

What Does God Have to Do with Sports?
Religion and Secularism in Professional Soccer and Football

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ABSTRACT

This thesis explores the intersection of secularism and sport, specifically examining how secularism operates as a metaphorical combat between religion and nonreligion in the public sphere. Focusing on two major sports leagues, the NFL in the United States and Ligue 1 in France, this study analyzes how the respective nations' approaches to secularism influence the role of religion in sports culture and the public lives of athletes.

In the U.S., where secularism often coexists with strong religious expressions in the public sphere, the NFL provides a unique case study of how religious practices, such as player prayers or public displays of faith, are integrated into the culture of the sport. In contrast, France's strict interpretation of *laïcité* creates a different dynamic in Ligue 1, where religion is largely excluded from the public domain, especially in government and state-run spaces. This thesis argues that the difference in these secular frameworks shape not only the ways in which religion and sport intersect but also the cultural perceptions and acceptability of religious expression in these leagues.

Drawing on historical and sociological perspectives, the study frames secularism as a battleground where different conceptions of religious freedom and expression are contested. Ultimately, this research contributes to understanding secularism not merely as a political or legal issue, but as an ongoing cultural combat that plays out in the realm of sports, where athletes, fans, and organizations negotiate the boundaries of faith and secular identity.

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INTRODUCTION

Mitt Romney is perhaps the best example of a political candidate who has outsized religious views. In the 2012 presidential election against Barack Obama, his faith as a member of the Church of Jesus Christ of Latter-Day Saints became widely known, and his faith was a point of consideration for American voters, as it often is for candidates. As Danielle Kurtzleben notes in an NPR article: “White evangelicals voted overwhelmingly for [him], 79 to 20 percent. But people who claimed no religious affiliation voted overwhelmingly for President Obama – 70 percent to 26 percent.”¹ However, politics and religion are meant to remain separate in the United States. That is simply not the case. If a candidate claims to be an atheist, that will likely doom their campaign before it even got started; a Pew Research poll found that 53% of Americans would be less likely to vote for a presidential candidate that is atheist, while only 5% indicated that would make them more likely to support that candidate.²

What does this suggest? A secular nation makes it clear that being nonreligious is a disadvantage in the pursuit of power. While the US brands itself as a secular country, its version of secularism is hazy at best. There is not a clear line where the church ends, and

¹ Kurtzleben, Danielle. “‘Religious Nones’ Are Growing Quickly.” June 12, 2015. <https://www.npr.org/sections/itsallpolitics/2015/06/12/413654984/americas-religious-nones-are-growing-quickly-should-republicans-worry>. This NPR article discusses the rise of those who are unaffiliated with any religious group, and their mounting political power.

² “For 2016 Hopefuls, Washington Experience Could Do More Harm Than Good.” Pew Research Center, May 19, 2014. <https://www.pewresearch.org/politics/2014/05/19/for-2016-hopefuls-washington-experience-could-do-more-harm-than-good/>. Pew Research poll interviewed 1,501 adults in April of 2014, asking them how several traits would impact their likelihood of supporting a candidate. The most positive traits were military service, being a governor, and a business executive. The most negative traits were having an extramarital affair, having never held public office, and the most negative of all was being an atheist.

the government begins on certain topics and issues. It is extremely common for a political figure to gain support based on his or her religious group, or simply their affiliation with being a Christian. This is particularly common in the Republican Party, which frequently makes overt references to Jesus Christ or the Bible to appeal to evangelical voters.

Certain hot-button topics, most notably abortion, are leveraged to mobilize religious sentiment, further entrenching faith in the political landscape. With much of the U.S. claiming to be Christian, many of these topics bring about visceral reactions that can doom a candidate's chances to succeed at the polls before he or she finishes a sentence.

Even when candidates do not overtly rely on their Christian faith to bring out voters, there is a clear connection between Christian faith and political success. The best example of this might be that there has never been an openly atheist president in history, even though the faiths of Thomas Jefferson,³ Abraham Lincoln,⁴ and William Howard Taft⁵ were each questioned at different times during their political careers. On the other hand, there is Jimmy Carter who made his faith a cornerstone of his political legacy.⁶

³ Beliles, Mark, Jerry Newcombe, Garrett Ward Sheldon, and Peter A. Lillback. *Doubting Thomas?* This book was written to discuss the faith and religious life of Thomas Jefferson. The book focuses on the question: was Thomas Jefferson a religious person, or was he a free-thinking humanist?

⁴ "Collected Works of Abraham Lincoln. Volume 1 [1824-Aug. 28, 1848]." In the digital collection Collected Works of Abraham Lincoln. <https://name.umdl.umich.edu/lincoln1>. University of Michigan Library Digital Collections. Accessed November 2, 2024. This put all the works of Lincoln in one place, including 'Handbill Replying to Charges of Infidelity,' where he is replying to the charge that he is not a Christian. These charges were made by his political opponent at the time, the Rev. Peter Cartwright.

⁵ "Taft as a Churchman." *The New York Times*, June 17, 1908. <https://timesmachine.nytimes.com/timesmachine/1908/06/17/104733263.html?pageNumber=2>. This article was written in the New York Times as a response to the accusation that Taft was not a Christian. He was in fact a Universalist, as were his parents.

⁶ Rice, Matthew Dale. "Deacon of the Cold War." This thesis discusses the faith of Jimmy Carter and its influence on his foreign policy.

France, too, claims to uphold secularism. Both nations declare themselves to be secular states, giving no preferential treatment to any religion, faith or creed. How these two nations go about this secularism is very different. Across the Atlantic, France follows a much stronger style of secularism. Though controversial, France tries to follow the rule of thumb that no religion should be allowed in the public space. This has led to the infamous law that states no headscarves may be worn in public schools, which has been in place since 2004.⁷ Even though France has the largest population of Muslims in Western Europe, at approximately 4.5-6 million, these laws prevent the wearing of symbols or clothes by which students outwardly show religious affiliation is prohibited. “While the text of the law facially applies to all belief systems, its application reflects that the quintessential French principles of secularism are not uniformly applied across religious groups.”⁸ This tension between secularism and religious expression extends beyond politics and into another key sphere of public life: sports.

Sports are thought of as an escape from the rest of the world; a realm where politics, religion and economics hold no sway. At first glance, this perspective makes

⁷ Pahl, Jordan. “VIOLENCE IMPLICIT IN HIJAB SUPPRESSION LAWS IN UZBEKISTAN, TAJIKISTAN, AND FRANCE UNDER THE CEDAW FRAMEWORK.” *Washington International Law Journal* 28, no. 3 (July 2019): 727–61.
https://utk.primo.exlibrisgroup.com/permalink/01UTN_KNOXVILLE/9go8o8/cdi_rmit_agispt_search_info_rmit_org_doi_10_3316_agispt_20200107022450. This article examines three instances of laws banning hijab, the headscarf worn by many Muslim women. These laws, as enacted in Soviet Uzbekistan, France, and Tajikistan provide justifications for violence against women on several levels and, as such, violate the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). The stigmatization of Muslim women these laws perpetuate result in women’s lack of access to work and education and act as a catalyst for violence against women who violate these laws. This paper argues that hijab suppression laws violate CEDAW on several levels; not only do these laws result in Muslim women’s disparate access to education and work but also have the effect of justifying and perpetuating violence against women.

⁸ Ibid.

sense. After all, there is nothing inherently political, or religious, or economical in the many games that are played around the world, from casual groups to professional leagues. While these aspects of the game are oftentimes harder to grasp or see in the amateur divisions and in perhaps some leagues around the world, these undercurrents of modern professional sports are very much there. Even now in college sports, which has long been admired for its so-called commitment to amateurism, there is now the presence of Name, Image, and Likeness deals, or NIL. These deals, along with the soon to come revenue sharing, force fans all over the United States to reckon with the fact that even college sports are not as ‘pure’ as it once was thought to be. As financial stakes grow, sports become less of an escape and more of a reflection of broader societal forces.

In the professional leagues, the ‘world’ is very much present, and impossible to ignore. This means that politics, religion and money are very easy to see. In the NFL, the greatest example where this was seen (and pushed back against) was the kneeling of Colin Kaepernick, the former quarterback of the San Francisco 49ers. As he knelt during the 2016 preseason and regular season “in opposition of social injustices and systematic oppression,” he faced intense media scrutiny and public pressure.⁹ This created a huge problem for the NFL, as viewership declined about 9% compared to the previous year,

⁹ Bradley, Kevin, Matthew Morcio, Alec Sims, and Amanda G McKendree. *The National Football League : Who Gets to “Take a Knee?” (A)*. London: The Eugene D. Fanning Center for Business Communication, Mendoza College of Business, University of Notre Dame, 2018. https://utk.primo.exlibrisgroup.com/permalink/01UTN_KNOXVILLE/bcmt7h/alma9926047587402311. This case study focused on Colin Kaepernick and how his kneeling presented a problem for the NFL in terms of its profits. The piece provides quotes from the NFL game operations manual on the national anthem, reactions from players and Dallas Cowboys owner Jerry Jones, as well as the political ramifications with Trump in office. It also includes information on the Pittsburgh Steelers and the incident in which Alejandro Villanueva was seen outside of the team tunnel alone, where he was portrayed as an American hero, even though he later said this was not his intent, and he got separated from the team accidentally.

though the direct impact of the protests on these numbers remains debated.¹⁰ Criticism of Kaepernick spanned from everyday fans to the highest levels of government, as then-President Donald Trump condemned him and other kneeling players.

Much of this backlash can be understood within the broader history of the NFL's relationship with its fanbase. During the 1990s, the NFL was the only major American sports league that avoided a work stoppage, as MLB, the NHL, and the NBA all experienced strikes or lockouts. This stability helped cement the NFL's reputation as a 'pure' team sport, in contrast to the perceived individualism of other leagues. Even as labor disputes and rising salaries challenged this image, many fans continued to see the NFL as a bastion of tradition, making Kaepernick's protest especially divisive.

Football, in both its forms, is the most popular sport in the world. Approximately 1.1 million men play American football at the high school level and above. Not included in this count is the over 2,500 high schools in the U.S. that sponsor girls tackle football.¹¹ In comparison to this, in the U.S., during the 2022-2023 academic year 828,000 students were reported to play soccer at the high school level,¹² with the number of players

¹⁰ Deitsch, Richard. "Why the NFL's Ratings Saw a Steep Decline in 2017." *Sports Illustrated*, January 3, 2018. <https://www.si.com/media/2018/01/03/nfl-ratings-decline-espn-fox-nbc-network-tv>. This piece was written to help explain why the NFL's viewership declined in 2017. Two experts (Austin Karp and Anthony Crupi) are asked for their explanation for this. They hardly reference the then-ongoing protests of NFL players and the national anthem, instead offering explanations that focus on the competitiveness of games, as well as the NFL not changing the time slots of games to better increase viewership. This is complicated because of competing networks trying to broadcast the best games.

