishable from *Lund* because Ms. Pintok has not suffered the kind of embarrassment and frustration at the hands of the commissioners in Rowan County.⁸ *See Lund*, 863 F.3d at 288. The vague mention of “distress” and “humiliation” in Ms. Pintok’s affidavit is but one denied allegation that, even if true, lacked the public mortification felt in *Lund*. *See* J.A. at 1; *Lund*, 863 F.3d at 288. The prayers in the present case were of a general Judeo-Christian nature

⁸ By using *Lund* as an example here, Petitioners do not intend to argue that the Fourth Circuit’s holding was correct. To the contrary, the Court should take notice that Appellant emphatically rejects the reasoning in *Lund*. At the same time, Ms. Pintok’s still does not rise to the level of government abuse in *Lund*.

and neither directly referenced salvation or furthered the implication of conversion. *See supra* Section I.C.

This issue is not difficult. There is no evidence that the Board's prayer-practice, over time, establishes a pattern of government abuse so to create a coercive dynamic between the government and citizen-attendees of the meetings.

CONCLUSION

The Board's prayer-practice comports with the rich history and tradition of legislative prayer in this country. The purpose of the Board's prayer-practice is demonstrably secular. What is more, it is enigmatic of the highest of uniquely American aspirations: to be a country that celebrates religious differences and champions the free exercise thereof. Additionally, the Board's prayers do not serve an unconstitutional religious purpose or unconstitutionally coerce insular minorities. For all of the foregoing reasons, the judgement of the lower court should be reversed and the case be remanded with instructions to enter judgment in the Board's favor.

APPENDIX A

Excerpt from Journal of the Senate of Illinois at 51 (Nov. 2, 1849)

OF

INV. 1868.

THE SENATE

OF THE

SIXTEENTH GENERAL ASSEMBLY

OF

THE STATE OF ILLINOIS,

AT ITS

SECOND SESSION,

COMMENCING OCTOBER 22, 1849.

SPRINGFIELD:

CHARLES H. LANPHER, PUBLIC PRINTER.

1849.

**LOS ANGELES COUNTY
LAW LIBRARY**

Senate met pursuant to adjournment.

Prayer by Rev. Mr. Richmond, a senator.

Mr. Richmond asked and obtained leave of absence for Mr. Patterson during the balance of the session.

Mr. Ames asked and obtained leave of absence for Mr. Matteson during the balance of the session.

Mr. Hardy, from the select committee, to whom was referred a Senate bill (No. 12) for "an act to authorize the appointment of a commissioner to take proofs in relation to certain claims," reported the same back with a substitute, and asked its adoption.

The substitute was adopted by the Senate, and the bill

Ordered to be engrossed for a third reading.

On motion of Mr. Ames,

The engrossing was dispensed with.

And the question being—"Shall the bill pass?"

The vote being taken, by yeas and nays, thereon;

It was decided in the affirmative,	{ Yeas,	:	:	17
	{ Nays,	:	:	6

Those voting in the affirmative are,

Messrs. Ames,
Cloud,
Davis,
Denny,
Gear,
Gillespie,

Messrs. Grass,
Judd,
Manly,
McRoberts,
Odam,
Osborn,

Messrs. Plato,
Reddick,
Smith,
Sutphin,
Witt.

Those voting in the negative are,

Messrs. Hardy,
Markley,

Messrs. Morrison,
Richmond.

Messrs. Rountree,
Stuart.

Ordered, That the title be as aforesaid, and that the secretary inform the House of Representatives, and ask their concurrence therein.

Mr. Hardy introduced a bill (No. 13) for "an act to provide for a general system of railroad incorporations;" which was read, and

Ordered to a second reading.

On motion of Mr. Ames,

The rule was dispensed with, the bill read a second time by its title,

And the question being on engrossing for a third reading,

Mr. Morrison moved to refer the bill to a select committee of five.

And the question being taken thereon, it was decided in the negative.

Mr. Gear moved to lay the bill on the table until the 4th of July.

And the question being taken, by yeas and nays, on laying on the table,

It was decided in the negative,	{ Yeas,	:	:	4
	{ Nays,	:	:	15

APPENDIX B

**Excerpt from Journal of the Senate of Iowa at 70 &
503 (Jan. 20 and Apr. 2, 1862)**

JOURNAL

OF THE

SENATE

OF THE

NINTH GENERAL ASSEMBLY

OF THE

STATE OF IOWA,

WHICH CONVENED AT THE CAPITOL, IN DES MOINES, IOWA, ON MONDAY,
JANUARY 13, 1862.

THE LIBRARY OF THE

APR 13 1928

UNIVERSITY OF ILLINOIS

DES MOINES:

F. W. PALMER, STATE PRINTER.
1862.

SENATE CHAMBER, DES MOINES, IOWA, }
MONDAY, January 20, 1862. }

Senate convened at the usual hour.

Prayer by Senator Watson.

Minutes of yesterday were read, corrected and approved.

PETITIONS.

Mr. Hesser presented a petition of farmers of Lee County, for an Act to protect sheep from the ravages of dogs. Referred to the Committee on Agriculture.

Also, a petition of James Schneider for relief. Referred to Committee on Judiciary.

Also, a petition of John F. Edwards for relief. Referred to Committee on Claims.

Mr. Shaffer presented a petition of farmers of Jefferson County, for an Act to protect sheep from the ravages of dogs. Referred to Committee on Agriculture.

Mr. Boardman presented a petition of farmers of Clinton County for an Act to license stallions. Referred to Committee on Agriculture.

NOTICES OF BILLS.

Mr. Udell gave notice that on to-morrow or some future day he would introduce a Bill for an Act giving certain powers to the Board of Auditing Commissioners.

Mr. Leake: Of a Bill for an Act requiring Clerks of the District Court to keep a docket to be known as an appearance docket.

Mr. Woolson: Of a Bill for an Act to amend Chapter 51 of the Revision of 1860.

Mr. McCrary of Van Buren: Of a Bill for an Act in regard to defendants in execution.

Mr. Smith: Of a Bill for an Act in regard to Sheriffs.

Mr. Watson: Of a Bill for an Act further defining the duties of County Treasurers.

RESOLUTIONS.

Mr. Watson offered the following resolution which was adopted:

Resolved, That the Governor be requested to report to this Senate whether the Emigrant Commissioner has made a report to him according to the requirement of the law, and if so, that he submit said report to the Senate.

Mr. McCrary, of Van Buren, offered the following resolution which was adopted:

the action of the Senate in the passage of said Bill, is, that we believe the Bill is in violation of the Constitution of the State of Iowa.

Section 9, of Article 5, of the Constitution of the State of Iowa, reads as follows:

“The salary of each Judge of the Supreme Court shall be two thousand dollars per annum; and that of each District Judge, one thousand six hundred dollars per annum, until the year eighteen hundred and sixty; after which time they shall severally receive such compensation as the General Assembly may, by law, prescribe; which compensation shall not be increased or diminished during the term for which they shall have been elected.”

The salary of the Supreme Judges is now two thousand dollars per annum, and was at the time of the election. The Constitution is imperative, and says that the compensation of the Judges of the Supreme and District Courts of this State “shall not be increased or diminished during the term for which they shall have been elected.” As before stated, the unexpired term of one of these Judges is nearly six years; the unexpired term of one other is nearly four years; and the unexpired term of the other is nearly two years. When elected, the salary was two thousand dollars per annum; and the Constitution which we all have sworn to support, tells us that we cannot alter these salaries so as to affect those who were elected while the laws of the State permitted and authorized the payment of these salaries.

The above are some of the reasons why we opposed the passage of the Bill above referred to, and now protest against the action of the Senate in passing the same.

M. L. McPHERSON,
J. M. SHAFFER.

On motion of Mr. Dixon, the Senate adjourned.

SENATE CHAMBER, DES MOINES, IOWA, }
WEDNESDAY, April 2, 1862. }

Senate convened at the usual hour.

Prayer by Senator Teter.

Journal of yesterday read and approved.

Mr. Kent offered the following resolution, which was adopted.

Resolved, That the Secretary of the Senate be required to furnish each member of the Senate a bound copy of the Reports and doc-

APPENDIX C

**Excerpt from Journal of the Senate of New Hampshire
at 90, 169, 293, 312 (June 18, June 26, July 8, and July 8, 1863)**

JOURNAL

OF THE

HONORABLE SENATE

OF THE

STATE OF NEW-HAMPSHIRE.

JUNE SESSION, 1863.

CONCORD:
AMOS HADLEY, STATE PRINTER.
1863.

THURSDAY, June 18, 1863.

Prayer by Mr. Stewart, member from New Hampton.

On motion of Mr. Perkins, of Winchester, the rules were suspended, and the reading of the Journal was omitted.

The communication from the N. H. Historical Society, presented by Mr. Mugridge, was referred to the Committee on Education.

PETITIONS &C., PRESENTED AND REFERRED.

To the Committee on Alteration of Names:

By Mr. Slader, of Nashua, petition of Lucy E. Flanders for change of name.

To the Committee on Railroads:

By Mr. Carpenter, petition of R. S. French and 103 others for Suncook Valley Railroad.

REPORTS.

Mr. Burleigh, from the Committee on the Judiciary, to whom was referred An act entitled An act in relation to partnerships, reported the accompanying resolution which was adopted:

Resolved, That the same be indefinitely postponed.

Mr. Bingham, from the same committee, to whom was referred the bill entitled An act in relation to costs, reported the same with the following amendment, viz.: insert after the word "State" in the fifth line of the second section the following words: "the name and place of residence of such person or the name of such county shall be endorsed on the writ or process before service thereof and." The amendment was adopted, and the bill ordered to a third reading.

Mr. Jones, from the Committee on Military Accounts, to whom was referred the claim of William Henry, reported the accompanying resolution, which was read a first time and ordered to a second reading:

Resolved by the Senate and House of Representatives in General Court convened: That William Henry be allowed the sum of \$118,50 in full for the care of a sick member of 1st N.

House; but that said Daniel Connor and William Little, are entitled to seats.

We therefore recommend the adoption of the following resolutions:

Resolved, That John Smith is not entitled to a seat in this House as a Representative from Ward 5, in the city of Manchester.

Resolved, That Daniel Connor, and William Little, are entitled to seats in this House, as Representatives from Ward 5, in the city of Manchester.

J. PARKHURST,

A. H. RUST,

WM. G. BRUCE.

Mr. Parkhurst moved to substitute the resolutions proposed by the minority of the said committee, for the resolution reported by the majority of said committee.

Mr. Burleigh, of Somersworth, moved that the House adjourn to meet this evening, at 7 1-2 o'clock.

Mr. Bingham moved to amend the motion of the gentleman from Somersworth, by inserting "9 o'clock to-morrow morning," instead of "7 1-2 o'clock this evening," which amendment was adopted.

The motion as amended then prevailed, and the House adjourned to 9 o'clock, to-morrow morning.

FRIDAY, June 26, 9, A. M., 1863.

Prayer by Mr. Lawrence, member from Claremont.

The Speaker called the House to order at 9, A. M.

PETITIONS PRESENTED AND REFERRED.

To Committee on Towns and Parishes:

By Mr. Blaisdell, of Tuftonborough, petition of Samuel Remick and others.

Savings Banks and Loan Fund Associations, reported the accompanying resolution, which was adopted :

Resolved, That the further consideration of said bill be postponed to the next session of the Legislature.

On motion of Mr. Burr,

The House adjourned.

WEDNESDAY, July 8, 1863.

Prayer by Mr. Lawrence, member from Claremont.

The House was called to order by the Speaker.

On motion of Mr. Mugridge, the rules were suspended and the reading of the Journal was omitted.

CLAIMS PRESENTED AND REFERRED.

To the Committee on Military Affairs :

By Mr. Clarke, of Manchester, claim of O. M. Winegar.

To the Committee on Military Accounts :

By Mr. Martin, of Manchester, claim of C. M. Merrill.

To the Committee on Claims :

By Mr. Eaton, of New-Ipswich, account of N. G. Ordway.

Mr. Whitcher, moved to amend the first rule of the rules of the House by inserting the following: " If required so to do by four members," but the motion did not prevail.

REPORTS.

Mr. Wood, from the Joint Committee on Engrossed Bills, reported that they had carefully examined and found correctly engrossed bills of the following titles, and the following resolutions, to wit:

STRAFFORD COUNTY. Drew of Durham, Bartlett, Joy, Watson of Rochester, Farrington, Wentworth, Pinkham.

BELKNAP COUNTY. Hammond, Davis of Alton, Dow, Reynolds, Dearborn, Prescott of Sanbornton, Badger of Upper Gilmanton.

CARROLL COUNTY. Ayers, Pitman, Morton, Stilphen, Perkins of Eaton, Taylor of Effingham, Davis of Freedom, Meserve, Warren, Hobbs of Ossipee, Smith of Wakefield, Rust, Goldsmith.

MERRIMACK COUNTY. Marden, Swett, Goodhue, Eaton of Bradford, Lake, Pecker, Knox, Copp, Chase of Hopkinton, Harper, Batchelder of London, Dana, Carpenter, Watson of Salisbury, Watson of Sutton, Harriman, Colby of Warner, Andrew.

HILLSBOROUGH COUNTY. Dodge, Ellinwood, Russell, Fuller of Hancock, Blood of Hillsborough, Merrill, Bruce, Bailey of Nashua, Parkhurst, Cahill, Gove, Gregg, Sherburne, Sawyer of Sharon, Whiting, Barrett, Chapman.

CHESHIRE COUNTY. Chapin, Jones of Marlow, Aldrich of Richmond, Weeks of Stoddard, Sawyer of Swanzev, Starkey, Patten.

SULLIVAN COUNTY. Woodbury, Booth, Parker of Lempster, Daniels, Blood of Springfield, Knowlton, Rounseville, Train.

GRAFTON COUNTY. Bailey of Alexandria, Whitchee, Sinclair, Flint, Morgan of Canaan, Pattee, Eaton of Dorchester, Avery, Whitney, Quint, Wheeler, Smith of Hebron, Knight, Bingham, Eastman, Jenkins, Weeks of Thornton, Bixby, Smith of Wentworth, Campbell of Woodstock and Lincoln.

COOS COUNTY. Leighton of Berlin and Randolph, Tufts, Keysar, Perkins of Jefferson, Phipps, McIntire, Ingalls, Twitchell, Young of Stewartstown, Fuller of Stratford.

Yeas 160; nays 121.

So the resolution passed.

On motion of Mr. Parker, of Farmington,

The House adjourned.

THURSDAY, July 9, 1863.

Prayer by Mr. Lawrence, member from Claremont.

The House was called to order by the Speaker.

Mr. Perkins, of Manchester, moved that the rules be suspended and the reading of the Journal be omitted.

The motion was negatived, there not being two thirds of the members present voting therefor.

APPENDIX D

**Excerpt from Journal of the Senate of Kansas at 119–20 &
316 (Jan. 17 and Feb. 7, 1867)**

SENATE JOURNAL

OF THE

LEGISLATIVE ASSEMBLY

OF THE

STATE OF KANSAS,

BEGUN AND HELD AT TOPEKA,

On Tuesday, January 8th, A. D., 1867.

PUBLISHED BY AUTHORITY.

LEAVENWORTH, KANSAS:

CLARKE, EMERY & CO., PRINTERS TO THE STATE.

1867.

Digitized by Google

On motion of Senator Green,

Capt. Lindsay, Rev. Fisher, Capt. Charles May, Capt. Morton and Mr. Repine were admitted within the bar.

Senator Dodge offered the following resolution:

Resolved, That the Sergeant-at-Arms be required to furnish the President of the Senate and each member with five dollars worth of postage stamps with which to prepay postage on documents to be sent to their constituents,

Which was lost.

On motion of Senator Lowe,

Senate adjourned until 10 A. M. to-morrow.

ALEX. R. BANKS,

Secretary.

MORNING SESSION.

SENATE CHAMBER,

Topeka, January 17th, 1867—10 o'clock, A.M. }

Senate called to order.

President in the chair.

Roll called.

Quorum present.

Senators present were:

Blakely, Clarke, Dodge, Emmert, Fisher, Foster, Graham, Green, Haas, Lowe, McFarland, Price, Riggs, Rogers, Scott, Sharp, Simpson, Underhill, Wiley.

Prayer by the Rev. Senator Green.

Journal of yesterday read and approved.

The Chairman of the Committee on Judiciary made the following reports:

MR. PRESIDENT:—Your Committee to whom was referred Senate Bill No. 15, entitled An act relating to the revision of the laws, instruct me to report the same back to the Senate, with the recommendation that it be passed with the following amendments:

In section one after the words Governor of the State the words by and with the advice and consent of the Senate. At the end, and as a portion of section three add: Said commissioners are hereby authorized to employ a competent clerk, whose salary shall not exceed the sum of six hundred dollars.

SAM'L A. RIGGS,

Chairman.

MR. PRESIDENT:—Your Committee, to whom was referred Senate Bill No. 23, entitled An act to repeal an act entitled an act to provide for the redemption of real estate, sold under execution, order of sale or other final process, approved June 4th, 1861, instruct me to report the same back to the Senate and recommend its passage.

SAM'L A. RIGGS,

Chairman.

MR. PRESIDENT:—Your Committee, to whom was referred Senate Bill No. 6, entitled An act to amend an act entitled an act to provide for the assessment and collection of taxes, instruct me to report the same back and recommend its rejection.

SAM'L A. RIGGS,

Chairman.

MR. PRESIDENT:—Your Committee, to whom was referred Senate Bill No. 16, entitled An act to amend the criminal laws, instruct me to report the same back to the Senate with a recommendation that it be passed.

SAM'L A. RIGGS,

Chairman.

Senator Foster introduced

Senate Bill No. 132, An act requiring the county assessors to place the bonds of the Union Pacific Railroad Company upon the assessment rolls.

Read first time.

On motion,

Senate adjourned.

ALEX. R. BANKS,

Secretary.

MORNING SESSION.

SENATE CHAMBER,
TOPEKA, February 6, 1867—10 o'clock A. M. }

Senate called to order.

President in the chair.

Roll called.

Quorum present.

Senators present were:

Blakely, Clarke, Cooper, Dodge, Emmert, Fisher, Foster, Graham, Green, Haas, Harvey, Lowe, McFarland, Price, Riggs, Rogers, Scott, Sharp, Simpson, Underhill, Veale, Wiley.

Prayer by the President of the Senate.

Journal of yesterday read and approved.

APPENDIX E

**Excerpt from Journal of the Senate of Connecticut at 231,
258, & 406 (June 5, June 11, June 28, 1861)**

JOURNAL
OF THE
SENATE
OF THE
STATE OF CONNECTICUT,
MAY SESSION, 1861.



Published under the direction of the Clerk of the Senate.

HARTFORD:
J. R. HAWLEY & CO., STATE PRINTERS.,
1861.

WEDNESDAY MORNING, June 5.

Prayer was offered by Rev. William Denison, a member of the House of Representatives from the town of Saybrook.

The Senate was called to order by the President.

The report of the Joint Standing Committee on Banks, to whom were referred the annual reports of sundry Savings Banks and Saving Societies in this State, to wit:

Of the City Savings Bank of Bridgeport;

Of the Chelsea Savings Bank;

Of the Litchfield Savings Society;

Of the New Canaan Savings Bank;

Of the Savings Bank of New London;

Of the Norwich Savings Society;

Of the Rockville Savings Bank;

Of the Seymour Savings Bank;

Of the Society for Savings, Hartford;

Of the Southington Savings Bank;

Of the Savings Bank of Stafford Springs;

Of the Savings Bank of Tolland;

Of the Westport Savings Bank; reporting that they have examined the same, and recommending that they be accepted and lodged on file in the office of the Secretary of State, was received from the House of Representatives, the reports of the Committee and of the Banks and Societies being severally accepted, and the said annual reports being ordered to be lodged on file in the office of the Secretary of State, as by the Committee recommended.

On motion, the Senate concurred with the House in accepting the report of the Committee and said annual reports, and in the order.

Petition No. 11. The petition of Jane Lane, of the town of New Haven, *vs.* William H. Lane, praying for a divorce from said Lane, was received from the House of Representatives, referred to the Joint Standing Committee on the Judiciary.

The substitute bill having been put upon its third reading,
On motion of Mr. Platt, the bill was amended by inserting after the word "towns" in the fifth line, the word "they."

The question recurring upon the passage of the substitute bill as amended,

The question "Shall the substitute bill as amended pass?" was put and decided in the affirmative.

The original bill referred to the Committee having been put on its third reading,

The question "Shall the bill pass?" was put and decided in the negative.

So the original bill was rejected, the substitute bill submitted by the Committee was amended and passed, as by the Committee recommended, and on further motion, the report of the Committee was accepted.

Thereupon, on motion, the Senate adjourned.

TUESDAY MORNING, June 11.

Prayer was offered by Rev. John Mitchell, a member of the House of Representatives from the town of Stratford.

The Senate was called to order by the President.

The report of the Joint Standing Committee on the State Prison, to whom were referred the annual reports,

Of the County Commissioners for the County of New Haven;

Of the County Commissioners for the County of Hartford;

Of the County Commissioners for the County of Fairfield; also,

Of the County Commissioners for the County of Tolland;

Reporting that they have examined the said annual reports and found them to be correct, and recommending that

The Convention was called to order by the President.

Mr. Carter of Norwalk introduced the following joint resolution, to wit:

GENERAL ASSEMBLY, May Session, 1861.

Resolved, By the Senate and House of Representatives in Joint Convention assembled,

That as a testimonial of the profound respect felt by this General Assembly for the memory of the late Chief Justice Storrs, we do now adjourn, and that the two Houses, preceded by their respective officers, do forthwith attend the funeral ceremonies of the lamented deceased.

The question being upon the passage of the resolution,

The question "Shall the resolution pass?" was put and decided in the affirmative.

So the resolution was passed, and thereupon the President declared the Convention dissolved.

FRIDAY MORNING, June 28.

Prayer was offered by Rev. E. H. Parmelee, a member of the House of Representatives, from the town of Killingworth.

The Senate was called to order by the President.

Mr. Platt, from the Joint Standing Committee on the Judiciary, to whom was referred the joint resolution granting leave to the Court of Probate for the District of New Milford, to grant letters of administration to some meet and suitable person on the estate of Dorcas Phippeny, formerly of said district, by leave of the Senate, submitted the report of the Committee, recommending the passage of the resolution.

APPENDIX F

**Excerpt from Journal of the House of Representatives of Alabama at
6, 36 (Nov. 10 and Nov. 12, 1880)**

JOURNAL

OF THE

General Assembly

HOUSE OF REPRESENTATIVES

OF THE

STATE OF ALABAMA,

SESSION OF 1880-81.

HELD IN THE

CITY OF MONTGOMERY,

Commencing November 9th, 1880.

WITH AN INDEX,

Prepared by the Clerk of the House.

MONTGOMERY, ALA. :

ALLRED & BEERS, STATE PRINTERS,

1881.

6th District, H. H. Brown.
 7th " Wm. Taylor.
 8th " J. W. Grayson.

ELECTION OF SPEAKER.

Mr. Price offered the following resolution :

Resolved, That this House now proceed to the election of a permanent Speaker, a Clerk, an Assistant Clerk, Engrossing Clerk, Enrolling Clerk, a Doorkeeper and an Assistant Doorkeeper.

Pending the consideration of the resolution, on motion of Mr. Watts, the House adjourned until ten o'clock to-morrow morning.

WEDNESDAY, November 10, 1880.

The House met pursuant to adjournment.

Hon. David Clopton, Speaker in the Chair.

Prayer by Rev. Mr. Calloway, of the House.

M. Thomas W. Newsom, member elect from Clay county, came forward, enrolled his name, and was duly qualified as a member of the House.

ROLL CALL.

Upon the call of the roll, the following members answered to their names :

Messrs. Armstrong, Avery, Bankhead, Barnett, Beard, Beck, Betts, Billingslea, Bowdon, Bulger, Bradford, Brassfield, Brewer, Brooks of Covington, Brooks of Macon, Brown of Tuskaloosa, Brown of Russell, Bruce, Caffee, Calhoun, Calloway, Camp, Collier, Cowart, Cunningham, Clark, Cleveland, Dement, Donoho, Foster, Floyd, Gilmore, Glover, Grayson, Hammond, Harris, Heacock, Head, Hogue, Johnson of Autauga, Johnson of Blount, Kent, Kirkland, Lane, Lanier, Langdon, Lary, Long, Maddox, Martin, Milner, Morrisette, McCullough, Nelson, Newnan, Newsom, Nettles, Nolen, Nowlin, Owens, Patton, Pickens, Pound, Powell, Price, Ramsay, Renfro, Robinson of Conecuh, Sanders, Sowell, Sheldon, Sharit, Shields, Skeggs, Slaughter, Smith, Taylor, Thomas, Underwood, Vaught, Waller, Walker of Maren-go, Walker of Montgomery, Watts, Welborn, White, Wilson of Chambers, Wilson of Shelby Wimberly, Wright of Butler, Wright of Lee, Wright of Russell.

H. B. 14. To repeal an act entitled an act to authorize persons to keep and use skiffs, or other crafts therein named, for conveying foot passengers across the Black Warrior river, opposite the city of Tuskaloosa ;

By Mr. Long—

H. B. 15. To repeal an act to amend section 274 of the Code of Alabama, approved February 12, 1879 ;

Also,

H. B. 16. To repeal an act to amend section 276 of the Code of Alabama, approved February 8, 1879 ;

Also,

H. B. 17. To repeal section 4369 of the Code of Alabama ;

By Mr. Betts—

H. B. 18. To amend an act to incorporate the Gulf Mining Company, approved February 2, 1876 ;

By Mr. Wilson of Chambers—

H. B. 19. To prohibit the sale or otherwise disposing of spirituous, vinous, or malt liquors, in Beat 6, in Chambers county, Alabama ;

Which bills were severally read once and ordered to a second reading on to-morrow.

On motion of Mr. Foster, the House adjourned until to-morrow morning 10 o'clock.

HOUSE OF REPRESENTATIVES,

FRIDAY, November 12, 1880.

The House met pursuant to adjournment.

Prayer by Rev. Mr. Harris, of the House.

On the call of the roll, the following members answered to their names :

Messrs. Speaker, Agnew, Armstrong, Avery, Bankhead, Barnett, Beard, Beck, Betts, Billingslea, Bowdon, Bulger, Bradford, Brassfield, Brooks of Covington, Brooks of Macon, Brown of Tuskaloosa, Brown of Russell, Bruce, Caffee, Calhoun, Calloway, Camp, Collier, Cowart, Cunningham, Clark, Cleveland, Dement, Donoho, Foster, Floyd, Gilmore, Glover, Grayson, Hammond, Harris, Heacock, Head, Hogue, Johnson of Autauga, Johnson of Blount, Kent, Kirkland, Lane, Lanier, Langdon, Long, Maddox, Martin, Mason, Milner, Morrisette, McCullough, Nelson, Newman, Newsom, Nettles, Nolen, Nowlin, Owens, Patton, Pickens, Pound, Powell, Price, Ramsay, Renfro, Robinson of Conecuh, Robinson of

APPENDIX G

**Excerpt from Journal of the Senate of Arkansas at 3 & 7
(Jan. 9 and Jan. 10, 1893)**

A 722

JOURNAL

OF THE

SENATE OF ARKANSAS

TWENTY-NINTH SESSION.

