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2. Only in America

How an Unknown Woman Stepped into the Public Square to Defend Her Son's Religious Freedom and Became "The Most Hated Woman in America"

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Abstract

In 1964, *Life* magazine called Madalyn Murray (O'Hair) "the most hated woman in America." Another critic described her as "rude, impertinent, blasphemous, a destroyer not only of beliefs but of esteemed values." This essay presents an assessment of her beliefs and actions, in the culture of the times—the 1950s and 1960s—and how they led her to represent both what Americans hated in their unbelieving enemies and feared in themselves as believers. First gaining notoriety in the 1963 case, *Murray v. Curlett*, which led to the Supreme Court banning school prayer and bible reading in the nation's public schools, she launched a crusade against God, or more specifically to assure the complete separation of church and state.

Keywords: Atheism, separation of church and state, First Amendment, Cold War America, anti-godless communism, prayer and bible reading in the schools, Madalyn Murray O'Hair, William J. Murray

Introduction

In February 1959, soon after moving to Baltimore, Maryland with her sons William and Jon Garth, Madalyn Murray marched William into Woodbourne Junior High School to register him to attend the public school. As William later reported in his *Life Without God* (1983, 46–47), having arrived at the opening of the school day, his mother was perturbed to witness the students standing and pledging allegiance to the flag and bowing their heads, reciting the Lord's Prayer.

Upon entering the guidance counselor's office, Madalyn confronted the counselor asking why the students were praying. "It's un-American and unconstitutional!" she argued, insisting that she did not want her son taught any prayers. As William recalled, the counselor was clearly flustered and initially responded that nobody else had ever complained, and that even those who were not very religious thought prayer recitation set a nice tone for the day. Not wishing to leave it there, he added: "There were prayers in the schools of this city before there was a United States of America. If our forefathers had wanted us to stop this practice, they would have told us that when they formed the government." Infuriated by the counselor's history lesson, Madalyn replied that "people like him had to be stopped." In one of those moments he may have later wished he had not responded, he said: "Then why don't you sue us?" Thus began Madalyn Murray's (to be O'Hair) quest to stop prayer and Bible reading in the nation's public schools (Murray 1983, 47–48).

This essay focuses on the historical and cultural context of Madalyn Murray (O'Hair)'s Supreme Court case, *Murray v. Curlett*, which led to the Supreme Court banning school prayer and Bible reading in the nation's public schools, and her crusade against God, or more specifically to assure the complete separation of church and state in America. In particular, the essay explains how and why Madalyn Murray became "the most hated woman in America" (Howard 1964, 91); how and why the case provoked such outrage; and how and why Madalyn Murray O'Hair came to personify what believers in America hated in unbelievers and feared in themselves, as believers.

O'Hair's Path to the US Supreme Court and the Making of an American Atheist Along the Way

On December 8, 1960, Madalyn Murray (soon to be Madalyn Murray O'Hair, but hereafter referred to as Madalyn so as to avoid confusion with the other Murrays in the story), filed suit in the Superior Court of Baltimore, asking the Court to rule that required Bible reading and recitation of the Lord's Prayer in the city's public schools were unconstitutional, that her son, William's, First Amendment rights were being violated. The judge's decision set the tone for what was to follow, referencing the fact that the law which not only allowed, but required, prayer and Bible reading in the city's public schools dated to 1905 and was never seriously challenged (not exactly correct). The judge ruled that the plaintiff (William) had not presented a good "cause of action," since the school board was acting in its discretion by

requiring Bible reading and prayer recitation, and that William had not “spelled out any violation” of his constitutional rights (Murray 1983, 72–73; O’Hair 1973, 208)

Judge J. Gilbert Pendergast then opined that the Murrays’ “real objective” was “to drive every concept of religion out of the public school system,” and that “If God were removed from the classroom, there would remain only atheism.” The religious beliefs of “virtually all the pupils” would be subordinated to those of William Murray, and any reference to the Declaration of Independence and Lincoln’s Gettysburg Address would be prohibited because of their reference to God or Divine Providence. “It is even possible that the United States currency would not be accepted in school cafeterias because every coin contains the familiar inscription, “In God We Trust,” added by an act of Congress in 1956. Pendergast might have added, as others would, the phrase “under God,” which was added to the Pledge of Allegiance in 1954. Or, he might have quoted President Dwight Eisenhower, who in 1955 told the nation: “Recognition of the Supreme Being is the first, the most basic, expression of Americanism. Without God, there could be no American form of government, not any American way of life” (Murray 1983, 72–73; O’Hair 1973, 208; Fried 1998, 96–97).

The state’s case was clear, both legally and culturally, and so it went up through the courts. In 1962 the Maryland Court of Appeals ruled 4 to 3 against the Murrays, basically concluding that the Maryland Law did not violate the U.S. Constitution, and “that there was no compulsion for a student to take part in religious exercises—a point the school district conceded—and if William chose not to participate, the personal deleterious effects of that decision were not of the Court’s concern (Murray 1983, 72–73; O’Hair 1973, 208).