¹¹ National Football Foundation. "Football by the Numbers." National Football Foundation, July 25, 2023. <https://footballfoundation.org/news/2023/7/25/football-by-the-numbers.aspx>. This is from a survey done by the National Football Foundation and College Hall of Fame which lists how many players there are at the different levels of football, from high school to the NFL. It also lists the rate at which players made each successive level, such as high school to college, and college to the NFL, and college and university graduation rates for players.

¹² High School Athletics Participation Survey. Accessed November 11, 2024. <https://www.nfhs.org/media/7213111/2023-24-nfhs-participation-survey-full.pdf>. This is from a survey

competing in college numbering around 77,000.¹³ With 29 teams currently playing in Major League Soccer, the highest professional league in the United States and Canada, there are around 870 rostered players at the highest professional level. These numbers do not fully reflect the popularity of soccer worldwide, since nearly every nation around the globe participates in the sport. In France, this popularity is no different, as the FFF (the French Football Federation) reports 2.3 million registered members for the 2023-2024 season which makes up 3.3% of the total population of the country. In a country with 68 million citizens, soccer is far and away the most popular sport.^{14 15}

What can be gained from comparing these two leagues, nations and approaches to secularism? The hope for this work is to be a comparison, to show how these two nations differ vastly in their approaches to secularism and sport. Particularly, I find it noteworthy to discuss how these approaches are reflected not only in the general culture of France

done by the NFSHSA, which lists how many schools and athletes participate in nearly every sport offered at the high school level for boys and girls. It also lists the 10 most popular sports for the year surveyed, which was 2022-2023.

¹³ NCAA.org. "Estimated Probability of Competing in College Athletics." NCAA, April 1, 2024. <https://www.ncaa.org/sports/2015/3/2/estimated-probability-of-competing-in-college-athletics.aspx>. This comes from NCAA Research, which lists the probability of athletes in several different sports competing at the NCAA level. For men's football, the percentage is 7.5%, while the percentage for soccer is 6.1%. For women, the percentage for soccer is 7.9%.

¹⁴ Gaillard, Claire. "Près de 2,4 Millions de Licences En 2023-2024." French Football Federation, June 8, 2024. <https://www.fff.fr/article/12662-pres-de-2-4-millions-de-licences-en-2023-2024.html>. This report comes from the French Football Federation, which lists the total number of registered players in the country. It also lists on the page the links to previous years' numbers, with 2023-2024 being the highest on the record, going back to 2014-2015. 2023-2024 was the first year that broke 2 million players.

¹⁵ Papon, Sylvain. "Demographic report 2022 - Insee Première - 1935." INSEE, January 17, 2023. <https://www.insee.fr/en/statistiques/6797730>.

This report comes from the National Institute of Statistics and Economic Studies, which lists the population of France, and its trends of births and deaths. In January 2023, the population of France was 68.0 million, which was an increase of .3% in 2022. Overall, the population of France has been falling for the last several years.

and the United States, but also in the sporting culture that is shown to the world through their matches. In France, Ligue 1's refusal to accommodate Ramadan breaks for Muslim players shows the country's rigid secularism, while the U.S. exhibits a more ambiguous, yet still deeply religious, approach.

Since this is a work focusing on secularism, it would be worthwhile to discuss what secularism is. Popular belief is that it is simply a separation of religious life from public life, a neutral wall is put up to keep these 2 conflicting forces apart. But secularism, as I argue, is not neutral at all. Much like sports themselves, secularism is a competition, a battle for dominance between religious and non-religious forces, constantly waged in the public sphere. Just as sports are often framed in the language of combat, secularism is not merely a passive boundary. It is an arena in which ideologies clash, where faith and nonbelief vie for cultural supremacy.

SECTION 1: WHAT IS SECULARISM?

As Phil Zuckerman puts it in his book *Faith No More: Why People Reject Religion*, “A wind of secularity is currently blowing across North America.”¹⁶ As much of the United States turns away from religion, it is important to not only define what exactly secularism is, but to understand its importance. Secularism is most often invoked in the political sense, since “modern, diverse democracies have to be ‘secular’ in some sense of this term.”¹⁷ According to Charles Taylor, there are two key conceptions to discuss when discussing secularism, since one perspective sees secularism as primarily about regulating religion, determining its role in public life and ensuring it remains within those set boundaries. The other perspective views secularism as a system for managing religious and philosophical diversity in a way that is fair and democratic.¹⁸ In this argument, secularism is a sort of balancing act that a government must make if it wants to claim the coveted title of ‘secular.’ Since no free, democratic government wants to be defined as theocratic nor religiously suppressive, it is often imperative to maintain the appearance of neutrality in the face of religious and nonreligious pressure.

Somewhat similarly to Taylor, Jacques Berlinerblau writes in *How to be Secular: A Call to Arms for Religious Freedom*, “Secularism is a political philosophy, which, at its

¹⁶ Zuckerman, Phil. *Faith No More: Why People Reject Religion*. 1st ed. Oxford: Oxford University Press, 2011. <https://doi.org/10.1093/acprof:oso/9780199740017.001.0001>. This work explores personal stories of people who were formerly religious but are no longer affiliated with any religious group.

¹⁷ Taylor, Charles. “How to Define Secularism.” In *Plight and Fate of Children during and Following Genocide*, 541–60, 2017. <https://doi.org/10.4324/9781315244624>. This book chapter works through how Taylor argues for how secularism should be defined, by working through several examples, particularly in the United States and France.

¹⁸ Ibid, 541.

core, is preoccupied with, and often deeply suspicious of, any and all relations between government and religion. It translates that preoccupation into various strategies of governance, all of which seek to balance two necessities: (1) the individual citizen's need for freedom of, or freedom from, religion, and (2) a state's need to maintain order."¹⁹ As Berlinerblau argues, secularism provides freedom, and "this type of freedom is secularism's essence...this is the end to which all genuine secularisms aspire."²⁰ Another definition, put forth by Gerard Phillips from the National Secular Society in the United Kingdom is as follows: "A shorthand definition of secularism is that it advocates the separation of Church and state though beyond that there is no universally agreed meaning of the term."²¹ To put it simply, there is no overarching definition for secularism. There are distinctions that must be made "between secularism as ideology and secularism as statecraft principle."²² He makes the point that as an ideology it theorizes religion as a fixed entity with essential characteristics, often framing it as irrational or outdated, while as a statecraft principle, it is the neutral separation of religion and state. Therefore, as a

¹⁹ Berlinerblau, Jacques. *How to Be Secular: A Call to Arms for Religious Freedom*. Boston: Houghton Mifflin Harcourt, 2012. In this book, Berlinerblau makes the argument that the type of secularity that was present in the American political system during the mid-twentieth century "has fallen upon some very difficult times. New ideas, new energy, and most of all new people are needed to resurrect it in America today." (xiii)

²⁰ Ibid, xvi.

²¹ Phillips, Gerard. "Introduction to secularism." *London: National Secular Society* (2011). This quote comes from page nine. The article attempts to introduce someone who is new to living a secular lifestyle.

²² Casanova, José. "The secular and secularisms." *Social Research: An International Quarterly* 76, no. 4 (2009): 1049-1066. This quote comes from the abstract. This essay starts by distinguishing between "the secular," "secularization" and "secularism." After this, the essay gets into its main argument of exploring the distinction between secularism as an ideology and secularism as a statecraft principle. The essay then draws a contrast between attitudes of Europeans, who view secularism because of modernity and Americans whose modernization has not led to widespread secularization.

statecraft principle, secularism is the separation of religion and state to ensure individual freedoms, equal citizen access and state neutrality.

These are noteworthy distinctions as I progress through this piece, as different authors and researchers have different ideas of what secularism is or what it should be. Some, like Berlinerblau, take an aggressive stance in saying that secularism should be defended, while others, such as Casanova, report the consensus is that as a society becomes more modern, the more secular it becomes; that is, the less religious it is supposed to become.

Regardless of how it is conceived or thought of, secularism has experienced an explosion of popularity, as shown in the 12% growth of U.S. adults who identify as religious ‘nones’ from 2007 to 2023 (“the term comes from the ‘none’ option on surveys”).²³ Pew Research Center data shows that the majority of these ‘nones’ believe in God or another deity of some kind. But very few go to religious services with any regularity.²⁴

As secularism is on the rise, so are non-religious groups. Some examples are the Freedom From Religion Foundation, which had a membership in 2023 of “more than 40,000, a historic high. FFRF has more than doubled its membership in the past decade

²³ Smith, Jesse M., and Ryan T. Cragun, eds. *Secularity and Nonreligion in North America: An Introduction*. London; Bloomsbury Academic, 2024. This quote comes from page seven, which is in the introduction. The book discusses the current state of secularism in North America.

²⁴ “Religious ‘nones’ in America: Who They Are and What They Believe.” Pew Research Center, January 24, 2024. <https://www.pewresearch.org/religion/2024/01/24/religious-nones-in-america-who-they-are-and-what-they-believe/>. This comes from the Pew Research Center, which discusses those in America who list ‘none’ as their answer for religious sections of survey.

([they] were at 19,801 in 2013).”²⁵ Another organization is the Secular Student Alliance, which today has 237 student organizations, with a listed number of 423,580 students impacted.²⁶ As Jesse M. Smith and Ryan T. Cragun note in *Secularity and Nonreligion in North America*, since there is now significant scholarly interest in the field, and substantial empirical literature to draw from. This interest is evidenced in part by new funded research in the area, an international professional organization called the Nonreligion and Secularity Research Network, and two academic journals devoted solely to the topic: *Secularism* and *Nonreligion* and *Secular Studies*.²⁷

While it is possible that the number of religiously affiliated adults in the U.S. has peaked, the 2023 Pew Research Center’s polling showed that 28% of U.S. adults affiliated with that classification.²⁸ However, this group of ‘nones’ are not always atheist or agnostic, but more often than not, this group of people do believe in God or some other

²⁵ “Year in Review, Membership Reports, 990 Forms.” Freedom From Religion Foundation, December 27, 2024. <https://ffrf.org/about/year-in-review/>. This work is a list of the achievements and victories the FFRF has achieved last year, including membership numbers rising, litigation being filed, and legal rulings in their favor. Other victories include funds awarded for students and others for reflecting the Foundation’s values of separating church and state.

²⁶ Secular Student Alliance. “A National Network for Nonreligious Students.” Accessed October 29, 2024. <https://secularstudents.org/>. This is from the home page of the organization, which states that it empowers secular students to proudly express their identity, build welcoming communities, promote secular values, and set a course for lifelong activism.

²⁷ Smith, Jesse M., and Ryan T. Cragun, eds. *Secularity and Nonreligion in North America: An Introduction*. London; Bloomsbury Academic, 2024. This quote comes from page two.

