



Presidential Religious Liberty Commission

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The following are comments submitted in PDF to the Religious Liberty Commission through the public comment process.

THE VISION OVER CHARLESTON

2 Corinthians 5:16-21

So from now on, we regard no one from a worldly point of view. Though we once regarded Christ in this way, we do so no longer. Therefore, if anyone is in Christ, the new creation has come: The old has gone, the new is here! All this is from God, who reconciled us to Himself through Christ and gave us **the ministry of reconciliation**: that God was reconciling the world to Himself in Christ, not counting people's sins against them. And He has committed to us the message of reconciliation. We are therefore Christ's ambassadors, as though God were making His appeal through us. We implore you on Christ's behalf: Be reconciled to God. God made Him who had no sin to be sin for us, so that in Him we might become the righteousness of God.

Background

I first visited the city in 1976 and met Richmond Bowens, who was a descendant of slaves and is now buried at Drayton Hall. Unfortunately, at the hall, there are two burial plots – one for the slave owners and one for the slaves. Richmond felt that it was home. Drayton Hall was the home of the slave owners and a hub for 30 plantations, including the nearby Magnolia Gardens.

Drayton Hall has a unique atmosphere, but there is a history with the Grimke-Drayton family, which is my heritage. Those who were to inherit Magnolia Gardens had to adopt the name 'Drayton'. I am descended from the younger brother of the owner of Magnolia Gardens. He trained as a doctor in Paris, met his English wife and emigrated to the UK in the 1850s, where he was given a seat on a coal mining board in Haydock. In Charleston, my great-great uncle, Rev John Grimke-Drayton, changed his plantation to gardens and employed his slaves as gardeners.

His legacy is in Magnolia Gardens, which has a zoo and is open today as a business, and there is so much history in the ministry of Rev John Grimke-Drayton, influencing churches and areas all over the UK, including the Grimke Seminary, now in Liverpool in the UK, through his nephew, Francis Grimke. Drayton Hall was the epicentre of thirty plantations, and the Grimke family had a reputation for being cruel to the slaves. The Drayton family were firm with slaves, but the whole issue of slavery brought a curse on the Drayton family.

Learning so much about the history of the family leaves me with a burden to speak reconciliation and to stand in the gap of the curse with the gospel message.

In November 2023, I had an overwhelming experience of God's redeeming love which completely obliterated a deep-seated anger that I had for the church, particularly those who spoke against the LGBT community. From that, the gospel message became personal to me, and I saw that what Jesus did on the cross was for me. I also became aware of God's holiness and His righteousness, which affected everything that I did. I found my identity in Christ, and no other identity bears any significance, including being gay, which I had been for 12 years. After this, I was baptised and now have a desire to see people realise that background, education or politics have no significance. The only thing that matters is our status with God as heavenly Father, and citizenship in heaven is paramount. God has placed Charleston and Drayton Hall on my heart.

What I see happening

I saw a vision of a mission called 'Be Not Silent' – a tent mission in a field – and as I reflected on that, I saw the same thing happening in the grounds of Drayton Hall, across several days. I saw a marquee there, drawing people from across Charleston and beyond to hear a message of reconciliation. There were representatives of both slaves and slave owners, speaking from the front. These are people who know and love God, with a message to share of how God has radically changed their lives.

Knowing the history of Drayton Hall, and what other events have been going on, there would be a need for us to engage in spiritual warfare prior to the mission, recognising that the barriers to reconciliation in the USA are found in powers and principalities. God not only wants to bring people into his kingdom, but to see strongholds broken. There is evidence of a prayer network in Charleston already, and I have history with Old St Andrews Church, as well as other churches in downtown Charleston.

In the mission itself, there's a need in the local area for people to be involved in prayer ministry and counselling ministry afterwards. My belief is to draw local churches together to be part of this mission, uniting beyond political, social and racial barriers. I am called to Charleston as a servant of the local churches, rather than a leader. However, Drayton Hall remains very much on my heart, and I believe that God has laid this vision upon me to see this mission come to fulfilment.

Practicalities

I am currently 77 years old and struggling with incontinence, praying that God would remove this particular thorn from my life. However, this is not a barrier to seeing the mission happen, and I have prayed, "Lord, I am willing to be used." I am currently living in the Bournemouth area, UK, and know that I can apply for a B2 Tourist Visa for 180 days, allowing me 6 months around the mission to be in the USA. My

understanding is that taking part in an unpaid mission in a charitable context is allowable on a B2 Visa. My incontinence is self-managed, so I am unlikely to be refused a visa on medical grounds.