Madalyn persisted with an appeal to the US Supreme Court in what became *Murray v. Curlett*, joined with *School District of Abington Township v. Schempp*. On June 17, 1963, by an eight to one margin, the Court ruled in favor of the Murrays and the Schempps that the Maryland and Pennsylvania laws violated the Establishment Clause of the First Amendment.

Madalyn Seizes the Moment

The school system and the Schempps maintained a low profile, not wishing to attract attention. Madalyn, however, would not be silenced. She flooded press and airways with arguments to support her case. She appealed to numerous groups to file *amicus curiae*, in the end succeeding only with the American Jewish Committee, Synagogue Council of America, and American Ethical Union—most of the others who opposed the law, choosing to support the Schempps (O’Hair 1973, 35, 40–41, 245, 253)

Madalyn blew the lid off things in an interview with the Baltimore *Morning Sun*. In what would become her trademark blunt language, Madalyn extended the reach of the case arguing that atheists were having their rights trampled throughout the United States. “I have had enough, for I am an Atheist, and I will no longer be maligned and abused by identification with all that is evil, corrupt, and noxious . . .” Paraphrasing Sojourner Truth’s “Ain’t I a Woman?” speech delivered at the 1851 Women’s Rights Convention held in Akron, Ohio, Madalyn asked: “What is an Atheist that he is so vile? Hath not an Atheist eyes? Hath not an Atheist hands, organs, dimensions, senses, affection, passions? Do we not love, work, bear children, praise, honor and seek worth? Do we not have a right to our opinion as to the existence or non-existence of a supreme intelligent being? . . . We Atheists and Agnostics want

only the freedom of our opinion. We desire to be excluded from your collective madness. We desire not to have this forced upon us against our good conscience and our considered convictions.” Perhaps more likely to raise alarm, she listed three issues that would become her causes going forward, echoing the words of Judge Pendergast and others: public prayer, the phrase “In God We Trust” on US coins, and the words “under God” in the Pledge of Allegiance (Murray 1983, 72–73; O’Hair 1973, 208).

The phone rang off the hook, not only from other local reporters, but nationally from radio and television, major newspapers, and magazines. Madalyn gave them all interviews, each more highly charged than the previous—loaded with what many Americans saw as blasphemous and vulgar language. She complained about the editing, which she argued misrepresented her “methodically, deliberately, and with premeditation” following the school’s line in making the case for her being a communist or “nuts” and avoiding the prayer issue. But, as one reporter responded, “Without the smear of your being a Communist and William being a nut, nothing would have appeared” (O’Hair 1973, 48–49, 52, 56–57). And, as might be expected, Madalyn, William, and their family were harassed with catcalling, spray painting the house, damaging the car, and an attempt by a bunch of boys to push William in front of a bus, which only served to attract more attention. Madalyn took the boys to court, where they confessed, wherein the judge lectured them, ordered them to shake hands, and dismissed the case (O’Hair 1973, 94–95; Murray 1983, 66–67; Shaw 1964, 170)

Timing is Everything

As the Woodbourne Junior High School counselor’s comments suggest, God has occupied our nation’s consciousness to an extent unlike most other developed nations, perhaps most decisively serving even to define what it means to be an American. Unlike Madalyn Murray, with only a few other notable exceptions—until more recently—unbelievers usually chose to remain silent on, or disguise, their unbelief, rather than face social, cultural, and even legal discrimination. Madalyn proved to be an exception. She refused to hide her unbelief and not only faced the repercussions, but also dedicated herself to a life-long crusade to pursuing equality for atheists in the public sphere (Moore and Kramnick 2018, xiii–xx).

The prominence of Madalyn’s crusade was directly related to three developments. First, *Murray v. Curlett* was joined at the Supreme Court level with *Abington Township v. Schempp* coming out of Pennsylvania, having suffered the same fate at the hands of the state’s courts. The cases were quite similar, both involved prayer in the schools and Bible reading. The Schempps, however, were Unitarians, rather than atheists, and they shunned the limelight, offering few public comments; Madalyn seized it while the trial was in the making, during the trial, and after. It was one of the major reasons for the reluctance of groups such as the ACLU to take on her case. Clearly, they did not want to sully their case with Madalyn’s public persona.

Second, as the nature of the outrage clearly indicated, Madalyn’s public stance challenged the very identity of the majority of Americans. The challenge of prayer in the public schools and Bible reading raised its head during the Cold War, wherein as most historians have argued, religion was at its height as measured by personally stated religious beliefs, church attendance, denominational affiliation, and opposition to “atheistic communism.” To be branded an atheist was to be branded a communist, as well, and in the process unamerican. In making her case in the 1950s and 1960s, whether she intended it or not—and there is evidence for both—

Madalyn was branded as both and was proclaimed in the press “the most hated woman in America” (Finke and Stark 1998, 15; Howard 1964, 91–92, 94).