²⁸ Smith, Gregory A., and Alan Cooperman. “Has the rise of religious ‘nones’ come to an end in the U.S.?” Pew Research Center, January 24, 2024. <https://www.pewresearch.org/short-reads/2024/01/24/has-the-rise-of-religious-nones-come-to-an-end-in-the-us/>. This article from Pew Research Center, which discusses the rise of religiously unaffiliated adults in the U.S. The article admits that it’s too early to tell whether or not this population will continue to rise, but in the last five years, they haven’t found any readings below 28% of the U.S. adult population. It is possible that the ‘nones’ have leveled off, or it could be that the growth hasn’t shown yet “in the data due to the natural fluctuations that can offer in survey estimates,” as the article states.

higher power. So, while this category is not perfect in describing the (potentially) growing portion of the population of the U.S, it does a good job of casting a broad net to those who are at least somewhat secular. Contrasting the American populace, surveys in France indicate a much more secular population. According to the National Institute of Statistics and Economic Studies, 51% of the population aged 18 to 59 declared to have no religion.²⁹ For a comparison, globally, the percentage of religiously unaffiliated in France and the United States are significantly both above the global percentage, which stood at 16% in 2015.³⁰

Secularism is not the same idea as atheism, even though these terms often are used interchangeably. Atheism is in itself a style of ‘belief’ in the non-existence of a divine being, which can then be divided into positive and negative atheism. The distinction is simply that positive atheism is where one is aware and chooses not to believe in a certain deity or higher power. Negative atheism is where one is unaware of the existence of the purported existence of a certain god, so one cannot choose to disbelieve such a god.³¹ Secularism tends to fashion itself as merely a separation of holy

²⁹ Drouhot, Lucas, Patrick Simon, and Vincent Tiberj. “Immigrés et descendants d’immigrés Édition 2023.” Insee, March 30, 2023. <https://www.insee.fr/fr/statistiques/6793308?sommaire=6793391>. This survey information focuses primarily on the immigrants of France and their descendants. This population was much more likely to be religious compared to those whose family was from France. Overall, immigrants who arrived in France after turning 16 were nearly twice as likely to be affiliated with a religion compared to those with no recent immigrant ancestry; 81% to 42%.

³⁰ “The Changing Global Religious Landscape.” Pew Research Center, April 5, 2017. <https://www.pewresearch.org/religion/2017/04/05/the-changing-global-religious-landscape/>. This 2015 Pew Research Center report analyzed 2,500 data sources, primarily censuses and general population surveys. This report is focused on the future trends of different religious groups, including those that are religiously unaffiliated. The report predicts that the population of religiously unaffiliated people will peak as a total number in 2040 then decline afterwards, while the percentage of global population will decline every decade after 2010.

³¹ Smith and Cragun, *Secularity and Nonreligion in North America*, 5.

and unholy matters, a concept that inevitably leads to nonreligious governance. At least, that seems to often be the popular opinion. In the context of this piece, however, I would argue that secularism is more of a metaphysical space than just an idea. In this way, secularism is more than just a principle of governance, it is a contested space, a field or pitch where religious and nonreligious actors actively compete for influence. While secularism is often framed as a form of neutrality, this neutrality does not eliminate conflict; rather it enables it by creating an arena in which different groups struggle over the meaning and application of secular principles. In this sense, secularism mirrors the structure of a competitive game, where opposing sides are forced into the same space and must contend with one another for control.

This dynamic can be observed in various contexts, but perhaps one of the clearest examples is sports, where competition is not just incidental but fundamental. Sports do not merely serve as pastimes; they structure human rivalry within a defined set of rules, turning conflict into a regulated contest. The language used in sports reflects this combative nature, with metaphors that evoke warfare and struggle. This is a well-established phenomenon, reflecting the competitive and combative nature of athletic contests. This is particularly evident in American football, where the physicality of the game and the strategies involved closely align with military tactics. The way sports frame competition can shed light on how secularism operates—not as a passive absence of religion, but as an active space where religious and nonreligious forces compete for public legitimacy.

The language of fighting and combat is especially prevalent in American football, where the violence of the game is both common and integral. To better understand this dynamic, we can look at how sports, particularly American football, function as symbolic battlegrounds, both in language and in practice. One of the best illustrations of this can be found in the coaching philosophy of General Robert Neyland, the legendary University of Tennessee football coach, who framed the game as an extended battle. One of his most famous principles, the seventh in a list of seven, urges players to "Carry the fight to our opponent and keep it there for 60 minutes."³² The phrasing is unmistakably combative, suggesting not just a game, but an ongoing war for dominance. Football in this sense is not just an athletic endeavor; it is a structured combat within a controlled environment. The inherent violence in football creates the idea that football in itself is a style of combat, since these comparisons are easy to make. However, this comparison between sports and combat is made often, for various reasons. Some sports involve direct physical engagement, such as football or wrestling, while sports also often require tactical planning, teamwork and decision-making, which can be similar to warfare. Furthermore, there is always risk involved when playing a high-level sport, but particularly in contact sports, and this risk can parallel the personal stakes of combatants. The words associated with sporting actions often carry overtones of combat, such as sacking a quarterback (which comes from sacking a city), a blitz (from blitzkrieg), or even attacking and

³² Creekmore, Betsey. "Game Maxims of Coach Robert R. Neyland." Volopedia. University of Tennessee Libraries, October 8, 2018. <https://volopedia.lib.utk.edu/entries/game-maxims-of-coach-robert-r-neyland/>. This is a web page run by UT libraries, which lists the most famous 7 of General Neyland's Maxims.

striking in soccer.³³ Sports and combat also involve elaborate rituals, like pre-game ceremonies (such as the famous haka performed by the New Zealand national rugby team), national anthems, and halftime shows, which can mirror the spectacle of a military parade or war memorials, such as the Tomb of the Unknown Soldier changing of the guard. There are also intense emotions involved in sporting events often from tapping into intense tribalism, creating the classic “us versus them” mentality. These feelings on an extreme level can lead to incidents of hooliganism, which is defined as “rowdy, violent, or destructive behavior.”³⁴ In particular, hooliganism often refers to moments of violence by sports fans, and Ligue 1 is no exception. In particular, groups known as ‘ultras’ (hardcore fan groups) can be more prone to these outbursts. A notable example of this violence includes Lens’s victory over Lille on September 18th, 2021, where Lens fans invaded the pitch, requiring riot police and steward intervention before the game resumed under the watchful eyes of police supervision.³⁵

As sports create an avenue for tribalistic conflict and striving for dominance on the field or pitch, I argue that secularism is a state where neutrality is supposed to rule supreme. Secularism requires balance, since neither endorse religion nor oppose it, so this

³³ “Jones, NFL Coiner of ‘sack the Quarterback,’ Dies at 74.” CNN, June 4, 2013. <https://www.cnn.com/2013/06/04/us/sport-deacon-jones-death/index.html>. This CNN article from 2013 briefly recounts David “Deacon” Jones’s life in football, where he was a renowned defensive end, primarily for the Los Angeles Rams.

³⁴ Merriam-Webster.com Dictionary, s.v. “hooliganism,” accessed January 20, 2025, <https://www.merriam-webster.com/dictionary/hooliganism>. This webpage lists the definition of hooliganism.

³⁵ “Lens 1-0 Lille (Sep 18, 2021) Game Analysis.” ESPN, May 17, 2023. https://www.espn.com/soccer/report/_/gameId/609474. This comes from ESPN, which recounts the game details, including how the second half of the game started late due to crowd invasion of the pitch, which required riot police and steward intervention in order to continue the match.

neutrality often becomes a battleground where religious and nonreligious groups contest what “neutrality” means. As Rosenfeld wrote in his work: “Secularism is not what it appears to be; it is too much for some; and, at the same time, too little for others.”³⁶ For some, this is seen as equal treatment of all beliefs, while others view secularism as an exclusion of religion from the public sphere altogether. This exclusion “imposes closed secularism—a model that attempts to exclude religion from the public square by relegating its conspicuous manifestations solely to private life.”³⁷ As religious values and secular principles battle through public policy, these forces try to shape societal norms, with varying success.

The methods for interpreting and implementing secularism are many and vary widely. The French method of *laïcité* involves primarily an attempt to completely remove religion from the public sphere entirely, which creates problems for religious groups who require wearing items like a headscarf, or for those who might simply wish to wear something like a cross necklace. As Rosenfeld wrote it is “the militant secularist model bent on keeping religion completely out of the public sphere.”³⁸ The American method of

³⁶ Rosenfeld, Michel. “Can Constitutionalism, Secularism and Religion Be Reconciled in an Era of Globalization and Religious Revival?” *Cardozo L. Rev.* 30 (2008): 2333. <https://larc.cardozo.yu.edu/faculty-articles/152/>. This is from the introduction of the article, which discusses different models of secularism in the context of the Enlightenment.

³⁷ Le Coz, Alexandre. “Laïcité: A Model or a Threat for Freedom of Religion?” Religious Freedom Institute, July 6, 2022. <https://religiousfreedominstitute.org/lacit-a-model-or-a-threat-for-freedom-of-religion/>. This 2019 article discusses the French model of secularism in conversation with the OSCE, or Organization for Security and Co-operation in Europe. The OSCE has commitments towards freedom of religion or belief, but the implementation of *laïcité* in recent years has sometimes violated these commitments. The article asks the question: how can the French government maintain its commitment to their model of secularism while staying true to their commitments with the OSCE?

³⁸ Rosenfeld, Michel. “Can Constitutionalism, Secularism and Religion Be Reconciled in an Era of Globalization and Religious Revival?” *Cardozo L. Rev.* 30 (2008): 2333. <https://larc.cardozo.yu.edu/faculty-articles/152/>.

secularism is arguably less clear, with the Establishment Clause providing the way for the government to not officially prefer any religious group over the other, creating the separation between church and state. Rosenfeld wrote that this is “the agnostic secularist model that seeks to maintain a neutral stance among religions but does not shy away from favoring religion over atheism and other non-religious perspectives.”³⁹ While it is often said that at its base or foundation, secularism is simply a separation between church and state, this is not an easy statement to make. I make the argument that secularism creates a field in which these forces compete for influence, since secularism is supposed to just be neutrality, allowing for competition between religious and nonreligious groups. Just as different sports have different rules for structuring competition, different nations have their own frameworks for managing religious and non-religious groups in the public sphere. This big, complex idea of secularism has been spotted all over the world, with Rosenfeld identifying five different, broad methods of jurisprudence.⁴⁰ A true ‘modern’ government is expected to be secular, even in governments where there is an official state religion (this is model four on his list). Secularism has a tortuous history, and every nation arrives at this idea differently.

³⁹ Ibid.

⁴⁰ Ibid.