Convened at the Capitol, in the City of Little Rock, at
12 m., Monday, January 9, 1893, and Adjourned
on Saturday, April 8, 1893.

BY AUTHORITY.

1893.

PILOT PRINTING CO., STATE PRINTERS,
MORRILTON, ARK.

SENATE JOURNAL.
OF THE
STATE OF ARKANSAS.
TWENTY-NINTH SESSION.

SENATE CHAMBER, LITTLE ROCK, ARK.,

Monday, January 9, 1893.

In pursuance of the provisions of the constitution and laws of the State of Arkansas, the members of the senate thereof met at the senate chamber in the city of Little Rock, on the above mentioned day at 12 o'clock meridian, and

The senate was called to order by the president of the senate, Hon. C. C. Hamby.

The president appointed Mr. Adam Clark sergeant-at-arms to serve until the senate shall have elected a sergeant-at-arms.

The roll of members holding over and newly elected was called by Jno. G. Holland, secretary of last senate, and

The following answered to their names:

Senators.	Senators.	Senators.
Adams,	Hawkins,	Russ,
Allen,	Hill.	Scott,
Amis,	Holmes,	Sloan,
Bell, G W,	Kinsworthy,	Smith,
Bell, J H.	Liddell,	Weaver,
Callaway,	Lucas,	West,
Casey,	Mehaffey,	Wilson,
Davidson,	Oyler.	Witt,
Erwin,	Pettigrew,	Word.
Gaughan,	Quinnney .	Mr. President,—82.
Harkey,	Redwine,	

Prayer was then offered by Hon. Hogan Allen, a member of the senate.

The president appointed Mr. Adam Clark sergeant-at-arms to serve until the senate shall have been organized.

The president presented the following from the secretary of state :

Senators Russ, Hawkins and Witt as committee to notify the governor.

On motion of Senator Quinney, at twelve o'clock and thirty minutes p. m., the senate adjourned until 9 o'clock tomorrow morning.

E. B. KINSWORTHY, *President*.

Attest, JOHN W. HOWELL, *Secretary*.

SENATE CHAMBER, LITTLE ROCK, ARK.,

Tuesday, January 10.

The senate met at 9 o'clock, was called to order by the president.

The secretary called the roll and the following answered to their names :

Senators	Senators	Senators
Adams,	Harkey,	Russ,
Allen,	Hawkins,	Scott,
Amls,	Hill,	Sloan,
Bell, G. W.	Holmes,	Smith
Bell, J. H.	Liddell,	Weaver,
Callaway,	Lucas,	West,
Casey,	Mehaffey,	Wilson,
Davidson,	Oyler,	Witt,
Erwin,	Pettigrew,	Word,
Gaughan,	Quinney,	Mr. President.—82.
Hamby,	Redwine,	

Quorum present.

Prayer by Senator Allen.

The journal of yesterday's proceedings was read and approved, and signed by the president and attested by the secretary.

The sergeant-at-arms announced a message from the Governor.

Whereupon the Governor's private secretary, A. W. Files, appeared within the bar of the senate and read the following :

APPENDIX H

**Excerpt from Journal of the Senate of Georgia at 584 (Dec.
17, 1898)**

JOURNAL
OF
THE SENATE
OF THE
STATE OF GEORGIA,
AT THE
REGULAR SESSION
OF THE
GENERAL ASSEMBLY,

At Atlanta, Wednesday, October 26, 1898.



ATLANTA.
Geo. W. Harrison, State Printer.
The Franklin Printing and Publishing Company.
1898.

Dickerson,	McGehee,	Webb,
Fouche,	Passmore,	West,
Greene,	Perkins,	Wight,
Gross,	Rawlings,	Wilcox,
Grovenstein,	Redding,	Wingfield,
Hand,	Steed,	Wood.
Heard,		

Those not voting were Messrs.—

Clifton,	Lang,	Nesbitt,
Davis,	Mann,	Odom,
Dowling,	Morrison,	Thompson,
Hodge,	McLester,	Mr. President.
Humphreys,		

The resolution having received the requisite constitutional majority, was passed as amended, and the amendments were to appropriate \$150.00 for the indexing of the Journals of the House and Senate for the year 1898.

Mr. Lang was granted leave of absence until to-morrow afternoon on account of sickness.

Upon motion of Mr. Daniel the Senate adjourned until to-morrow morning at 9 o'clock.

Senate Chamber, Atlanta, Ga.,
Saturday, December 17, 1898.

The Senate met pursuant to adjournment at 9 o'clock, and was called to order by the President.

Prayer was offered by Senator McGehee.

APPENDIX I

**Excerpt from Journal of the House of Representatives of Michigan
at 10, 82, 594, 956
(Jan. 2, Jan. 11, Feb. 20, and Mar. 20, 1879)**

JOURNAL
OF THE
HOUSE OF REPRESENTATIVES

OF THE
STATE OF MICHIGAN.

1879.

Printed by virtue of an Act of the Legislature, under the direction and supervision of

DANIEL L. CROSSMAN,
Clerk of the House of Representatives.

IN TWO VOLUMES.

VOL. I.



BY AUTHORITY.

UNIV. OF
CALIFORNIA

LANSING:
W. S. GEORGE & CO., STATE PRINTERS AND BINDERS.
1879.

Lansing, Thursday, January 2, 1879.

The House met pursuant to adjournment and was called to order by the Speaker.

Prayer by Representative Sharts.

Roll called; quorum present.

Mr. Bradfield announced that Mr. C. Briggs, of Houghton county, was present, and desired to take his seat.

Mr. Abbott announced that Mr. L. B. Miller, of the first district of Monroe county, was present, and desired to take his seat.

Whereupon the two gentlemen named, came forward, took and subscribed the constitutional oath of office, and entered upon the discharge of their duties.

PRESENTATION OF PETITIONS.

No. 1. By Mr. Allen: Petition of Watson Snyder, D. B. Green, and 387 others, citizens of Michigan, asking for the establishment of a reform school for girls;

Referred to the committee on State affairs.

No. 2. By Mr. Stevens: Petition of numerous merchants and business men of Michigan, relative to insolvent debtor laws;

On demand of Mr. Stevens

The petition was read at length and spread at large on the journal, as follows:

To the Senate and House of Representatives:

The undersigned, merchants and business men of the State of Michigan, respectfully represent:

That since the passage of the late Bankrupt Act of March 2d, 1867, there has been no legislation directed to that code so vital in its importance to every commercial community which regulates the relations between the debtor and creditor classes.

That during the period which has elapsed since the passage of the bankrupt law, the material and commercial wealth and importance of this State has made wonderful progress, and the repeal of the bankrupt law has left our statute books without legislation, corresponding with the changing needs of the community in that regard.

We urge upon your attention the general need of a revision of our State laws upon insolvency and in regard to the collection of debts, and most respectfully, but earnestly, demand immediate attention to the subject.

Without attempting, in the space which a memorial should cover, to call attention to all the defects which time has developed in our system of laws in the premises, we call your attention to a few, which, it seems to us, in the interest of the material prosperity of this State, call for the earliest remedy.

I.—THE CHATTEL MORTGAGE LAW.

The Courts have now construed our statutes upon this subject to allow

1. The validity of a mortgage upon a stock of goods, which in itself provides that the debtor may continue the business and buy and sell in the ordinary way of trade.

2. Which provides that it shall cover goods purchased and put into the stock after the giving of the mortgage; and

3. That such a mortgage, even if not filed, and even if concealed from the

The resolution and amendment were then referred to the committee on state affairs.

Mr. Parsons offered the following resolution :

Resolved, That the committee on municipal corporations be authorized to employ a clerk at a compensation of \$3 per day ;

Which was adopted.

Mr. Stevens moved that when the House adjourn to-day it be until Monday, at 8½ o'clock P. M.

On motion of Mr. Cheney,

The motion was laid on the table.

Mr. Parker asked and obtained leave of absence for himself until the 15th.

Mr. Donnelly asked and obtained leave of absence for himself until the 15th.

Mr. Stevens asked and obtained leave of absence for himself until the 13th.

Mr. Mosher moved that the House do now adjourn ;

Which motion did not prevail.

Mr. Johnson asked and obtained leave of absence for himself until the 15th.

Mr. Goebel moved that when the House adjourn to-day it be until Monday next at 8½ o'clock P. M.

On motion of Mr. Cheney,

The motion was laid on the table.

On motion of Mr. Turck,

The House adjourned.

Lansing, Saturday, January 11, 1879.

The House met pursuant to adjournment and was called to order by the Speaker.

Prayer by Representative Sharts.

Roll called : quorum present.

Absent without leave: Messrs. Estabrook, Girardin, Jackson, May, Pailthorp, Sawyer, Stearns, J. Strong, and Waltz.

Mr. Veenfliet asked and obtained leave of absence for Mr. Estabrook until the 16th.

Mr. Granger asked and obtained leave of absence for Mr. Pailthorp until the 14th.

Mr. Kuhn asked and obtained leave of absence for Mr. Waltz until the 14th.

Mr. G. H. Hopkins asked and obtained leave of absence for Mr. Jackson until the 14th.

Mr. White asked and obtained leave of absence for Mr. May for the day.

Mr. Noah asked and obtained leave of absence for Mr. Girardin until the 14th.

Mr. Henderson asked and obtained leave of absence for Mr. J. Strong until the 14th.

Mr. Moore asked and obtained leave of absence for himself, after the morning session, until the 14th.

Mr. Allen asked and obtained leave of absence for Mr. Sawyer for the day.

Mr. White asked and obtained leave of absence for himself until the 14th.

If this, beyond a doubt, were shown,
That by no rule was Hayes his own.

Then, grand or petit, which the theft,
What is the value, worth, or heft?
One said, no cause could be maintained,
No value got, no man arraigned.

Springfield, to Lansing, sends her news
John Logan is the man we use.
While Madison, the greeting sends,
Mat Carpenter will serve our ends.

But Michigan is not behind,
She answers back, and frees her mind,
You've played your bowers, in spite of croaker,
But, sister States, *we've played the joker.*

On motion of Mr. Sawyer,
The foregoing communication was spread at large on the journal.
On motion of Mr. Allen,
The House adjourned.

Lansing, Thursday, February 20, 1879

The house met pursuant to adjournment and was called to order by the Speaker.

Prayer by Representative Barnes.

Roll called: a quorum present.

Mr. Curtis asked and obtained leave of absence for the committee on roads and bridges for the forenoon.

By unanimous consent

Mr. Griffey offered the following resolution:

WHEREAS, On the 29th day of January it was stated in the legislative journal that the Hon. Andrew Jackson, representative from Chippewa county, was absent without leave under a call of this House, and liable to be arrested; and

WHEREAS, He was at that very time serving as a member of the special committee to invite the Governor and State officers to attend the memorial services of the late lamented Congressman Alpheus S. Williams; and

WHEREAS, Injurious imputations have gone abroad from this misunderstanding and erroneous report, although Mr. Jackson had virtual leave of absence under the rules of this House; therefore

Be it Resolved, That the Hon. Andrew Jackson is fully exonerated from all blame or censure, and that the clerk of this House be required to make a statement of the facts on the journal of to-day.

Which was adopted.

Whereupon the clerk made the following statement:

The Hon. Andrew Jackson, although reported absent, during the call of

Lansing, Thursday, March 20, 1879.

The House met pursuant to adjournment and was called to order by the Speaker.

Prayer by Representative Sharts.

Roll called: quorum present.

Absent without leave: Messrs. Kuhn and Raymond.

Mr. Bennett asked and obtained leave of absence for himself for to-morrow, after 10½ o'clock A. M.

Mr. Gould asked and obtained leave of absence for Mr. Raymond indefinitely, on account of sickness.

Mr. Noah asked and obtained leave of absence for Mr. Kuhn for the day.

By unanimous consent,

Mr. Allen offered the following resolution:

Resolved, That the house hold a session on Thursday evening, of next week, to hear and consider petitions, and that the order of petitions be passed until the time named;

Mr. Mosher moved to amend the resolution so as to make the time for the consideration of petitions every alternate evening;

Pending which,

On motion of Mr. Baldwin,

The resolution was laid on the table.

By unanimous consent,

Mr. Chase offered the following resolution:

Resolved, That the committee on the Michigan Asylum for the Insane be permitted to absent themselves at will from the sessions of this House during the investigation of said asylum;

Which was adopted.

By unanimous consent,

Mr. Johnson offered the following resolution:

Resolved, That the chairmen of the several committees on state institutions be required to report in writing, as soon as may be, the amount of the appropriations asked for by each institution, and the purposes in detail to which such appropriations are to be applied; also the amount of income (if any) now received by such institution, and from whence derived; also the number of officers and professors in such institution who are now drawing more than \$1,200 per annum, and the amount so received, with the name of such employé; together with a statement of the amount received for similar services in the years 1870 and 1875; and that no bill making appropriations to state institutions be considered in the committee of the whole until after the expiration of at least five days subsequent to such report being made;

Which was adopted.

By unanimous consent,

Mr. Yeomans offered the following resolution:

Resolved, That hereafter the daily sessions of this House commence at half-past nine o'clock A. M., until further ordered.

Mr. Hill moved that the resolution be laid on the table.

Mr. Shattuck demanded the yeas and nays.

The demand was not seconded.

The motion that the resolution be laid on the table then prevailed.

APPENDIX J

**Excerpt from Journal of the House of Representatives of Kentucky
at 319 (Feb. 2, 1910)**

JOURNAL
OF THE
REGULAR SESSION
OF THE
House of Representatives
OF THE
COMMONWEALTH OF KENTUCKY

Begun and Held in the City of Frankfort, the Fourth Day of
January, in the Year of Our Lord, 1910, and of
the Commonwealth, One Hundred
and Eighteen

PROPERTY OF THE STATE OF KENTUCKY

LOUISVILLE
THE CONTINENTAL PRINTING CO.
1910

H. B. 59. An act to appropriate \$50,000 to the work on the grounds of the new State Capitol.

By same:

H. B. 192. An act creating the county of Wilson.

Said bills were severally read the first time at length and ordered to be placed upon the calendar.

At 3:15 o'clock P. M.

Mr. Golson moved that the House do now adjourn.

Said motion was agreed to.

WEDNESDAY, FEBRUARY 2, 1910.

The House was opened with prayer by the Hon. J. S. Steers, Representative from the county of Grant.

The reading of the Journal of yesterday's proceedings was dispensed with.

Mr. Moore presented the petition of sundry citizens of Campbell county remonstrating against the passage of H. B. 26, introduced by Mr. Weber.

Which was received, its reading dispensed with and referred to the Committee on Cities of the Fourth Class.

Mr. Moore presented the petition of sundry citizens of Hickman County asking the passage of House Bill No. 45.

Referred to Committee on Insurance.

APPENDIX K

**Excerpt from Journal of the House of Representatives of Ohio at 84 (Jan.
21, 1921)**

JOURNAL

OF THE

House of Representatives

OF THE

EIGHTY-FOURTH GENERAL ASSEMBLY OF THE STATE OF OHIO

REGULAR SESSION

COMMENCING MONDAY, JANUARY, 3, 1921

VOLUME CIX

UNIVERSITY OF ILLINOIS LIBRARY

FEB 7 1923



COLUMBUS, OHIO:
THE F. J. HEER PRINTING CO.
1921

Bound at State Bindery.

Mr. Ramey moved that the rules be suspended and the resolution be considered at once.

The motion was agreed to and the resolution was taken up.

The question being, "Shall the resolution be adopted?"

The resolution was adopted.

MESSAGE FROM THE SENATE.

Mr. Speaker:

I am directed to inform the House of Representatives, that the Senate has adopted **S. R. No. 24**, and requests the consent of the House of Representatives to such adjournment.

Attest:

W. E. HALLEY,
Clerk.

On motion of Mr. Crabbe, the House consented to the adjournment of the Senate as provided in **S. R. No. 24** — Mr. Whittemore.

Use of the hall of the House of Representatives was granted to the committee on Military Affairs for a public hearing on **H. J. R. No. 2** — Mr. Gordon, of Hamilton, at 7:30 o'clock tonight.

On motion of Mr. Crabbe the House accepted an invitation to attend a dinner at the State Institution for the Deaf on Wednesday, January 26th, 1921, at 6:30 o'clock p. m.

The speaker announced the appointment of William Reed as a page. Mr. Hastings was granted leave of absence for the day.

3:10 o'clock p. m.

On motion of Mr. Crabbe the House adjourned.

Attest:

JOHN P. MAYNARD,
Clerk.

Hall of the House of Representatives.

Friday, January 21, 1921, 9:00 o'clock a. m.

The House met pursuant to adjournment.

Prayer was offered by Speaker Rupert R. Beetham.

The journal of yesterday was read and approved.

The House then passed to the fourth order of business, being reports of standing committees.

Mr. Brummitt submitted the following report:

The standing committee on County Affairs, to which was referred **H. B. No. 30** — Mr. Albaugh, having had the same under consideration, reports it back with the following amendment, and recommends its passage when so amended:

In line 24 strike out the word "convered" and insert in lieu thereof the word "covered."

Signed by a majority of the committee in committee.

FRANK S. ROBINSON,
J. F. VEIGEL,
E. F. COTTON,
HARRY C. MYERS,
WM. J. PRANGE,

ALBERT HASTINGS,
J. A. HUMMON,
WM. WILEY,
H. J. BRUMMITT.

APPENDIX L

**Excerpt from Journal of the House of Representatives of Tennessee at
623 (Mar. 15, 1923), available at
[http://www.capitol.tn.gov/house/archives/63GA/Publications/ web%
20journ%201923/03151923ld58.pdf](http://www.capitol.tn.gov/house/archives/63GA/Publications/web%20journ%201923/03151923ld58.pdf)**

House Bill No. 635—To amend Chapter 124, Private Acts 1921.

The bill passed its third and final reading by the following vote:

Ayes	69
Noes	0

Representatives voting aye were: Messrs. Allen, Bejach, Bogle, Bratton, Buckner, Butler, Candler, Carothers, Claiborne, Clark (of Davidson), Clarke (of Washington), Coleman, Cooper, Crawford (of Lawrence), Croskery, Cunningham (of Shelby), Cunningham (of Warren), Dean, Durham, Easterly, Edwards, Ellis, Fox, Gordon, Green, Griffin, Grubb, Ginn, Hale, Hilliard, Hamilton, Hamner, Hatcher, Haynie, Haynes (of Franklin), Haynes (of Unicoi), Jacobs, Jeter, Johns, King, Lay, McDaniel, Moore, Neely, Nuchols, Odle, Parks, Peal, Peek, Peterson, Prince, Rackley, Rowsey, Russell (of Maury), Sloan, Smith, Sparks, Spencer, Stewart, Stone, Street, Sullins, Tatum, Terry, Thomas, Wade, Wilson (of Anderson), Yoakley and Mr. Speaker Hall—69.

A motion to reconsider was tabled.

On motion the House adjourned until 9:30 A. M. tomorrow.

THURSDAY, MARCH 15, 1923.

FIFTY-EIGHTH DAY.

The House met at 10 A. M. and was called to order by Mr. Speaker Hall.

The proceedings were opened with prayer by Representative S. R. Bratton.

On motion the roll call was dispensed with.

On motion the reading of the Journal was dispensed with.

REPORTS FROM STANDING COMMITTEES.

Committee on Finance, Ways and Means.

MR. SPEAKER: Your Committee on Finance, Ways and Means beg leave to report that we have carefully considered and recommend House Bills Nos. 251, 678, 760, 764, 774, 775, 779, 781 and 783 for passage; House Joint Resolution No. 37 for rejection.

BRATTON, *Chairman.*

APPENDIX M

**Prayer Practices of the State and Territorial Legislatures, from Brief of
Amicus Curiae West Virginia and 12 Other States in *Lund v. Rowan County,*
North Carolina, No. 15-1591 (4th Cir.), Table 1**

Table 1. Prayer Practices of the State and Territorial Legislatures.

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Alabama</i>	Senate, House	Senate, House		
<i>Alaska</i>	Senate, House	Senate, House		
<i>American Samoa</i>	Senate	House		
<i>Arizona</i>		Senate, House		
<i>Arkansas</i>	Senate, House	Senate, House		
<i>California</i>	Senate	Senate, House		
<i>Colorado</i>	Senate	Senate, House		
<i>Connecticut</i>	Senate, House	Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Delaware</i>	House	Senate, House		
<i>District of Columbia</i>			City Council	
<i>Florida</i>	Senate, House	Senate, House		
<i>Georgia</i>	Senate	Senate, House		
<i>Guam</i>		Legis.		
<i>Hawaii</i>	House	House		Senate
<i>Idaho</i>	Senate, House	Senate, House		
<i>Illinois</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Indiana</i>	Senate	Senate, House		
<i>Iowa</i>	Senate, House	Senate, House		
<i>Kansas</i>	Senate, House	Senate, House		
<i>Kentucky</i>		Senate, House		
<i>Louisiana</i>	Senate, House	Senate, House		
<i>Maine</i>		Senate, House		
<i>Maryland</i>	House	Senate		
<i>Massachusetts</i>		House		Senate
<i>Michigan</i>	House	Senate, House		
<i>Minnesota</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Mississippi</i>	House	Senate, House		
<i>Missouri</i>	House	Senate, House		
<i>Montana</i>	Senate, House	Senate, House		
<i>Nebraska</i>	Legis.	Legis.		
<i>Nevada</i>	Senate	Senate, House		
<i>New Hampshire</i>		Senate, House		
<i>New Jersey</i>		Senate, House		
<i>New Mexico</i>	Senate	Senate, House		
<i>New York</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>North Carolina</i>	Senate, House	Senate, House		
<i>North Dakota</i>		Senate, House		
<i>Northern Mariana Islands</i>	Senate	Senate	House	
<i>Ohio</i>		Senate, House		
<i>Oklahoma</i>	Senate, House	Senate, House		
<i>Oregon</i>	Senate	Senate, House		
<i>Pennsylvania</i>		Senate, House		
<i>Puerto Rico</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Rhode Island</i>	Senate House	House		
<i>South Carolina</i>		Senate, House		
<i>South Dakota</i>		Senate, House		
<i>Tennessee</i>	Senate, House	Senate House		
<i>Texas</i>	Senate	Senate, House		
<i>Utah</i>	Senate, House	Senate, House		
<i>Vermont</i>	House	Senate, House		
<i>Virginia</i>	Senate, House	Senate, House		
<i>Virgin Islands</i>		Legis.		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Washington</i>	Senate, House	Senate, House		
<i>West Virginia</i>	Senate, House	Senate, House		
<i>Wisconsin</i>	House	Senate, House		
<i>Wyoming</i>		Senate, House		

The data in Table 1 comes from and supplements a 2002 national survey. Nat'l Conf. of State Leg., *Inside the Legislative Process, Prayer Practices* 5-148 (2002), <http://tinyurl.com/ncslprayer>.

The following sources correct omissions and later changes to the practices reported in the survey: Conn. H.R. No. 5 (2015); 2 Guam Code § 1112; Guam S. Standing R. § 2.08; N.Y. Assemb. R. VI, § 2(b); N.J. Gen. Assemb. R. 9:1; Ore. H. R. 4.01; N.Y. S. R. IX, § 4(a); Miss. S. R. 25(2); N.C. S. R. 3; Kate Havard, *In Delegates They Trust: Maryland House Members Lead Secular Prayer*, Wash. Post (Mar. 9, 2013), <http://www.washingtonpost.com/local/md-politics/in->

delegates-they-trust-md-house-members-lead-secular-prayer/2013/03/09/571fef8e-810a-11e2-8074-b26a871b165a_story.html; *Prayers and Public Meetings Don't Mix, Critic Says*, News Journal, 2009 WLNR 26228629 (Dec. 31, 2009); Deanna Martin, *Prayer Returns to the Ind. House*, Associated Press (Nov. 19, 2008); Ind. S., S. J. 1 (Nov. 19, 2013) (member offered prayer); e.g., Colo. S. J. (70th Gen. Assemb., 1st Sess.) (Jan. 26, 2015) (by the chaplain); Colo. S. J. (67th Gen. Assemb., 2d Sess.) (Mar. 30, 2010) (by Sen. Tapia); Colo. S. J. (64th Gen. Assemb., 1st Sess.) (Jan. 9, 2003) (by Sen. Hanna); S.C.H.R., *Wednesday, July 8, 2015 Pt. 1*, S.C. Leg. Video Archives, <http://www.scstatehouse.gov/video/videofeed.php>; S.C.S., *Tuesday, July 7, 2015 Pt. 1*, S.C. Leg. Video Archives, <http://www.scstatehouse.gov/video/videofeed.php>; D.C. City Council, *Agenda 1* (July 14, 2015), <http://dccouncil.us/videos/archive/>; Freedom from Religion Foundation, *North Carolina Senate Prayers* (Jan. 26, 2011-Jan. 5, 2012), <http://ffrf.org/uploads/legal/NCSenatePrayers.pdf>; Okla. S., S. J. 901 (Apr. 14, 2015); N. Mar. I. S., *Rules of the Senate* 1 (May 1, 2015); R.I. H.R., *Rhode Island House of Representatives June 5, 2013*, YouTube (June 6, 2013), <https://www.youtube.com/watch?v=6vXFolcdl10>; Tenn. H.R., *House Session – 12th Legislative Day* (Mar. 16, 2015), http://tnga.granicus.com/MediaPlayer.php?view_id=280&clip_id=10356 (member offered prayer); P.R.S.,

Diario de Sesiones 1 (May 18, 2015), <http://senado.pr.gov/Diario%20de%20Sesiones/051815.pdf> (prayer by clergy).