A third consideration—a bit of an enigma—is why the decision in the Supreme Court case outraged so many Americans. Simply put, anyone who had followed the Court must have seen it coming. There were several related court cases dating back to the 1940s preparing the way for the Court’s decision of 1963. The case could be made, for example, that prior to *Cantwell v. Connecticut*, which was decided in 1940, incorporating the free exercise of religion into the Fourteenth Amendment and assuming (*obiter dictum*) that the Establishment Clause imposed on the states the same restraints as upon Congress, that assumption becoming constitution law in *Everson v. Board of Education* in 1947, *Schempp/Murray* may never have been heard, or at least not decided as it was. In *Everson*, Justice Hugo Black, wrote for the majority: “The ‘establishment of religion’ clause of the First Amendment means at least this: Neither a state nor the Federal Government can set up a church. Neither can pass laws which aid one religion, aid all religions, or prefer one religion to another. Neither can force nor influence a person to go to or to remain away from church against his will or force him to profess a belief or disbelief in any religion” (Levy 1986, 123–24).

That decision was followed by *McCollum v. Board of Education of Champaign, Illinois*, in 1952, which declared religious instruction in the public schools unconstitutional (Levy 1986, 144–45; Alley 1988, 173). Although two years later, in *Zorach v. Clauson*, the Court sustained a New York law that releasing students from school, on written request of parents, so that they could attend religious centers of their choice off campus for religion instruction was acceptable (Semonche 1985, 52; Alley 1988, 183; Levy 1986, 146). Finally, in *Engel v. Vitale* (1962), decided on the eve of *Schempp/Murray*, the Court ruled unconstitutional a prayer, composed by the State of New York in an attempt to create a nonsectarian prayer that might pass muster with those who saw such prayers as not violating the establishment clause (Lewis 1962; Semonche 1985, 60; Levy 1986, 147; “Majority Opinion by Justice Black” 1963; “Dissenting Opinion by Justice Stewart” 1962).

Publicity around, and opposition to, *Schempp/Murray* surfaced even before the decision was rendered. On March 15, in “The Bible Better in School than in Court” (1963), *Life* magazine’s editors argued that the Founding Fathers did not intend to outlaw prayer or Bible reading in the schools, that the Supreme Court’s doing so would “offend the nation’s natural piety and sense of its own past,” and that the matter should be left to the school boards to work out. Interestingly, the editors predicted that actions of the “Maryland atheist” and a “Pennsylvania Unitarian” might have “even more seismic political effects” than *Engel*. They recommended that the Court “re-examine the premises” on which it had been deciding such cases, as “millions of Americans” would be “shocked to learn than any prayer could be unconstitutional.

The editors accused the Supreme Court of leading the nation into a “morass,” and that it would be no surprise if it moved the country to “complete secularization, [erecting] a literal ‘wall of separation’ between public property and piety of any kind.” They quoted Alexis de Tocqueville, author of *Democracy in America* (1835–1840): “Religion in American takes no direct part in the government of society, but it must be regarded as the first of their political

institutions . . . Despotism may govern without faith, but liberty cannot” (“The Bible—Better in School Than in Court” 1963).

A month later, on April 12, still awaiting the Court’s decision, Madalyn responded to the *Life* editorial in a letter that appeared along with her picture (1963). As the editors had not identified her or the Schempps by name, she began by introducing herself as did the magazine, “the Maryland atheist.” She described her—and the atheists’ position—as “founded in science, in reason and in love for fellow man rather than in a love for God.” She continued: “We find the Bible to be nauseating, historically inaccurate, replete with the ravings of madmen. We find the Lord’s Prayer to be that muttered by worms groveling for meager existence in a traumatic, paranoid world. This is not appropriate untouchable dicta to be forced on adult or child. The business of public schools, where attendance is compulsory, is to prepare children to face the problems on earth, not to prepare for heaven – which is a delusional dream of the unsophisticated minds of the ill-educated clergy.”

The Court Rules and the Public Responds

In writing for the majority in an 8 to 1 decision in the *Schempp/Murray* case, Justice Tom Clark reported that the Court had found unconstitutional the Pennsylvania and Maryland laws requiring Bible reading and prayer recitation in the public schools, because they violated the Establishing Clause of the First Amendment. The majority opinion maintained that the Establishment Clause is violated by any government sponsorship of religion in the public schools, regardless of whether a showing or coercion exists. In extending the *Engel* decision, the Court established purpose and effect tests regarding the Establishment Clause. As Clark put it, for a law to be valid, “There must be a secular legislative purpose and a primary effect that neither advances nor inhibits religion,” and the laws in both states failed that test (“Text of the Supreme Court’s Decision” 1963; Levy 1986, 149; Alley 1988, 204). Only Justice Potter Stewart dissented.