SECTION 2: THE HISTORY OF SECULARISM IN THE U.S. AND FRANCE

France

As a political phenomenon, secularism has its origins in ancient Greece, India, particularly “under the emperors Ashoka (3rd century BCE) and Akbar (1556-1605), and in the Islamic Ottoman Empire’s system of autonomous self-governing religious communities.”⁴¹ Ashoka in particular is renowned for his religious tolerance, making possible the argument that he was one of the first rulers in the world to be somewhat secular in his political philosophy. While the origins of secularism are impossible to firmly nail down to one time and place, it is much less difficult to do so in the French mindset. The concept of *laïcité* has its modern roots in the 1789 Declaration of the Rights of Man and of the Citizen. It is difficult to overstate the importance of this text in the context of the modern French state. Inspired by the Declaration of Independence and the Enlightenment, this document created a new era for France’s relationship with the Catholic church, at least publicly. The Declaration of the Rights of Man served as the preamble to the first Constitution of the French Republic in 1791, and inspired similar texts in Europe and Latin America.⁴² Article Ten states: “No one may be disturbed on account of his opinions, even religious ones, as long as the manifestation of such opinions

⁴¹ Preston, Charles, “Secularism.” Encyclopedia Britannica. <https://www.britannica.com/topic/secularism>. This encyclopedia entry focuses on the history of the secular and secularism, and then how it is done in various countries throughout the world, including France and the United States.

⁴² “The Declaration of the Rights of Man and of the Citizen.” [elysee.fr](https://www.elysee.fr/en/french-presidency/the-declaration-of-the-rights-of-man-and-of-the-citizen), November 16, 2012. <https://www.elysee.fr/en/french-presidency/the-declaration-of-the-rights-of-man-and-of-the-citizen>. This comes from the website of the French Presidency, and it lists a brief history of the document and its full text.

does not interfere with the established Law and Order.”⁴³ This qualifier of not interfering with the established law and order helped create the idea of a public/private division, where religion belongs in one and not in the other. This demoted religion out of the public sphere in order to create a nonreligious space where religion can be regulated, if allowed at all. The Declaration seemed to perhaps indicate a turn towards the secularization of the French nation, but the road towards *laïcité* was complex.

The Concordat of 1801 was a crucial turning point in the development of modern secularism in France, as it marked an early attempt to regulate religion within a state framework while maintaining governmental authority over the Church. Following the French Revolution and the passage of the Civil Constitution of the Clergy (1790), which had subordinated the Church to the state and led to widespread unrest, Napoleon sought to restore social stability by reconciling with the Catholic Church without giving back its former privileges. The Concordat, signed between Napoleon and Pope Pius VII on July 15, 1801, recognized Catholicism as ‘the religion of the great majority of the French,’ but did not reestablish Catholicism as the state religion, signaling a departure from the ancien régime's model of religious governance.⁴⁴ This model was done through Gallicanism, a political and religious doctrine that emphasized the independence of the French Church from papal authority.⁴⁵ This was done through several ways, such as the French king

⁴³ Ibid.

⁴⁴ Cunningham, John M. “Concordat of 1801.” Encyclopædia Britannica. <https://www.britannica.com/event/Concordat-of-1801>. This article briefly covers the details of the Concordat of 1801, including when it was denounced in 1905. The Concordat acknowledged Catholicism’s majority status but not as the state religion.

⁴⁵ Parsons, Jotham. “Gallicanism.” *Renaissance and Reformation*. Oxford University Press, 2020. <https://doi.org/10.1093/obo/9780195399301-0447>. This encyclopedia entry lists an introduction and many documents that discuss Gallicanism in some way, broken down by the time frame in which it focuses on.

having the ability to appoint bishops, papal decisions requiring the consent of the French Church, and the legal supremacy of the French state, which meant that French law was binding even in matters of religion. Furthermore, this distinction maintained religious freedom for Protestants and other non-Catholic French citizens. The Concordat allowed the state to nominate bishops, while the pope retained the right to depose them.⁴⁶ Moreover, while the Concordat restored the Church's ability to function in public life, it also required the Vatican to accept the confiscation of Church lands during the Revolution, reinforcing the state's authority over former ecclesiastical property. In an exchange of sorts for that loss of property, the state also agreed to pay clerical salaries, while the clergy swore an oath of allegiance to the state. The Organic Articles of 1802, implemented unilaterally by the French government, further pushed back papal influence by subjecting religious practices to state regulation and extending official recognition to Protestant and Jewish communities, creating a system of religious pluralism under state control. These Organic Articles were met with opposition from Pope Pius VII, who claimed to have not seen them before they were passed by the French government. Overall, the Concordat of 1801 was strategically done by Napoleon Bonaparte to heal the divide between the French state and the Catholic Church, helping create a sense of national unity. Though the Concordat stopped short of the full separation of church and state that would later be codified in the 1905 Law on the Separation of Churches and

⁴⁶ Boundless. "World History." The Concordat of 1801 | World History. <https://courses.lumenlearning.com/suny-worldhistory/chapter/23-1-9-the-concordat-of-1801/>. This open-source educational resource covers the key points of the Concordat of 1801, which granted the government the power to nominate bishops, ensuring state influence over Church leadership.

State, it laid the groundwork for France's evolving model of laïcité by formalizing a state-managed approach to religion, ensuring that religious institutions remained under the government's power and supervision.

The next steppingstone toward French secularism were the Jules Ferry Laws, which removed religious instruction from public schools and made education mandatory and free. These laws were unpopular at the time for forbidding unauthorized congregations to teach, and for the determination to respect all religious groups.⁴⁷ Named after the Minister of Public Instruction at the time, these laws aimed to promote universal education and to reduce the role of the Catholic Church in public schools. First passed on June 16th, 1881, the initial Ferry Law established free primary education in public schools. The second law, published on March 28th, 1882, outlined various components of what was to be included in a free education, the options of a religious education, and various other administrative factors in overhauling an education system.⁴⁸ The impact these laws had on French society were profound. By secularizing the public education system, the laws reinforced the principles of laïcité and ensured the state-run schools were run free of religious influence. These laws also mandated that French be the exclusive language of instruction, which contributed to diminishing the regional languages and dialects of France, which helped promote a sense of national unity. Then finally, by removing religious instruction from public schools, the laws diminished the

⁴⁷ Willert, P. F. *The English Historical Review* 19, no. 76 (1904): 804–6. <http://www.jstor.org/stable/548646>. This short biography was written by Ferry's friend Alfred Rambaud, who wrote on his legacy, especially his educational policy.

⁴⁸ Brickman, William W. 1981. "The Ferry Law of 1881: The Fundamental Law of French Primary Education." *Western European Education* 13 (3): 3–5. doi:10.2753/EUE1056-493413033. This source details more information about the Ferry Laws, including listing out the 18 articles.

Catholic Church's direct influence over education, aligning with the broader Republican goal of reducing clerical power in state affairs. These laws helped to set the stage for the introduction of the December 9th, 1905, law separating the Church and State. This educational reform was part of a broader Republican campaign to diminish the Church's political power and promote secular values, which culminated in the 1905 law.

This 1905 Law, officially titled "Law of December 9, 1905 concerning the separation of Churches and the State," was arguably the landmark legislation in creating modern secularism in France and making it a foundation of French public life. The key provisions of this law are included in its first few articles. The most noteworthy of these is the second, which says that the state does not financially support any religion.⁴⁹ In effect, this separation effectively ended the Concordat of 1801, which had established Catholicism as the state religion and provided state funding in the form of clerical salaries. The law faced significant opposition, especially Pope Pius X who condemned the law as a break with the Concordat of 1801.⁵⁰ He wrote at the time that the Concordat was a binding contract for both parties, expressing the outrage of the Catholic Church. Over time, however, the 1905 Law has helped create a more pluralistic society by preventing any one religion from holding sway over state matters. The principles in the law have continued to influence French legislation, serving as a reference point in debates

⁴⁹ "Loi du 9 décembre 1905 concernant la séparation des Eglises et de l'Etat." Legifrance.gouv.fr, December 9, 1905. <https://www.legifrance.gouv.fr/loda/id/LEGISCTA000006085398>. This comes from a French government website, which lists out every article of the 1905 law in its original French.

⁵⁰ X, Pius. "Vehementer Nos (February 11, 1906): Pius X." Vehementer Nos (February 11, 1906) | PIUS X. February 10, 1906. https://www.vatican.va/content/pius-x/en/encyclicals/documents/hf_p-x_enc_11021906_vehementer-nos.html. This is the transcript of Vehementer Nos, which was Pope Pius X's complaint about the 1905 Law. This was released as an encyclical, and he later condemned the law in a later encyclical in August 1906.

over religious symbols in public spaces and the role of religion in schools. The 1905 law was pivotal in establishing a secular framework inside of which diverse religious beliefs and faiths could coexist, reinforcing the values of freedom and equality that underpin the French Republic.

The final documents that show the advancement of *laïcité* in France are the constitutions of 1946 and 1958. Both of these documents played important roles in solidifying and formalizing the principles of *laïcité* in France. The Constitution of October 27th, 1946 established the Fourth Republic after the fall of the Third Republic in World War II and the Vichy regime. This new constitution explicitly affirmed France's commitment to secularism. Article 1 declared: "La France est une République indivisible, laïque, démocratique et sociale" (France is an indivisible, secular, democratic and social Republic).⁵¹ This was the first time that secularism was constitutionally enshrined as a defining characteristic of the French state. The preamble to the 1946 Constitution doubled down on this commitment by stating that it reaffirmed the rights and freedoms written in the Declaration of the Rights of Man and of the Citizen, and that "France forms with the overseas peoples a Union founded on equality of rights and duties, without distinction of race or religion."⁵² These references ensured the nation's dedication to equality and non-discrimination, both of which are foundational aspects of *laïcité*. Then after the Algerian War of Independence, the 1958 Constitution—and the Fifth Republic it

⁵¹ "Constitution de 1946, IVe République." Conseil constitutionnel, October 27, 1946. <https://www.conseil-constitutionnel.fr/les-constitutions-dans-l-histoire/constitution-de-1946-ive-republique>. This is the 1946 Constitution in the original language, obtained from a French government website.

⁵² Ibid.

brought in–reaffirmed and expanded on these secular principles established before. Similar to the 1946 Constitution, the 1958 version wrote that France will ensure equality, without discrimination or distinction on the basis of origin, race or religion. The expansion occurs in the phrase “It shall respect all beliefs.”⁵³ This sentence not only reaffirmed the secular nature of the French Republic but also emphasized the state’s obligation to ensure equality and respect for all beliefs, therefore strengthening the legal foundations of *laïcité*.