APPENDIX N

Lawmaker-led Prayer Practices in Michigan Counties

Prayer practices in Michigan counties with some form of legislative prayer

Mich. County	Who prays	Source
Alpena	Clergy	http://www.alpenacounty.org/2015%20Commissioners/2015%20Agendas%20and%20Minutes.pdf
Barry	Commissioner	http://www.barrycounty.org/BOC%20Minutes%20-%2012-13-16%20-%20Approved.doc
Bay	Clerk	https://www.youtube.com/watch?v=azqoEFfsU9Y
Benzie	Commissioner	http://cms.revize.com/revize/benzie/document_center/commissioners/2015_01_27_Regular.pdf
Calhoun	Commissioner	https://www.calhouncountymi.gov/assets/1/7/BOC_minutes_010815.pdf
Cass	Commissioner	http://www.casscountymi.org/LinkClick.aspx?fileticket=gZmThopQW_c%3d&tabid=355
Cheboygan	Commissioner	http://is0.gaslightmedia.com/cheboygancounty/ ORIGINAL /fs99-1424179419-48274.pdf
Crawford	Commissioner	http://www.crawfordco.org/wp-content/uploads/2017/01/Minutes-1-22-15.pdf
Eaton	Commissioner	https://www.eatoncounty.org/images/January_5_2015_Organizational_Meeting.pdf

Mich. County	Who prays	Source
Genesee	Speaker not identified	http://www.gc4me.com/departments/board of commissioners 1/docs/BOC_010715.pdf (agenda; minutes not online)
Grand Traverse	Commissioner	http://www.grandtraverse.org/DocumentCenter/View/348
Gratiot	Commissioner	https://v3.boardbook.org/Public/PublicItemDownload.aspx?mk=50171042&fn=minutes.pdf
Hillsdale	Commissioner	http://www.co.hillsdale.mi.us/images/bocminutes/BOC%20Minutes%202017-01-24.pdf
Huron	Commissioner	http://www.co.huron.mi.us/documents/com.1-13-15.pdf
Ionia	Commissioner	http://www.ioniacounty.org/wp-content/uploads/2009/02/May-19-20151.pdf
Jackson	Commissioner	This case: https://www.co.jackson.mi.us/AgendaCenter/ViewFile/Minutes/ 11182014-202
Kalamazoo	Commissioner	https://www.kalcounty.com/userfiles/boc/minutes/01-20-15minboc.pdf
Kent	Commissioner	https://www.accesskent.com/Calendar/openFileDocument.do?ele=3&type=eventV&file=minutes&eVec=0&eType=board&minutes=1452026837135-minutes.PDF&year=2015&eventid=13406

Mich. County	Who prays	Source
Lake	Commissioner	http://lakecounty-michigan.com/Portals/50/2011%20Minutes/2011%20January%2012.pdf
Lapeer	Commissioner	https://www.youtube.com/watch?v=kin3wEexxNc (at 0:32)
Lenawee	Speaker not identified	http://www.lenawee.mi.us/AgendaCenter/ViewFile/Minutes/01052017-155
Manistee	Speaker not identified	http://www.manisteecountymi.gov/index.php?option=com_docman&task=doc_download&gid=2660&Itemid=191
Mason	Commissioner	http://www.masoncounty.net/userfiles/filemanager/636/
Midland	Commissioner	https://www.co.midland.mi.us/Commissioners/BoardMeetings.aspx (e.g., Minutes, Feb. 16, 2016)
Missaukee	Commissioner	http://www.missaukee.org/minutes/docs/February_10_2015.doc
Monroe	Clerk	http://www.co.monroe.mi.us/BoardCommissioners/Minutes/2015/010615_Organizational_Meeting_Minutes.pdf
Montcalm	Clergy	http://www.montcalm.us/Board%20Commission%20Minutes/2015/012615_board_minutes.pdf
Muskegon	Commissioner	http://www.co.muskegon.mi.us/clerk/01282014_board_minutes.pdf

Mich. County	Who prays	Source
Oakland	Commissioner or guest	https://www.oakgov.com/boc/Documents/minutes/15_min/15_01_29.pdf
Otsego	Commissioner	http://www.otsegocountymi.gov/wp-content/uploads/2015/12/01-06-2015-Minutes.pdf
Ottawa	Commissioner	https://www.miottawa.org/appImages/Calendar/1422977212644-minutes.PDF
Presque Isle	Commissioner	http://presqueislecounty.org/2015%20mins/2015%20PI%20COUNTY%20MINUTES.pdf (e.g., page 31)
Saginaw	Commissioner	http://www.saginawcounty.com/Docs/Commissioners/COMPILED%20015%20MINUTES.pdf
St. Clair	Clergy (sometimes)	http://stclaircounty.org/minutes/CM150108.pdf
St. Joseph	Commissioner	http://www.stjosephcountymi.org/forms/bocmin031516.pdf
Sanilac	Commissioner	http://www.sanilacounty.net/publicpages/Entity.aspx?ID=138 (e.g., 01-16-2015 BOC Minutes)
Shiawassee	Commissioner	http://www.shiawassee.net/Portals/0/150115%20Board%20Mins.pdf
Tuscola	Commissioner	http://www.tuscolacounty.org/boc/doc/archmin/2015-01-29.pdf

Mich. County	Who prays	Source
Wayne	Commissioner, Clergy, or guest	http://www.waynecounty.com/documents/exec/commission/Journal of the Commission February 19 2015.pdf#toolbar=1&view=FitH

APPENDIX O

Lawmaker-led Prayer Practices in Tennessee Counties

Prayer practices in Tennessee counties with some form of legislative prayer

Tenn. County	Who prays	Source
Anderson	Guest clergy or commissioner	http://www.andersoncountyclerk.com/files/min061515.pdf
Bedford	Commissioner	http://www.bedfordcountyttn.org/pdf/board/BOARD-OF-COMMISSIONERS-01-10-2017-Minutes.pdf
Benton	Commissioner	http://bentoncountyttn.gov/boards_of_commissioners/mtg_minutes_agendas/minutes/2016/12192016.pdf
Bradley	Commissioner	http://www.bradleyco.net/systems/file_download.ashx?pg=2292&ver=1
Campbell	Commissioner	https://www.youtube.com/watch?v=qXXg1cTtNrI (at 0:01)
Cannon	Speaker not identified	https://www.youtube.com/watch?v=5iSnUZTgkys (at 0:01)
Carter	Commissioner	http://www.cartercountyttn.gov/wp-content/uploads/pdfs/monthlyminutes/2015/Commission%20Minutes%2001-20-2015.pdf
Cheatham	Commissioner	http://cheathamcountyttn.gov/government/county_commission/pdfs/Countycommissionminutes%20012615.pdf
Cocke	Commissioner	https://www.youtube.com/watch?v=hFRCtcZ1H30 (at 0:09)

Tenn. County	Who prays	Source
Coffee	Commissioner	http://www.coffeecountytn.org/government/county_comm_min_agendas/minutes/2015/01132015.pdf
Cumberland	Commissioner	http://cumberlandcountytn.gov/wp-content/uploads/2011/03/03-16-2015-CCCM.doc
Davidson	Councilman	http://www.nashville.gov/mc/minutes/term_2011_2015/2015_01_06_minutes.htm
Dickson	Commissioner	http://dicksoncountytn.gov/commission/minutes/2015/01202015.pdf (called a devotion)
Fayette	Commissioner	http://www.fayettetn.us/CCPackets-CCMeetings/2015/CCPacketJan2015.pdf
Fentress	Commissioner	https://www.youtube.com/watch?v=GcHlxKQAlvA (at 1:23); see also http://www.fentresscouriernews.com/ray-buck-seeks-re-election-as-co-commissioner/
Franklin	Commissioner	http://www.franklincotn.us/elected_officials/county_commission/commission_min_agendas/minutes/2015/01202015.pdf
Gibson	Commissioner	https://www.youtube.com/watch?v=7vMVmm5H2NM (at 0:30)

Tenn. County	Who prays	Source
Greene	Guest clergy	http://greenecountytn.gov/sites/greenecountytn.gov/files/January%20Commission%20Meeting%20Minutes.pdf
Hamblen	Guest clergy or commissioner	http://www.hamblencountyclerk.com/sites/hamblencountyclerk.com/files/910.pdf
Hamilton	Guest clergy	http://www.hamiltontn.gov/pdf/commission/minutes/01-18-17%20Regular.pdf (Baha'i)
Henry	Commissioner	http://www.henrycountyclerktn.com/sites/henrycountyclerktn.com/files/JAN%202015.pdf
Humphreys	Commissioner	https://www.youtube.com/watch?v=z9CY3xcc7GU (at 0:30); see also http://www.humphreystn.com/county_commissioners/index.html
Jackson	Commissioner	https://www.youtube.com/watch?v=8vfw7WJpbD0 (at 0:00 & 0:47)
Jefferson	Commissioner	http://www.jeffersoncountyttn.gov/media/file/lib/County_Commission_Agenda_Minutes/Minutes/06-27-16_MINUTES_Regular_Monthly_Session.pdf
Knox	Commissioner	http://knoxcounty.org/clerk/CommMinutes/2015/1-26-2015.pdf (devotional)

Tenn. County	Who prays	Source
Lawrence	Commissioner	http://www.lawrencecountyttn.gov/government/meetings/197-county-commission-meeting-11-24-09-regular-session
Loudon	Commissioner	https://www.loudoncounty-tn.gov/documentsAndForms/documents/CommissionMeetingDocuments/20150105_CommissionMeeting_Minutes.pdf
Madison	Clergy	http://www.co.madison.tn.us/Archive.aspx?AMID=36
Marion	Commissioner	http://www.marioncountyttn.net/government/minutes_agendas/minutes/2015/01262015.pdf
Maury	Commissioner	http://www.maurycounty-tn.gov/modules/showdocument.aspx?documentid=405
McMinn	Commissioner	http://mcminncountyttn.gov/minutes_agendas/2015/minutes/0215.pdf
Monroe	Mayor	http://monroetn.com/wp-content/uploads/2014/08/CC62414.pdf
Montgomery	Commissioner	http://montgomeryminutes.bisonline.com/viewpdf.php?id=PRjSfn7fh4q9bybyd0Urs0uc88%2BQ2MUvdBKTCRp7oko%3D
Morgan	Clergy	https://www.youtube.com/watch?v=Ln06Mu8q1pc (at 1:08)

Tenn. County	Who prays	Source
Putnam	Commissioner or clergy	http://www.putnamcountyttn.gov/uploads/documents/08172015.pdf
Roane	Commissioner	http://roanecountyttn.gov/wp-content/uploads/2015/03/01-12-15CCMIN.pdf
Robertson	Commissioner or clergy	http://www.robertsoncountyttn.org/sites/robertsoncountyttn.org/files/0215_0.pdf#overlay-context=node/32
Rutherford	Commissioner	http://rcsharepoint.rutherfordcountyttn.gov/sites/Commission/Commission/1/Commission/Fiscal%20Year%202014-2015/20150115/Commission%20Minutes%2001-15-2015.pdf
Scott	Speaker not identified	http://www.scottcounty.com/main/wp-content/uploads/2016/11/Document-Document-5.pdf
Shelby	Clergy	http://shelby.granicus.com/MinutesViewer.php?view_id=4&clip_id=1274
Smith	Commissioner	https://www.youtube.com/watch?v=wfeWa2WasJQ (at 0:12)
Sullivan	Speaker not identified	http://sullivancountyttn.gov/sites/sullivancountyttn.gov/files/2017%20March%20.%20Resolution%20Packet.%203.17.16%20docx_0.pdf
Sumner	Clergy or commissioner	http://www.sumnertags.com/documents/commission/1511-commission-minutes.pdf (usually clergy)

Tenn. County	Who prays	Source
Trousdale	Commissioner	http://www.trousdalecountyttn.gov/sites/trousdalecountyttn.gov/files/JANUARY%2026%2C%202015%20-%20County%20Court.pdf
Unicoi	Commissioner	http://www.unicoicountyttn.gov/files/01052015min.pdf
Union	Commissioner	http://www.unioncountyclerktn.com/sites/unioncountyclerktn.com/files/2015%2C%20January%2012%20Regular%20Meeting.pdf
Van Buren	Commissioner	http://www.vanburencountyttn.com/agendas_minutes/minutes/2016/01122016.pdf (unanimous approval to pray at all future meetings, but prayer not recorded in later minutes)
Warren	Clergy	https://www.youtube.com/watch?v=h-k5AFinl0A (at 1:06)
Washington	Commissioner	http://www.washingtoncountyttn.org/sites/default/files/january_2015_commission_minutes.pdf
Wayne	Commissioner	http://www.waynecountyttn.org/docs/06_20_16%20meeting.pdf
Weakley	Commissioner	http://www.weakleycountyttn.gov/downloads/countycommission/2015-docx/MINUTES_5-18-15.pdf

Tenn. County	Who prays	Source
White	Speaker not identified	http://whitecountyttn.gov/sites/default/files/White%20County%20Commission%20Minutes%202015.01.26.pdf (example of prayer being on agenda but not in the minutes)
Williamson	Speaker not identified	http://www.williamsoncountyttn.gov/ArchiveCenter/ViewFile/Item/1216
Wilson	Commissioner	https://www.wilsoncountyttn.gov/images/documents/agendas/archives/13-minutes-results/01-28-2013.DOC

APPENDIX P

Lawmaker-led Prayer Practices in Kentucky Counties

Prayer practices in Kentucky counties with some form of legislative prayer

Note: The county-level lawmaking body in Kentucky is often known as a “fiscal court,” and its lawmakers are variously given the title of “magistrate,” “judge,” “squire,” or the like. *See* Ky. Rev. Stat. Ann. § 67.040 to § 67.080; *see also id.* § 67.075 (defining a “county ordinance” as “an official written act of a fiscal court”).

Ky. County	Who prays	Source
Adair	Speaker not identified	http://www.myadaircounty.com/tes/t/ (agenda)
Anderson	Speaker not identified	http://andersoncounty.ky.gov/20162017%20Fiscal%20Court%20Agendas/010317AgendaSC.pdf (governing body called the fiscal court)
Boone	Commissioner	http://www.boonecountyky.org/0106.pdf
Boyle	Commissioner/ magistrate	http://boyleky.com/wp-content/uploads/2015/05/Fiscal-Court-Minutes-January-27-2015.pdf
Breckinridge	Commissioner/ judge	http://www.breckinridgecountyky.com/uplimg/documents/Minutes%201-12-15%20(PPC).pdf
Bullitt	Clergy	https://bcfiscalcourt.files.wordpress.com/2012/09/fc-minutes-08-19-14.pdf

Ky. County	Who prays	Source
Christian	Commissioner/ justice	http://cloud2.snappages.com/09d1e33885420413f21413c8fb6d17fe017be2fa/minutes%201-12-2016.pdf
Clark	Speaker not identified	http://www.clarkcoky.com/pdf/agenda%201-14-15.pdf
Clay	Commissioner or clergy	https://www.youtube.com/watch?v=MT1oZBI3yJA (prayer at 2:34)
Daviess	Commissioner	https://www.youtube.com/watch?v=qgpjauE5t4c (at 0:25)
Floyd	Commissioner/ magistrate	https://www.youtube.com/watch?v=ZXY8TulUYEk
Grant	Clergy	http://grantcounty.ky.gov/wp-content/uploads/2015/12/Minutes-for-January-20-2015.pdf
Hardin	Commissioner/ squire	http://hcky.org/minutes/2015%2001%2027.pdf
Henderson	Clergy or commissioner/ judge	http://www.hendersonky.us/docs/minutes/09152016.pdf
Hopkins	Commissioner/ magistrate	http://hopkinscounty.ky.gov/index.php/minutes/274-minutes-10-16-2013
Kenton	Commissioner	https://www.egovlink.com/public_documents300/kentoncounty/published_documents/Fiscal%20Court%20Minutes/2015/Minutes%2001-05-15.pdf

Ky. County	Who prays	Source
Knox	Speaker not identified	https://www.youtube.com/watch?v=ghS4KlOmGgk (at 0:51, explaining that they were not praying because it was a special meeting, rather than a regular meeting)
Lawrence	Speaker not identified	http://lawrencekentucky.com/category/fiscal-court-agendas/
Lewis	Commissioner/ magistrate	http://lewiscounty.ky.gov/Fiscal%20Court%20Minutes/RegularFiscalCourtMeeting111214.pdf
Livingston	Speaker not identified	http://lincolncy.com/wp-content/uploads/2015/04/Agenda.pdf
Lyon	Commissioner/ magistrate	http://www.lyoncountky.com/Minutes/LYON_COUNTY_FISCAL_COURT_FEB_12_2015.doc
McCracken	Commissioner	http://mccrackenky.com/mccracken-county-fiscal-court-meetings/ (Apr. 10, 2017 meeting at 0:42)
McCreary	Commissioner	https://www.youtube.com/watch?v=dI9hEiWMw68
Madison	Clergy or commissioner	https://www.youtube.com/watch?v=WhSPjTyqZOs (at 0:26)
Martin	Speaker not identified	https://www.youtube.com/watch?v=iv3XcBTjszs
Morgan	Commissioner	https://www.youtube.com/watch?v=3aBeKUD1ojc (at 0:40)

Ky. County	Who prays	Source
Ohio	Clergy or commissioner	https://portal.ksba.org/public/Meeting.aspx?PublicAgencyID=4381&PublicMeetingID=14499&AgencyTypeID=1
Pendleton	Commissioner/squire	http://pendletoncounty.ky.gov/Government/Documents/02%20February%2010.pdf
Pike	Commissioner	http://www.piketv.com/portfolio-item/pike-county-fiscal-court-july-2nd-2015/ (before calling meeting to order)
Powell	Guest	http://powellcountyky.us/minutes/minutes20150113.pdf
Russell	Speaker not identified	https://www.youtube.com/watch?v=8jjTl-m_BRI
Simpson	Commissioner	http://www.simpsoncounty.us/minutes/minutes20150106.pdf
Spencer	Commissioner/esquire	http://www.spencercountyky.gov/minutes/FCmin,%20152015.pdf
Todd	Commissioner/magistrate	http://toddcountry.ky.gov/Documents/July%2026%202013.pdf
Union	Commissioner/magistrate	https://media.wix.com/ugd/b71d138a312b28e1464fc9a00ce1a9c6fd1971.pdf
Warren	Clergy	https://drive.google.com/file/d/0B1zhDr21WzTJMkpRZXh2Q1QyYTA/view

Ky. County	Who prays	Source
Whitley	Clergy or clerk	http://www.whitleycountyfiscalcourt.com/minutes/minutes20150915.pdf

APPENDIX Q

Lawmaker-led Prayer Practices in Ohio Counties

Prayer practices in Ohio counties with some form of legislative prayer

Ohio County	Who prays	Source
Adams	Commissioner	https://adamscountyoh.gov/files/1-14-15%20Commissioner%20Minutes.pdf
Clark	Speaker not identified	http://www.clarkcountyohio.gov/AgendaCenter/ViewFile/Minutes/01072015-189
Clermont	Commissioner or clergy	https://www.youtube.com/watch?v=p5p0lsvpJas&list=PL6bmag8nxmlmRYrtCsH1w-GnMJM2z-b_bk&index=55
Columbiana	Clergy	http://www.columbianacounty.org/2015/Minutes/Minutes01072015.pdf
Delaware	Commissioner	https://www.youtube.com/watch?v=hRXulXaDI3I (controversy over sectarian-nature of prayer, noting that commissioner has been leading prayer since he took office); compare http://www.co.delaware.oh.us/commissioners/journal/2007/01_16_07.pdf (minutes that do not record the prayers having occurred)
Fulton	Speaker not identified	http://www.fultoncountyoh.com/AgendaCenter/ViewFile/Minutes/01062015-329

Ohio County	Who prays	Source
Lorain	Commissioner	http://www.loraincounty.us/platform/cms/files/Clerk%20of%20the%20Board/012016.doc
Medina	Speaker not identified	http://www.co.medina.oh.us/commiss/CommishMinutes/2017/jan3.pdf
Morrow	Speaker not identified	http://morrowcountyohio.gov/www/images/Commissioners/Journals/Journal_April_17_2017.pdf
Paulding	Clergy	https://www.youtube.com/watch?v=r95OmWjrDKg (at 2:38)
Preble	Commissioner or clergy	http://prebleminutes.com/soundfiles/nov2509/1.mp3 (at 1:05)
Seneca	Commissioner	https://www.youtube.com/watch?v=mQBQwJihKWQ&feature=youtu.be (at 0:43)
Tuscarawas	Commissioner	http://www.co.tuscarawas.oh.us/commissioners/CommishMinutes/2017%20Minutes/010317Minutes.pdf

Appendix R

Examples of Lawmaker-Led Prayer In West Virginia and Other States -

Table 1: Examples Of West Virginia State Lawmaker-Led Prayers In 2016

Prayer Given By	Date	Prayer Text
Delegate Eric L. Householder	Jan. 14, 2016	“Ladies and gentlemen please bow your heads. Dear Heavenly Father, we turn to you to receive the spiritual guidance, and communication, and direction for our Legislative Session. We pray for your voice of wisdom and truth, to do what is right for the citizens of this State. We pray for understanding and spiritual guidance to fill our hearts and minds completely, to make wise and compassionate decisions. We pray for the Holy Spirit to direct our every step, we acknowledge your Holy presence; and we give thanks for wisdom, the strength, and the serenity you give us. In these things we pray in your holy name. Amen.” ⁵
Delegate Marty Gearheart	Jan. 19, 2016	“Please bow in prayer. Father, your presence warms us on this day when your warmth is needed more than any other. We thank you for the great honor of being here as representatives of the citizens of the great state of West Virginia. Remind us that our service is in your name and to accomplish your will on earth. Bless and guide our work and give us the wisdom to assure that all of our efforts benefit our state and all West Virginians. In the name of Jesus Christ we pray, Amen.” ⁶

⁵ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=D0qdtfPPtVY&index=77&list=PL2q3Wbz7wKWXkkgQSEK9FGpki7XgRxOtp> (6:42).

⁶ W. Va. Public Broadcasting, WV Legislative Session, https://www.youtube.com/watch?v=Vo67w_PTST8 (1:24).

Prayer Given By	Date	Prayer Text
Delegate Michael Ihle	Jan. 20, 2016	“Let’s bow our heads as we come to God in prayer. Dear God, since through your providence we enjoy the blessings of civil, political and religious liberty. We the people of West Virginia and through the provisions of our Constitution, reaffirm our faith, and are in constant reliance upon you. And seek diligently to promote, preserve and perpetuate good government in the state of West Virginia for the common well-being, freedom, and security of ourselves and our posterity. Lord, help us stay on this path and when we don’t, help correct us. We ask that you continue to be with us throughout the day. We ask that you help all those that have to travel on the weather safe. And we thank you so much for the challenges that you have before us, because they present an opportunity for us to do good. In your name we pray, Amen.” ⁷
Delegate Denise Campbell	Jan. 21, 2016	“If all the members in the chamber and all those in the gallery would please join me in prayer. Guide me oh Lord. You are my heart. You are my strength. You are my hope. Teach me oh Lord and guide me by way in everything. I love you more each passing day. Thank you for your guidance in Jesus name I pray. If all the members would please join me in the Lord’s Prayer [spoken aloud by Delegates] Our Father, which art in heaven, Hallowed be thy Name. Thy Kingdom come. Thy will be done in earth as it is in heaven. Give us this day our daily bread. And forgive us our trespasses as we forgive them that trespass against us. And lead us not into temptation, but deliver us from evil. For thine is the kingdom, the power, and the glory, for ever and ever. Amen.” ⁸

⁷ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=cb7394yxLM8&index=70&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp> (34:03).

⁸ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=0hUZS83DgCg&index=67&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp> (1:47:47).

Prayer Given By	Date	Prayer Text
Delegate Tom Fast	Jan. 25, 2016	“Let us pray. Our father in Heaven we call upon you this day, humbly asking for your guidance, asking for your grace, asking for your help. For Lord, if a sparrow cannot fall to the ground without your notice, how God can we try to build an empire of the State of West Virginia without your providential aid. Father, we humbly call upon you now, for your aid, for your help, God we pray for a spirit of unity. For those who labor without your aid God, simply labor in vain. Help us Lord not to do that. We open our hearts up to you, we open our minds to you, we acknowledge that you are the director of the affairs of mankind. We pray God for your help this day, this week, up on this Capitol, up on this State. It’s in the name of Jesus we pray. Amen.” ⁹
Delegate Mick Bates	Jan. 29, 2016	“Would the members and their guest please bow their heads and join me as we pray the prayer of St. Patrick. May the strength of God guide us. May the power of God preserve us. May the wisdom of God instruct us. May the hand of God protect us. May the way of God direct us. May the shield of God defend us. May the angels of God guard us against the snares of the evil one. May Christ be with us! May Christ be before us! May Christ be in us, Christ be over all! May thy grace Lord always be ours, this day, O Lord, and forevermore. Amen.” ¹⁰

⁹ W. Va. Public Broadcasting, WV Legislative Session, https://www.youtube.com/watch?v=9yzpc_iepoY&index=41&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp (2:11).

¹⁰ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=UbGnsS1XnSs&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp&index=56> (1:00:41).

Prayer Given By	Date	Prayer Text
Delegate Jim Butler	Feb. 4, 2016	“Would everyone stand, please. Thank you Lord for providing us a wonderful world, country, and state in which to live. Lord, please give us wisdom and clarity to do what is right and pleasing in your eyes. Help us today and every day to do what is best for the people of West Virginia. Amen.” ¹¹
Delegate Eric L. Householder	March 2, 2016	“Let us pray. My dear heavenly father, we pray for the things that are going on in our world right now Lord. Lord God, that you will put your healing hand on the people that need it and give people peace where they need it, Lord Jesus. And we pray that you would fill us with your Holy Spirit. I pray that our hearts are open to receive your word, Lord. I thank you for the gift of your word and while people are overseas, just thankful to have just a page out of the Bible, Lord we have the entire word of God here Lord, and the freedom to read it. Lord, I just pray that our hearts and that our minds be open to you and only you, Lord. It’s in your name we pray. Amen.” ¹²
Senator Charles Trump	March 5, 2016	“Let us bow our heads. Heavenly father, we give you thanks for the many blessings of life. Give us grace, we pray for grace. We ask that you watch over West Virginia and the United States of America. We ask these things in the name of Jesus Christ our Lord and Savior, who lives and reigns with you in the unity of the Holy Spirit, one God. Amen.” ¹³

¹¹ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=tVZhraxRjOc> (14:00).

¹² W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=pj2s3z9pqL0&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp&index=18> (27:40).

¹³ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=AslthWTVIYQ&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp&index=16> (43:44).

Prayer Given By	Date	Prayer Text
Delegate Randy Smith	May 17, 2016 (special session)	“Let us pray. Most gracious and heavenly father thank you for the opportunity to be here today, Lord. We just thank you for the honors and privileges to serve the people of West Virginia, Lord. We just thank you for the wonderful day you have given us, Lord, and we just ask that you open our minds and open our heart, Lord, as we tackle this budget problem with the State, Lord, and let cooler heads prevail. We ask that you be just be with us, and just lead, guide, and direct us, and forgive us where we failed you. In these favors and blessings we ask in Jesus’ precious and holy name. Amen.” ¹⁴
Delegate Mike Azinger	May 23, 2016 (special session)	“Let us pray. Thank you Father for the privilege Lord of partaking in creating the laws of a great State of West Virginia. Lord, we just need wisdom Father. We just need your spirit Father. Lord, help us to do the right thing, Lord. Help us to know your will. To have the spirit of God in our hearts to guide us and teach us and give us wisdom Lord. I pray for every member today that we would all have wisdom Lord. I pray for the leadership, for the Speaker, and the leadership team, Lord. And Father we love you. We thank you for all you do for us. Help our State. God, we need you in a desperate way. In Jesus name, Amen.” ¹⁵
Delegate Rick Moye	May 25, 2016 (special session)	“Will everyone join me in prayer. God and Father thank you so for your love and mercy. We ask you Lord for the wisdom that we need to lead this State in a manner that would be pleasing to you. Help us first to be pleasing to you and serve well the constituents that have sent us here. We ask for your blessings and your guidance. And in Christ’s name we pray, Amen.” ¹⁶

¹⁴ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=GniVkgeMfnM> (17:20).