All of the justices, including Stewart, agreed that the state must not establish a religion of secularism, in the sense of opposing religion or showing hostility to it, thus preferring irreligion. To this, Clark added, however, that “Nothing we have said here” should be construed to preclude the study of the Bible or religion in the public schools “when presented objectively as part of a secular program of education.” But that was not the case in Pennsylvania or Maryland. To the argument that by the ruling the majority was being denied its will, Clark responded that the purpose of the free exercise clause was to protect the minority from the pressure of the majority. And, that allowing students not to participate in the morning exercises did not “mitigate the obligatory nature of the ceremony” (“Text of the Supreme Court’s Decision” 1963).

Clark allowed that religion “has always been closely identified with our history and government, but that, having been so identified, so too has been religious freedom,” having resulted from “the most telling of personal experiences in religious persecution suffered by our forebearers,” and that remains “indispensable” in a nation of such “diversity of religious opinion.” “The place of religion in our society is an exalted one . . . [but] it is not within the power of government to invade that citadel, whether its purpose or effect be to aid or oppose, to advance or retard . . . The breach of neutrality that is today a trickling stream may all too soon become a raging torrent” (“Text of the Supreme Court’s Decision” 1963).

In his dissent, Justice Potter Stewart did not question the majority's opinion on the meaning of the Establishment Clause or on the dangers of violating the protections therein. Rather he argued that evidence of "the dangers both for government and to religion" posed by the issue at hand, and upon which the court based its majority opinion, was not present, and that the cases should have been remanded for the taking of additional evidence. He opined, however, that "as a matter of history and as a matter of the imperatives of our free society . . . religion and government must necessarily interact in countless ways," and that "a doctrinaire reading of the Establishment Clause leads to irreconcilable conflict with the Free Exercise Clause" ("Text of the Supreme Court's Decision" 1963; Semonche 1985, 203–4; Lewis 1963, 27).

Madalyn may have felt vindicated by the decision, but several religious organizations, not of one mind, rushed to make their thoughts known. Several church groups, mostly mainstream Protestants and Jews accepted the decision or even welcomed it. The National Council of Churches asserted that the decision served as a reminder that "teaching for religious commitment is the responsibility of the home and the community of faith . . . rather than the public schools. Neither the church nor the state should use the public school to compel acceptance of any creed of conformity to any specific religious practice." Similarly, the Synagogue Council of America, representing Orthodox, Reform, and Conservative Judaism, through its president, said "We fervently believe that prayers, Bible reading, and sectarian practices should be fostered in the home, church and synagogue, and that public institutions such as the public school should be free of such practices" (Dugan 1963, 29).

Others argued that the decision was the result of misreading the First Amendment. Originally conceived to prevent the establishment of a state church and to assure the free exercise of all faiths, they stated, the First Amendment had come to be interpreted by "humanist judges" as requiring the removal of religion from public institutions. In doing so, the Court had in effect established another religion, the religion of the secular state, or secular humanism (Lienesch 1993, 166). Mark Murphy, vice president of Citizens for Educational Freedom, charged that the decision established "Godless schools" and was "another step toward the elimination of God from all public American life" (Dugan 1963, 29).

As to the states of Pennsylvania and Maryland, Charles Boehm, Pennsylvania's superintendent of public instruction, recommended that "an inspirational period" allowing for silent meditation and reading be adopted" (Hechinger 1963, 1). Maryland acted even before the decision was handed down, recommending a required silent meditation period, which passed in the state's lower house but failed in the Senate (O'Hair 1970, 305).

Several states called for an amendment to the US Constitution to reaffirm and reestablish prayer in the schools. None other than Francis Burch, the attorney who represented the city in *Murray*, proposed such an amendment, which received support from former President Eisenhower and the governors of several other states. Constituents besieged their congressmen with mail and the House Judiciary Committee held eighteen days of hearings to evaluate some 147 to 150 resolutions proposing thirty-five different amendments—the so-called Becker Amendment, being the most popular. It read, in part:

Section 1: Nothing in the Constitution shall be deemed to prohibit the offering, reading from, or listening to prayers and biblical scriptures, if

participation therein is on a voluntary basis in any government or public school, institution or place.

But none made it out of Congress. And, of course, the most prominent evangelical preacher of the day, Billy Graham, condemned the decision as “a prelude to the fall of the West,” or the toppling of “civilization as we know it” (Lienesch 1993, 168; William Murray 1983:90; Shaw 1964, 115; Alley 1988, 204; O’Hair 1992, 116–17; Wright 1995, 91).