By including secularism into the core constitutional texts, both the 1946 and 1958 Constitutions: institutionalized *laïcité*, ensured equality and guided public policy. They institutionalized *laïcité* by transforming secularism from a legislative principle in the 1905 law that separated church and state, into a constitutional mandate, giving it the highest legal authority. The institutionalization ensured that state institutions could not favor any religion or religious group, segregating the public sphere from religious beliefs and practices. This construction shaped how France would handle issues like the public display of religious symbols, religious education and the role of religion in governance. In particular, this has played out in recent times in the banning of the headscarf in public and in schools. The constitutions ensured equality by guaranteeing it before the law without discrimination of religion. This guarantee reinforced the idea that France would not privilege any one religion, protecting religious minorities and non-believers just as practicing religious citizens. In practice, this meant that no religion could claim a

⁵³ “The Constitution of the Fifth Republic.” elysee.fr, November 20, 2012. <https://www.elysee.fr/en/french-presidency/constitution-of-4-october-1958>. This comes from the website of the French presidency, and this source lists the entire constitution in English.

privileged position within the public sphere. In principle, religious groups could exist and operate freely, and all were treated fairly in terms of legal rights and access to public resources. These promises of equality and non-discrimination shaped France's approach to issues like public education, where the state could not officially endorse any religious teachings but instead had to ensure inclusive access to education for all, regardless of any religious background. Finally, they guided public policy. The 1905 law termed *laïcité* as more a policy of separation, meaning the state should stay out of religious affairs.

However, placing secularism in the Constitution meant that public neutrality was no longer just a matter of policy, it was now a defining aspect of French identity. The best example of this is in education, which has been deeply influenced by *laïcité*. Religious education is not a part of public schooling, and religious symbols in public schools or government buildings are prohibited, ensuring that the public sphere remains free of religious influence. This has been a point of contention, especially in recent years, with the display of the veil and headscarf, which brings into question what neutrality truly means. The government's involvement in religious matters is carefully regulated, as *laïcité* extends to public subsidies for religious activities. Under *laïcité*, religious groups are not entitled to state funding for their activities or buildings. This principle ensures that religions are not institutionalized or subsidized by the state, which would violate the neutrality that is required under secularism. The idea of secularism in France has evolved from being seen as a mechanism of separation to being viewed as a tool for protecting religious freedom.

From the Declaration of the Rights of Man and of the Citizen in 1789 to the 1905 Separation of Church and State, and later the 1946 and 1958 Constitutions, France has built a secular system that's not set in stone but constantly shifting and changing. The core principles of freedom of belief, state neutrality, and the separation of religion from public life have remained, but how they are applied has always been up for debate and contention.

This ongoing back and forth contest makes secularism feel less like a rigid wall and more like a field of play, where different groups, whether they be religious leaders, politicians, legal institutions, or just everyday people, compete over what *laïcité* should actually mean in practice. In sports, there are rules that set the boundaries, but within those, there's room for strategy, conflict, and the unexpected play. Every major moment in the French history of secularism, from the battles over church property in 1905, to the tightening of state secularism in 1946, to the reaffirmation of *laïcité* in 1958, show that this isn't just about drawing a clear line between church and state, but about continually battling over where that line should be.

Over time, some players and teams have pushed for stricter enforcement, trying to keep religion as far from public life as possible, while others have fought for more flexibility, arguing for religious expression within a secular framework. We see this today in debates over religious symbols in schools, state funding for faith-based institutions, and the role of religion in national identity. The rules keep evolving, but the game itself, the struggle to define secularism in France, never truly stops.

So, instead of thinking about secularism as a fixed doctrine, I argue it makes more sense to see it as a contested space, where different forces are always jockeying for position. The French government, neutral and yet a participant, has adjusted the boundaries again and again, sometimes enforcing strict neutrality, other times making room for religious presence. But no matter how the rules shift, the core dynamic remains: secularism in France isn't just about separation, it's about struggle, strategy, and competition for space in public life. The game remains constant, this ongoing struggle to define the limits and possibilities of secularism within the Fifth French Republic

The United States

Secularism in the United States has its roots most famously in the establishment clause of the Bill of Rights, which states that “Congress shall make no law respecting an establishment of religion.”⁵⁴ This secularism means in theory that no religion or religious group can be privileged above any other. The primary benefit in the U.S. is that any religious organization that is a registered 501(c)(3) is tax exempt, since “advancement of religion” is one of the exempt purposes in section 501(c)(3).⁵⁵ This secular status has been recognized in the US since its founding, but was specifically laid out in the 1797 Treaty of Tripoli, which states in Article 11: “As the government of the United States of America is not in any sense founded on the Christian Religion, as it has in itself no

⁵⁴ Ryman, Hana, and J. Alcorn. “Establishment Clause: Separation of Church and State.” The Free Speech Center. Middle Tennessee State University, October 17, 2023. <https://firstamendment.mtsu.edu/article/establishment-clause-separation-of-church-and-state/>. This comes from the MTSU Free Speech Center, which lists out the entirety of the Establishment Clause.

⁵⁵ IRS. “Exempt Purposes - Internal Revenue Code Section 501(c)(3) | Internal Revenue Service.” Government Publishing Office, June 5, 2024. <https://www.irs.gov/charities-non-profits/charitable-organizations/exempt-purposes-internal-revenue-code-section-501c3>. This comes from the IRS website, which details what it means for an entity to have a 501(c)(3) label.

character of enmity against the laws, religious or tranquility of Musselmen, and as the said States never have entered into any war or act of hostility against any Mehomitan nation, it is declared by the parties that no pretext arising from religious opinions shall ever produce an interruption of the harmony existing between the two countries.”⁵⁶ This treaty has been referenced to counter arguments that the United States is a ‘Christian nation.’ In terms of religious demographics, the numbers do not lie. People in the U.S. overwhelmingly align with Christian groups when asked. According to the Public Religion Research Institute, in 2022, 67.3% of American adults identified with a Christian group, ranging from White mainline Protestant (13.9%) to Orthodox Christian (.3%; the smallest unique group).⁵⁷ The notable counterpoint, however, is that the largest response was from the ‘Religiously unaffiliated’ group, which was 26.8%, nearly twice as much as the White mainline group. This is in addition to a pattern of nearly continuous growth, starting at 16% in 2006.

While the First Amendment established a legal framework for religious freedom and government neutrality, its application was not clear immediately. What exactly did ‘no establishment’ and ‘free exercise’ mean in practice? Over time, some influential writings and court decisions would help shape the American understanding of American secularism, beginning with Thomas Jefferson’s now-famous (infamous?) letter to the

⁵⁶ Vile, John. “1797 Treaty of Tripoli.” The Free Speech Center. Middle Tennessee State University, July 22, 2022. <https://firstamendment.mtsu.edu/article/1797-treaty-of-tripoli/>. This comes from the MTSU Free Speech Center, which lists out the entirety of the Treaty of Tripoli.

⁵⁷ PRRI Staff. “PRRI Census of American Religion — 2022.” *PRRI | At the Intersection of Religion, Values, and Public Life*. (blog), February 24, 2023. <https://www.prii.org/spotlight/prri-2022-american-values-atlas-religious-affiliation-updates-and-trends/>. This lists out the numerical details of what percentage of the population is in each denomination, including nones.

Danbury Baptist Association, in which he wrote on the idea of a ‘wall of separation’ between the church and the state.

In his letter, Jefferson addresses Nehemiah Dodge, Ephraim Robbins and Stephen Nelson, who were all representatives of the Danbury Baptist Association, a religious society in Connecticut.⁵⁸ The January 1, 1802 letter contains the famous phrase about building a wall of separation between the church and state. Since then, this letter (that had no legal weight at the time; it was merely a statement of personal beliefs) has been used repeatedly to define how the U.S. should handle issues of church and state. The Jefferson letter took on its fame in the 1947 case of *Everson v. Board of Education*, in which Justice Hugo Black said that the wall must be kept high and insurmountable. This official endorsement made Jefferson’s letter a crucial reference point in the idea of American secularism. While this letter and concept have been attacked over the years to help explain America’s rather hazy secularism through the idea that the wall Jefferson had in mind was a type of one-way wall, this letter has been referenced over and again in the Supreme Court’s church-state decisions to explain a strong commitment to the wall of separation approach. Critics have hypothesized that Jefferson meant to create a wall that only protected the church from interference, but not the other way around. Despite the fact that the Supreme Court has chosen to take Jefferson literally, the meaning of his words are still debated today. Some make the argument that the wall should be like what Justice Black described, while others believe Jefferson meant for a more flexible

⁵⁸ Davis, Derek H. “Chapter Five: Thomas Jefferson’s Letter to the Danbury Baptist Association.” In *Thomas Jefferson and Philosophy*. United States: Lexington Books/Fortress Academic, 2013. This book chapter discusses the meaning of the famous ‘wall of separation’ metaphor.

interpretation, allowing for some religious influence in public life. Regardless of the personal interpretation one might make, the Dabury letter shaped how the U.S. would come to understand the relationship between religion and government. This influence would impact future Supreme Court rulings about religion in public schooling to modern political debates. It remains one of the earliest and clearest statements in favor of secular government.

The next important moment I have chosen to focus on is the famous Scopes Trial. Often called the Monkey Trial, this was one of the most famous legal battles in American history, pitting science against religion and the modern against the traditional. It took place in Dayton, Tennessee, in 1925 and became a national spectacle, drawing major legal figures, intense media coverage and even a carnival-like atmosphere in the streets. Taking place from July 10-21, a high school teacher, John Thomas Scopes, was charged with violating state law by teaching Darwin's theory of evolution.⁵⁹ The trial's proceedings helped create a national debate over the truth of evolution that continues today. The trial originated from a Tennessee law called the Butler Act, also passed in 1925, which made it illegal to teach evolution.⁶⁰ Though the Butler Act was later repealed in 1967, the Scopes Trial famously ended with Scopes being found guilty

⁵⁹ Rafferty, John P. "Scopes Trial." Encyclopædia Britannica, January 13, 2025. <https://www.britannica.com/event/Scopes-Trial>. This encyclopedia entry gives details on the Scopes trial, giving information on the background, the details of the trial itself, and brief details of the aftermath.

⁶⁰ Webb, George E. "The Tennessee Academy of Science and the repeal of the Butler Act." *Journal of the Tennessee Academy of Science* 87, no. 4 (2012): 150+. *Gale Academic OneFile* (accessed March 1, 2025). https://link-gale-com.utk.idm.oclc.org/apps/doc/A335293584/AONE?u=tel_a_utl&sid=bookmark-AONE&xid=d081cadd. This article details how the Tennessee Academy of Science worked to repeal the Butler Act. In the beginning, it explains what happened in the Butler Act and what it says.

and fined \$100. This verdict was later overturned on a technicality. Though this trial only pertained to one state's law, it helped shape public opinion and led to a slow shift in educational policies towards modern understandings of secularism. The 1968 case of *Epperson v. Arkansas* legalized the teaching of evolution in the state, showing the gradual shift after the Scopes Trial.⁶¹ Randy Moore writes that "*Epperson v. Arkansas*...was a death knell for other anti-evolution laws."⁶² In 1970, the Mississippi Supreme Court blamed *Epperson v. Arkansas* for making its anti-evolution statute to be void and of no effect. Though the *Epperson* case had a huge impact on teaching what would come to be known as 'creation science,' it did not address the possibility of restrictions on teaching creationism, allowing for the possibility of church interference in state matters. This came to fruition later as creationist cases went to court to push for the preservation of their beliefs in the schooling system. Vernon Grose wrote a 13-page memo to the California Board of Education in 1969 to argue against *The Scientific Framework for California Schools*, which succeeded in getting the Board to formally recommend teaching creationism. The fallout of this action was swift, with resignations coming in from the scientists who advised the Board, and condemnation from various scientific groups.⁶³ In schools, the battle over what to teach and how to teach it has always been a contentious game, filled with battles of interpretation. This game has

⁶¹ Moore, Randy. "Creationism in the United States: IV. The Aftermath of *Epperson v. Arkansas*." *The American Biology Teacher* 61, no. 1 (1999): 10–16. <https://doi.org/10.2307/4450602>. This article discusses the aftermath of the case, which led to the downfall of other laws forbidding the teaching of evolution.