¹⁵ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=qyEgDyckkeE> (19:37).

¹⁶ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=MZLGqqzaA60> (26:14).

Prayer Given By	Date	Prayer Text
Senator Ronald Miller	May 25, 2016 (special session)	“Let us bow in prayer please. As we gather here this day O Lord we ask for your wisdom, your direction. We ask that you give us the understanding of what we need to be as individuals from different parts of the State, this great State you have given us in which to live, to make differences for the people of this State. Lead us this day Lord as we come together, as we work together. Lead us as we go out and show that we follow where you direct us. Help us we pray in all things that we do. In the name of our Lord we pray, Amen.” ¹⁷
Delegate Michael Ihle	May 26, 2016 (special session)	“If the members and guests will please join me in prayer. Dear God, we thank you for all the blessings you have provided us, including the blessing of the great challenges that lie before us. Please give us wisdom and courage as we make the decisions that are the best for the people for our State. Help us to keep you in mind with everything that we do. Help us to be more concerned with our character and our reputation because our character is what you think of us. Help us to make everything we do pleasing to you and bless every person within our state based on the decisions that we’ve made. In your name we pray Amen.” ¹⁸

¹⁷ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=MZLGqqzaA60> (1:09:47).

¹⁸ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=a8zd4KODAdw> (25:00).

Prayer Given By	Date	Prayer Text
Senator Ronald Miller	June 14, 2016 (special session)	“As we pray today let us remember that today is Flag Day. Let us also remember in silence before we pray not only those in Florida who lost their lives, but three in West Virginia were shot this week too. So let us—last night--so let us have a moment of silence for that too. Let us pray. Here us now Lord as we gather in this place once again to do business as a state. Here us as we go through the finances of this State, as we look forward to finishing and going home very soon. Give each person the wisdom they need and let us progress, process that which needs to be done. Be with us. Be with this great State. Help us to remember those who have lost lives due to violence. Help us to be a people who are messengers of peace. This we pray. Amen.” ¹⁹
Delegate Kayla Kessinger	June 14, 2016 (special session)	“Father, we come before you today so thankful for the opportunity to represent the State of West Virginia and the people that live here Lord. I pray that you will give us wisdom and discernment to be the leaders that you have called us to be. Help us to follow your example of leadership, and true leadership being servants to the people that follow us. Help us to bring peace to the people of West Virginia Lord, that we pass a budget, that their jobs are no longer at risk. I pray that you will give us wisdom today as we continue to represent the state of West Virginia. That you will lead us and guide us and give us the wisdom we need to make the right choices. In Jesus name, Amen.” ²⁰

¹⁹ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=OiR2xM8IeVk>. (30:38).

²⁰ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=OiR2xM8IeVk> (1:11:56).

Prayer Given By	Date	Prayer Text
Delegate Brent Boggs	June 12, 2016 (special session)	“If the members and guests will join us as we go to the Lord in prayer. Our Father and our God, we thank you for the day. We thank you for the many wonderful blessings you have given us heavenly father because we know indeed how all good things come from you. We thank the Lord for our families, for our friends, we are thankful for this great State. And we pray Lord that the decisions we make here, that will be pleasing in your sight and an honor and glory to you. Thank you Lord for all of the blessings, be with those Lord that have sickness and injury and heartache in their families Lord. And Lord, especially be with those in Florida that suffered such a horrendous tragedy in the wee hours of the morning. This we pray Lord. This we thank you for all things. In Jesus name. Amen.” ²¹

²¹ W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=gunO-MHj3q8> (39:33).

Prayer Given By	Date	Prayer Text
Senator Greg Boso	June 12, 2016 (special session)	<p>“Join me as we share in prayer together. Almighty God, a beautiful day we share together just for us. You sent the rain, you sent the sunshine. Father we see your power in so many ways around us. Thank you. Father, I’ve been gone, I apologize for missing yesterday, but you know, you know where I was. To be able to see 150 kids smiling and enjoying the environment here in West Virginia is why we serve here. God I thank you for my fellow Senators that are here, I pray God that you will bless each of us. Father, I thank you for the House of Delegates members as they serve here on the other end. Father we are all here to see what we can do to make West Virginia better, to do what’s right. Father we pray for our governor, we pray God that in each thing that we deal with here, in these chambers, we can work together to move West Virginia forward. Father we thank you for your divine providence in our lives. For your wisdom, for your insight. Father for our staffs that serve us, we just pray that you will anoint them. Continue to give them the wisdom and the health to be able to continue. Be with us in all that we do today. In Christ’s name we pray, Amen.”²²</p>

²² W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=gunO-MHj3q8> (52:21).

Table 2: Examples Of Exclusively Citizen-Led Prayers In Fourth Circuit Local Governments

County or City	Prayer-Giver	Sample Prayer
Anne Arundel County, Maryland	Council Member Jerry Walker	“Please bow our heads. Lord and heavenly Father we thank you for this evening and for this opportunity to get together to debate the people’s business. Pray you might be with us and bless our conversation. In your name we pray. Amen.” ²³
Carroll County, Maryland	Commissioner Richard Rothchild	“Heavenly Father, I come to you on behalf of our Board of Commissioners, Lord. I ask for your guidance and your wisdom, that we might make decisions that are pleasing to you, that we might make decisions in the best interest of all the people of Carroll County regardless of their faith and belief. I offer this prayer in the name of my personal Savior. Amen.” ²⁴
Garrett County, Maryland	Commissioner Larry Tichnell	“Let us all bow in prayer. Heavenly Father Lord, we just come to you today thanking you for all you do for us, for the many blessings that you give us each and every day. Lord we just ask that you be with every person in this building today, everything that is said here is thought out and done that it would be pleasing to you. Lord, we continue to ask for your guidance and your wisdom. We ask all this in thy most precious holy name. Amen.” ²⁵

²³ Anne Arundel Cnty. Council, <http://www.aacounty.org/departments/county-council/Council/county-council-meeting-november-7-2016> (Nov. 7, 2016) (0:06).

²⁴ Carroll Cnty. Council, <http://carrollcountymd.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2430&MinutesID=2242&FileFormat=pdf&Format=Minutes&MediaFileFormat=ismv> (June 23, 2016) (8:34).

²⁵ Garrett Cnty. Council, <https://www.garrettcounty.org/resources/commissioners/pdf/audio/2016/03-15-2016.mp3> (Mar. 3, 2016) (0:23).

County or City	Prayer-Giver	Sample Prayer
Saint Mary's County, Maryland	Commissioner John O'Connor	"Heavenly Father, thank you for another day where we are able to take a step forward and walk hand in hand with our fellow man. I only have one request Father, is that I pray for Nolan Scully in his battle with surgeries and that you keep his spirit alive as you have this entire time and comfort his family in these trying times. In Jesus name we pray. Amen." ²⁶
Somerset County, Maryland	Commissioner Craig Mathies	Commissioner Craig Mathies invokes the Lord's Prayer before each session ²⁷
Washington County, Maryland	Commissioner John Barr	"May we bow in an attitude of prayer. Gracious heavenly Father thank you for this day, this beautiful day, another beautiful day in Washington County. Lord guide us, direct us, use us for thy service that we may uplift everyone in our community and just be a positive reinforcement. Direct us, guide us, use us I pray in your name. Amen." ²⁸
Wicomico County, Maryland	County Councilmembers	The Lord's Prayer ²⁹

²⁶ St. Mary's Cnty. Council, <https://www.youtube.com/watch?v=gcwIm0NfVko> (Oct. 25, 2016) (1:51).

²⁷ E.g., Bd. of Cnty. Commr's for Somerset Cnty., *Minutes*, http://www.co.somerset.md.us/minutes/Comm6_2_2015.pdf (June 2, 2015).

²⁸ Washington Cnty. Bd. of Comm'rs, <http://washco.pegcentral.com/player.php?video=fb53a496c6803025d0cd58705a651303> (Oct. 11, 2016) (0:06).

²⁹ Wicomico Cnty. Council, <http://www.youtube.com/watch?v=4cXJUYqEb8Y&list=PLD026330056E3BADF&index=27> (August, 2016) (0:46).

County or City	Prayer-Giver	Sample Prayer
Hagerstown, Maryland	Councilmember Kristen Aleshire	“As we gather here this evening may we be ever mindful of opportunities to render ourselves to the services of fellow citizens and to our community. Keeping in mind always that enduring values of life, exerting our efforts in those areas and on those things on which we build with confidence. Let us continue to strive to make this a better place.” ³⁰
Alamance County, North Carolina	Chairman Eddie Boswell	“Please join me in prayer. Almighty heavenly father, we thank you so much for all your blessings. Thank you for a beautiful day today. And just thank you for protecting us during the storm. Lord be with the ones down east that are still trying to figure out how to survive and just find a place to sleep tonight. Look after them. Take care of them. Be with our deputies as they go down there to help out and other responders. Just protect them as they work to help these people that are in need. God we thank you for all you do for us. Help us to make wise decisions as a Board tonight and do what is good in you will. These things we ask in your name. Amen.” ³¹

³⁰ Hagerstown County Council, <https://www.youtube.com/watch?v=Y6SQU1IZWNc&list=PLJXxCe9GA2fEf4TIVzTH2O-kFJIS8VVgQ&index=17>(July 26, 2016) (0:33).

³¹ Alamance Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=CsUW3YY2TdA> (Oct. 17, 2016) (0:39).

County or City	Prayer-Giver	Sample Prayer
Alexander County, North Carolina	Commissioner Josh Lail	<p>“Dear Heavenly Father thank you for today. Thank you for allowing us to gather here to work on the county’s business. Dear Heavenly Father please be with all the employees and all of the folks that work so hard each day to help provide the lifestyle we get to enjoy here. Please be with our police, and EMS, and military, as well as our firefighters. Help us to make good decisions. Help us to look at what is best for the people of Alexander County. In your name we pray. Amen.”³²</p>
Beaufort County, North Carolina	Commissioner Robert Cayton	<p>“May we pray. Our gracious heavenly Father we come into thy presence in the name of the Lord Jesus Christ. We thank you for your blessings, your encouragement and strength. We thank you for the privileges you have granted each and every one of us to participate in government and in choosing our leaders. Bless this Board this night, that what it will do what is fair and equitable and guide them that everything will be done decently and in order. In Christ’s name. Amen.”³³</p>

³² Alexander Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=XOm2gVIZuQ4&index=8&list=PLF712F38DEC835247> (June 6, 2016) (0:42).

³³ Beaufort Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=BZy3ch7GDyQ> (Dec. 3, 2012) (3:25).

County or City	Prayer-Giver	Sample Prayer
Buncombe County, North Carolina	Chairman Brownie Newman	<p>“If you will join me in prayer. We are moving into Autumn with crisp mornings and changing leaves and lowering temperatures. Our schools are fully occupied with both teachers and students settled down into the rhythm of a new year. Football games and talk of coaches, athletes, wins and losses fill the air. We are also in the middle of an important election to decide who leads our county, state, and federal governments. While all this activity is going on, help us to remember the people who are struggling physically, emotionally, and financially. Who have lost all hope and do not think they have anywhere to go. The people who have filled their hearts with hatred for our company (sic) and the American lifestyle that we lead. Help us to continue to reach out to all people not just folks who look, act, and live like we do. Open our hearts to love, acceptance, and honest belief that everyone matters because each one of us is a divine creation. Fill us full of energy and empowerment to help all the people on this planet. And thank you for the opportunity to appreciate all we have, including a solid love for these beautiful mountains who will once again astound us with a color display that is known all over the world. Give us wisdom to remember who we are and why we were put together on this planet. Amen.”³⁴</p>

³⁴ Buncombe Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=a4f9CiJKzPc> (Sept. 20, 2016) (0:47).

County or City	Prayer-Giver	Sample Prayer
Caldwell County, North Carolina	Chairman Randy Church	<p>“Heavenly Father we just come to you this evening And we thank you for the day that you have given us and for the blessings of life that you bestow upon each and every one of us. And for the time and opportunity that we have this evening to be able to come conduct the business of this county. I thank you for each one of our commissioners and I just pray a special blessing upon them. We’d just ask that you would give us wisdom and guidance this evening as we make decisions to benefit our county as a whole. And I thank you for each one who lives and calls Caldwell County home. Father as we’ve got word today of the loss another police officer in a neighboring community, we just want to pause for his family and ask God that you would give them the grace that only you can provide. Gird them up and give them comfort in all that they do. Just help them through this time. Help that department. Help our law enforcement as a whole. We Pray for our firefighters, our EMS, and rescue personnel. We pray our county employees and again those who live and call Caldwell County home. Now be with us. Lead, guide, and direct us and we’ll give you the praise, the honor, and the glory for the things that are done. We ask it all in Jesus name. Amen.”³⁵</p>

³⁵ Caldwell Cnty. Bd. of Comm’rs, <http://caldwellcountync.pegcentral.com/player.php?video=7f3ea16601cd922de40d973ce5393be3> (Sept. 12, 2016) (4:35).

County or City	Prayer-Giver	Sample Prayer
Cumberland County, North Carolina	Commissioner Jimmy Keefe	<p>“We bow our heads for the invocation. Lord, there are so many things in our life that we cannot control and many of us realize that at a high level during Hurricane Matthew came to visit us in October. Four years ago a tornado devastated parts of our community. But we live in a great community and we are fortunate that we are able to control the people that work with us to govern. Each of us pray on this Board that we serve with reverence, understanding, and compassion. We pray that our Lord gives us the wisdom and guidance to make a difference in our county, our community, and each in the lives of all of our citizens. That we are able to do this with sound judgment that is not self-serving. All the things that we do or decisions that we make send out ripples. That may seem so small, but have a potential very large impact on the lives of the people we serve. We have been entrusted to govern with a sound mind and character. May we all continue to be a positive force for the greater good sending out those beneficial ripples wave after wave so that we can continue to move our county in a better direction that is fair, kind, and just. Where each of us are judged by our actions and character and not by how we look like, how we pray, where we live or how we love. Judge us on our character that each of us represent each of you fairly, kindly, and justly. That we have the passion to make our county great and the compassion to make our citizens even greater. May our build beacons of hope for a community that has known hardship but will continue to grow and be better. We are all connected in this life, connected by a greater good and a greater God. We pray (cont.)</p>

County or City	Prayer-Giver	Sample Prayer
Cumberland County, North Carolina	Commissioner Jimmy Keefe	that our God continues to bless our community and all of our people. Stand guard over our first responders, our armed forces, law enforcement and others who protect us but also we pray that you protect our children and our parents. We look to you to be the thread that binds us together and strengthens ropes that pull us together. Only when we move together can we move forward. In your name we pray. Amen.” ³⁶
Davie County, North Carolina	Chairman Terry Renegar	“At this time if you would join me in the invocation. Dear God as we come before you this evening we are so thankful for the many blessings in life. We are thankful for family, friends, the right to free governance and freedom. As always we ask for wisdom and discernment in this meeting tonight as we make the best decisions or try to make the best decisions we can for all the residents of Davie County. In your name we give you the thanks. Amen.” ³⁷

³⁶ Cumberland Cnty. Bd. of Comm’rs, https://www.youtube.com/watch?v=1WzO5_I8LbE (Dec. 5, 2016) (0:39).

³⁷ Davie Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=cc34MJesGdc> (Dec. 5, 2016) (0:14).

County or City	Prayer-Giver	Sample Prayer
Gates County, North Carolina	Commissioner Billy Felton	“Let us pray. Gracious father we are blessed to be here today Lord. Lord, we are thankful for your presence. We lift up our county, our nation, and our State, Lord. And we just ask you to bless all the deliberations and decisions that are made on our behalf. Lord, lift up our citizens and Lord, we want to just ask you to bless all of those families in this Christmas season and Lord remind us that your son Jesus Christ is the reason that we celebrate. In your name we pray, Amen.” ³⁸
Graham County, North Carolina	Commissioner Raymond Williams	“Merciful gracious God, we thank you for this day Lord. We thank you for the rain Lord and we know Lord, that you know that we need it. We know that you know best about everything Lord and just ask you to be with us tonight as we come to this meeting. Lord, that we do the best for Graham County and all its people. Just give us the strength and the knowledge to do it Lord. Thank you for everyone that has come out tonight to be with us. Lord lead us. Watch over people during the holidays Lord. Give them safe travels. Amen.” ³⁹

³⁸ Gates Cnty. Bd. of Comm’rs, http://www.gatescounty.govoffice2.com/index.asp?SEC=CEEE6EE5-7A05-4D43-B24C-5D143FECF3D9&Type=B_BASIC (Dec. 5, 2016) (0:14).

³⁹ Graham Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=fpZdZo4cNcc> (Dec. 1, 2015) (0:20).

County or City	Prayer-Giver	Sample Prayer
Harnett County, North Carolina	Vice Chairman Gordon Springle	“Let us pray. Lord we thank you for all the blessings you have bestowed upon us. Lord we thank you for the opportunity this week to pause as a nation to be thankful for all the blessings of this county. We pray that you will continue to watch over this county as you have. Be with the military throughout this world which gives us the freedom to worship as we please. These things we ask in Jesus’ name. Amen.” ⁴⁰
Haywood County, North Carolina	Vice-Chairman Kirkpatrick	“Bow your heads. Dear Heavenly Father, we just thank you for this day in Haywood County and all that you have given us. Lord, just be with those folks that are fighting those fires out here in our surrounding counties. And Lord, if it is your will, just bring us some rain into this area. Help all those farmers and the industries that count on it. Lord, be with us today as we make decisions for this county. Help us to do what is in the best interest of our citizens. In your name I ask this prayer. Amen.” ⁴¹

⁴⁰ Harnett Cnty. Bd. of Comm’rs, <http://www.harnett.org/boc/downloads/BoardMeeting.mp3> (Nov. 21, 2016) (0:28).

⁴¹ Haywood Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=j42-DlbB0Sw> (Nov. 7, 2016) (0:37).

County or City	Prayer-Giver	Sample Prayer
Henderson County, North Carolina	County Manager Steve Wyatt	<p>“If you would pray with me. Lord, we come before you to ask your forgiveness. We praise your holy name that you give it to us whenever we ask. We ask you for guidance for these gentlemen as they make decisions. More than anything Lord, we thank you. We thank you for all of your blessings, especially the blessing of freedom, that we are able to come here, that we are able to able to assemble, and we are able to select those who are that in positions of authority. Tomorrow, Lord we will go across this land and do the same. We ask that you guide and direct our decisions. May it be pleasing to you and according to your will. In your holy name we pray. Amen.”⁴²</p>
Iredell County, North Carolina	Commissioner Renee Griffith	<p>“Let us pray. Heavenly father we thank you for this time we have together as free citizens. We know that there are many people around the world that do not experience the blessings and privileges that we have that come with freedom. With those freedoms we know the responsibilities that come with those freedoms. We ask that you give us wisdom tonight as we make decisions and that you give us clarity of mind. We thank you for the men and women who have served to protect those freedoms. We thank you for the people in this county that work hard to make this a great place to live. We ask your continued blessings on this county, our decisions, and this county. We thank you for the goodness you have given us. And we ask all these things in your son’s name, Jesus. Amen.”⁴³</p>

⁴² Henderson Cnty. Bd. of Comm’rs, http://www.hendersoncountync.org/boc_videos/boc_11072016.html (Nov. 7, 2016) (1:19).

⁴³ Iredell Cnty. Bd. of Comm’rs, <https://viewer.earthchannel.com/PlayerController.aspx?&PGD=iredellconc&eID=59> (Oct. 7, 2014) (0:27).

County or City	Prayer-Giver	Sample Prayer
Lee County, North Carolina	Commissioner Ricky Frazier	“Let us bow our heads. Most gracious and eternal God. We again thank you for this privilege and this opportunity to gather today. We thank you God for the county commissioners who have gathered here together to discuss the business of community. We thank you God for our citizens and also the staff of this great county. We thank you God for what we are going to talk about tonight and discuss. We pray God that whatever we say and do will be pleasing in thy sight. We thank you for all that you do. In Christ’s name we pray. Amen.” ⁴⁴
Lenoir County, North Carolina	Commissioner Jackie Brown	“Let us bow our heads. Dear heavenly father we come to you this morning seeking your blessings. We come to you this morning asking for praises. Help for those victims of the Matthew flood. We pray Lord that you would be with us as we go through this meeting today. Lord, because we need you each and every hour of each and every day. We ask Lord that you would be with us in all that we do and all that we say. This we ask in Jesus name. Amen.” ⁴⁵

⁴⁴ Lee Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=1JwOWtp5Ovg> (Oct. 3, 2016) (0:49).

⁴⁵ Cnty. Bd. of Comm’rs, https://vimeo.com/194587944?utm_source=email&utm_medium=vimeo-cliptranscode-201504&utm_campaign=29220 (Dec. 5, 2016) (0:13).

County or City	Prayer-Giver	Sample Prayer
McDowell County, North Carolina	Commissioner Matthew Crawford	“Let’s go to our heavenly father in prayer. Dear Heavenly Father, we give thanks for the many blessings that you bless each one of us each day as we meet tonight as Commissioners for McDowell County, we ask that each decision that we do be for the benefit of McDowell County and approved by you. We ask for a special prayer for the firefighters as there are fighting woods fires all around our community. Keep them safe and Lord send rain and make that happen. In your name we pray, Amen.” ⁴⁶
Mecklenburg County, North Carolina	Chairman Ella Scarborough	“Would you join with me in prayer. God give us the serenity to accept the things we cannot change, the courage to change the things we can, and the wisdom to know the difference. Amen.” ⁴⁷
Nash County, North Carolina	Commissioner Lisa Barnes	“Heavenly father we just come before you tonight to give you thanks and praise for so many blessings you have given to use during this season of thanksgiving, Lord, we take time to get together and recall all of our many blessings and we just thank you for this meeting tonight for everyone here that gives of their time and energy to support our community. Lord, we thank you for the food we have had tonight. Lord please bless that to the nourishment of our bodies. And bless this meeting, this time together. In Jesus name we pray. Amen.” ⁴⁸

⁴⁶ McDowell Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=Qb3fQLcuUKI> (Nov. 20, 2016) (0:48).

⁴⁷ Mecklenburg Cnty. Bd. of Comm’rs, http://mecklenburg.granicus.com/MediaPlayer.php?view_id=44&clip_id=2947 (Dec. 9, 2016) (1:00).

⁴⁸ Nash Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=TMWvhIix1ZQ> (Nov. 22, 2016) (0:32).

County or City	Prayer-Giver	Sample Prayer
Onslow County, North Carolina	County Manager Jeffrey Hudson	<p>“Please bow with me in prayer. Our Gracious Heavenly Father, I come to you in the name of Jesus Christ. I thank you for your many blessings. I thank you for this county. I thank you for the democracy that we enjoy, the freedoms that we enjoy. Lord, I thank you for those veterans that through the ages have suffered and died to provide us these freedoms. Dear Lord tonight, as this legislative body enters deliberations on matters affecting this community, I ask that your guidance for these county commissioners. And Lord, looking toward the future I ask that your hand be upon Onslow County and this nation. Guide our leaders at all levels for the benefit of your people. Father, I thank for the gracious things that you have shown me personally these last seven and a half years. And I ask you blessings on the next manager that fills this seat. Give that person wisdom to serve the citizens of this county fairly and with wisdom. In all these things I will be careful to give you the praise, honor, and the glory. In Christ’s name I pray. Amen.”⁴⁹</p>
Pender County, North Carolina	Commissioner Fred McCoy	<p>“Let us pray. Dear Heavenly Father we ask for wisdom and guidance in deciding the future of this county. We alone cannot solve these problems, but only with your help. In your name we pray. Amen.”⁵⁰</p>

⁴⁹ Onslow Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=Eorc7F7TtKc> (Nov. 21, 2016) (0:16).

⁵⁰ Pender Cnty. Bd. of Comm’rs, <http://www.ustream.tv/recorded/92864595> (Nov. 21, 2016) (3:11).

County or City	Prayer-Giver	Sample Prayer
Pitt County, North Carolina	Commissioner Mary Perkins-Williams	“Please bow. Gracious Father. Thank you for those gathered here today. Thank you for the citizens of this wonderful county. Thank you for its leadership. Thank you for its employees and their families. Let us all know what this season and the real reason for it is. It is to you we love. Amen.” ⁵¹
Stanly County, North Carolina	Commissioner Gene McIntyre	“Let us pray. Dear Heavenly Father we thank you so much for the many blessings you have bestowed upon us. And even though we have had a lot of tragedy and sadness in the eastern part of the State, thank you for making sure that it wasn’t any worse than it is. We pray for those folks down there, visiting through there on their way to the beach. Pray for those devastated. Be with those folks. Let them know that you are there for them as we know you are. Be with the Board tonight, that we might make decisions that will be pleasing to you, for the benefit of our citizens. These things we ask in Christ’s name. Amen.” ⁵²

⁵¹ Pitt Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=f9Qci1SmqSY> (Dec. 5, 2016) (1:28).

⁵² Stanly Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=m9QAv2V2-4I> (Nov. 17, 2016) (0:34).

County or City	Prayer-Giver	Sample Prayer
Union County, North Carolina	Commissioner Richard Helms	“Bow in place. Dear heavenly father, you are indeed the giver of all gifts and we welcome you today to seek you wisdom and guidance. On this day before our country’s election we ask that you would place your hand on our hearts so that we will do your will. Give us the wisdom to place our vote in the candidate who will bless you and guide our country. Give us insight to lead with integrity, that our decisions may reflect what is right and good. Please give special protection to the military, police, EMS, and firemen that risk their lives to ensure our safety. Finally, dear Lord grant us humility to always seek you in all that we do and say. In thy name we pray. Amen.” ⁵³
Wake County, North Carolina	Commissioner Caroline Sullivan	“Please join me in prayer. Dear God, thank you for all of our many blessings. Please be with this Board as we make decisions now and in the future. Please be with all of us as we travel to be with family and friends this Thanksgiving, and we thank you for all of your many blessings to all of us. Amen.” ⁵⁴

⁵³ Union Cnty. Bd. of Comm’rs, <http://unioncountync.swagit.com/play/11072016-1444> (Nov. 7, 2016) (1:04).

⁵⁴ Wake Cnty. Bd. of Comm’rs, http://wake.granicus.com/MediaPlayer.php?view_id=18&clip_id=1946 (Nov. 21, 2016) (22:35).