Madalyn Charges Ahead

Rather than pulling back, Madalyn charged ahead, launching a blizzard of highly publicized court cases on every imaginable issue that could even remotely be seen as violating the separation of church and state. To cite just a few, she threatened the Senate with a suit over appointing an envoy to the Vatican; threatened Congress over its use of chaplain-led opening prayers; sued Maryland and other states to remove the tax exempt status of religious institutions; filed suit in different venues to remove “under God” from the daily pledge of allegiance; filed complaints with the Federal Communications Commission for refusing her air time when it granted it to religious institutions; tried to stop “the religious exploitation of outer space” (i.e., any public display or religion, such as a prayer offered by astronaut Frank Boorman in space Christmas Eve 1968); tried to block and then picketed the pope’s mass in Grant Park in Chicago; mimicking Jesus storming the temple’s merchants and money changers in Mark 11:16, she stormed a bingo game at a Roman Catholic Church, protesting that such gambling was illegal, “grabbing bingo cards, pushing and shoving people, [while] a man who was with her started punching people”; challenged the opening prayer at an Austin City Council Meeting; stormed the stage at her granddaughters band concert, when the PTA president began with a prayer; challenged religious caroling and ceremonies at Christmas in the Texas state capitol rotunda; and the list goes on. That, after 1963, she seldom succeeded in her cases, was not her ultimate concern. As she explained in 1979, they were symbolic: “I will file a suit, knowing that there is a 95% chance I’m going to lose. But I use that suit as a vehicle to go out and make speeches, appear on television and radio programs, go to high schools and colleges, and be interviewed in newspapers and magazines, in order to argue for the end of that I was trying to reach in the suit.” As she also admitted, these suits also helped her raise money (Bozarth 1989, pt. 1:11).

All of this made Madalyn a celebrity and the subject of several exposes. One of the earliest major exposes came in the June 19, 1964, issue of *Life* magazine, titled, “The Most Hated Woman in America.” Author Jane Howard described Madalyn as “America’s most outspoken and militant atheist.” Her cause was “the total and utter separation of church and state.” “In a land where most people believe in God and those who don’t keep quiet,” Howard continued, such a cause “is as good a way to win public favor as bringing back polio.” By outlawing official prayer in public schools, she had “made the name of Murray anathema to millions of Americans.” In response, Madalyn quipped. “I think sooner or later some night some nut is going to get a message from Jesus Christ, and I am going to have had it. But as long as I’m still around I’m going to keep on being a squeaking wheel” (Howard 1964, 92–94).

A month later, on July 11, Robert Liston published an article in the *Saturday Evening Post* under the similarly provocative title, “Mrs. Murray’s War on God,” announcing that having abolished school prayer, she had set out “to uproot religion altogether by taxing the churches

out of existence.” He quoted her as explaining, “If people want to go to church and be crazy fools, that’s their business. But I don’t want them praying at ball parks, legislatures, courts and schools. I don’t want to see their religion emblazoned on the public buildings.” In the same article, she admitted being an anarchist—meaning “fundamentally antiauthoritarian,” she added—but not a communist” (Liston 1964, 83, 85).

Liston included letters sent to Madalyn in the wake of *Murray*. Both the content and the references are interesting as indicators of how Americans associated atheism and communism:

“Lady, you are as deadly to our city as a snake. Return to Russia.”

“You don’t belong in this country. Russia is where you should go, and when you get there, kiss the hind end of dictator K[hrushchev]. He is an atheist, too, and will be pleased to give you a big bear hug.”

“You filthy atheist. Only a rat like you would go to court to stop prayer. All curses on you and your family. Bad luck and leprosy disease upon you and your damn family.”

“You will repent, and damn soon a 30-30 [rifle bullet] will fix you nuts. You will have bad luck forever. You atheist, you mongrel, you rat, you good for nothing s---, Jesus will fix you, you filthy scum” (Liston 1964, 86).

Over the course of decades, in order to “propagandize atheism,” as she put it, and attract those who sought to prevent “religious intervention in the secular world,” but were not necessarily atheists (Howard 1964, 92, 94), Madalyn established several organizations, nearly all of which have folded or been spun off—including the Society of Separationists, which became American Atheists, and the Freethought Society, both of which still exist. She established state directors, a network of “associates” in all fifty states, and “friends” in several countries. Moving her operation to Austin, Texas, Madalyn operated her American Atheist Center, which by 1972 operated out of several buildings, publishing a monthly magazine and hosting a library and the American Atheist Press. American Atheists distributed a recorded radio series, and at one point turned to cable television programming under the title, “American Atheist Forum,” which peaked at 100 cable stations (O’Hair 1988, 9, 10; Le Beau 2003, 133–36, 179).

In 1961, as she took on the Baltimore public schools, Madalyn composed the original draft of *Why I Am an Atheist* (1991), which she continually revised over the years. Originally, she used it to introduce herself as the person who was fighting the battle to remove prayer and Bible reading from the public schools. But over time, by including “free thinkers”—from Democritus to the 20th century—she sought to establish her intellectual heritage. It became her perennial favorite lecture.