⁶² *Ibid*, pg. 10.

⁶³ *Ibid*, pg. 11.

continued unabated since the Monkey Trial, despite the widespread thought that schools today are less religious than ever.

Legislative efforts continue to challenge the principles of secular education. In 2023, West Virginia lawmakers passed Senate Bill 280, which allows for teachers in public schools to teach intelligent design as a theory for how the world came to be. It is unclear if this bill will pass. Even more recently, Louisiana has required that the Ten Commandments be displayed in every public-school classroom, from kindergarten to state-funded universities.⁶⁴ The argument made in favor of this law is that the 10 Commandments are not solely religious but have historical significance for the state and national government. While not directly tied to creationism like the other cases, the law reflects the ongoing push to reintegrate religious principles into public education. While the Louisiana law has been challenged in court like the West Virginia one likely will be should it pass, this ongoing conflict shows how the struggle over secularism in American education is not just a historical issue, it remains an active and evolving battleground. While the courts have consistently upheld the separation of church and state, local policymakers continue to push these boundaries, ensuring the debate over religion's role in public education will persist into the future.

Finally, the last document I intend to examine is the Supreme Court's Lemon Test. Named after Alton Lemon and established in the case of *Lemon v. Kurtzman*

⁶⁴ Press, The Associated. "Louisiana Will Require the 10 Commandments Displayed in Every Public School Classroom." NPR, June 19, 2024. <https://www.npr.org/2024/06/19/nx-s1-5012597/louisiana-10-commandments-law-public-school-classrooms>. This article from NPR details the Louisiana law, including details on how funding for these presentations will be procured and what opponents of the bill were saying about it.

(1971), it is meant to determine when or if government action violates the establishment clause in the First Amendment. The test has 3 prongs, which require government programs to “1) have a secular legislative purpose, 2) primarily neither advance nor inhibit religion, and 3) not create an ‘excessive entanglement’ with religion.”⁶⁵ This test has always been difficult to apply. The first prong is vague, since seemingly every law has a secular legislative purpose, and it is not clear how government officials could shed their beliefs when making policy. For example, if a Christian policymaker decided to vote on a social issue because of his or her faith, then that would technically violate the first prong of this test. The second and third prong make the test impossible to truly use. In order to truly tell if a government program is advancing religion would be to poll and ask participants, which would likely then be excessive entanglement. The Lemon Test has many problems, leading to the courts ignoring it and invoking it only when it is convenient. The Supreme Court voted that the Lemon “should not apply in cases that ‘involve the use, for ceremonial, celebratory, or commemorative purposes, of words or symbols with religious associations.’”⁶⁶

While the idea behind the Lemon Test seems solid, the practical application of this shows how difficult it is to truly adjudicate a fair line between church and state. It

⁶⁵ Dunn, Joshua. “Supreme Court Partially Junks a Lemon.” *Education Next* 20, no. 1 (2020). This article celebrates the end of the Lemon Test, writing on how it was never used regularly nor did it ever make sense to be used as a real test for lawmakers. In a relatively recent case involving a 40-foot high Latin cross that was on land the state purchased, the American Humanist Association claimed the cross violated the separation of church and state. The claim was denied using the Lemon Test, then overturned, thus reaching the Supreme Court. The Court then decided since the Test was only used occasionally, it was time to get rid of it. The decision was 7-2, ruling in favor of changing when the Lemon Test should apply, confining its application significantly.

⁶⁶ Ibid, pg. 6.

was used to strike down school prayer, Bible readings in classrooms, and state-funded religious programs. However, as it has been noted, the Lemon Test was not without its critics, who argued that it was too rigid and hostile to religion in public life. By the early 2000s, the Supreme Court had moved away from strict application of the Lemon Test. Justices began favoring other interpretations of the Establishment Clause rather than tests. In *Kennedy v. Bremerton School District*, the 2022 decision ruled in favor of the high school football coach praying on the field after games, and the Supreme Court effectively abandoned the Lemon Test.⁶⁷ This sweeping decision had other impacts as well. The Endorsement test was also eliminated, which could be considered an offshoot of the Lemon, and held that the government should not do anything that might signal to religious dissenters that they are outsiders. Similar to the Lemon Test, it is difficult to administer this test because it is difficult to tell when that line has been crossed. Furthermore, the court ruled that not only was the Lemon Test on the way out, but that the Establishment Clause could not be used as a justification for violating free speech and exercise rights. “The court said that ruling against Kennedy would have also authorized firing a Muslim teacher for wearing a headscarf or a Christian teacher for praying over

⁶⁷ Dunn, Joshua. "The First Amendment's Establishment Clause Doesn't Suspend Free Speech and Free Exercise Rights, Supreme Court Rules Opinion backs prayer by football coach, scraps Lemon Test." *Education Next* 22, no. 4 (2022): 6+. *Gale In Context: Opposing Viewpoints*. https://link-gale-com.utk.idm.oclc.org/apps/doc/A729340073/OVIC?u=tel_a_utl&sid=summon&xid=4fc6d95c. The case *Kennedy v. Bremerton* consisted of an assistant football coach who prayed post-game at midfield. Eventually players asked to join him, which led to administrators telling Kennedy he had to stop the practice. He refused, was fired, then challenged his firing as a violation of his First Amendment rights. In their decision, the majority wrote that the Lemon Test should not guide judicial analysis of alleged Establishment Clause violations. Essentially, this is the follow-up of the *American Legion v. American Humanist Association* case from 2019.

‘her lunch in the cafeteria.’”⁶⁸ This decision will likely lead to more flexibility in schools for accommodating religious speech. The majority opinion did note however, that the government cannot coerce citizens to engage in religious practices, possibly setting up future debates over what constitutes coercion.

The histories of secularism in the U.S. and *laïcité* in France show two very different approaches to the relationship between religion and the public sphere, but they share a common thread: conflict, adaptation and continuous negotiation. In France, *laïcité* emerged over time from anti-clerical sentiment, solidified through battles like the 1905 Law, and continues to shape public policy. From the Ferry Laws enabling more secular education to modern debates over religious symbols in public places, France has long had secularism as a fundamental national principle, as shown in the 1946 and 1958 Constitutions. France has held to this conviction, even at the expense of restricting public expressions of faith, particularly regarding Islam.

The U.S., on the other hand, has followed a more flexible, but no less contentious path. The Jefferson Letter and early Supreme Court cases built a structure for church-state separation (particularly, the wall of separation idea), but the Scopes Trial, the Lemon Test and other recent legal battles have kept the limits of lines of secularism shifting. Unlike France, where *laïcité* is often enforced through legal restrictions, American secularism has been more about negotiation, particularly negotiation over religious freedom in public life. Sometimes this freedom has been expanded, while at other points it has been cut down.

⁶⁸ Ibid.

Despite these fundamental differences of interpretation, both countries still compete over the place of religion in public institutions, especially in education and government. Whether it is French laws banning religious symbols in schools or American debates over teaching evolution, the tension between faith and secular governance has not gone away, rather the game has just changed over time. That brings us to today. In both the U.S. and France, secularism is not just a legal or philosophical issue. It plays out all around us, in culture, politics and even sports. As I've argued before, sports are not a separate world, nor an escape from reality. From the NFL's public prayers and religious advocacy to Ligue 1's strict adherence to *laïcité*, the way secularism appears in sports leagues reflects these larger national contests.

SECTION 3: DISCUSSION OF SECULARISM IN FRANCE AND THE U.S.

TODAY WITH SPORTS

When sports are played, particularly professional sports, they are never just about the game. Sports and the teams that play them can represent identity, culture, and often, the push and pull between religion and secularism. Whether it is Tim Tebow ‘Tebowing’ after a touchdown, Raisel Iglesias pointing to the sky after a successful save, or Messi crossing himself after scoring in extra time in the World Cup Final, sports have long been a space where religious expression plays out in public view. But just how much should religion have in professional sports, these spectacles enjoyed all over the world? That depends on where you are looking. In the United States, the NFL exists in a culture where Christianity is deeply woven into public life, often blending with national identity, in particular Christian nationalism. There are prayers before games, post-game verses and ‘thank Gods’ in interviews, and even faith-based leadership styles from coaches are all part of the fabric of American football.⁶⁹ While secularism is indeed a legal principle in the United States, it tends to operate as a negotiation rather than a strict prohibition, allowing for religious visibility as long as it aligns with broader cultural values.

France, however, takes a different approach. With its strong commitment to *laïcité*, Ligue 1 operates in a system where religion is meant to be kept out of the public eye, including sports. Public prayers, religious gestures, and even faith-based symbols

⁶⁹ Krattenmaker, Tom. *Onward Christian Athletes: Turning Ballparks into Pulpits and Players into Preachers*. Rowman & Littlefield, 2010. This book outlines how pro athletes are more evangelical than the general population in the US, which is something Krattenmaker argues that athletes are taught to uphold through chaplains and sports ministry organizations.

like Neymar's contractual obligations to avoid "religious propaganda that could damage the image and unity" of PSG have been sources of controversy.⁷⁰ Instead of imitating the United States' negotiation of religion's place in sports, France has often sought to remove it from the field of play completely, treating religious expression as something that should stay private.

This section will explore how the NFL and Ligue 1 reflect two very different models of secularism, one that integrates and manages religious expression, and one that seeks to limit it. By looking at key moments of controversy, public debates, and the way each league enforces (or does not enforce) its secular ideals, we can see that secularism in sports is not just a random coincidence, it is an integral part of the broader battle in society, where the fight over religion's place is constantly unfolding.