County or City	Prayer-Giver	Sample Prayer
Wayne County, North Carolina	Commissioner Ray Mayo	<p>“Let us pray. Dear Lord we are thankful again that we can come together as a county to conduct the business of this county in your shadow and guidance this morning. Father, we are thankful for a lot of things for living in this country, but today we are most grateful for the deliverance from the hurricane and the flood that we just experienced in the county, the dedication of our emergency services, our fire departments, our sheriffs, police, everyone that was involved, the national guard that was involved. We just thank you Lord for their service, but Father, our hearts are heavy for the ones that lost their lives during this situation. Father, we ask that these ones that are not with us anymore that you might console their families and help them through this time and give them faith to persevere. And Father as we conduct the business of this county today and for the next four years after the oath of office today we ask Lord that we might look to you for guidance and direction. And during this time of the year that we celebrate you and the birth of the Lord Jesus Christ, that we might remember not just during this time of year, but all year, that there will be no peace on earth without your guidance. Bless this Board as we conduct the business at this time. These things I ask in your holy name. Amen.”⁵⁵</p>

⁵⁵ Wayne Cnty. Bd. of Comm’rs, https://www.youtube.com/watch?v=T2S_dV9a-3c&index=9&list=PL-mrcybcIIUAUM4FVTEXv5MiuVu5cHGPN (Dec. 5, 2016) (0:45).

County or City	Prayer-Giver	Sample Prayer
Wilkes County, North Carolina	Commissioner Eddie Settle	“Let us pray. Dear heavenly father Lord we come to you tonight humble to thank you for watching over us. We thank you for this county and the people in it. We just ask that you continue to lead this group in a direction that would be pleasing to you and thank you for these three that are getting ready to go back in tonight. They are good, Godly men, and we just ask you to keep your hand on them, and guide us all – this whole board, this whole county. In all these blessings we ask in Jesus name. Amen.” ⁵⁶
Wilson County, North Carolina	Commissioner Leslie Atkinson	“Let us pray. Merciful father, we come to you this afternoon Father, we thank you for getting ourselves here Father. We ask you bless to each Commissioner on the sound of my voice that will make the right decisions that is pleasing for Wilson County and its citizens. We ask all of your blessings in your name. Amen.” ⁵⁷

⁵⁶ Wilkes Cnty. Bd. of Comm’rs, <http://view.earthchannel.com/PlayerController.aspx? &PGD=wilkesconc&eID=149> (Dec. 5, 2016) (2:02).

⁵⁷ Wilson Cnty. Bd. of Comm’rs, <http://wilsoncountync.iqm2.com/Citizens/SplitView.aspx? Mode=Video&MeetingID=1109&Format=Minutes> (Nov. 7, 2016) (2:03).

County or City	Prayer-Giver	Sample Prayer
Charlotte, North Carolina	Council member Gregg Phipps	<p>“Let us bow. Heavenly father we come before you tonight as elected leaders in a community of citizens. Thank you for the many blessings you have bestowed upon us. We ask for your continued covering over our city and the many leaders at the federal, state, and local levels who collectively provide influence over our governments. Grant us the wisdom and patience dear God, to govern in a manner that is honorable in your sight. As we deliberate on the business of this city that we all love, we ask your special blessing for the men and women all over the nation and the world who make it possible for us to serve in a free and open democracy. Heavenly father we also ask your anointing and protection over the service and sacrifice of our law enforcement officers, fire fighters, EMTs who respond and citizen calls for service each and every day to keep our neighborhoods and community safe. In you precious name we pray. Amen.”⁵⁸</p>

⁵⁸ City of Charlotte, http://charlottenc.granicus.com/MediaPlayer.php?view_id=2&clip_id=2869 (Sept. 19, 2016) (1:34).

County or City	Prayer-Giver	Sample Prayer
Anderson County, South Carolina	Councilman Cindy Wilson	“Gracious heavenly Father we thank you for the awesome privilege and blessing of living here in these United States, the state of South Carolina, and our wonderful Anderson County. We thank you for all of our many blessings. We ask your guidance and wisdom in the meeting here tonight. And as always we ask your divine providence and protection of those who serve in the field to protect our wonderful privileges here and our public safety people who keep us safe at home. I pray this in the name of my precious Lord and Savior, Jesus Christ. Amen.” ⁵⁹
Beaufort County, South Carolina	Chairman Paul Sommerville	“If you would please bow your heads for an invocation. Heavenly Father we humbly ask your blessings on these deliberations. That you guide our thoughts, words, and decisions as we serve the needs of our citizens, our environment, and our community. This we pray in your precious name. Amen.” ⁶⁰

⁵⁹ Anderson Cnty. Council, <https://www.youtube.com/watch?v=vLWr749dCRw> (Feb. 2, 2016) (1:45).

⁶⁰ Beaufort Cnty. Council, http://beaufort.granicus.com/MediaPlayer.php?view_id=2&clip_id=2978 (Dec. 12, 2016) (0:33).

County or City	Prayer-Giver	Sample Prayer
Berkeley County, South Carolina	Councilmember Caldwell Pinckney	“Let us pray. Our God and our Father. It’s again we come today to tell you thank you. Thank you for yet another day and another opportunity. We thank you for your love. We thank you for your grace, your mercy. We thank you God for your healing. We thank you for being God almighty. And now O God as we come together today to take care of the business of your people, we ask that you will give us humble spirits that you would be able to come in, lead, guide, and direct us in all our decision making. Help us to make right decisions tonight and do the right thing for the betterment of mankind everywhere. Keep us submissive to your word and faithful to you knowing that you are God all by yourself. These and all other blessings we do ask in the mighty name of Jesus. Amen.” ⁶¹
Dillon County, South Carolina	Councilmember Archie Scott	“Let us pray. Sustainer of life Father in the name of Jesus as we come today. We thank you again for another opportunity to be existent in earth. Lord we invite you in concerning this meeting. We pray your blessings upon it Lord God as we endeavor to conduct governmental business. We depend upon you. Give us clarity of thought and eloquent of speech. In Jesus name we pray. Amen.” ⁶²

⁶¹ Berkeley Cnty. Council, <https://www.youtube.com/watch?v=FIS46Wfh4KE> (June 27, 2016) (0:35).

⁶² Dillon Cnty. Council, <http://florenceco.org/council/archives/2016/> (Dec. 8, 2016) (1:14).

County or City	Prayer-Giver	Sample Prayer
Florence County, South Carolina	Chairman Waymon Mumford	<p>“Let us pray. Our Father and our great God, we come at this hour in the mighty name of Jesus. Thanking you for this another glorious day. Thank you for your many, many blessings. Thank you for how you have blessed this council, city, county, state, and the federal government. We thank you for this time of the year, this wonderful season. Here we are standing between Thanksgiving and Christmas. God we pray that all of us will remember the reason for the season. Jesus Christ is our Savior. Bless now individually and collectively. In Jesus name we pray. Amen.”⁶³</p>
Greenwood County, South Carolina	Councilmember Chuck Moates	<p>“Please stand. Let us pray. Eternal God. We pause at the beginning of this meeting to invoke you presence. And to ask for your guidance and wisdom as we conduct the business of this county government. Father we recognize the importance of what we have been elected to do for our citizens and for this community. To make decisions that are fair and reasonable to consider the consequences, intended and unintended of these decisions. And to act with pure and unselfish motivation. And Lord during this Advent season where our thoughts are focused upon family and faith, goodwill and peace, giving and receiving, may we not forget or neglect those for whom life is hard and unsympathetic. Give us eyes to see and ears to hear the cries of those in need. This we ask in your holy name. Amen.”⁶⁴</p>

⁶³ Florence Cnty. Council, <https://www.youtube.com/watch?v=GK1qfgsDP2o> (Nov. 16, 2016) (0:35).

⁶⁴ Greenwood Cnty. Council, <https://livestream.com/GreenwoodCountySC/CouncilMeetings/videos/143691502> (Dec. 6, 2016) (16:19).

County or City	Prayer-Giver	Sample Prayer
Horry County, South Carolina	Councilmember Paul Prince	<p>“Most kind and gracious heavenly father we bow before you and thank you for your mercy, for your grace, and for your many wonderful blessings of life. Lord, I ask your continued blessings upon those who are dealing with sickness and their families and the loss of loved ones. Father, just place your healing and comforting hand upon them. We ask that you touch and bless the leaders of our country and the leaders our county Lord. Give them wisdom, compassion, and to realize that it is truly an honor to serve. Bless those Lord who defend our freedom at home and abroad and Lord I ask that you bring them home safe to us, Father. Father, as we enter this beautiful and holy season of Christmas, I hope for peace and comfort for all, and that all can understand that this celebration is truly about our Savior. Finally Father, I ask for your presence here this evening, for your leadership and your guidance as we work together for the good of this community. We pray these things I will be sure to give you the glory and the praise. As always, I ask in the name of my Lord and Savior. Amen.”⁶⁵</p>
Kershaw County, South Carolina	Councilmember Tom Gardner	<p>“Let us pray. Heavenly Father we thank you for the many blessings that you continue to give us. Thank you for the wonderful place, Kershaw County that we live. We ask that you would guide us, give us wisdom, as we make the decisions to improve our county. These things we ask in Jesus name, Amen.”⁶⁶</p>

⁶⁵ Horry Cnty. Council, http://horrycounty.granicus.com/MediaPlayer.php?view_id=3&clip_id=1066 (Dec. 6, 2016) (0:25).

⁶⁶ Kershaw Cnty. Council, <https://www.youtube.com/watch?v=6X64x4uITnA> (July 24, 2012) (0:24).

County or City	Prayer-Giver	Sample Prayer
Laurens County, South Carolina	Councilman Stewart Jones	<p>“Please join me in a word of prayer. Dear Heavenly Father we ask that you comfort those who have lost loved ones and friends in the terrible tragedy in Orlando. We ask that you help those that have hate in their hearts for any human being for any reason. Help them to find peace. We ask that you help us remember how precious life is and while hate may seem to have won at certain times, we keep in mind that we are all saved by accepting you into our hearts. Help us to help those who are in need in our community and to show the world that love which you have shown us ultimately your love will prevail. Please be with us. Give use guidance, strength as we make decisions which will affect all the people of Laurens County. Be with the first responders, fire, and EMS, law enforcement, and all the staff that works for the people of Laurens County. In your name. Amen.”⁶⁷</p>

⁶⁷ Laurens Cnty. Council, <https://www.youtube.com/watch?v=gD0exKadR-Q> (June 14, 2016) (0:28).

County or City	Prayer-Giver	Sample Prayer
Lexington County, South Carolina	Councilman James “Jim” Kinard	“Bow with me please. Our Father we thank you so much for the privilege you have given us to gather freely in your name to do the business of the citizens of Lexington County. Lord, we ask that you give us wisdom and discernment as you always have. Be with us as we make decisions on behalf of the citizens we represent. Lord, be with us, be with those of our firefighters, our EMS, our law enforcement people who protect us, and keep us safe every day, keep them safe as well. Be with our troops overseas as they protect our freedoms. Lord, now we ask that you be with us as we conduct this meeting to bring glory to your name. In Jesus name we pray. Amen.” ⁶⁸
Marlboro County, South Carolina	Councilmember Anthony Woods	“Our heavenly father we once again come before your Lord to give you thanks. Father we thank you first and foremost for life, health and strength. Father, as we come together we are here to make Marlboro County grow and be a better place for all of us. We are here in Jesus name. Amen.” ⁶⁹

⁶⁸ Lexington Cnty. Council, <http://lexingtoncountysc.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1415&Format=Agenda> (Dec. 13, 2016) (23:49)

⁶⁹ Marlboro Cnty. Council, <https://www.youtube.com/watch?v=eo3i6LF4fLM> (Apr. 12, 2016) (0:38).

County or City	Prayer-Giver	Sample Prayer
York County, South Carolina	Councilmember Christi Cox	<p>“Let us pray. Dear heavenly father, I thank you for the many blessings that you have bestowed upon our county and our nation, for the freedom to govern ourselves and to gather together to resolve our disputes and for the constitutional right that we have to express ourselves without fear. Lord, I thank you for your giving your son as an example of what it means to truly serve humanity and I thank you for those who have had the courage to follow your example and to sacrifice their lives so that we could have our freedom. I thank you for the many men and women who continue to protect us and to fight for our freedoms. I pray for each of the members of this council. I ask for your guidance in our decision making tonight. That the truth would be made known, that the best interest of our citizens would be served, and that our actions would be honorable to you. Finally, I pray for your hand in our elections tomorrow. Regardless of the outcome, I pray for peace and unity and that our county would come together. In Jesus name, Amen.”⁷⁰</p>

⁷⁰ York Cnty. Council, https://www.youtube.com/watch?v=NuWOOkBe_x0 (Nov. 7, 2016) (0:06).

County or City	Prayer-Giver	Sample Prayer
Summerville, South Carolina	Councilmember Aaron Brown	<p>“O Father in heaven this is a special prayer. You have blessed this town of Summerville over many many decades and we certainly need you now. The public has perceived that there is a division on Council. And that is not good for the town, it is not good for the Council or the mayor. I pray that you would bring us together through your Holy Spirit since we all claim to be Christians; I hope that we will remember to exercise the Christian benevolence and civility. I pray O God that we will reach out to one another as councilmembers and the mayor. That we will set aside our egos. That we will forget how we voted in the last election. That we will remember the people in the entire town of Summerville, who we swore when we took the pledge as councilmembers and as the mayor. I believe your blessings are upon us but I think that we have forgotten about your blessings, and we are thinking in a mundane way as mayor and councilmembers, but our own personal perceptions of how this town should be governed; about our own personal perceptions about what councilmembers we are comfortable with; which ones we should talk and socialize with and which ones we should not. I hope after this meeting tonight and especially after this weekend when we have the municipal association in Charleston that as members of this council and the mayor that you would bring us together this weekend. Maybe we can meet in a social way and try to resolve our differences. We’ve all got arms and we all have hands. All we have to do is reach our hand out to one another. I think that if we did that we would find that the right hand of the other is coming our way. And as our hands combine, I think we can make progress again (cont.)</p>

County or City	Prayer-Giver	Sample Prayer
Summerville, South Carolina	Councilmember Aaron Brown	and feel so good about the job that we do. And that you have given us to preserve this town. These and all the blessings we ask in your holy name of your son Jesus Christ. Amen.” ⁷¹
Accomack County, Virginia	Supervisor William “Billy” Tarr	“Let us pray. Heavenly Father, thank you again for allowing us to be in your presence tonight heavenly father. I thank you for the health , the safety, and hidden protection you have placed around us to bring us here this evening to make decisions that are pleasing to you and according to your will. I ask heavenly father that those decisions that are made that affect those around us can understand why they are made. We ask all this in Jesus’ precious name. Amen.” ⁷²
Brunswick County, Virginia	Supervisor Barbara Drummond	“Let us pray. Once again most gracious Lord we stand here tonight with your will and your way in our mind. We ask you Father God to bless each citizen who is here tonight, all our board members that are here tonight, bless our constituents are here. That as we move to throughout this evening we make decisions in a way which you are pleased. We ask that you would guide our tongues, guide our mind, that we will be able to agree to disagree, but still move forward with county business. These are the blessings we ask in your name as we pray. Amen.” ⁷³

⁷¹ Summerville City Council, http://www.summervillesc.gov/index.asp?SEC=FEAA9A37-FA74-4935-944D-4FCECAB1725F&Type=B_LIST (July 13, 2016) (3:38).

⁷² Accomack Cnty. Bd. of Supervisors, <http://accomackcountyva.swagit.com/play/11162016-769> (Nov. 16, 2016) (0:28).

⁷³ Brunswick Cnty. Bd. of Supervisors, <https://www.youtube.com/watch?v=iTF68n7bjtw> (June 27, 2012) (2:14).

County or City	Prayer-Giver	Sample Prayer
Campbell County, Virginia	Supervisor Eddie Gunter	<p>“Join me in prayer please. Father again we thank you that we have an opportunity to come before you today. I pray that you will give us the knowledge and the wisdom and the vision to do things that are pleasing in your sight and that promote Campbell County. Lord, I ask you to be with Ms. Goldsmith’s wife. I understand that she has had another stroke and is in the hospital. So Lord be with their family. You comfort him as only you can. We ask all these things in Jesus’ name and for his sake. Amen.”⁷⁴</p>
Fauquier County, Virginia	Supervisor Christopher Butler	<p>“Let us stand and pray. Our most gracious and heavenly father we thank you for this day. Lord, we thank you for the ability to serve this fine county and its citizens. Lord, we ask that everything we do tonight be in your favor. We thank those who came out tonight and we pray for their safe travels home. We ask all these things in your name. Amen.”⁷⁵</p>

⁷⁴ Campbell Cnty. Bd. of Supervisors, <https://www.youtube.com/watch?v=4UsSlv6acsg> (July 5, 2016) (0:27).

⁷⁵ Fauquier Cnty. Bd. of Supervisors, http://fauquier-va.granicus.com/MediaPlayer.php?view_id=1&clip_id=93 (Nov. 3, 2016) (2:11:50).

County or City	Prayer-Giver	Sample Prayer
Frederick County, Virginia	Supervisor Robert “Bob” Hess	<p>“Please bow your heads. Almighty God we begin this meeting by asking for your guidance as we deal with issues that affect the future of our county and our citizens. Heavenly Father, you are an awesome God and you have blessed us in so many ways. On this beautiful fall evening, we thank you for the bounty of the harvest and the fruit of the land. We are grateful for the hard work of those in our local agricultural community who contribute so much to the vitality of our county. As election day draws near we thank you for the freedom we enjoy in the county to elect our leaders. And we thank you for the men and women who have served in our armed forces to preserve that freedom. We ask your blessing on those gathered here. Guide us all and give us the strength and desire to serve you, our county, our Commonwealth and our great nation. In your heavenly name we pray. Amen.”⁷⁶</p>
Gloucester County, Virginia	Chairman John Meyer	<p>“Now if you would please stand for the invocation and pledge of allegiance. Dear Lord we want to thank you for the opportunity to live in the wonderful county with the bountiful lands and the generous people that are here. Please help us to be good stewards of this land and of its people. And guide us in our deliberations that we may wisely and fairly balance the needs of all of our citizens. In your holy name we pray. Amen.”⁷⁷</p>

⁷⁶ Frederick Cnty. Bd. of Supervisors, <https://www.youtube.com/watch?v=8qaTY9dgkpo> (Oct. 26, 2016) (0:15).

⁷⁷ Gloucester Cnty. Bd. of Supervisors, http://gloucester.granicus.com/MediaPlayer.php?view_id=10&clip_id=1493 (April 18, 2016) (0:42).

County or City	Prayer-Giver	Sample Prayer
Hanover County, Virginia	Vice-Chair Kelly-Wiecek	“You O Lord are our strength and we sing you praises for you are our defense, our God of mercy. The Lord is our strength and our shield and our hearts trust in him and we are helped. Our hearts leap for joy and we give thanks to him in song. Deliver us O Lord in this season of joy, a world committed to peace, kindness, compassion, and above all, hope. And we ask these things in your name. Amen.” ⁷⁸
Isle of Wight County, Virginia	Supervisor Richard “Dick” Grice	“If you will bow your heads. Lord, we thank you for the many blessings you have granted us. We thank you for the beauty of our historic county and the talents of its people. Tonight, we would ask that you would provide this assembly with uncluttered minds, impartial hearing, and clearer words that we would see the path that you would have us follow. Only you would have foreseen the ramifications of the efforts this evening, both near and long term. So we humbly ask that you would guide us with the momentary wisdom we need to accomplish your will. In Jesus name we pray. Amen.” ⁷⁹

⁷⁸ Hanover Cnty. Bd. of Supervisors, http://hanovercounty.granicus.com/MediaPlayer.php?view_id=6&clip_id=221 (Dec. 14, 2016) (0:18).

⁷⁹ Isle of Wight Cnty. Bd. of Supervisors, <http://view.earthchannel.com/PlayerController.aspx?PGD=islewightcova&eID=93> (Dec. 15, 2016) (1:08:50).

County or City	Prayer-Giver	Sample Prayer
Louisa County, Virginia	Chairman Troy Wade	<p>“Please stand if you choose. Let us pray. Heavenly father Lord thank you for allowing us to gather here today to do the work of Louisa County and the folks that we represent. Lord, we ask that you keep an ever-watchful eye over us and guide us in the decisions that we make We also ask that you keep an ever-watchful eye over those serving this county both here and abroad. We ask everything in Jesus’ name. Amen.”⁸⁰</p>
Powhatan County, Virginia	Supervisor Larry Nordvig	<p>“Lord we thank you for bringing us here safely and we pray for the safety of our first responders and our citizens as they go about their business and their lives here in Powhatan. We ask your great blessing on this new year of 2016, may it be best ever for our community. May we be healthy, happy, safe, and do good things to each other and move forward. Lord, a special plea for those who are sick at this time and that you would grant them healing. And we thank you again for a holiday season to mark a special occasion for many. And it’s in your name that we pray. Amen.”⁸¹</p>

⁸⁰ Louisa Cnty. Bd. of Supervisors, <http://louisacountyva.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1250> (Dec. 5, 2016) (1:20).

⁸¹ Powhatan Cnty. Bd. of Supervisors, <https://www.youtube.com/watch?v=CIEobKe7hBg> (Jan. 4, 2016) (0:18).

County or City	Prayer-Giver	Sample Prayer
Shenandoah County, Virginia	Chairman Conrad Helsey	<p>“Please stand for the invocation and the pledge of allegiance. Dear Heavenly Father, we have so much to be thankful for in this week of Thanksgiving. We live in this beautiful valley, we are about move about with freedom and speak and do as we please. We have so many freedoms that we sometimes take for granted. And the people that have provided those freedoms are often in harm’s way and will not be with their families this Thanksgiving. They are our soldiers and those that are committed to foreign service. Please be with them this week and hopefully they will be able to join their families for Thanksgiving in the future. Please also be with anyone who is in harm’s way that they can also be brought together with their families as we celebrate Thanksgiving here in the United States. In Jesus name and for his sake. Amen.”⁸²</p>
Spotsylvania County, Virginia	Supervisor Greg Cebula	<p>“Dear Lord and heavenly father, please bless those who are gathered here for our last Board meeting of 2016. On behalf of my fellow Board members I ask you to bestow a special Christmas blessing on all our county staff, employees, and our residents as we gather today to conduct the business of Spotsylvania County. A special thank you goes out to all our veterans for their service and the preservation of our right to vote. Please continue instill in this body the integrity, perseverance, and wisdom to effectively govern Spotsylvania County. We ask this in Jesus’ name. Amen.”⁸³</p>

⁸² Shenandoah Cnty. Bd of Supervisors, <http://view.earthchannel.com/PlayerController.aspx?&PGD=shencova&eID=237> (Nov. 22, 2016) (0:15).

⁸³ Spotsylvania Cnty. Bd. of Supervisors, <https://www.youtube.com/watch?v=PEXOXXLJ1ug> (Dec. 13, 2016) (0:09).

County or City	Prayer-Giver	Sample Prayer
Stafford County, Virginia	Supervisor Meg Bohmke	“Let us pray. Dear heavenly father thank you for this day you have given us to conduct the county’s business here tonight. Lord, we pray for the families of James Malleigh and Garth Tagey both from Georgia who died in a tragic boating accident this past weekend at Fairview Beach. We also continue to pray for our men and women in uniform and also our own sheriffs and fire and rescue department that protects us each and every day. In your name we pray. Amen.” ⁸⁴
Washington County, Virginia	Supervisor Phillip McCall	“Please stand and join me. Most gracious and heavenly Father we are always thankful for the opportunity you give us to come in here and discuss county business. We thank you for everything you have given us this year and help us to look forward to the things that we can do for this county this coming year. We ask you be with our men and women who can’t be home this year for the holidays. Keep them safe. Help us keep them in our hearts. We also ask that you be with our men and women in our emergency services as they come and protect us and help to do the things that we do. Now we ask that you be with us as we go through this Board meeting and help us say and do the things that are pleasing to thy sight. We give you honor and the praise in Jesus’ precious and holy name. Amen.” ⁸⁵

⁸⁴ Stafford Cnty. Bd. of Supervisors, <http://stafford.bos.regionalwebtv.com/2016/1018.html> (Oct. 18, 2016) (1:21:57).

⁸⁵ Washington Cnty. Bd. of Supervisors, <http://washingtoncountyva.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2264&MinutesID=2155&Format=Minutes&MediaFileFormat=ismv> (Dec. 13, 2016) (0:15).

County or City	Prayer-Giver	Sample Prayer
Norfolk, Virginia	Vice Mayor Angelia Graves	<p>“Dear Heavenly Father we thank you for this day and the opportunity to serve the citizens of Norfolk. We thank you for the rich history that this city has provided, the milestones that we have been blessed to enjoy, and the legacy that has been established. We ask you to bless this council, our manager, our city employees, and our residents. As one era comes to an end and another begins, we ask you to bless and favor Paul Frank, Barkeley Wynn, and Andy Protogeriou as they move forward into the next phases of their lives. Grant them peace, prosperity, and good health. May you grant them blessings. May they see their children’s children. May they be poor in misfortune and rich in blessings. May they know nothing of happiness from this day forward. Then Lord, bless the remaining members of this council, along with Mayor Elect Katie Alexander and Councilmember Andrea McClellan. Bless us all with the ability to work together for the good of the city of Norfolk, the residents of Norfolk, and most importantly let us work together in a manner that is pleasing in your sight. These and all other blessings we ask in your son’s name. Amen.”⁸⁶</p>
Chesapeake, Virginia	Councilmember Roland Davis	<p>“Father in Heaven, bless us as we gather today this meeting. Guide our minds and hearts so that we will work for the good of our community and to help all your people. Teach us to be generous in our outlook, courageous in the face of difficulty, and wise in our decisions. We ask this request O Lord. Amen.”⁸⁷</p>

⁸⁶ Norfolk City Council, https://www.youtube.com/watch?v=53E_FEAEBbU&feature=youtu.be (June 28, 2016) (0:03)

⁸⁷ Chesapeake City Council, http://chesapeake.granicus.com/MediaPlayer.php?view_id=4&clip_id=8175 (Dec. 13, 2016) (2:01:03).

County or City	Prayer-Giver	Sample Prayer
Hampton, Virginia	Councilmember Jimmy Gray	“Heavenly father, as we gather here today at this city council meeting we pray that we are ever-mindful of the opportunities to render our services to fellow citizens and our community. Keeping in mind of the enduring values of life and exerting our efforts upon those things upon which future generations can build with confidence. Let us continue to strive to make this world and our community a better place. And throughout this holiday season we ask that you lay your protective hands upon us as we travel to spend time with family and friends through this holiday and we ask that you continue to protect us and watch over us as we do your work. For these things we pray in your name. Amen.” ⁸⁸
Suffolk, Virginia	Councilmember Curtis Milteer	“Let us pray. Eternal God our heavenly Father again we come in your presence. We are grateful for this opportunity. Give us wisdom and courage as we go through this decision making process. For this we shall always remember your name. Amen.” ⁸⁹
Lynchburg, Virginia	Vice Mayor Treney Tweedy	“Let us be intent on doing good work for our city and our citizens. Let us seek to represent fairly and those who have given us this task. May our efforts be blessed with insight guided by understanding and wisdom. We seek to serve with respect for all. May our personal faiths give us strength to act respectfully, cooperatively, and collaboratively in all matters before us. In our father’s name.” ⁹⁰

⁸⁸ Hampton City Council, http://hampton.granicus.com/MediaPlayer.php?view_id=2&clip_id=2453 (Dec. 14, 2016) (1:45).

