ger test, finding that the interest sought to be upheld by the state did not justify the suppression of religious views that simply annoyed listeners.[289]

A series of sometimes-conflicting decisions followed. At first, the Court sustained the application of a non-discriminatory license fees to vendors of religious books and pamphlets,[290] but eleven months later it vacated the decision and struck down such fees.[291] A city ordinance making it unlawful for anyone distributing literature to ring a doorbell or otherwise summon the dwellers of a residence to the door to receive such literature was held to violate the First Amendment when applied to distributors of leaflets advertising a religious meeting.[292] A state child labor law, however, was held to be validly applied to punish the guardian of a nine-year old child who permitted her to engage in "preaching work" and the sale of religious publications after hours.[293]

The Court decided a number of cases involving meetings and rallies in public parks and other public places by upholding licensing and permit requirements which were premised on nondiscriminatory "times, places, and manners" terms and which did not seek to regulate the content of the religious message to be communicated.[294] In 2002, the Court struck down on free speech grounds a town ordinance requiring door-to-door solicitors, including persons seeking to proselytize about their faith, to register with the town and obtain a solicitation permit.[295] The Court stated that the requirement was "offensive . . . to the very notion of a free society."

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[289] 310 U.S. at 307–11. "In the realm of religious faith, and in that of political belief, sharp differences arise. In both fields the tenets of one man may seem the rankest error to his neighbor. To persuade others to his own point of view, the pleader, as we know, at times, resorts to exaggeration, to vilification of men who have been, or are, prominent in church or state, and even to false statement. But the people of this nation have ordained in the light of history, that, in spite of the probabilities of excesses and abuses, these liberties are in the long view, essential to enlightened opinion and right conduct on the part of the citizens of a democracy." Id. at 310.

[290] Jones v. Opelika, 316 U.S. 584 (1942).

[291] Jones v. Opelika, 319 U.S. 103 (1943); Murdock v. Pennsylvania, 319 U.S. 105 (1943). *See also* Follett v. Town of McCormick, 321 U.S. 573 (1944) (invalidating a flat licensing fee for booksellers). *Murdock* and *Follett* were distinguished in Jimmy Swaggart Ministries v. California Bd. of Equalization, 493 U.S. 378, 389 (1990), as applying "only where a flat license fee operates as a prior restraint"; upheld in *Swaggart* was application of a general sales and use tax to sales of religious publications.

[292] Martin v. City of Struthers, 319 U.S. 141 (1943). *But cf.* Breard v. City of Alexandria, 341 U.S. 622 (1951) (similar ordinance sustained in commercial solicitation context).

[293] Prince v. Massachusetts, 321 U.S. 158 (1944).

[294] *E.g.*, Niemotko v. Maryland, 340 U.S. 268 (1951); Kunz v. New York, 340 U.S. 290 (1951); Fowler v. Rhode Island, 345 U.S. 67 (1953); Poulos v. New Hampshire, 345 U.S. 395 (1953). *See also* Larson v. Valente, 456 U.S. 228 (1982) (solicitation on state fair ground by Unification Church members).

[295] Watchtower Bible & Tract Soc'y v. Village of Stratton, 536 U.S. 150 (2002).