But Madalyn’s most impactful outreach came from her appearances on dozens of radio and television shows hosted by such figures as Steve Allen, Mike Douglas, Johnny Carson, Merv Griffin, Tom Snyder, and David Hartman, and her lectures on college campuses across the nation, including Dartmouth, Harvard, UCLA, Howard, Rice, Tulane, the Universities of Pennsylvania, Illinois, Maryland, Michigan, St. Edwards, St. John’s, and Loyola New Orleans (Le Beau 2003, 136).

In the midst of all of this, bits of news about Madalyn's personal life leaked out—confirming the popular stereotype of the atheist. Even by contemporary standard, Madalyn was not a paragon of morality or proper behavior, but in the context of the 1950s, Madalyn fell far short of any such measures. Madalyn violated many of the sacred codes of her age. Growing up in a tumultuous, combative family, she nevertheless earned two college degrees—one a JD, though she never took the bar exam nor practiced—but was forced to take and lose jobs beneath those for which she was qualified with individuals with whom she invariably quarreled. The twice married, divorced mother of two children conceived out of wedlock to two different fathers, neither of whom she married and lived only briefly with others. By her and William's accounts, she applied for Soviet citizenship and after failing to get approval despite her visits to the Soviet Embassy in Washington, DC and in Paris (with her two sons), she returned to Baltimore to enroll William in school. All of this no doubt contributed to her combative state of mind, when she confronted the school counselor (Murray 1983, 35–36, 41; O'Hair 1970, 19; Abrams 1983, 1).

Madalyn came to personify what many Americans believed was the inevitable fate of anyone who did not believe in God—preferably the Christian God—and follow the moral guidelines provided by the Church for “proper” behavior. And this only served to embitter her, to make her more difficult to live and work with, and even to push her in a more confrontational, self-destructive direction. At times, in the privacy of her diary, she contemplated her life and fate, accepting the premise that she had made mistakes and was paying the price for them. But those moments were usually countered by arguing that all she had done wrong was to violate social codes that were the product of an irrational, inhumane, repressive, and authoritarian state unduly and unconstitutionally influenced by organized religion, the result of which was truly immoral. So, Madalyn set out to undermine every aspect of that repressive system, especially religion, which she identified as the principal source of her condemnation. By toppling it, she would free herself of the burden she bore from having violated its taboos. Her fight, then, was as much to free herself as it was to free American society (Le Beau 2003, 15).

The Cold War

Some would argue that although the Cold War reshaped, perhaps distorted, many aspects of American life, there was little fundamentally new about American culture during the Cold War. Most of the characteristics by which we define it were the result of long-standing concepts. In brief, during the late-1940s, the 1950s, and 1960s, America's belief in itself as a redeemer nation took on millennial overtones with the potential for the United States to become God's chosen nation, with its victory over the forces of godless communism. This added to the urgency of Madalyn's battle against atheism. As one observer pointed out, whenever her opponents began railing against “those atheists,” the latter ceased to be individuals and became “a monolithic mass of faceless enemies—and in a war, there's no fraternizing with the other side.” As William Murray, who ultimately broke with his mother over her atheist activities and became one of her most engaged opponents, put it: “In reality my mother did not create the time, the time created her” (Strobel 1994, 135; Dugan 1999).

This was not an intellectual debate. Atheism and immorality were linked. Many feared that the nation was already going down the road of immorality, and Madalyn's life confirmed

the link. As Lee Strobel, who knew her, observed: “This person’s denial of God has opened the door to a selfish, vulgar, and immoral lifestyle. Words like liar, cheater, hypocrite, and publicity seeker only scratch the surface in describing this individual’s depth of personal corruption” (1994, 123).

Lawrence Wright, who knew her as well, pointed to those who also harbored disbelief, but were afraid to face it. For them, Madalyn was “a religious phenomenon in the same way that anti-matter is an expression of matter. She was a black hole of belief.” On a more personal note, he added, “Emotionally, it was like watching a city burn, horrifying but thrilling [which included] a sneaky underlying feeling of relief at the distraction of everything I had counted upon, a welcoming sense of chaos, and above all, joy at hearing the unspeakable truth brayed aloud—what a load of powerful but ambivalent feelings I had when Madalyn Murray entered our public consciousness” (1995, 106, 118–19).

Even Madalyn saw this. As she explained to a Texas newspaper in 1985, she found it revealing how her mission had revealed the sanctimoniousness of American society, in that she, the voice of a single woman denying God, would create such mob hysteria: “I am a walking, talking personification of their doubt. The more they doubt, the more tenuous their hold, and the more they’re going to attack” (Wright 1995, 106).