⁸⁹ Suffolk City Council, <https://www.youtube.com/watch?v=Gut6mkkbexs> (July 17, 2013) (2:39).

⁹⁰ Lynchburg City Council, http://lynchburg.granicus.com/MediaPlayer.php?view_id=4&clip_id=2429 (Nov. 8, 2016) (1:40:18).

County or City	Prayer-Giver	Sample Prayer
Harrisonburg, Virginia	Vice-Mayor Richard Baugh	<p>“Heavenly Father as we come before you to consider the business of this city, we ask that you give us your strength and wisdom. Help us make decisions that further your purposes. Help us make decisions that provide that bring the most benefit that we can to our community. Grant us peace and prosperity. Help us give appropriate remembrance to all those sacrificed in whatever manner to help us. We ask all this in your name.”⁹¹</p>

⁹¹Harrisonburg City Council, http://harrisonburg-va.granicus.com/MediaPlayer.php?view_id=4&clip_id=339 (Dec. 13, 2016) (0:23).

Table 3: Calls To Order In State Legislatures In The Fourth Circuit

State Legislature	Legislator in the Chair	Sample Call to Order
Maryland Senate	Senate President Mike Miller	“We are very honored today to have with us from the [name and background of person giving invocation]. We would like everyone to please rise for the invocation.” ⁹²
Maryland House of Delegates	Speaker Michael Busch	“The prayer this morning will be offered by our good friend and colleague from [county name] County, the Honorable Delegate [name].” ⁹³

⁹² *E.g.*, Maryland Senate, 2016 General Assembly of Maryland Regular Session Proceedings – Senate Audio, http://mgaleg.maryland.gov/webmga/frmAudioVideo.aspx?ys=2016RS&clip=SEN_03032016_1.mp4 (Mar. 3, 2016) (0:46); *id.* at http://mgaleg.maryland.gov/webmga/frmAudioVideo.aspx?ys=2016RS&clip=SEN_03092016_1.mp4 (Mar. 9, 2016) (2:03).

⁹³ *E.g.*, Maryland House of Delegates, 2016 General Assembly of Maryland Regular Session Proceedings – Senate Audio, http://mgaleg.maryland.gov/webmga/frmAudioVideo.aspx?ys=2016RS&clip=HSE_04082016_1.mp4 (April 8, 2016) (0:17); *id.* at http://mgaleg.maryland.gov/webmga/frmAudioVideo.aspx?ys=2016RS&clip=HSE_04052016_1.mp4 (Mar. 8, 2016) (0:14). The Maryland House of Delegates does not appear specifically to ask the public to stand during the invocation, but as a practical matter, the public appears always to already be standing at that time because they have just stood for the Pledge of Allegiance. In the first meeting of the 2016 session, for example, Chief Clerk Sylvia Siegert says, “Will everyone please stand for the pledge of allegiance.” And after the pledge was said by all present, she continued, “The prayer today will be offered by the Honorable Samuel I. Rosenberg of Baltimore City.” *Id.* at http://mgaleg.maryland.gov/webmga/frmAudioVideo.aspx?ys=2016RS&clip=HSE_01132016_1.mp4 (Jan. 13, 2016) (2:28). In the remainder of the 2016 Session, the audio begins at earliest, midway through the pledge of allegiance. *See e.g.*, *id.* at http://mgaleg.maryland.gov/webmga/frmAudioVideo.aspx?ys=2016RS&clip=HSE_03282016_1.mp4 (Mar. 28, 2016); *see also*

State Legislature	Legislator in the Chair	Sample Call to Order
North Carolina Senate	Lieutenant Governor Dan Forrest	“Leading the senate in prayer tonight is the Rev. Peter Milner, the Senate Chaplain. All guests in the gallery and members will please stand.” ⁹⁴
North Carolina House of Delegates	Speaker Tim Moore	“Today’s prayer will be offered by Representative [name]. We’d ask all members and all guests in the gallery to please stand for the prayer.” ⁹⁵
South Carolina Senate	Lieutenant Governor Henry McMaster	“Members and guests will remain standing while we are led in our devotion by the Chaplain.” ⁹⁶
South Carolina House of Representatives	Speaker James Lucas	“Members and our guests please rise as our chaplain leads us in prayer.” ⁹⁷

http://mgaleg.maryland.gov/webmga/frmLegislation.aspx?id=2016rs_house_audio&stab=02&pid=legisnlist&tab=subject3&ys=2016rs (listing audio of each 2016 meeting).

⁹⁴ *E.g.*, North Carolina Senate Prayers (Jan. 26, 2011–Jan. 5, 2012), <https://ffrf.org/uploads/legal/NCSenatePrayers.pdf> (Feb. 1, 2011); *see also id.* (Mar. 29, 2011) (“prayer this afternoon”); *id.* (Mar. 30, 2011) (“prayer today”).

⁹⁵ *E.g.*, North Carolina General Assembly, House Audio Archives <http://www.ncleg.net/DocumentSites/HouseDocuments/20152016%20Session/Audio%20Archives/2016/02-19-2016.mp3> (Feb. 19, 2016) (0:46); *id.* at <http://www.ncleg.net/DocumentSites/HouseDocuments/20152016%20Session/Audio%20Archives/2016/04-26-2016.mp3> (Apr. 26, 2016) (0:27).

⁹⁶ *E.g.*, South Carolina Senate, <http://www.scstatehouse.gov/video/videofeed.php> (Dec. 6, 2016) (0:48); South Carolina Senate, <http://www.scstatehouse.gov/video/videofeed.php> (June 15, 2016) (0:50).

⁹⁷ *E.g.*, South Carolina House of Representatives, <http://www.scstatehouse.gov/video/videofeed.php> (Dec. 7, 2016) (0:11); South Carolina House of Representatives, <http://www.scstatehouse.gov/video/videofeed.php> (June 1, 2016) (0:07).

State Legislature	Legislator in the Chair	Sample Call to Order
Virginia Senate	Lieutenant Governor Bill Bolling	“The Senators and all in attendance will please stand and be led in prayer by ...” ⁹⁸
Virginia House of Delegates	Speaker Bill Howell	“The members will rise and be led in prayer by...” ⁹⁹
West Virginia Senate	President Bill Cole	“Those in the gallery and those on the floor will please rise as we are led in prayer by the Senator from [county].” ¹⁰⁰
West Virginia House of Delegates	Speaker Tim Armstead	“Members and guests will please rise as we are led in prayer this morning by the gentlemen from the [district], [delegate name].” ¹⁰¹

⁹⁸ *E.g.*, Virginia Senate, <http://ia600402.us.archive.org/15/items/senate20160310/20160310.mp4> (Mar. 10, 2016) (8:19); Virginia Senate, <http://ia800202.us.archive.org/20/items/senate20160309/20160309.mp4> (Mar. 9, 2016) (5:19).

⁹⁹ *E.g.*, Virginia House of Delegates, <http://ia800406.us.archive.org/13/items/house20160311/20160311.mp4> (Mar. 11, 16) (2:39); Virginia House of Delegates, <http://ia600200.us.archive.org/10/items/house20160304/20160304.mp4> (Mar. 4, 2016) (2:36).

¹⁰⁰ *E.g.*, W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=OiR2xM8IeVk> (June 14, 2016) (30:38).

¹⁰¹ *E.g.*, W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=D0qdtfPPtVY&index=77&list=PL2q3Wbz7wKWXkkgQSEK9FGpkI7XgRxOtp> (Jan. 1, 2016) (6:41); W. Va. Public Broadcasting, WV Legislative Session, https://www.youtube.com/watch?v=Vo67w_PTST8 (Jan. 19, 2016) (1:25); W. Va. Public Broadcasting, WV Legislative Session, <https://www.youtube.com/watch?v=tVZhraxRjOc> (Feb. 4, 2016) (13:56).

Table 4: Examples Of Local Government Prayer That Ask Everyone To Stand

County or City	Prayer-Giver	Sample Prayer
Anne Arundel County, Maryland	Chairman John Grasso	“Please stand for the invocation and remain standing for the pledge of allegiance.” ¹⁰²
Saint Mary’s County, Maryland	President James Guy	“Please stand.” ¹⁰³
Wicomico County, Maryland	President John Cannon	“Those who elect to stand and join us in the Lord’s Prayer and the pledge of allegiance please do.” ¹⁰⁴
Alexander County, North Carolina	Chairman Ryan Mayberry	“If you all would please stand.” ¹⁰⁵
Caldwell County, North Carolina	Chairman Randy Church	“If you would stand.” ¹⁰⁶
Cumberland County, North Carolina	Commissioner Jimmy Keefe	“If we could all rise.” ¹⁰⁷

¹⁰² Anne Arundel Cnty. Council, <http://www.aacounty.org/departments/county-council/Council/county-council-meeting-november-7-2016> (Nov. 7, 2016) (0:05).

¹⁰³ St. Mary’s Cnty Council, <https://www.youtube.com/watch?v=gcwIm0NfVko> (Oct. 25, 2016) (1:50).

¹⁰⁴ Wicomico Cnty. Council, <https://www.youtube.com/watch?v=4cXJUYqEb8Y&list=PLD026330056E3BADF&index=27> (August, 2016) (0:43)

¹⁰⁵ Alexander Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=XOm2gVIZuQ4&index=8&list=PLF712F38DEC835247> (June 6, 2016) (0:39).

¹⁰⁶ Caldwell Cnty. Bd. of Comm’rs, <http://caldwellcountync.pegcentral.com/player.php?video=7f3ea16601cd922de40d973ce5393be3> (Sept. 12, 2016) (4:35).

County or City	Prayer-Giver	Sample Prayer
Gates County, North Carolina	Chairman Linda Hofler	“Could everybody please stand as we give the invocation and say the pledge of allegiance.” ¹⁰⁸
Henderson County, North Carolina	Chairman Tommy Thompson	“If you would please stand for our invocation.” ¹⁰⁹
McDowell County, North Carolina	Chairman David Walker	“We always begin our meeting with a prayer and pledge. I would ask everybody to please stand at this time.” ¹¹⁰
Nash County, North Carolina	Commissioner Lisa Barnes	“Can we stand?” ¹¹¹
Pitt County, North Carolina	Chairman Beth Ward	“If you will please stand.” ¹¹²
Pender County, North Carolina	Chairman George Brown	“Please stand.” ¹¹³

¹⁰⁷ Cumberland Cnty. Bd. of Comm’rs, https://www.youtube.com/watch?v=1WzO5_I8LbE (Dec. 5, 2016) (0:39).

¹⁰⁸ Gates Cnty. Bd. of Comm’rs, http://www.gatescounty.govoffice2.com/index.asp?SEC=EEEE6EE5-7A05-4D43-B24C-5D143FECF3D9&Type=B_BASIC (Dec. 5, 2016) (0:03).

¹⁰⁹ Henderson Cnty. Bd. Of Comm’rs, http://www.hendersoncountync.org/boc_videos/boc_11072016.html (Nov. 7, 2016) (1:15).

¹¹⁰ McDowell Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=Qb3fQLcuUKI> (Nov. 20, 2016) (0:44).

¹¹¹ Nash Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=TMWvhIix1ZQ> (Nov. 22, 2016) (0:32).

¹¹² Pitt Cnty. Bd. of Comm’rs, <https://www.youtube.com/watch?v=f9Qci1SmqSY> (Dec. 5, 2016) (1:20).

¹¹³ Pender Cnty. Bd. of Comm’rs, <http://www.ustream.tv/recorded/92864595> (Nov. 21, 2016) (3:06).

County or City	Prayer-Giver	Sample Prayer
Anderson County, South Carolina	Chairman Tommy Dunn	“All rise for the invocation of Councilman [name].” ¹¹⁴
Dorchester County, South Carolina	Chairman David Chinnis	“Chairman Chinnis called to order the meeting of Dorchester County Council. He invited all to stand for the invocation given by Councilman [name]” ¹¹⁵
Kershaw County, South Carolina	Chairman Julian Burns	“Would everyone please stand.” ¹¹⁶
Laurens County, South Carolina	Chairman Joseph Wood	“I would ask everyone to stand.” ¹¹⁷
City of Charleston, South Carolina	Mayor John Tecklenburg	“And now if you would like, please join us as Councilmember [name] is going to lead us in an invocation.” ¹¹⁸
City of Summerville, South Carolina	Mayor Wiley Johnson	“Please stand.” ¹¹⁹

¹¹⁴ Anderson Cnty. Council, <https://www.youtube.com/watch?v=vLWr749dCRw> (Feb. 2, 2016) (1:21).

¹¹⁵ Dorchester Cnty. Council, *Minutes*, <https://www.dorchestercounty.net/Modules/ShowDocument.aspx?documentid=12124> (minutes).

¹¹⁶ Kershaw Cnty. Council, <https://www.youtube.com/watch?v=6X64x4uITnA> (July 24, 2012) (0:21).

¹¹⁷ Laurens Cnty. Council, <https://www.youtube.com/watch?v=gD0exKadR-Q> (June 14, 2016) (0:17).

¹¹⁸ Charleston City Council, <https://www.youtube.com/watch?v=0siQorlnEwk> (Nov. 22, 2016) (5:21).

¹¹⁹ Summerville City Council, http://www.summervillesc.gov/index.asp?SEC=FEAA9A37-FA74-4935-944D-4FCECAB1725F&Type=B_LIST (July 13, 2016) (3:26).

County or City	Prayer-Giver	Sample Prayer
Accomack County, Virginia	Chairman Ron Wolff	“If you would please stand.” ¹²⁰
Gloucester County, Virginia	Chairman John Meyer	“Now if you would please stand for the invocation and pledge of allegiance.” ¹²¹
Louisa County, Virginia	Chairman Troy Wade	“Please stand if you choose.” ¹²²
Shenandoah County, Virginia	Chairman Conrad Helsey	“Please stand for the invocation and the pledge of allegiance.” ¹²³
Stafford County, Virginia	Chairman Robert Thomas	“Please rise as Supervisor [name] leads us in the invocation.” ¹²⁴
Washington County, Virginia	Supervisor Phillip McCall	“Please stand and join me.” ¹²⁵
City of Harrisonburg, Virginia	Vice-Mayor Richard Baugh	“If you wish please stand as we are led in our invocation. Mayor Christopher Jones.” ¹²⁶

¹²⁰ Accomack Cnty. Bd. of Supervisors, <http://accomackcountyva.swagit.com/play/11162016-769> (Nov. 16, 2016) (0:24).

¹²¹ Gloucester Cnty. Bd. of Supervisors, http://gloucester.granicus.com/MediaPlayer.php?view_id=10&clip_id=1493 (April 18, 2016) (0:42).

¹²² Louisa Cnty. Bd. of Supervisors, <http://louisacountyva.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=1250> (Dec. 5, 2016) (1:20).

¹²³ Shenandoah Cnty. Bd. of Supervisors, <http://view.earthchannel.com/PlayerController.aspx?PGD=shencova&eID=237> (Nov. 22, 2016) (0:15).

¹²⁴ Stafford Cnty. Bd. of Supervisors, <http://stafford.bos.regionalwebtv.com/2016/1018.html> (Oct. 18, 2016) (1:21:51).

¹²⁵ Washington Cnty. Bd. of Supervisors, <http://washingtoncountyva.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2264&MinutesID=2155&Format=Minutes&MediaFileFormat=ismv> (Dec. 13, 2016) (0:15).

¹²⁶ Harrisonburg City Council, http://harrisonburg-va.granicus.com/MediaPlayer.php?view_id=4&clip_id=339 (Dec. 13, 2016) (0:21).

County or City	Prayer-Giver	Sample Prayer
City of Lynchburg, Virginia	Mayor Joan Foster	“Please stand for the pledge of allegiance and invocation.” ¹²⁷
City of Suffolk, Virginia	Mayor Linda Johnson	“Please stand for the invocation by Councilmen [name] and the pledge of allegiance to the flag.” ¹²⁸

¹²⁷ Lynchburg City Council, http://lynchburg.granicus.com/MediaPlayer.php?view_id=4&clip_id=2429 (Nov. 8, 2016) (1:40:18).

¹²⁸ Suffolk City Council, <https://www.youtube.com/watch?v=Gut6mkkbexs> (July 17, 2013) (2:39).

Appendix S

Examples of Prayer Practices in all States and Territories of the United States
& -

Examples of Lawmaker-led Prayer in Maryland, North Carolina, South Carolina, Virginia
and West Virginia

TABLES OF PRAYER PRACTICES

Table 1	Prayer Practices of the State and Territorial Legislatures (Add. 2)
Table 2	Lawmaker-Led Prayer Practices in Maryland Counties (Add. 11)
Table 3	Lawmaker-Led Prayer Practices in the Ten Most Populous Maryland Cities (Add. 13)
Table 4	Lawmaker-Led Prayer Practices in North Carolina Counties (Add. 14)
Table 5	Lawmaker-Led Prayer Practices in the Ten Most Populous North Carolina Cities (Add. 25)
Table 6	Lawmaker-Led Prayer Practices in South Carolina Counties (Add. 26)
Table 7	Lawmaker-Led Prayer Practices in the Ten Most Populous South Carolina Cities (Add. 31)
Table 8	Lawmaker-Led Prayer Practices in Virginia Counties (Add. 32)
Table 9	Lawmaker-Led Prayer Practices in the Twelve Most Populous Virginia Cities (Add. 40)
Table 10	Lawmaker-Led Prayer Practices in West Virginia Counties (Add. 42)
Table 11	Lawmaker-Led Prayer Practices in the Ten Most Populous West Virginia Cities (Add. 43)

Table 1. Prayer Practices of the State and Territorial Legislatures.

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Alabama</i>	Senate, House	Senate, House		
<i>Alaska</i>	Senate, House	Senate, House		
<i>American Samoa</i>	Senate	House		
<i>Arizona</i>		Senate, House		
<i>Arkansas</i>	Senate, House	Senate, House		
<i>California</i>	Senate	Senate, House		
<i>Colorado</i>	Senate	Senate, House		
<i>Connecticut</i>	Senate, House	Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Delaware</i>	House	Senate, House		
<i>District of Columbia</i>			City Council	
<i>Florida</i>	Senate, House	Senate, House		
<i>Georgia</i>	Senate	Senate, House		
<i>Guam</i>		Legis.		
<i>Hawaii</i>	House	House		Senate
<i>Idaho</i>	Senate, House	Senate, House		
<i>Illinois</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Indiana</i>	Senate	Senate, House		
<i>Iowa</i>	Senate, House	Senate, House		
<i>Kansas</i>	Senate, House	Senate, House		
<i>Kentucky</i>		Senate, House		
<i>Louisiana</i>	Senate, House	Senate, House		
<i>Maine</i>		Senate, House		
<i>Maryland</i>	House	Senate		
<i>Massachusetts</i>		House		Senate
<i>Michigan</i>	House	Senate, House		
<i>Minnesota</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Mississippi</i>	House	Senate, House		
<i>Missouri</i>	House	Senate, House		
<i>Montana</i>	Senate, House	Senate, House		
<i>Nebraska</i>	Legis.	Legis.		
<i>Nevada</i>	Senate	Senate, House		
<i>New Hampshire</i>		Senate, House		
<i>New Jersey</i>		Senate, House		
<i>New Mexico</i>	Senate	Senate, House		
<i>New York</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>North Carolina</i>	Senate, House	Senate, House		
<i>North Dakota</i>		Senate, House		
<i>Northern Mariana Islands</i>	Senate	Senate	House	
<i>Ohio</i>		Senate, House		
<i>Oklahoma</i>	Senate, House	Senate, House		
<i>Oregon</i>	Senate	Senate, House		
<i>Pennsylvania</i>		Senate, House		
<i>Puerto Rico</i>		Senate, House		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Rhode Island</i>	Senate House	House		
<i>South Carolina</i>		Senate, House		
<i>South Dakota</i>		Senate, House		
<i>Tennessee</i>	Senate, House	Senate House		
<i>Texas</i>	Senate	Senate, House		
<i>Utah</i>	Senate, House	Senate, House		
<i>Vermont</i>	House	Senate, House		
<i>Virginia</i>	Senate, House	Senate, House		
<i>Virgin Islands</i>		Legis.		

State or Territory	Member Leads Prayer	Clergy Leads Prayer	Moment of Silence	No Prayer and No Moment of Silence
<i>Washington</i>	Senate, House	Senate, House		
<i>West Virginia</i>	Senate, House	Senate, House		
<i>Wisconsin</i>	House	Senate, House		
<i>Wyoming</i>		Senate, House		

The data in Table 1 comes from and supplements a 2002 national survey. Nat'l Conf. of State Leg., *Inside the Legislative Process, Prayer Practices* 5-148 (2002), <http://tinyurl.com/ncslprayer>.

The following sources correct omissions and later changes to the practices reported in the survey: Conn. H.R. No. 5 (2015); 2 Guam Code § 1112; Guam S. Standing R. § 2.08; N.Y. Assemb. R. VI, § 2(b); N.J. Gen. Assemb. R. 9:1; Ore. H. R. 4.01; N.Y. S. R. IX, § 4(a); Miss. S. R. 25(2); N.C. S. R. 3; Kate Havard, *In Delegates They Trust: Maryland House Members Lead Secular Prayer*, Wash. Post (Mar. 9, 2013), <http://www.washingtonpost.com/local/md-politics/in->

delegates-they-trust-md-house-members-lead-secular-prayer/2013/03/09/571fef8e-810a-11e2-8074-b26a871b165a_story.html; *Prayers and Public Meetings Don't Mix, Critic Says*, News Journal, 2009 WLNR 26228629 (Dec. 31, 2009); Deanna Martin, *Prayer Returns to the Ind. House*, Associated Press (Nov. 19, 2008); Ind. S., S. J. 1 (Nov. 19, 2013) (member offered prayer); e.g., Colo. S. J. (70th Gen. Assemb., 1st Sess.) (Jan. 26, 2015) (by the chaplain); Colo. S. J. (67th Gen. Assemb., 2d Sess.) (Mar. 30, 2010) (by Sen. Tapia); Colo. S. J. (64th Gen. Assemb., 1st Sess.) (Jan. 9, 2003) (by Sen. Hanna); S.C.H.R., *Wednesday, July 8, 2015 Pt. 1*, S.C. Leg. Video Archives, <http://www.scstatehouse.gov/video/videofeed.php>; S.C.S., *Tuesday, July 7, 2015 Pt. 1*, S.C. Leg. Video Archives, <http://www.scstatehouse.gov/video/videofeed.php>; D.C. City Council, *Agenda 1* (July 14, 2015), <http://dccouncil.us/videos/archive/>; Freedom from Religion Foundation, *North Carolina Senate Prayers* (Jan. 26, 2011-Jan. 5, 2012), <http://ffrf.org/uploads/legal/NCSenatePrayers.pdf>; Okla. S., S. J. 901 (Apr. 14, 2015); N. Mar. I. S., *Rules of the Senate* 1 (May 1, 2015); R.I. H.R., *Rhode Island House of Representatives June 5, 2013*, YouTube (June 6, 2013), <https://www.youtube.com/watch?v=6vXFolcdl10>; Tenn. H.R., *House Session – 12th Legislative Day* (Mar. 16, 2015), http://tnga.granicus.com/MediaPlayer.php?view_id=280&clip_id=10356 (member offered prayer); P.R.S.,

Diario de Sesiones 1 (May 18, 2015), <http://senado.pr.gov/Diario%20de%20Sesiones/051815.pdf> (prayer by clergy).

Table 2. Lawmaker-Led Prayer Practices in Maryland Counties

County Name	Who Offers Prayer	Source
<i>Anne Arundel</i>	Lawmaker	<i>E.g., Anne Arundel Cnty. Council, Apr. 20, 2015 County Council Meetings</i> (Apr. 22, 2015), http://www.aacounty.org/VideoMediaExec/CC/County%20Council%20Meeting%202008%20April%2020%2C%202015/01introduction-7 .
<i>Carroll</i>	Lawmaker	John Fritze, <i>Supreme Court Decision Allows Carroll Co. Commissioners to Pray</i> , The Balt. Sun (May 05, 2014), http://articles.baltimoresun.com/2014-05-05/news/bs-md-scotus-carroll-20140505_1_prayers-public-meetings-carroll-county .
<i>Cecil</i>	Lawmaker	<i>E.g., Cecil Cnty. Council, Legislative Session Minutes</i> 4-5 (June 17, 2014), http://www.ccgov.org/06.17.14.legislativeminutes.pdf .
<i>Dorchester</i>	Lawmaker	<i>E.g., Cnty. Council of Dorchester Cnty., Regular Meeting Minutes</i> 1 (May 19, 2015), http://docogonet.com/uploads/File/Regular%20Meeting%20Minutes%20May%2019%202015.pdf .
<i>Garrett</i>	Lawmaker	<i>E.g., Audio Public Meeting – Tuesday June 16, 2015</i> (June 21, 2015), https://www.garrettcounty.org/commissioners/audio-video-meetings .
<i>Harford</i>	Lawmaker	Jonathan Pitts and Pamela Wood, <i>Supreme Court to Consider Prayer at Government Meetings</i> , The Balt. Sun, (August 10, 2013), http://articles.baltimoresun.com/2013-08-10/news/bs-md-prayer-at-meetings-20130810_1_prayer-policy-christian-prayer-government-meetings .

