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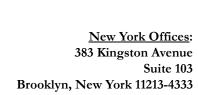
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September 24, 2025



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## VIA Email

Mayor Abdullah H. Hammoud 16901 Michigan Avenue Dearborn, Michigan 48126

Email: mayorhammoud@ci.dearborn.mi.us

Re: Religious Displays in the City of Dearborn

Dear Mayor Hammoud:

It was brought to our attention by residents of the City of Dearborn ("City") that the City has been displaying Islamic religious banners on City property during Ramadan. While the City has many residents who follow the Islamic religion, there are also a considerable number of Christian and Jewish residents.

A photograph of the banners in question appears below:



We were also informed of several other instances where the City demonstrated a preference for Islam over other faiths, including when the Dearborn police and fire departments sold shirts displaying religious Ramadan messages along with the official government emblems for their respective departments, but they did not similarly provide Christians and Jews the opportunity to purchase clothing with a message appropriate to their faith traditions; and when the City failed to erect religious displays for Christians or Jews, but only erected Muslim religious displays or secular holiday displays such as a "Christmas" tree and completely excluded any recognition of our Jewish brothers and sisters; and finally, when you made an invitation as the Mayor on your government email to celebrate an Iftar meal for Ramadan, but made no similar outreach efforts to celebrate a Passover or Easter meal.

While all of the residents of the City do not share the same faith, they do share the same rights guaranteed under the United States Constitution. Indeed, it is because of the fundamental right to religious exercise found in the First Amendment that members of diverse religions, including Muslims, are able to practice their faith freely in our great country. The same cannot be said about many Islamic nations, which forbid the practices of Christianity and Judaism under pain of often severe penalties.

Unfortunately, the City has a long history of discriminating against individuals, specifically Christians, who do not share the Islamic faith, and this has often resulted in litigation that favored the Christians. See Saieg v. City of Dearborn, 641 F.3d 727 (6th Cir. 2011) (striking down a restriction on a Christian pastor's right to distribute religious literature during the Arab festival held in the City of Dearborn); Acts 17 Apologetics v. City of Dearborn, No. 11-cv-10700, 2012 U.S. Dist. LEXIS 197041 (E.D. Mich. Feb. 7, 2012) (denying the City's motion to dismiss the lawsuit filed by Christians who alleged that they were unlawfully arrested for evangelizing during the Arab festival held in the City of Dearborn); Bible Believers v. Wayne Ctv., 805 F.3d 228 (6th Cir. 2015) (holding that law enforcement violated the constitutional rights of Christians at the Arab festival held in the City of Dearborn).

In April 2024, video captured pro-Palestinian protestors chanting "death to America" and "death to Israel" in the City. This protest was widely reported across the country. As noted in the story reported by The Detroit News, "The chants were denounced by Dearborn's mayor and other locals," and rightfully so as such hostility is exceedingly divisive.

However, it was recently reported that you had a verbal altercation with a Christian resident who was exercising his right to free speech at a City Council meeting. The resident was expressing his objections to two intersections being renamed after an individual that he believed was "a promoter of Hezbollah and Hamas," which are officially designated as terrorist organizations by the United States government. After accusing the speaker of being racist, bigoted, and an Islamophobe for expressing his concerns to the City Council, you reportedly stated, "Although you live here, I want you to know as mayor, you are not welcome here." Unfortunately, there are many residents, in particular Christians and Jews, who do not feel "welcome" in your City.

https://www.detroitnews.com/story/news/politics/2024/04/08/death-to-america-chantdearborn-jihad-rally-al-quds-day-draws-condemnation/73247053007/).

<sup>&</sup>lt;sup>2</sup> (See https://www.foxnews.com/us/dearborns-muslim-mayor-tells-christian-hes-not-welcomedebate-honoring-pro-terror-arab-leader).

As the U.S. Supreme Court stated decades ago in West Virginia State Board of Education v. Barnette, 319 U.S. 624, 642 (1943), "If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion or other matters of opinion. . . . " According to the Court, "Government in our democracy, state and national, must be neutral in matters of religious theory, doctrine, and practice. It may not be hostile to any religion or to the advocacy of no religion; and it may not aid, foster, or promote one religion or religious theory against another or even against the militant opposite." Epperson v. Ark., 393 U.S. 97, 103-04 (1968). In short, "[t]he clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another." Larson v. Valente, 456 U.S. 228, 244 (1982). The Framers and the citizens of their time not only sought to protect the right of individual conscience in matters of religion, but they also wanted to guard against civic divisiveness that often follows when the government weighs in on the side of one religion.

The bottom line is that the City of Dearborn has become a hostile place for Christians and Jews. Your City's singular celebration of Ramadan through the display of the banners discussed previously is one factor fueling this hostility.

To help heal those in your City who feel like outsiders due to the singular promotion of Islam, we would request that the City display at the appropriate time banners similar in size and content to the Ramadan banners that recognize the holy days of Christians and Jews, such as Christmas, Easter, Rosh Hashanah, and Yom Kippur, respectively. We are happy to work with you on the content and design of these banners.

We look forward to a favorable reply.

Sincerely,

Robert J. Muise, Esq.

David Yerushalmi, Esq.

cc: Jeremy Romer, City Attorney, via email (jromer@ci.dearborn.mi.us)