So why did she do this? Madalyn personified the Christian stereotype of an atheist. Rude, intemperate, blasphemous, a destroyer not only of beliefs but of esteemed values. It was impossible not to admire her nerve, while at the same time wondering at her apparent compulsion to be loathed. Was she simply committed to changing the world, to making it, by her way of thinking, a better, more humane place? Might it be that she did not realize what she was doing—that she did not foresee what the reaction to her would be until it was too late? Having read her diary—consisting of several volumes covering nearly the entirety of her adult life—Madalyn presents successive conflicting self-portraits. She was always struggling to better explain herself, often revising the “facts,” and/or altering her interpretations, of the seminal events in her life.¹ To most of us, she remains a puzzle (Le Beau 2003, 16). Once again, as Lawrence Wright put it: “Everyone has an opinion about Madalyn Murray O’Hair, yet no one who knows her will claim to understand her (Wright 1995, 93; see also Strobel 1994, 125).

How Madalyn’s Crusade Came to an End

Whatever her motives, O’Hair’s crusade positioned and served her well during the Cold War and immediate post-Cold War Era, the reform-minded, counter-cultural, even iconoclastic 1960s and 1970s, wherein her popularity peaked. She embraced just about every other cause, from the anti-Vietnam War movement to civil and women’s rights, where she was cautiously welcomed. Her star faded as the time gave way to the conservative backlash of the 1980s and 1990s. The Cold War was reheated during the Reagan years, accompanied by the rise of the New Christian Right and Moral Majority, complete with renewed ideological crusades against the “Evil Empire” and its sympathizers at home, turning a cold shoulder to

¹ O’Hair’s diaries are privately held and available to the public only by permission from the owner, Jimmy Nassour, of Austin, Texas.

liberals, reformers, and those standing outside the ideological mainstream. During the more conservative mood of the nation, what most people found so shocking (and appealing) about Madalyn and her cause during previous decades became “old hat.” Madalyn roared in opposition to the Reagan decade, but it was like tilting with windmills, especially when those to whom she once appealed tired of the battle for liberal reform and might well have been heard to respond, “Madalyn, we’ve heard it before.”

As Madalyn prepared to retire, American Atheists faced its most serious challenges. To begin with, A. Lawrence Wright observed in his *Saints and Sinners*: “Hungry all her life for money and power, she lives at last in a world of material comfort, surrounded by luxurious German cars and expensive artwork. Yet the organization she created to carry on her crusade is little more than a hollow shell, a sounding chamber for the roar of O’Hair’s complaints. She has suffered the loss of her second husband—the only one with whom she remained married for long—and the defection, in 1980, of her son, William, to Christianity” (1995, 93–94). William, in whose name Madalyn had brought forth *Murray v. Curlett*, according to Madalyn and William, had “shamed” her into stepping up her protest, accusing her of not standing up for what she believed.

William not only formed an evangelical Christian ministry—the Religious Freedom Coalition—published *My Life Without God* (1982) and *Let Us Pray: A Plea for Prayer in Our Schools* (1995) and openly criticized his mother’s atheist crusade. He picketed his mother’s annual American Atheist meetings, with which the press had a field day. Wright, who knew her personally, claimed that he saw “anxiety” in her eyes, which he allowed might have been due to recent family losses. But he also noted that some of her religious opponents had begun to gloat over her decline in influence, for which they often took credit. They pictured her as “quaking at the prospect of death,” to which Wright wondered if it was not death but life that frightened her: “life, and the contradictions, the lies, the deceit, that make up the furious existence of Madlyn Murray O’Hair” (1995, 93–94).

As Madalyn rose to prominence and expanded her operation, she became increasingly dictatorial. She had no patience with those of lesser skills and energy or who challenged or even questioned her, and, as a result, she alienated many of those who might have served her organization well. This became a problem as she lost prominence, and members of her own organization began to blame her for the decline of the movement and sought to remove her from power. Others simply sensed her growing weakness and moved in for the kill for their own reasons. As her granddaughter, Robin (William’s daughter), who was working for her, put it, Madalyn’s critics besieged her with ridicule. They bear-baited her—as well as son Jon Garth and Robin—with published unflattering, demeaning pictures, while the print media ridiculed their intelligence, education, hair, clothing, and personal relationships. Otherwise, as Madalyn wrote in 1990: “No one listened. No one cared” (iii–iv). She had become a curiosity (Terzian 2001, 17).

By the mid-1980s, Madalyn lost the support of several of her state chapters and even her Board of Directors. Trusting no one beyond her immediate circle, she insisted on passing the baton to Jon Garth. His leadership and interpersonal skills were questionable, and the method by which he was thrust into power outraged many within the national organization. Other prominent atheists felt the need to distance themselves from Madalyn. In 1983, Jane Kathryn

Conrad published *Mad Madalyn*, in which she wrote: “This booklet was written for one purpose only: to assure the public that most non-theists are honorable and respect the right of every person to his individual freedom of conscience. We ask that you not judge us by the image projected by Madalyn and family members” (9–11). Six years later, G. Richard Bozarth, who worked at the American Atheists Center in 1979–1980 wrote a devastating insider’s view, explaining that it was “high time that something true be written about her by someone who is not trying to score points against atheism and who will go the full distance to provide all the evidence he has to support his conclusions” (Bozarth 1989, pt 1:1).