County Name	Who Offers Prayer	Source
<i>Saint Mary's</i>	Lawmaker	<i>E.g., St. Mary's Cnty., Md., Gov't, Comm'rs of St. Mary's Cnty. 04/14/15, YouTube (Apr. 16, 2015), https://www.youtube.com/watch?v=pip0d2wJ_7U.</i>
<i>Somerset</i>	Lawmaker	<i>E.g., Bd. of Cnty. Commr's for Somerset Cnty., Tuesday, June 2, 2015 1 (June 2, 2015), http://www.co.somerset.md.us/minutes/Comm6_2_2015.pdf.</i>
<i>Washington</i>	Lawmaker	<i>E.g., Washington Cnty. Bd. of Comm'rs, June 2, 2015 Approved Minutes (June 2, 2015), http://www.washco-md.net/commissioners/packets/2015/150602/150602.pdf.</i>
<i>Wicomico</i>	Lawmaker	<i>E.g., PAC 14, Wicomico County Council Meeting 2.3.15 Part 1, YouTube (Feb. 4, 2015), https://www.youtube.com/watch?v=RcoQ0LOUoPQ.</i>

Table 3. Lawmaker-Led Prayer Practices in the Ten Most Populous Maryland Cities

City Name	Who Offers Prayer	Source
<i>Hagerstown</i>	Lawmaker	<i>E.g., Hagerstown City Council, 71st Regular Session, Work Session and Executive Session 4 (May 26, 2016), http://www.hagerstownmd.org/ArchiveCenter/ViewFile/Item/885.</i>
<i>Annapolis</i>	Lawmaker	<i>E.g., Annapolis City Council, Regular Minutes – Final 1 (Mar. 9, 2015), https://annapolismd.legistar.com/Calendar.aspx.</i>

Table 4. Lawmaker-Led Prayer Practices in North Carolina Counties

County Name	Who Offers Prayer	Source
<i>Alamance</i>	Lawmaker	<i>E.g., Alamance Cnty. Bd. of Comm’rs, Minutes of the Regular Meeting 1</i> (May 18, 2015), http://alamancecountync.iqm2.com/Citizens/FileOpen.aspx?Type=15&ID=1193&Inline=True .
<i>Alexander</i>	Lawmaker	<i>E.g., Alexander Cnty. Bd. of Comm’rs, Regular Meeting 1</i> (June 8, 2015), http://alexandercountync.gov/minutes-agendas/2015-docs/20150608m.pdf .
<i>Alleghany</i>	Lawmaker	<i>E.g., Alleghany Cnty. Bd. of Comm’rs, Agenda 1</i> (May 18, 2015), http://www.alleghanycounty-nc.gov/minutes/05-18-15.pdf .
<i>Ashe</i>	Lawmaker	<i>E.g., Ashe Cnty. Comm’n, Meeting Minutes – Final 1</i> (Apr. 6, 2015), https://ashecouny.legistar.com/Calendar.aspx .
<i>Beaufort</i>	Lawmaker	<i>E.g., Cnty. Council of Beaufort Cnty., Agenda 1</i> (June 8, 2015), http://www.bcgov.net/departments/Administrative/beaufort-county-council/council-meetings/agendas/2015/060815.pdf .
<i>Bertie</i>	Lawmaker	<i>E.g., Bertie Cnty. Bd. of Comm’rs, Regular Meeting 1</i> (May 4, 2015), http://www.co.bertie.nc.us/commissioners/meetings/2015/minutes/5-4-15min.pdf .
<i>Buncombe</i>	Lawmaker	<i>E.g., BCGOVTV, Bd. of Comm’rs’ Regular Meeting (June 2, 2015), YouTube</i> (June 3, 2015), https://www.youtube.com/watch?v=cCk7wX2W9-g .
<i>Caldwell</i>	Lawmaker	<i>E.g., Caldwell Cnty. Bd. of Comm’rs, Minutes 1</i> (June 1, 2015), https://ccgov.s3.amazonaws.com/portal/5591a08dc6bb5.pdf .

County Name	Who Offers Prayer	Source
<i>Camden</i>	Lawmaker	<i>E.g., Camden Cnty. Bd. of Comm'rs, Minutes 1</i> (Mar. 2, 2015), http://www.camdencountync.gov/government/board-of-commissioners/meeting-minutes/category/101-2015 .
<i>Catawba</i>	Lawmaker	<i>E.g., Catawba Cnty. Bd. of Comm'rs, Regular Session 525</i> (May 18, 2015), http://www.catawbacountync.gov/commish/Minutes/051815min.pdf .
<i>Chatham</i>	Lawmaker	<i>E.g., Chatham Cnty. Bd. of Comm'rs, Meeting Minutes 1</i> (May 4, 2015), http://www.chathamnc.org/index.aspx?page=1797 .
<i>Cherokee</i>	Lawmaker or Employee	<i>E.g., Cherokee Cnty. Bd. of Comm'rs, A Regular Meeting of the Cherokee County Board of Commissioners 1</i> (May 18, 2015), http://www.cherokeecounty-nc.gov/Modules/ShowDocument.aspx?documentid=1821 (lawmaker-led prayer); <i>Cherokee Cnty. Bd. of Comm'rs, A Regular Meeting of the Cherokee County Board of Commissioners 1</i> (Apr. 20, 2015), http://www.cherokeecounty-nc.gov/Modules/ShowDocument.aspx?documentid=1809 (employee-led prayer).
<i>Chowan</i>	Lawmaker	<i>E.g., Chowan Cnty. Bd. of Comm'rs, Regular Meeting 1</i> (Apr. 6, 2015), http://www.chowancounty-nc.gov/vertical/sites/%7B10E82D50-AAE0-43D7-A98A-42E82683885E%7D/uploads/April_6_minutes.pdf .

County Name	Who Offers Prayer	Source
<i>Cleveland</i>	Lawmaker or Employee	<i>E.g.</i> , Cleveland Cnty. Bd. of Comm'rs, <i>Minutes 1</i> (Mar. 3, 2015), http://www.clevelandcounty.com/governing/minutes/minutes03032015.pdf (employee-led prayer); Cleveland Cnty. Bd. of Comm'rs, <i>Minutes 1</i> (Feb. 3, 2015), http://www.clevelandcounty.com/governing/minutes/minutes02032015.pdf (lawmaker-led prayer).
<i>Columbus</i>	Lawmaker	<i>E.g.</i> , Columbus Cnty. Bd. of Comm'rs, <i>Agenda and Backup 1</i> (May 18, 2015), http://columbusco.org/Portals/0/Minutes/2010s/2015-05-18.pdf .
<i>Craven</i>	Lawmaker	<i>E.g.</i> , Craven Cnty. Bd. of Comm'rs, <i>Regular Meeting</i> , CTV10 (Jan. 20, 2015), http://www.ctv10.com/craven_boc_january_20_2015.htm .
<i>Cumberland</i>	Lawmaker	<i>E.g.</i> , Cumberland Cnty. Bd. of Sup'rs, <i>Minutes 1</i> (Apr. 14, 2015), http://www.cumberlandcounty.virginia.gov/supervisors/docs/2015/041415.BOS.6pm.minutes.pdf .
<i>Davidson</i>	Lawmaker	<i>E.g.</i> , Davidson Cnty. Bd. of Comm'rs, <i>Minutes of the Regular Board of Commissioners Meeting 1</i> (June 9, 2015), http://www.co.davidson.nc.us/commissioners/MinutesAndAgendas.aspx
<i>Davie</i>	Lawmaker or Clergy	<i>E.g.</i> , Davie Bd. of Comm'rs, <i>Minutes 1</i> (Nov. 3, 2014), http://www.daviecountync.gov/ArchiveCenter/ViewFile/Item/427 (lawmaker-led prayer); Davie Bd. of Comm'rs, <i>Minutes 1</i> (Feb. 2, 2015), http://www.daviecountync.gov/ArchiveCenter/ViewFile/Item/445 (clergy-led prayer).

County Name	Who Offers Prayer	Source
<i>Duplin</i>	Lawmaker	<i>E.g.</i> , Duplin Cnty. Bd. of Comm'rs, <i>Minutes 1</i> (July 6, 2015), http://www.duplincountync.com/minutes/2015%20minutes/07062015meeting.pdf .
<i>Franklin</i>	Lawmaker	<i>E.g.</i> , Franklin Cnty. Bd. of Comm'rs, <i>Agenda Packet</i> (July 6, 2015), http://files.www.franklincountync.us/commissioners/franlin-county-comissioners-links/AGENDA_PACKET_-_July_6_2015_Part_1.PDF .
<i>Gaston</i>	Lawmaker	<i>E.g.</i> , Gaston Cnty. Bd. of Comm'rs, <i>Regular Session 1</i> (Jan. 27, 2015), http://www.gastongov.com/departments/county-commission/agendas-minutes-meeting-schedule .
<i>Gates</i>	Lawmaker	<i>E.g.</i> , Gates Cnty. Bd. of Comm'rs, <i>Regular Meeting Minutes 1694</i> (June 3, 2015), http://www.gatescounty.govoffice2.com/vertical/sites/%7BC4993D33-7F3A-4388-B179-2EC1739C7E2E%7D/uploads/6-3-15_Approved_Minutes.pdf .
<i>Graham</i>	Lawmaker	<i>E.g.</i> , Graham Cnty. Bd. of Comm'rs, <i>Regular Meeting 1</i> (June 2, 2015), http://www.grahamcounty.org/forms/1/2015/6/20150602Regular.pdf .
<i>Granville</i>	Lawmaker	<i>E.g.</i> , Bd. of Comm'rs of Granville Cnty., <i>Minutes 1</i> (June 1, 2015), http://www.granvillenc.govoffice2.com/vertical/sites/%7BF819B1A2-6E50-4666-BDD0-AE938210631C%7D/uploads/June_1_2015_Minutes.pdf .

County Name	Who Offers Prayer	Source
<i>Greene</i>	Lawmaker	<i>E.g.</i> , Greene Cnty. Bd. of Cnty. Comm’rs, <i>Agenda—Meeting 1</i> (June 15, 2015), http://www.co.greene.nc.us/agendas-minutes .
<i>Halifax</i>	Lawmaker	<i>E.g.</i> , Cnty. of Halifax Bd. of Comm’rs, <i>Regular Meeting 166</i> (Feb. 2, 2015), http://www.halifaxnc.com/index.php?option=com_content&view=article&id=35&Itemid=3.aspx .
<i>Harnett</i>	Lawmaker	<i>E.g.</i> , Harnett Cnty. Bd. of Comm’rs, <i>Minutes of Regular Meeting 1</i> (June 15, 2015), http://www.harnett.org/boc/ .
<i>Haywood</i>	Lawmaker	<i>E.g.</i> , Haywood Cnty. Comm’rs, <i>Regular Meeting 1</i> (June 1, 2015), http://www.haywoodnc.net/downloads/commissioners/agmin2015/bocc060115/min06012015.pdf .
<i>Henderson</i>	Lawmaker, Employee, or Clergy	<i>E.g.</i> , Henderson Cnty. Bd. of Comm’rs, <i>Minutes 1</i> (May 20, 2015), http://www.hendersoncountync.org/agendas/150520m.pdf (employee-led prayer); Henderson Cnty. Bd. of Comm’rs, <i>Minutes 1</i> (June 1, 2015), http://www.hendersoncountync.org/agendas/150504m.pdf (clergy-led prayer); Henderson Cnty. Bd. of Comm’rs, <i>Minutes 1</i> (June 1, 2015), http://www.hendersoncountync.org/agendas/150601m.pdf (lawmaker-led prayer).
<i>Hertford</i>	Lawmaker	<i>E.g.</i> , Hertford Cnty. Bd. of Comm’rs, <i>Regular Meeting 1</i> (May 18, 2015), http://www.hertfordcountync.gov/county-departments/commissioners/minutes/2015/051815.pdf .

County Name	Who Offers Prayer	Source
<i>Hoke</i>	Lawmaker or Clergy	<i>E.g.</i> , Hoke Cnty. Bd. of Comm'rs, <i>Minutes</i> 3750 (June 1, 2015), http://nc-hokecounty.civicplus.com/AgendaCenter/ViewFile/Agenda/06012015-403 .
<i>Hyde</i>	Lawmaker	<i>E.g.</i> , Bd. of Cnty. Comm'rs Hyde Cnty., <i>Regular Meeting Minutes</i> 1 (June 1, 2015), http://www.hydecountync.gov/board_of_commissioners/docs/06_01_2015_Minutes.pdf .
<i>Iredell</i>	Lawmaker	<i>E.g.</i> , Iredell Cnty. Bd. of Comm'rs, <i>Regular Minutes</i> 5 (May 5, 2015), http://iredell.granicus.com/DocumentViewer.php?file=iredell_a682a113f4fbfb7bc42f325f15c64dba.pdf&view=1 .
<i>Jackson</i>	Lawmaker	<i>E.g.</i> , Jackson Cnty. Bd. of Comm'rs, <i>Minutes of a Regular Meeting</i> 1 (June 18, 2015), http://www.jacksonnc.org/commissioners-meeting-minutes.html .
<i>Johnston</i>	Lawmaker	<i>E.g.</i> , Johnston Cnty. Bd. of Comm'rs, <i>Meeting</i> 1 (June 1, 2015), http://www.johnstonnc.com/files/board/minutes/2015/June1_10am.pdf .
<i>Jones</i>	Lawmaker	<i>E.g.</i> , Jones Cnty. Bd. of Comm'rs, <i>Regular Meeting</i> 1 (Jan. 5, 2015), http://www.jonescountync.gov/vertical/sites/%7B9E2432B0-642B-4C2F-A31B-CDE7082E88E9%7D/uploads/Minutes_01-05-2015.pdf .
<i>Lee</i>	Lawmaker	<i>E.g.</i> , Lee Cnty. Bd. of Comm'rs, <i>Regular Meeting</i> 1 (June 1, 2015), http://leecountync.gov/LinkClick.aspx?fileticket=KZg9CM2bFzk%3d&tabid=85 .

County Name	Who Offers Prayer	Source
<i>Lenoir</i>	Lawmaker	<i>E.g.</i> , Lenoir Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (June 1, 2015), http://www.co.lenoir.nc.us/documents/06012015MeetingMinutes.pdf .
<i>Lincoln</i>	Lawmaker or Clergy	<i>E.g.</i> , Lincoln Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (May 4, 2015), http://www.lincolncounty.org/ArchiveCenter/ViewFile/Item/738 (clergy-led prayer); Lincoln Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (Apr. 20, 2015), http://www.lincolncounty.org/ArchiveCenter/ViewFile/Item/726 (lawmaker-led prayer).
<i>Martin</i>	Lawmaker	<i>E.g.</i> , Martin Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (June 17, 2015), http://www.martincountyncgov.com/_fileUploads/minutes/617201582702AM.pdf .
<i>McDowell</i>	Lawmaker	<i>E.g.</i> , Cnty. of McDowell Cnty. Bd. of Comm'rs, <i>Regular Session</i> 1 (May 11, 2015), http://www.mcdowellgov.com/vertical/sites/%7B2D9A4CFF-B077-4D35-8C47-FDF52593850E%7D/uploads/Minutes_-_May_11_2015_Regular_Meeting.pdf .
<i>Mecklenburg</i>	Lawmaker	Tim Funk & David Perlmutter, <i>Mecklenburg Commissioners Leake, Cotham Battle over Prayer</i> , Charlotte Observer (May 18, 2015), http://www.charlotteobserver.com/living/religion/article21332430.html .
<i>Mitchel</i>	Lawmaker	<i>E.g.</i> , Mitchell Cnty. Comm'rs, <i>Minutes, Regular Session</i> (Feb. 2, 2015), http://www.mitchellcounty.org/minutes/2015/02-02-15-Minutes.html .

County Name	Who Offers Prayer	Source
<i>Nash</i>	Lawmaker	<i>E.g.</i> , Nash Cnty. Bd. of Comm'rs, <i>Regular Meeting 1</i> (May 4, 2015), http://www.co.nash.nc.us/AgendaCenter/ViewFile/Minutes/05042015-138 .
<i>Northampton</i>	Lawmaker	<i>E.g.</i> , Northampton Cnty. Bd. of Comm'rs, <i>Regular Session 565</i> (June 15, 2015), http://www.northamptonnc.com/documents/boards/minutes/Minutes%20061515%20RM.pdf .
<i>Pamlico</i>	Lawmaker	<i>E.g.</i> , Pamlico Cnty. Bd. of Comm'rs, <i>Regular Session 1</i> (Apr. 6, 2015), http://www.pamlicocounty.org/SharedFiles/Download.aspx?pageid=72&mid=115&fileid=689 .
<i>Pasquotank</i>	Lawmaker	<i>E.g.</i> , Pasquotank Cnty. Bd. of Comm'rs, <i>Regular Session 1</i> (June 15, 2015), http://www.co.pasquotank.nc.us/departments/manager/minutes/2015/061515mins.pdf .
<i>Pender</i>	Lawmaker	<i>E.g.</i> , Pender Cnty. Bd. of Comm'rs, <i>Minutes 1</i> (June 8, 2015), http://www.pendercountync.gov/Government/AgendasMinutes/BoardofCommissioners/minutes/fy1415/150608.pdf .
<i>Perquimans</i>	Lawmaker	<i>E.g.</i> , Perquimans Cnty. Bd. of Comm'rs, <i>Regular Meeting 3021</i> (June 1, 2015), http://www.perquimanscountync.gov/board-of-commissioners.html .
<i>Pitt</i>	Lawmaker	<i>E.g.</i> , Pitt Cnty. Bd. of Comm'rs, <i>Minutes 2</i> (June 9, 2015), http://www.pittcountync.gov/bcc/agenda/attach/02_previousminutes.pdf

County Name	Who Offers Prayer	Source
<i>Polk</i>	Lawmaker or Clergy	<i>E.g.</i> , Polk Cnty. Bd. of Comm'rs, <i>Regular Meeting 1</i> (June 1, 2015), http://www.polknc.org/commissioners/b_o_c_meeting_minutes/index.php#revize_document_center_rz602 (lawmaker-led prayer); Polk Cnty. Bd. of Comm'rs, <i>Regular Meeting 1</i> (Feb. 2, 2015), http://www.polknc.org/commissioners/b_o_c_meeting_minutes/index.php#revize_document_center_rz602 (clergy-led prayer).
<i>Randolph</i>	Lawmaker	<i>E.g.</i> , Randolph Cnty. Bd. of Comm'rs, <i>Minutes 1</i> (June 1, 2015), http://www.co.randolph.nc.us/meetings_agendas/commissioners/default.htm .
<i>Scotland</i>	Lawmaker	<i>E.g.</i> , Scotland Cnty. Bd. of Comm'rs, <i>Regular Meeting 1</i> (June 1, 2015), http://www.scotlandcounty.org/Data/Sites/1/media/minutes/rm6-1-2015.pdf .
<i>Stanly</i>	Lawmaker	<i>E.g.</i> , Stanly Cnty. Bd. of Comm'rs, <i>Regular Meeting Minutes 1</i> (May 18, 2015), http://www.stanlycountync.gov/wp-content/uploads/2012/10/05182015m.pdf .
<i>Stokes</i>	Lawmaker	<i>E.g.</i> , Stokes Cnty. Bd. of Comm'rs, <i>Minutes 1</i> (June 8, 2015), http://www.co.stokes.nc.us/bocc/minutes/2015/m060815.pdf .
<i>Surry</i>	Lawmaker	<i>E.g.</i> , Surry Cnty. Bd. of Comm'rs, <i>Minutes 11154</i> (June 1, 2015), http://www.co.surry.nc.us/document_center/Minutes/June_1__2015.pdf .

County Name	Who Offers Prayer	Source
<i>Union</i>	Lawmaker or Clergy	<i>E.g.</i> , Union Cnty. Bd. of Comm'rs, <i>Regular Meeting Minutes</i> (Apr. 6, 2015), http://www.co.union.nc.us:8080/sirepub/mtgviewer.aspx?meetid=281&doctype=MINUTES .
<i>Wake</i>	Lawmaker	Wake Cnty. Bd. of Comm'rs, <i>Meeting Procedures</i> (Aug. 7, 2013), http://www.wakegov.com/commissioners/Pages/meetingprocedures.aspx .
<i>Washington</i>	Lawmaker	<i>E.g.</i> , Washington Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (Mar. 2, 2015), http://www.washconc.org/PDFs/Minutes/2015/3-2-15%20meeting%20minutes.pdf .
<i>Watauga</i>	Lawmaker	<i>E.g.</i> Watauga Cnty. Bd. of Comm'rs, <i>Minutes</i> (June 2, 2015), http://www.wataugacounty.org/main/App_Pages/Dept/BOC/viewminutes.aspx?ID=522 .
<i>Wayne</i>	Lawmaker or Clergy	<i>E.g.</i> , Wayne Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (May 28, 2015), http://www.waynegov.com/cms/lib05/NC07000827/Centricity/Domain/145/May%2028%202015.pdf .
<i>Wilkes</i>	Lawmaker	<i>E.g.</i> , Wilkes Cnty. Bd. of Comm'rs, <i>Minutes</i> 2 (June 23, 2015), http://wilkescounty.net/wp-content/uploads/2015/07/6-23-2015.pdf .
<i>Wilson</i>	Lawmaker	<i>E.g.</i> , Wilson Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (Feb. 2, 2015), http://wilsoncountync.iqm2.com/Citizens/FileOpen.aspx?Type=15&ID=1006&Inline=True .
<i>Yadkin</i>	Lawmaker	<i>E.g.</i> , Yadkin Cnty. Bd. of Comm'rs, <i>Regular Session Minutes</i> 1 (June 15, 2015), http://www.yadkincountync.gov/ArchiveCenter/ViewFile/Item/1495 .

County Name	Who Offers Prayer	Source
<i>Yancey</i>	Lawmaker	<i>E.g., Yancey Cnty. Bd. of Cnty. Comm'rs, Minutes of the 11 May 2015 Regular Meeting 1,</i> http://www.yanceycountync.gov/index.php/county-commissioners/board-minutes .

Table 5. Lawmaker-Led Prayer Practices in the Ten Most Populous North Carolina Cities

City Name	Who Offers Prayer	Source
<i>Charlotte</i>	Lawmaker	<i>E.g., Charlotte City Council, 2d Monday – City Council – Business</i> , CharlotteNC.gov (June 2, 2015), http://charlottenc.granicus.com/MediaPlayer.php?view_id=2&clip_id=2699 .
<i>Raleigh</i>	Lawmaker or Clergy	<i>E.g., City Council of the City of Raleigh, Council Minutes 1</i> (June 2, 2015), https://www.raleighnc.gov/government/content/BoardsCommissions/Articles/CityCouncil.html (lawmaker-led prayer); <i>City Council of the City of Raleigh, Council Minutes 1</i> (May 19, 2015), https://www.raleighnc.gov/government/content/BoardsCommissions/Articles/CityCouncil.html (clergy-led prayer).
<i>Wilmington</i>	Lawmaker or Clergy	<i>E.g., Wilmington City Council, Regular City Council Meeting Minutes 1</i> (Feb. 3, 2015), http://www.wilmingtonnc.gov/city_manager/gtv8/meeting_video_audio_archive/city_council_archive (employee-led prayer); <i>Wilmington City Council, Regular City Council Meeting Minutes 1</i> (Feb. 17, 2015), http://www.wilmingtonnc.gov/city_manager/gtv8/meeting_video_audio_archive/city_council_archive (clergy-led prayer).

Table 6. Lawmaker-Led Prayer Practices in South Carolina Counties

County Name	Who Offers Prayer	Source
<i>Abbeville</i>	Lawmaker	<i>E.g., Abbeville Cnty. Council, Regular Meeting Minutes 1</i> (Mar. 16, 2015), http://www.abbevillecountysc.com/_fileuploads/Minutes/332_Workshop%203-16-15.pdf .
<i>Aiken</i>	Lawmaker	Rob Novit, Amy Banton, & Maayan Schechter, <i>Where Is Public Prayer Allowed?</i> , <i>Aiken Standard</i> (Oct. 29, 2013), http://www.aikenstandard.com/article/20131029/AIK0101/131029448 .
<i>Anderson</i>	Lawmaker	<i>E.g., WAIM.TV, ACC Regular Meeting – June 2, 2015 – Pt1</i> , YouTube (June 28, 2015), https://www.youtube.com/watch?v=7luX8bxYRik .
<i>Bamberg</i>	Lawmaker or Clergy	<i>E.g., Bamberg Cnty. Council, Minutes 1</i> (Oct. 6, 2014), http://www.bambergcountysc.gov/images/scripts/minutes2014/oct/minutes-10-06-2014.pdf ; <i>Bamberg Cnty. Council, Minutes1</i> (Feb. 2, 2015), http://www.bambergcountysc.gov/images/scripts/minutes2015/feb/minutes-02-02-2015.pdf .
<i>Beaufort</i>	Lawmaker	<i>E.g., Cnty. Council of Beaufort Cnty., Agenda 1</i> (June 8, 2015), http://www.bcgov.net/departments/Administrative/beaufort-county-council/council-meetings/agendas/2015/060815.pdf .
<i>Berkeley</i>	Lawmaker	<i>E.g., Berkeley Cnty. Council, Regular Monthly Meeting 1</i> (June 25, 2001), http://berkeleycountysc.iqm2.com/Citizens/FileOpen.aspx?Type=12&ID=1638&Inline=True .

County Name	Who Offers Prayer	Source
<i>Calhoun</i>	Lawmaker	<i>E.g., Calhoun Cnty. Council, Minutes of Meeting 1</i> (July 25, 2015), http://www.calhouncounty.sc.gov/officials/Documents/July%2025%20Minutes.pdf .
<i>Chesterfield</i>	Lawmaker	<i>E.g., Chesterfield Cnty. Council, Regular Meeting 1</i> (June 3, 2015), http://www.chesterfieldcountysc.com/_fileUploads/agendasAndActions/111409AMMinutes632015.pdf .
<i>Clarendon</i>	Lawmaker	<i>E.g., Clarendon Cnty. Council, Regular Council Meeting 1</i> (May 11, 2015), http://www.clarendoncountygov.org/attachments/article/91/May%2011,%202015.pdf .
<i>Colleton</i>	Lawmaker	<i>E.g., Colleton Cnty. Council, Regular Meeting Minutes 1</i> (May 5, 2015), http://www.colletoncounty.org/Data/Sites/1/media/council/may-5,-2015-rm.pdf .
<i>Darlington</i>	Lawmaker	<i>E.g., Darlington Cnty. Council, Public Hearing & Regular Meeting 3</i> (June 1, 2015), http://www.darcosc.com/document_center/Council/June_1__2015__minutes.pdf .
<i>Dillon</i>	Lawmaker	<i>E.g., Dillon Cnty. Council, Regular Meeting 1</i> (May 27, 2015), http://dilloncounty.sc.gov/Documents/Council%20Council%20Minutes/2014_2015%20minutes/MI05.27.15.pdf .
<i>Dorchester</i>	Lawmaker	<i>E.g., Dorchester Cnty. Council, Minutes 1</i> (June 15, 2015), http://www.dorchestercounty.net/Modules/ShowDocument.aspx?documentid=9721 .