The NFL

There are many things that set American sports apart from those in Europe, such as the basic difference in which sports amass large followings. While the NBA, MLB and the NHL all have access to large amounts of fans (as they are the other three of the 'Big Four' in the American market), the NFL remains the dominant player in the United States when it comes to fan engagement. Another large segment of this difference is the visibility of religion, especially Christianity. A player's faith can be public through celebrations, prayers and references to God in interviews, and this faith is not just

⁷⁰ "Star paid not to stir controversy over faith." *Christianity Today*, November 21, 2021. *Gale in Context: Opposing Viewpoints*. https://link-gale-com.utk.idm.oclc.org/apps/doc/A682868676/OVIC?u=tel_a_utl&sid=summon&xid=ef4ae90a. This brief magazine article describes how Neymar's contract includes a clause that he will be paid 540,000 more euros per month if he avoids statements of religion.

tolerated but often lauded and embraced as part of the cultural fabric of the league—and America as a whole. Religious expression in football is not hidden; it is a part of the show. However, the NFL does not officially take any stance on religion, as it is not a religious institution. Instead it works within a framework of secularism that attempts to balance religious freedom with an allegedly neutral playing field. This act of balancing often plays out in an unbalanced style. While Christian expressions of faith are widespread and accepted, controversies arise when religious expression pushes the league's comfort zone, whether it is Muslim players in Ramadan, non-Christian players questioning the dominance of Christian chaplaincy programs (every NFL team employs a chaplain), or even the league's contrasting treatment of religious gestures versus political protests. The NFL takes a more fluid approach to secularism that contrasts sharply with Ligue 1.

As mentioned before, Tim Tebow, a devout Christian, would frequently kneel in prayer after big plays, a gesture that became known as 'Tebowing.' Tebow is widely recognized as a former Florida and NFL quarterback who has maintained a presence on television by co-hosting 'SEC Nation.' During his time at Florida, he became renowned for his faith, which he expressed openly on and off the field. On the field, this included his famous pose, but also through writing Bible verses on his eye black. His public displays of faith, including 'Tebowing,' brought about mixed reactions from the public and the media. Supporters viewed his actions as a bold testament to his beliefs, appreciating his willingness to express his faith openly.⁷¹ On the other hand, some critics

⁷¹ Thomasos, Christine. "Tim Tebow Brings in a New Wave of Christian Athleticism." The Christian Post, October 21, 2011. <https://www.christianpost.com/news/tim-tebow-brings-in-a-new-wave-of-christian->

have argued that such overt religious expression was inappropriate in professional sports, suggesting they blurred the lines between personal faith and public spectacle.⁷² He has been reported as someone who is self-centered and a hypocrite due to his outspoken views. His eye black as well, brought about public scrutiny, in particular during the 2009 BCS National Championship Game, he wore eye black that had “John 3:16” written on it. The result of that action was that 94 million people looked up the meaning of the verse.⁷³ The cultural phenomenon of ‘Tebowing’ and Tebow’s other public religious expressions show the complex interplay between faith and football. His actions sparked national conversation about the appropriateness of religious displays in sports, reflecting the broader societal debate within public domains.

In the NFL, chaplaincy programs play a significant role in supporting the spiritual and emotional well-being of players, coaches, staff and their families. These programs, often facilitated by outside organizations like Athletes in Action (AIA), provide pastoral care, mentorship and guidance inside the difficult environment of professional football,

athleticism.html. This short article details an interview Tebow took with *The Christian Post* where he said he was blessed with his success in football, and it notes that despite his critics, he is in line to start for the Denver Broncos soon.

⁷² Jethani, Skye. “Is Tim Tebow a Hypocrite?” HuffPost, March 8, 2012. https://www.huffpost.com/entry/is-tim-tebow-a-hypocrite_b_1184345. This article discusses the practice of Tebowing and the big questions it brings up about Christian prayer in public versus private. It discusses the importance of witnesses in a world where the approval of others is often sought, and the author notes that God is his witness.

⁷³ Post, Washington. “John 3:16, Sports and Aaron Hernandez.” Chicago Tribune, August 18, 2019. <https://www.chicagotribune.com/2017/05/05/john-316-sports-and-aaron-hernandez/>. This article details how Aaron Hernandez, a college teammate of Tebow, had written “John 3:16” on his forehead before committing suicide. The reason for this reference is unknown, though some speculated that he either came to be a Christian, or perhaps it was a final act of protest.

with its very high stakes.⁷⁴ NFL chaplains offer various forms of support, including chapel services, Bible studies and providing individual mentorship. Furthermore, AIA chaplains are always on call, offering support to players in difficult situations. The integration of chaplains and their services vary among teams. For the Houston Texans, their chapel gatherings and Bible study sessions during the 2024-2025 season grew tremendously, from a dozen to nearly forty members.⁷⁵ The chapel services, led by the team chaplain Mikado Hinson or a guest speaker, focus on sharing the word of God and fostering a supportive community together. Key members of the squad attend these services, such as team captains like edge rusher Will Anderson Jr., quarterback C.J. Stroud, and even the head coach, DeMeco Ryans. All of these figures emphasize the importance of their faith, such as how Stroud will begin every post-game press conference by giving thanks to Jesus Christ. An example like the Texans show how these sessions help manage the pressures of a professional football workload and strengthen team unity and culture.

The ubiquity of chaplains in the NFL has occasionally sparked debates regarding the separation of church and state, particularly in public institutions. A notable example in the NCAA was Coach Deion Sanders including religious practices into team activities

⁷⁴ “NFL.” Athletes in Action. Accessed March 1, 2025. <https://athletesinaction.org/football/nfl/>. This page lists how AIA works to bring players to Christ, helping them build a solid foundation in faith and not in temporal, worldly things. AIA chaplains can provide chapel before games or during training camp, lead small group Bible studies, or do individual meetings with those who need it. The page also lists how AIA presents the Bart Starr Award for a player who shows character and leadership.

⁷⁵ Alexander, Jonathan M. MSN, January 17, 2025. <https://www.msn.com/en-us/sports/nfl/faith-fellowship-and-football-how-chapel-gatherings-and-bible-study-connect-houston-texans/ar-AA1xnVn9>. This Houston Chronicle article discusses the role that religion has played in the Texans’ team culture, bringing the team closer together.

at the University of Colorado.⁷⁶ He faced criticism from the Freedom From Religion Foundation (FFRF), which argued that such actions could be seen as coercive or excessive entanglement. These are especially prevalent in a public university, which raised concerns about violating the Establishment Clause. While chaplaincy programs provide valuable support to many within the NFL, NCAA and high schools, they also raise questions about inclusivity and the potential for endorsement of specific religious beliefs. The challenge with these programs lies in balancing the personal faith expressions of players and staff with the diverse beliefs represented within a team, guaranteeing that participation in religious activities remains voluntary and respectful of individuality. While sports chaplaincy programs, particularly those that serve the NFL, serve as resources for emotional support and spiritual growth, they also necessitate careful navigation of legal and ethical considerations to create and maintain a setting that respects religious expression and secular principles.

One of the most striking examples of the NFL's complex relationship with religion came not from a pre-game chapel service or a post-game prayer circle, but from a moment of crisis on the field. While chaplaincy programs provide structured spiritual support within teams, there are moments when faith emerges spontaneously. This was evident on January 2, 2023, when Buffalo Bills safety Damar Hamlin collapsed from cardiac arrest during a Monday Night Football game. In an instant, the league's often-

⁷⁶ Gomez, Jorge. "Coach Deion Sanders Can't Invite Chaplain to Pray with Football Team, Says Anti-Religious Group." First Liberty, October 25, 2024. <https://firstliberty.org/news/coach-deion-sanders-cant-invite-chaplain-to-pray-with-football-team-says-anti-religious-group/>. This article comes from First Liberty, a group that fights to protect religious liberty. The article is admittedly biased, but it details how the FFRF wrote to the University that Sanders' actions violated the Constitution. First Liberty wrote their own letter about how there is a long history of chaplaincy, and how, in light of the Kennedy Supreme Court decision, public school employees may engage in religious expression and exercise.

unspoken ties to religion became unmistakable, as players, coaches, fans, and even sports commentators turned to prayer in a way that transcended team allegiances and the usual boundaries between faith and sport.⁷⁷ Damar Hamlin's cardiac arrest created an unprecedented outpouring of public prayer and support across the NFL community. In the immediate aftermath of his collapse, players from both the Buffalo Bills and the Cincinnati Bengals gathered together on the field, many kneeling in prayer. This spontaneous moment resulted in the cancellation of the remainder of the game and showed the profound role of faith within the league. Players were not the only ones who responded. All 32 NFL franchises changed their Twitter profile pictures to an image of Hamlin's jersey with the words 'Pray For Damar' on them. People gathered outside the University of Cincinnati Medical Center, participating in vigils at 8:55 p.m., the time Hamlin collapsed.⁷⁸ Landmarks, such as the City Hall in Buffalo and even Niagara Falls were illuminated blue, the primary color of the Bills, as signs of hope and faith.⁷⁹ The widespread prayer in response to Hamlin's injury does a great job of showing the

⁷⁷ Kornick, Lindsay. "Social Media Praises ESPN's Dan Orlovsky's on-Air Prayer for Damar Hamlin: 'Powerful, Brave and Genuine.'" Fox News, January 4, 2023. <https://www.foxnews.com/media/social-media-praises-espns-dan-orlovskys-prayer-damar-hamlin-powerful-brave-genuine>. This article highlights praise for Dan Orlovsky's spontaneous prayer, which he performed during NFL Live. The video of the prayer is at the top of the article, in which Orlovsky says that it was weighing on his conscience to pray. Fox highlights the praise he received online who praised this act.

⁷⁸ Hodges, Bebe. "This Prayer Wall Captures Cincinnati's Love for Damar Hamlin." Cincinnati.com, January 7, 2023. <https://www.cincinnati.com/story/news/2023/01/07/see-the-prayer-wall-bengals-fans-created-for-damar-hamlin/69785803007/>. This article shows the support that Hamlin was receiving during his recovery, including a prayer wall outside the UC Medical Center.

⁷⁹ Beilein, Olivia. "Niagara Falls, and the City of Buffalo Light up Landmarks for Buffalo Bills Safety." wgrz.com, January 3, 2023. <https://www.wgrz.com/article/news/local/niagara-falls-goes-blue-for-hamlin/71-a2c6bb29-3848-41b6-94e4-d2d5b1e505f3>. This short article also highlights the support Hamlin received in his recovery, such as landmarks being lit in blue, and large donations being made to Hamlin's charity.

complex interactions between secularism and religious expression in the NFL. While the league is secular, extreme moments reveal an intrinsic reliance on faith among players, teams and fans. The public prayers and religious gestures following Hamlin's collapse show how the NFL community moves toward religious expression in times of adversity. This pull toward communal religious expression challenges the boundaries of secularism in professional sports. In summary, the reaction to Damar Hamlin's injury serves as a poignant example of how the NFL community turns to Christianity in moments of crisis, illustrating the interwoven relationship between secularism and religious expression in American professional football.