In the early 1980s, the IRS charged American Atheists with failing to pay back taxes for \$1.5 million. American Atheists seemed on the verge of being torn apart, if not collapsing altogether. In 1983, on the twentieth anniversary of *Murray*, Madalyn officiated at the opening of a new headquarters, but otherwise, she was pushed out of public view, only occasionally emerging as a caricature of what she once was (Rapport 1998: 100; Van Biema 1997; Dugan 1999; Bozarth 1989, pt 1:1; “Atheists Celebrate 25th Year” 1988; Murray 1988).

Madalyn’s Death—As Inconceivable as Her Life

In 1995 Madalyn, age 77, Jon Garth Murray, age 41, and Robin Murray-O’Hair, age 30, disappeared. The threesome lived together in Austin. Some thought they had left for New York to picket the pope’s public appearances, but they never arrived in New York and, as to the group’s whereabouts, as one newspaper headline put it, ironically, “God only knows” (“Where’s Madalyn” 1996). Rumors abound, some more fantastic than others, and were featured in numerous media accounts. A few believed that she died due to complications from her diabetes, and that her family had followed Madalyn’s orders to simply burn her “carcass” in her backyard and scatter the ashes. Some believed that the trio had fled due to their financial debt, that they were on a mission of some kind and would eventually turn up, or that they had absconded with what was left of the organization’s money. And, still others—many, in fact—were convinced that, as Madalyn predicted, they had been kidnapped by the “Christers,” who Madalyn had spent decades offending with anti-religious screeds, and, as we saw earlier, either threatened her with being shot or wished it on her. All that remained was a note on the headquarters’ door saying: “We’ve been called out on an emergency basis and will call you when we get back” (“Where’s Madalyn” 1996; Lindell and Gee 2001; Rapport 1998, 19; Van Biema 1997).

It took four years for a break to come in the case, but the ending proved sordid, if unexpectedly mundane. March 1999—four years after their disappearance—David Waters, Madalyn’s former office manager, and Gary Karr, both convicted felons, were arrested on weapons charges. Both had substantial criminal records. In 1964, at age 17, Waters and three other teenagers fatally bludgeoned a 16-year-old boy in a dispute over 50 cents worth of gasoline. In 1974 Karr had been found guilty of rape, kidnapping, and armed robbery. Both had been released from prison several months before the trio’s disappearance (“FBI Keeps Searching” 1999; “Agents Dig But Find No Sign” 1999; McFadden 1999; Dugan 1999; Stack 2001; Harris 2001; Terzian 2001; Le Beau 2003, 314–15).

In April 1999, Austin area newspapers reported that the FBI was searching a ranch 125 miles west of San Antonio. The FBI failed to confirm the subject of the search, but it was widely speculated that the search was for the trio. The unconfirmed report proved to be

accurate. In January 2001, Waters—in plea bargaining to avoid the death penalty—led investigators to the buried remains. In exchange for a deal that he would not be executed, Waters pled guilty to murder and other related crimes and was sentenced to a total of 80 years in prison, where he died in 2003. Karr was sentenced to life in prison, but upon appeal—by then in his seventies—to nearly fifty years in prison (“FBI Ends Search for Missing Atheist” 1999; “The Case of the Missing Atheist” 1999).

The press referred to Madalyn’s murder as “a saga of greed and teachery, of gold coins and metal drums [references to coins that were stolen and containers of some of the bodily remains], of disbelief and dismemberment,” and as “an unlovely tale, at turns tragic and deeply absurd” (“The Case of the Missing Atheist” 1999). A *Washington Post* reporter, referred to her as “a cultural leftover, dimly recalled . . . Churlish and foul-mouthed and contentious as ever . . . And when suddenly one morning she was gone, the world just shrugged. Ashes to ashes” (Harris 2001). Reportedly, son William Murray’s final public comment was to wonder whether in the end, she had had a chance to accept Jesus (“Statement of William J. Murray in O’Hair Buried Without Prayer as She Wished” 2001). After some vocal opposition to William’s taking possession by those who still recognized Madalyn for her leadership—or just did not want him to have his way—William secreted the remains of his mother, brother, and daughter to an unmarked grave, which remains unknown today to anyone but William (“The Case of the Missing Atheist” 1999). As reported in the press, Madalyn Murray O’Hair’s life ended with “a grisly climax to a life that was, in many respects, the stuff of comic relief” (Dugan 1999; see also Stack 2001; Terzian 2001).

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