County Name	Who Offers Prayer	Source
<i>Edgefield</i>	Lawmaker or Clergy	<i>E.g.</i> , Edgefield Cnty. Council, <i>Minutes</i> 1 (June 2, 2015), http:// www. edgefieldcounty.sc.gov/Documents/06-02-15%20cc%20mins.pdf (lawmaker-led prayer); Edgefield Cnty. Council, <i>Minutes</i> 1 (Jan. 6, 2015), http://www. edgefieldcounty.sc.gov/Documents/01-06-15%20mins.pdf (clergy-led prayer).
<i>Fairfield</i>	Lawmaker	<i>E.g.</i> , Fairfield Cnty. Council, <i>Minutes</i> 95 (June 8, 2015), http://www.fairfieldsc.com/secondary.aspx?pageID=109 .
<i>Florence</i>	Lawmaker	<i>E.g.</i> , Florence Cnty. Council, <i>Minutes</i> 1 (Jan. 3, 2008), http://files.florenceco.org.s3.amazonaws.com/public/CountyCouncil/Minutes/2008/01032008minutes.pdf .
<i>Georgetown</i>	Lawmaker	<i>E.g.</i> , Georgetown Cnty. Council, <i>Meeting Minutes</i> 1 (May 27, 2014), http:// docs.georgetowncountysc.org/cache/00003/304/052714%20MINUTES.pdf .
<i>Greenville</i>	Lawmaker	<i>E.g.</i> , Greenville Cnty. Council, <i>Regular Council Meeting</i> 1 (June 2, 2015), https://www.greenvillecounty.org/apps/DirectoryListings/CountyCouncilAgendas/ .
<i>Greenwood</i>	Lawmaker	<i>E.g.</i> , Greenwood Cnty. Council, <i>Minutes</i> 1 (June 2, 2015), http://www.greenwoodsc.gov/countywebsite/Modules/ShowDocument.aspx?documentid=4449 .
<i>Hampton</i>	Lawmaker	<i>E.g.</i> Hampton Cnty. Council, <i>Agenda</i> 1 (June 15, 2015), http://www.hamptoncountysc.org/archive.aspx .

County Name	Who Offers Prayer	Source
<i>Horry</i>	Lawmaker	<i>E.g.</i> , Horry Cnty. Council, <i>Minutes 1</i> (Jan. 27, 2004), http://www.horrycounty.org/Portals/0/Docs/council/archives/min04-0127.pdf .
<i>Jasper</i>	Lawmaker	<i>E.g.</i> , Jasper Cnty. Council, <i>Minutes 2</i> (Mar. 16, 2015), http://www.jaspercountysc.org/_fileUploads/Actions/3-16-2015_COUNCILMEETING.pdf .
<i>Kershaw</i>	Lawmaker	<i>E.g.</i> , Kershaw Cnty. Council, <i>Minutes 1</i> (June 9, 2015), http://www.kershaw.sc.gov/index.aspx?recordid=2640&page=242 .
<i>Lancaster</i>	Lawmaker	<i>E.g.</i> , Lancaster Cnty. Council, <i>Regular Meeting Agenda 1</i> (July 13, 2015), http://www.mylancastersc.org/vertical/sites/%7BA02FC01E-6C41-44F4-BE02-9B73FC0206C5%7D/uploads/7-13-15_agenda-07072015151933.pdf .
<i>Laurens</i>	Lawmaker	<i>E.g.</i> , Laurens Cnty. Council, <i>Minutes 1</i> (May 12, 2015), http://www.laurenscountysc.org/_fileUploads/minutes/512201513711PM.pdf .
<i>Lee</i>	Lawmaker	<i>E.g.</i> , Lee Cnty. Council, <i>Minutes</i> (May 12, 2015), http://www.leecountysc.org/category/minutes/ .
<i>Lexington</i>	Lawmaker	<i>E.g.</i> , Lexington Cnty. Council, <i>Minutes 71</i> (Apr. 28, 2015), http://lexingtoncountysc.iqm2.com/Citizens/FileOpen.aspx?Type=15&ID=1252&Inline=True .
<i>Marion</i>	Lawmaker	<i>E.g.</i> , Marion Cnty. Council, <i>Minutes 1</i> (Jul. 24, 2014), http://www.marionsc.org/_fileUploads/minutes/7242014122342PM.pdf .

County Name	Who Offers Prayer	Source
<i>Marlboro</i>	Lawmaker	<i>E.g., Marlboro Cnty. Council, Minutes 1</i> (May 4, 2015), http://www.marlborecounty.sc.gov/council/agendas/Documents/May%204,%202015%20Minutes.pdf .
<i>McCormick</i>	Lawmaker	<i>E.g., McCormick Cnty. Council, Meeting Minutes 1</i> (May 19, 2015), http://www.mccormickcountysc.org/mccormick_county_agenda.php .
<i>Newberry</i>	Lawmaker or Employee	<i>E.g., Newberry Cnty. Council, Minutes 1</i> (June 17, 2015), http://www.newberrycounty.net/home/showdocument?id=1712 .
<i>Pickens</i>	Lawmaker	<i>E.g., Pickens Cnty. Council, Minutes 1</i> (May 4, 2015), http://www.co.pickens.sc.us/_fileUploads/minutes/542015111953AM.pdf .
<i>Richland</i>	Lawmaker	<i>E.g., Richland Cnty. Council, Regular Session Minutes 1</i> (June 2, 2015), http://www.richlandonline.com/Portals/0/Departments/CountyCouncil/Minutes/Reg.06.02.15.pdf .
<i>Sumter</i>	Lawmaker or Clergy	<i>E.g., Sumter Cnty. Council, Regular Meeting Agenda</i> (Apr. 28, 2015), http://sumtercosc.suiteonemedia.com/web/Player.aspx?id=447&key=-1&mod=-1&mk=-1&nov=0 .
<i>Union</i>	Lawmaker	<i>E.g., Union Cnty. Council, Regular Monthly Meeting 1</i> (Dec. 9, 2014), http://www.countyofunion.org/site/cpage.asp?cpage_id=180008527&sec_id=180003405 .
<i>York</i>	Lawmaker	<i>E.g., YCGOV, York County Council Meeting 6 15 2015</i> , YouTube (June 18, 2015), https://www.youtube.com/watch?v=EDz8QioSvhU .

Table 7. Lawmaker-Led Prayer Practices in the Ten Most Populous South Carolina Cities

City Name	Who Offers Prayer	Source
<i>Charleston</i>	Lawmaker	<i>E.g.</i> , City Council of Charleston, <i>Regular Meeting 1</i> (May 26, 2015), http://www.charleston-sc.gov/AgendaCenter/ViewFile/Minutes/05262015-1410 .
<i>Greenville</i>	Lawmaker	<i>E.g.</i> , Greenville City Council, <i>Minutes 1</i> (June 22, 2015), http://www.greenvillesc.gov/AgendaCenter/ViewFile/Minutes/06222015-282 .
<i>Summerville</i>	Lawmaker	<i>E.g.</i> , Summerville Town Council, <i>Council Meeting Minutes 1</i> (June 10, 2015), http://www.summervillesc.gov/vertical/sites/%7BAAEC23E2-99CA-4103-85AD-32CB4206F79B%7D/uploads/June_2015.pdf .
<i>Sumter</i>	Lawmaker	<i>E.g.</i> , Sumter City Council, <i>Regular Meeting</i> (June 16, 2015), https://www.voterheads.com/organizations/58/public_agendas/16291 .

Table 8. Lawmaker-Led Prayer Practices in Virginia Counties

County Name	Who Offers Prayer	Source
<i>Accomack</i>	Lawmaker or Clergy	<i>E.g.</i> , Accomack Cnty. Bd. of Sup'rs, <i>Regular Monthly Meeting</i> 1 (Apr. 15, 2015), http://www.co.accomack.va.us/home/showdocument?id=2929 (prayer led by clergy); Accomack Cnty. Bd. of Sup'rs, <i>Regular Monthly Meeting</i> 1 (Feb. 18, 2015), http://www.co.accomack.va.us/home/showdocument?id=2793 (lawmaker-led prayer).
<i>Alleghany</i>	Lawmaker	<i>E.g.</i> , Alleghany Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Apr. 7, 2015), available at http://www.co.alleghany.va.us/board_of_supervisors/Minutes.htm .
<i>Amelia</i>	Lawmaker	<i>E.g.</i> , Amelia Cnty. Bd. of Sup'rs, <i>Regular Meeting</i> 1 (May 20, 2015), http://ameliacova.com/Minutes_for_5_20_2015.pdf .
<i>Amherst</i>	Lawmaker	<i>E.g.</i> , Amherst Cnty. Bd. of Sup'rs, <i>Minutes – Book</i> 34 1146 (May 19, 2015), http://www.countyofamherst.com/egov/documents/1435075823_42596.pdf .
<i>Appomattox</i>	Lawmaker	<i>E.g.</i> , Appomattox Cnty. Bd. of Sup'rs, <i>Regular Meeting Minutes</i> (Mar. 2, 2015), http://appomattoxcountyva.iqm2.com/Citizens/FileView.aspx?Type=12&ID=1321 .
<i>Augusta</i>	Lawmaker	<i>E.g.</i> , Augusta Cnty. Bd. of Sup'rs, <i>Regular Meeting Minutes</i> 1 (Jan. 4, 2006), http://www.co.augusta.va.us/ftp/minutes/1-4min.06.pdf .

County Name	Who Offers Prayer	Source
<i>Bath</i>	Lawmaker	<i>E.g., Bath Cnty. Bd. of Sup'rs, Regular Meeting Minutes 1</i> (May 12, 2015), http://www.bathcountyva.org/assets/May_2015_BOS.pdf .
<i>Bland</i>	Lawmaker	<i>E.g., Bland Cnty. Bd. of Sup'rs, Regular Meeting 1</i> (Apr. 28, 2015), http://www.blandcountyva.gov/uploads/docs/Regular%20meeting04-28-2015.pdf .
<i>Brunswick</i>	Lawmaker	<i>E.g., Brunswick Cnty. Bd. of Comm'rs, Agenda</i> (July 6, 2015), http://brunswick.novusagenda.com/agendapublic/MeetingView.aspx?MeetingID=150&MinutesMeetingID=404&doctype=Agenda .
<i>Buckingham</i>	Lawmaker	<i>E.g., Buckingham Cnty. Bd. of Sup'rs, Monthly Meeting Minutes 1</i> (Jan. 12, 2015), http://www.buckinghamcountyva.org/Board%20Minutes/2015/January%2012,%202015.pdf .
<i>Campbell</i>	Lawmaker	<i>E.g., Campbell Cnty. Bd. of Sup'rs, Meeting Minutes 1</i> (Jan. 6, 2015), http://www.co.campbell.va.us/bos/Documents/board_minutes/2015/01%2006%202015.pdf .
<i>Carroll</i>	Lawmaker	<i>E.g., Carroll Cnty. Bd. of Sup'rs, Minutes 2</i> (June 8, 2015), http://carrollcountyva.org/docs/bdpkt/2015/July/02_BOSMinutes_June_8_2015.pdf .
<i>Charlotte</i>	Lawmaker	<i>E.g., Charlotte Cnty. Bd. of Sup'rs, Minutes 1</i> (May 12, 2015), http://www.charlotteva.com/pdfs/minutes/2015_05min.pdf .

County Name	Who Offers Prayer	Source
<i>Chesterfield</i>	Lawmaker	Chesterfield Cnty. Bd. of Sup'rs, <i>Invocation Policy</i> (Jan. 1, 2015), http://chesterfieldva.granicus.com/MetaViewer.php?view_id=6&clip_id=1068&meta_id=109239 .
<i>Fauquier</i>	Lawmaker	<i>E.g.</i> , Fauquier Cnty. Bd. of Sup'rs, <i>Minutes</i> (Feb. 12, 2015), http://agenda.fauquiercounty.gov/MeetingView.aspx?MeetingID=111&MinutesMeetingID=198&doctype=Minutes .
<i>Floyd</i>	Lawmaker	<i>E.g.</i> , Floyd Cnty. Bd. of Sup'rs, <i>Regular Meeting 1</i> (May 26, 2015), http://www.floydcova.org/wp-content/uploads/2015/06/may-26-2015-minutes.pdf .
<i>Franklin</i>	Lawmaker	<i>E.g.</i> , Franklin Cnty. Bd. of Sup'rs, <i>Meeting Minutes 1</i> (Jan. 5, 2015), http://www.franklincountyva.gov/images/bos/bos-minutes-2015/bos-minutes-010515.pdf .
<i>Frederick</i>	Lawmaker	<i>E.g.</i> , Frederick Cnty., <i>Bd. of Sup'rs – June 10, 2015</i> , YouTube (June 11, 2015), https://www.youtube.com/watch?list=SPkth-ViEO0IyPGXgWCUARayu2CuHh6Xu5&v=6Quc0o_pmCM .
<i>Gloucester</i>	Lawmaker	<i>E.g.</i> , Gloucester Cnty. Bd. of Sup'rs, <i>Meeting Minutes 1</i> (Apr. 21, 2015), http://gloucester.granicus.com/DocumentViewer.php?file=gloucester_233fa94c-02a8-4147-be02-d5cb36c61908.pdf .
<i>Greensville</i>	Lawmaker	<i>E.g.</i> , Greensville Cnty. Bd. of Sup'rs, <i>Minutes 1</i> (June 15, 2015), http://www.greensvillecountyva.gov/index.php/public-information/agendas-minutes/board-of-supervisors .

County Name	Who Offers Prayer	Source
<i>Halifax</i>	Lawmaker	<i>E.g., Halifax Cnty. Bd. of Comm’rs, Regular Meeting 166</i> (Feb. 2, 2015), http://weblink.mccinnovations.com/WebLink/6/doc/134908/Page1.aspx .
<i>Hanover</i>	Lawmaker	<i>E.g., Hanover Cnty. Bd. of Sup’rs, Draft Summary Minutes 1</i> (June 10, 2015), http://hanovercounty.gov/BCC/Board_of_Supervisors/Minutes/06_10_15_Minutes_draft.pdf .
<i>Henry</i>	Lawmaker	<i>E.g., Henry Cnty. Bd. of Sup’rs, Minutes 1</i> (Mar. 24, 2015), http://www.henrycountyva.gov/content/uploads/2015bos/03242015minutes.pdf .
<i>Isle of Wight</i>	Lawmaker	<i>E.g., Isle of Wright Cnty. Bd. of Sup’rs, Agenda 1</i> (July 16, 2015), http://www.co.isle-of-wight.va.us/board-of-supervisors/download/full_agenda_2015/agenda07162015.pdf .
<i>King and Queen</i>	Lawmaker	<i>E.g., King & Queen Cnty. Bd. of Sup’rs, Minutes of the Meeting 1</i> (May 11, 2015), http://www.kingandqueenco.net/html/Govt/boarddocs/Minutes/2015/Bd_Min_5_11_15.pdf .
<i>Louisa</i>	Lawmaker	<i>E.g., Louisa Cnty. Bd. of Sup’rs, Minutes 1</i> (June 15, 2015), http://louisacountyva.iqm2.com/Citizens/FileOpen.aspx?Type=12&ID=1168&Inline=True .
<i>Lunenburg</i>	Lawmaker	<i>E.g., Lunenburg Cnty. Bd. of Sup’rs, Minutes of May 14, 2015 Meeting 1</i> , http://www.lunenburgva.net/wp-content/uploads/2012/04/5-14-15-minutes.pdf .

County Name	Who Offers Prayer	Source
<i>New Kent</i>	Lawmaker	<i>E.g.</i> , New Kent Cnty. Bd. of Sup'rs, <i>Regular Meeting Minutes</i> 1 (June 8, 2015), http://va-newkentcounty.civicplus.com/ArchiveCenter/ViewFile/Item/3333 .
<i>Northumberland</i>	Lawmaker or Clergy	<i>E.g.</i> , Northumberland Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (May 14, 2015), http://www.co.northumberland.va.us/NH-top-level/Test%20Webpage/NC_Webpage/NC_Public_Hearings/BOS/2015/Minutes%20May%2014,%202015%20Meeting.pdf (lawmaker-led prayer); Northumberland Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Feb. 12, 2015), http://www.co.northumberland.va.us/NH-top-level/Test%20Webpage/NC_Webpage/NC_Public_Hearings/BOS/2015/Minutes%20Feb%2012,%202015%20(2).pdf (clergy-led prayer).
<i>Nottoway</i>	Lawmaker	<i>E.g.</i> , Nottoway Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Apr. 16, 2015), available at http://www.nottoway.org/supervisors.shtml
<i>Page</i>	Lawmaker or Clergy	<i>E.g.</i> , Page Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Feb. 26, 2015), http://pagecounty.virginia.gov/files/Minutes%20-%20February%2026,%202015.pdf (lawmaker-led prayer); Page Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (May 19, 2015), http://pagecounty.virginia.gov/files/Minutes%20-%20May%2019,%202015 . Pdf.(clergy-led prayer);

County Name	Who Offers Prayer	Source
<i>Patrick</i>	Lawmaker or Clergy	<i>E.g.</i> , Patrick Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Mar. 23, 2015), http://www.co.patrick.va.us/content/File/March%2023%202015.pdf (lawmaker-led prayer); Patrick Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Apr. 27, 2015), http://www.co.patrick.va.us/content/File/April%2027%202015.pdf (clergy-led prayer).
<i>Powhatan</i>	Lawmaker	<i>E.g.</i> , Powhatan Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (May 4, 2015), http://powhatan.siretechnologies.com/sirepub/cache/2/4wgap03zlyt5gdhw3m5tn1yu/2300407302015111006229.PDF .
<i>Prince George</i>	Lawmaker	<i>E.g.</i> , Prince George Cnty. Bd. of Sup'rs, <i>Minutes</i> 4 (Mar. 10, 2015), http://www.princegeorgeva.org/index.aspx?recordid=6194&page=386 .
<i>Prince William</i>	Lawmaker or Clergy	Prince William Cnty. Bd. of Supervisors, <i>BOCS Rules of Procedure Section F: Order of Business</i> (Jan. 14, 2014), http://www.pwcgov.org/government/bocs/Pages/BOCS-Rules-of-Procedure.aspx .
<i>Richmond</i>	Lawmaker	<i>E.g.</i> , Richmond Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Mar. 14, 2015), http://www.co.richmond.va.us/files/Minutes0515.pdf .
<i>Rockbridge</i>	Lawmaker	<i>E.g.</i> , Rockbridge Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (May 11, 2015), http://www.co.rockbridge.va.us/ArchiveCenter/ViewFile/Item/549 .

County Name	Who Offers Prayer	Source
<i>Rockingham</i>	Lawmaker or Employee	<i>E.g.</i> , Rockingham Cnty. Bd. of Comm’rs, <i>Regular Meeting</i> 1 (Jan. 5, 2015), http://www.co.rockingham.nc.us/docview.aspx?doctype=minute&docid=15734 .
<i>Shenandoah</i>	Lawmaker	<i>E.g.</i> , Shenandoah Cnty. Bd. of Sup’rs, <i>Minutes</i> (May 26, 2015), http://shenandoahcountyva.us/bos/events/board-night-meeting-2-2015-05-26/ .
<i>Smyth</i>	Lawmaker or Employee	<i>E.g.</i> , Smyth Cnty. Bd. of Sup’rs, <i>Minutes</i> 2 (Aug. 12, 2014), http://www.smythcounty.org/board_of_supervisors/minutes/2014_minutes/min_bos_aug_2014.pdf (employee-led prayer); Smyth Cnty. Bd. of Sup’rs, <i>Minutes</i> 2 (February 11, 2014), http://www.smythcounty.org/board_of_supervisors/minutes/2014_minutes/min_bos_feb_2014.pdf (lawmaker-led invocation).
<i>Southampton</i>	Lawmaker	<i>E.g.</i> , Southampton Cnty. Bd. of Sup’rs, <i>Minutes</i> 1 (Mar. 23, 2015), http://www.southamptoncounty.org/MediaArchive/PDF/BOS%20AGENDA%20-%20APRIL%202015/BOS%20Minutes_3-23-15.pdf .
<i>Spotsylvania</i>	Lawmaker	<i>E.g.</i> , Advanced Media Solutions of Va., LLC., <i>Spotsylvania County 6/23/2015</i> , YouTube (June 25, 2015), https://www.youtube.com/watch?v=0JZa6MA_H_I .

County Name	Who Offers Prayer	Source
<i>Stafford</i>	Lawmaker	<i>E.g.</i> , Stafford Cnty. Bd. of Sup'rs, <i>Minutes</i> 27 (June 16, 2015), staffordcountyva.gov/ArchiveCenter/ViewFile/Item/2370 .
<i>Sussex</i>	Lawmaker	<i>E.g.</i> , Sussex Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Apr. 9, 2015), http://www.sussexcountyva.gov/uploads/docs/April%209%202015%20minutes.pdf .
<i>Tazewell</i>	Lawmaker	<i>E.g.</i> , Tazewell Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Apr. 7, 2015), http://www.tazewellcounty.org/bos/minutes/june2010%20and%20up/April%207%202015%20TCBOS%20Minutes.pdf .
<i>Washington</i>	Lawmaker	<i>E.g.</i> , Washington Cnty. Bd. of Comm'rs, <i>Minutes</i> 1 (Mar. 2, 2015), http://www.washconc.org/PDFs/Minutes/2015/3-2-15%20meeting%20minutes.pdf .
<i>Wise</i>	Lawmaker	<i>E.g.</i> , Wise Cnty. Bd. of Sup'rs, <i>Minutes</i> (Jan. 9, 2014), http://www.wisecounty.org/BOS/minutes/2014/20140109_org.html .
<i>York</i>	Lawmaker or Employee	<i>E.g.</i> , York Cnty. Bd. of Sup'rs, <i>Minutes</i> 1 (Mar. 17, 2015), http://www.yorkcounty.gov/Portals/0/bos/Minutes%202015/March%2017,%202015.pdf (employee-led prayer); York Cnty. Bd. of Sup'rs, <i>Regular Meeting Minutes</i> 1 (Sept. 16, 2014), http://www.yorkcounty.gov/Portals/0/bos/Minutes%202014/September%2016,%202014.pdf (lawmaker-led prayer).

Table 9. Lawmaker-Led Prayer Practices in the Twelve Most Populous Virginia Cities

City Name	Who Offers Prayer	Source
<i>Norfolk</i>	Lawmaker	<i>E.g., Norfolk City Council, Action of the Council 1</i> (June 9, 2015), http://www.norfolk.gov/AgendaCenter/ViewFile/Mi nutes/06092015-536 .
<i>Chesapeake</i>	Lawmaker	<i>E.g., Chesapeake City Council, Marked Agenda 2</i> (June 16, 2015), http://chesapeake.granicus.com/DocumentViewer.ph p?file=chesapeake_2a7a2eaf7bc271f04d6bdf87a507 445d.pdf&view=1 .
<i>Hampton</i>	Lawmaker	<i>E.g., Hampton City Council, Council Agenda 3</i> (July 8, 2015), http://www.hampton.gov/AgendaCenter/ViewFile/A genda/07082015-686 .
<i>Roanoke</i>	Lawmaker	<i>E.g., Roanoke City Council, Regular Session 1</i> (July 6, 2015), http://www.roanokeva.gov/DeptApps/CCAgendas.nsf/3cac7f13c72b8ab385256b1b004ec9af/cb39066004 63f6ff85257e76005a168f/\$FILE/ag%2007-06- 15.pdf .
<i>Suffolk</i>	Lawmaker	<i>E.g., Suffolk City Council, Regular Meeting 1</i> (June 17, 2015), http://suffolkva.granicus.com/DocumentViewer.php? file=suffolkva_71766cd88e7df3036e754154c31867f d.pdf&view=1 .
<i>Lynchburg</i>	Lawmaker	<i>E.g., Lynchburg City Council, Meeting 183</i> (June 23, 2015), http://www.lyncburgva.gov/city-council-meetings .

City Name	Who Offers Prayer	Source
<i>Harrisonburg</i>	Lawmaker	<i>E.g.</i> , Harrisonburg City Council, <i>Minutes</i> 1 (July 14, 2015), https://harrisonburg-va.legistar.com/Calendar.aspx .

Table 10. Lawmaker-Led Prayer Practices in West Virginia Counties

County Name	Who Offers Prayer	Source
<i>Berkeley</i>	Lawmaker or Clergy	Berkeley Cnty. Council, <i>Minutes</i> 1 (Apr. 13, 2000), http://www.berkeleycountycomm.org/sharedimg/pdf/minutes/917.pdf (lawmaker-led prayer); Berkeley Cnty. Council, <i>Minutes</i> 1 (June 4, 2015), http://www.berkeleycountycomm.org/sharedimg/pdf/minutes/1820.pdf (clergy-led prayer).
<i>Jackson</i>	Lawmaker	Informal survey by the West Virginia Attorney General's Office field representatives.
<i>Mineral</i>	Lawmaker	Informal survey by the West Virginia Attorney General's Office field representatives.
<i>Pleasants</i>	Lawmaker	Informal survey by the West Virginia Attorney General's Office field representatives.
<i>Ritchie</i>	Lawmaker	Informal survey by the West Virginia Attorney General's Office field representatives.
<i>Tyler</i>	Lawmaker	Informal survey by the West Virginia Attorney General's Office field representatives.

Table 11. Lawmaker-Led Prayer Practices in the Ten Most Populous West Virginia Cities

City Name	Who Offers Prayer	Source
<i>Charleston</i>	Lawmaker	<i>E.g., Charleston City Council, Journal of the Proceedings of the City Council 2</i> (June 15, 2015), http://www.cityofcharleston.org/sites/default/files/journals/council_journal_6-15-15.pdf .
<i>Parkersburg</i>	Lawmaker	Ariel Rothfield, <i>Parkersburg City Council Asked to Drop Prayer Before Public Meetings</i> , 13News (July 8, 2015), http://www.wowktv.com/story/29505688/parkersburg-city-council-asked-to-drop-prayer-before-public-meetings .
<i>Wheeling</i>	Lawmaker	<i>E.g., Wheeling City Council, Minutes 1</i> (June 2, 2015), http://www.wheelingwv.gov/citygovernment.php?id=70 .
<i>Clarksburg</i>	Lawmaker	<i>E.g., Clarksburg City Council, Regular Session 1</i> (June 4, 2015), http://www.cityofclarksburgwv.com/a-public-invitation# .

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT
APPEARANCE OF COUNSEL FORM

BAR ADMISSION & ECF REGISTRATION: If you have not been admitted to practice before the Fourth Circuit, you must complete and return an [Application for Admission](#) before filing this form. If you were admitted to practice under a different name than you are now using, you must include your former name when completing this form so that we can locate you on the attorney roll. Electronic filing by counsel is required in all Fourth Circuit cases. If you have not registered as a Fourth Circuit ECF Filer, please complete the required steps at [Register for eFiling](#).

THE CLERK WILL ENTER MY APPEARANCE IN APPEAL NO. 15-1591 as

☐ Retained ☐ Court-appointed(CJA) ☐ Court-assigned(non-CJA) ☐ Federal Defender ☐ Pro Bono ☒ Government

COUNSEL FOR: State of West Virginia

_____ as the
(party name)

☐ appellant(s) ☐ appellee(s) ☐ petitioner(s) ☐ respondent(s) ☒ amicus curiae ☐ intervenor(s)

/s/ Elbert Lin
(signature)

Elbert Lin
Name (printed or typed)

304-558-2021
Voice Phone

WV Office of the Attorney General
Firm Name (if applicable)

304-558-0140
Fax Number

State Capitol Bldg. 1, Room 26-E

Charleston, WV 25305
Address

Elbert.Lin@wvago.gov
E-mail address (print or type)

CERTIFICATE OF SERVICE

I certify that on 08/03/2014 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by serving a true and correct copy at the addresses listed below:

/s/ Elbert Lin
Signature

08/03/2014
Date