Ligue 1

If the NFL has an uneasy but ultimately permissive relationship with public religiosity, France's Ligue 1 offers a stark contrast. Rooted in the country's principle of *laïcité*, Ligue 1 operates in an environment where religion is expected to remain a strictly private matter, both legally and culturally. While religion remains important for many players, the league and its governing bodies have repeatedly taken measures to restrict religious expression on the field, sometimes sparking controversy in the process. From the French Football Federation's (FFF) ban on religious symbols on the pitch, to Neymar's contractual agreement with Paris Saint-Germain (PSG) restricting religious statements, to the continual debates over Karim Benzema's fasting during the season, Ligue 1 provides a compelling case study of how secularism in sports can move from an unspoken expectation to an enforced policy. These moments reveal not only the league's

commitment to *laïcité*, but also the tensions that come up when religious devotion and professional sports encounter each other.

The FFF enforces a strict policy prohibiting the display of conspicuous religious symbols during official football matches aligning with France's principle of *laïcité*. The policy has notably affected Muslim female players who wish to wear the hijab while playing. Despite FIFA permitting the hijab since 2014, the FFF upholds its ban, citing adherence to secular values.

In response, a collective known as "Les Hijabeuses" emerged in 2020, advocating for the right to wear hijabs during matches.⁸⁰ Comprising young Muslim women, the group has actively protested the FFF's stance, organizing demonstrations and games in protest, and challenging the policy in court. Their efforts highlight the tension between individual religious freedoms and institutional secularism in French sports. The debate intensified in 2022 when the French Senate passed an amendment aiming to codify the ban on religious symbols in sports. Proponents argued it was necessary to uphold secularism, while critics, including human rights organizations, viewed it as discriminatory, particularly against Muslim women. The amendment faced opposition and was ultimately not adopted into law. Despite these challenges, the FFF's ban remains in effect. In June 2023, France's highest administrative court, the Conseil d'État, upheld the prohibition, reinforcing the federation's commitment to secularism over individual religious expressions on the field. France as a general population seems to be in favor of

⁸⁰ Méheut, Constant, and Monique Jaques. "The Female Soccer Players Challenging France's Hijab Ban." The New York Times, April 18, 2022. <https://www.nytimes.com/2022/04/18/sports/soccer/france-hijab-ban-soccer.html>. This story discusses the Hijabeuses, an organization that was created in 2020, in their fight against France's hijab ban on the field.

upholding this ban as well, with more than six in ten French people saying they are in favor of banning the hijab in the street.⁸¹ This ongoing controversy underscores the complex interplay between religious freedom and secular policies within French football, reflecting broader societal debates about the place of religion in public life.

As referenced earlier, Neymar's contract with PSG reportedly included an 'ethical clause' that would award him an additional €541,680 per month, totaling approximately €6.5 million annually, provided he would refrain from making public statements or actions deemed as "political or religious propaganda" that could harm the club's image and unity.⁸² This clause is noteworthy because of Neymar's known Christian faith and previous public religious expressions, such as wearing a '100% Jesus' headband during celebrations. The inclusion of this clause reflects PSG's commitment to maintaining a secular and politically neutral stance, aligning with broader French cultural and legal norms that emphasize the separation of religion and public life. By incorporating this clause, PSG seeks to ensure that players' personal beliefs do not interfere with the club's public image or internal cohesion. This approach shows the club's dedication to upholding French secular principles within professional sports, illustrating the complex balance between individual expression and organizational identity in the context of French *laïcité*.

⁸¹ "Sondage : Plus de 6 Français Sur 10 Favorables à Une Loi Interdisant Le Port Du Voile Dans La Rue." CNEWS, March 24, 2022. <https://www.cnews.fr/france/2022-03-24/sondage-plus-de-6-francais-sur-10-favorables-une-loi-interdisant-le-port-du-voile>. This French news article detailed the results of the poll, which said that 61% of the respondents were in favor of a ban.

⁸² "Star paid not to stir controversy over faith." *Christianity Today*, November 21, 2021. *Gale in Context: Opposing Viewpoints*. https://link-gale-com.utk.idm.oclc.org/apps/doc/A682868676/OVIC?u=tel_a_utl&sid=summon&xid=ef4ae90a.

The final case study I want to look at in Ligue 1 is Karim Benzema and fasting during the holy month of Ramadan. Muslims all over the world do not eat nor drink from sunrise to sunset, provided they are physically able. Concerns have been raised that this might affect his performance, but Benzema has demonstrated incredible form during this time. In April 2022, (the same year he won the Ballon d'Or) he scored a hat-trick against Chelsea in the UEFA Champions League, having broken his fast allegedly thirteen minutes before the kick-off.⁸³ Benzema has stated that fasting does not negatively impact his performance, and studies have shown that with proper management, fasting during Ramadan does not significantly impair athletic ability.⁸⁴ Benzema's incredible ability to not only perform but excel while fasting shows the importance of individualized approaches to training and nutrition, allowing athletes to uphold their personal values without jeopardizing their duties to their clubs.

By examining how secularism plays out in the NFL and Ligue 1, it becomes clear that the enforcement, or lack of, religious expression in sports is not a neutral, unrelated act but a form of competition in itself. Just as athletes compete on the field, secularism functions as a game of control, negotiation and resistance, showing what is acceptable in

⁸³ Jabbar, Nasir. "Karim Benzema Was Fasting All Day for Ramadan before Chelsea Match, Then Scored a Sensational Hat-Trick." SPORTbible, April 7, 2022. <https://www.sportbible.com/football/karim-benzema-was-fasting-all-day-for-ramadan-before-chelsea-match-20220407>. This article details how Benzema had fasted all day before scoring three goals for Real Madrid. The article notes how in an interview with *Esquire*, Benzema had said that Ramadan had no impact on his performance.

⁸⁴ "Football Nutrition: Impact of Ramadan Fasting on Athlete Performance." Soccer Science | Football Science | Soccer Performance, February 19, 2024. <https://www.isspf.com/articles/football-nutrition-impact-of-ramadan-fasting-on-athlete-performance/>. This study details how players are affected during the fast, the issues associated with fasting, and how to best manage performance during this time. It includes as well five tips to aid athletes during the month, which include timing events to be just before or after eating, sleeping as early as possible after the evening meal, managing hydration, proper consumption of salt and water, and appropriate consumption of protein after exercise.

the public sphere. In the NFL, faith is ingrained in American culture, religion is tolerated, if not fully embraced, provided it does not affect the league's interests. Moments like Hamlin's injury and subsequent near-death experience reveal how public prayer can become a normal event, despite the NFL being a non-religious league. On the other side, Ligue 1, has *laïcité* as a defining characteristic of its approach to religious expression. Public expression is treated similar to a break of the rules through several ways: official bans on hijabs, contractual restrictions on religious speech, or debates over fasting in Ramadan.

These rules are constantly pushed and tweaked. Athletes can argue against these rules, adapting their public faith to fit inside these guardrails, or to push the boundaries further. Neymar's contract seemed to try to limit his public expression, but his Catholic faith is foundational to his identity. Similarly, Benzema's fasting has been scrutinized for his commitment to fasting, but that has not stopped him from excelling in his games. The FFF's hijab ban has sparked activism and legal battles that continue to test the limits of *laïcité*. These moments are not just private beliefs, they are set pieces, like plays or free kicks, in a broader contest over who gets to define the role of religion in public life. In the end, the way secularism is enforced in professional sports reveals deeper cultural and national fears about identity, unity and the role of religion in modern society. Whether in the NFL or Ligue 1, the tension between religion and secularism is not a settled question; it is an ongoing match, one that changes with every new controversy, regulation, and act of defiance.

CONCLUSION

Sports are often framed as a refuge from the conflicts of the world, a place where people of all backgrounds come together under the simple banner of competition. However, as this analysis has shown, the field is never neutral. Secularism, like religion, is always in the game. Whether in the blurred, flexible approach of the U.S. or the rigid, rule-driven model of France, secularism does not merely dictate the rules of engagement, rather, it is a game in itself, one in which various forces fight to define the limits of belief in public life. Just as sports are governed by rules, strategies, and shifting power dynamics, so too is secularism a structured and evolving form of competition. It is not simply a philosophical principle enshrined in law or policy; it is a real force, constantly negotiated by athletes, leagues, and governing bodies, whether sporting or governmental.

This is especially evident in the way religious expression emerges, even when constrained, within the framework of professional sports. The rise of religious ‘nones’ might suggest that nonreligiousness is winning, yet the persistence of faith in sports complicates that narrative. In the U.S., public prayer remains a visible and even expected part of sporting culture, from Tim Tebow’s genuflections on the field to the widespread displays of faith following Damar Hamlin’s near-fatal collapse. Even in a country where church and state are separate, the NFL does not enforce nor pursue a strict secular identity. Rather, it selectively accommodates religious expressions that align with dominant cultural norms while benching those that challenge the league’s interests. Praying for Damar was a trend that took the league by storm, while praying for social justice was not something that was trending on social media. Athletes who wear their

faith openly are not always treated the same; an evangelical Christian invoking God's blessing often receives a different reception than a Muslim athlete observing Ramadan or an activist invoking faith to challenge systemic injustice. This uneven playing field is not incidental; it reflects the ways secularism in America operates as a fluid, negotiable force rather than a rigid doctrine.

By contrast, in France, the ideology of *laïcité* has been explicitly codified into policy, extending far beyond government institutions to permeate even private organizations like professional sports leagues. The French Football Federation's ban on religious symbols, Neymar's contract restrictions on religious speech, and the scrutiny over Karim Benzema's fasting all point to a state-driven effort to keep religion as a strictly private practice, out of the public eye. Unlike in the U.S., where religious expression often adapts within a hazy secular framework, *laïcité* in France is wielded as a barrier, an attempt to create a playing field where faith is not just sidelined but actively pushed out of view and hidden. Yet even there, the contest is ongoing. French Muslim athletes continue to challenge these restrictions, and public debates about the role of religion in sports have not disappeared. In fact, I would argue the very need for continued enforcement of *laïcité* suggests that religion remains an active force, resisting full erasure from the public sphere.

Ultimately, the presence of secularism in sports is not a neutral background against which the game is played, it is part of, and reflects, the game itself. Just as sports are not merely games but structured competitions that rely on strategy, endurance, and dominance, secularism is not a mere separation of church and state, it is a struggle over

who gets to define the boundaries of belief in the public sphere. The language of sports, steeped in militaristic and tribalistic metaphors, mirrors the reality that secularism is not a static, unchanging principle but a contest of wills, shifting with each new controversy and cultural moment.

This comparative study of secularism in sports is ultimately at its core a study of power: who has it, who challenges it, and how it is enforced. Whether on the field or in the halls and pages of government, religion and nonreligion continue to battle for space, recognition, influence and fans. Like any competition, the outcome is never final—the game is still being played. The referees may change, the rules may be rewritten, and new players may enter the field, but the underlying contest remains. Secularism, far from being a settled issue, is a dynamic, ongoing struggle, one that will continue to shape not just the world of sports, but society itself.

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