


WATCHTOWER
Bible and Tract Society of New York, Inc.

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August 30, 2019

Bill Jeffrion, President
Meadowlark Lakes & Villas Homeowners' Association
10738 Crane Drive
Indianapolis, IN 46231-1055

VIA USPS PRIORITY MAIL

Re: Jehovah's Witnesses

Dear Mr. Jeffrion:

We have been informed that the Meadowlark Lakes & Villas Homeowners' Association is under the impression that its "No Solicitation" policy applies to the pure speech activity of Jehovah's Witnesses. We are writing to inform you that U.S. Supreme Court precedent does not support the Association's application of this policy to Jehovah's Witnesses.

Jehovah's Witnesses seek to speak to people about the Bible's message and may offer Bible-based literature, at no cost, to those who might be interested. As part of their public ministry, the Witnesses do not seek contributions, nor do they engage in any kind of fund-raising or commercial or charitable sales activity. If a homeowner is not interested in the Witnesses' message, the ministers will promptly and politely take their leave.

The U.S. Supreme Court has ruled repeatedly that the public ministry of Jehovah's Witnesses is entitled to the full protection of the First Amendment to the U.S. Constitution. *E.g., Watchtower Bible and Tract Society of New York, Inc. v. Village of Stratton*, 536 U.S. 150 (2002). As the streets within your community are public, Jehovah's Witnesses may lawfully engage in their constitutionally protected free speech activity. *See Frisby v. Schultz*, 487 U.S. 474, 480 (1988) ("a public street does not lose its status as a traditional public forum simply because it runs through a residential neighborhood"); *cf. Flower v. United States*, 407 U.S. 197, 198-99 (1972) (the First Amendment prevented a military base that was open to the public and treated as part of the surrounding city from prohibiting free speech activity within the base).

Therefore, we have advised the local ministers accordingly. We trust you will ensure that there will be no interference with their ministry. If you have any comments or concerns about this matter, please have the Association's attorney correspond with us.

Very truly yours,



Carolyn R. Wah
Associate General Counsel

CRW:pss

c: Jared McKee, Plainfield Chief of Police

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