In light of the current situation in the USA, in terms of the division in the nation, to me, a ministry of reconciliation is urgent, and whilst I recognise the practicalities of getting to Charleston, this seems to be the dominant call on my life, and I know if the door opened tomorrow, I would be there. I seek the Lord's leading, and there is preparation both practically and personally to undertake.

At one o'clock in the church hall we had Friendship Hour. During this time we saw a ten minute video of the testimony of Duncan Campbell about his baptism of the Holy Spirit and the Hebrides revival of 1947. As we watched the video, I had a vision in which I saw a rider on horseback as from US history of the 18th or 19th century a bit like Paul Revere. He approached me where I was standing. He stopped just by me, and reaching down to his satchel bag, brought out a large envelope of communication which he handed to me. I opened it and read, "We need your help. Please come." I was moved to tears by this vision. Vincent talked about the revival in the Hebrides using those very words. Could this be confirmation of my calling to Charleston?

September 22, 2025

Via Electronic Mail to RLC@usdoj.gov

Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue, NW
Room 5706
Washington, DC 20530

Dear Chair Patrick, Vice Chair Carson, and members of the Religious Liberty Commission:

Thank you for the opportunity to submit comments in advance of the Commission's third meeting. On behalf of Americans United for Separation of Church and State, we write to the Commission to discuss the rights and responsibilities of public school officials regarding religious freedom and the threats to religious liberty posed by private school voucher programs.

Founded in 1947, Americans United is a nonpartisan educational and advocacy organization dedicated to preserving the constitutional principle of church-state separation, which is the foundation of true religious freedom for all Americans. We fight to protect the right of individuals and religious communities to practice religion—or not—as they see fit without government interference, compulsion, support, or disparagement. We represent people of all faiths and none and have a network of more than 380,000 members and supporters across the country.

Americans United is the only organization in the country dedicated solely to defending and promoting the separation of church and state. Our 78-year legacy of protecting religious freedom and expertise as an organization staffed with constitutional lawyers means that we are uniquely positioned to offer guidance and information for your discussion of religious liberty issues in education.

Religious freedom is a fundamental American value and a cornerstone of our democracy. It is meant to be a shield that protects and should not be used as a sword to harm others or discriminate. The true threats to religious freedom in this country come from Christian Nationalists and their extremist allies: they misrepresent and misuse our nation's history of religious freedom and work to erode the separation of church and state, all in an effort to force others to live by their religious beliefs.¹ Efforts to undermine religious freedom are especially egregious in our education system, where families and students suffer the most harm.²

¹ See Americans United's June 14, 2025 [Comments on the Religious Liberty Commission's First Meeting](#) for further details on the history and meaning of religious liberty and church-state separation.

² See American United's August 30, 2025 [Comments on the Religious Liberty Commission's Second Meeting](#) for examples of the harms families face.



1310 L Street NW, Suite 200
Washington, DC 20005
au.org

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In our diverse society, America's public schools are a unifying factor among people of different religions and beliefs. One of the hallmarks of public education is that it is secular and accepts all students, regardless of what religion—if any—they follow. When public school officials promote religion or coerce students to participate in it, departing from the neutrality required by the Constitution, it weakens public schools and undermines students' and families' religious liberties.

Private school voucher programs, which use taxpayer dollars to fund a select group of students to attend private, mostly religious, schools, present a different but equally dangerous threat. When public dollars go towards funding private religious instruction, taxpayers are forced to pay for the religious education of others, violating a fundamental principle of religious freedom and leaving less funding for public schools. In addition, private schools are not bound by the same constitutional or civil rights protections as public schools and often discriminate against students and families.

Whether it is promoting religion in public schools or funding private religious education with taxpayer money, these threats to religious liberty in education are part of a larger, nationwide effort to use the power of government to impose religion on all students. If left unchecked, these efforts will further erode our constitutional right to freedom of religion.

A. Religious Freedom in Schools: Teachers and Coaches

1. Rights and Responsibilities of Public School Officials Regarding Religious Freedom

Public school employees—from teachers, coaches, and nurses to principals, superintendents, and other administrators—are government employees. Their right to religious freedom at work is guaranteed by the Establishment Clause and Free Exercise Clause of the First Amendment to the United States Constitution. But, as government employees who are charged with teaching and protecting our schoolchildren, the Constitution also sets important limits on when, where, and how they can exercise these rights to protect the religious freedom of students and their families.

Public school employees can pray, discuss religion with coworkers, or read the Bible during a break when they are not in front of students. Outside of instructional time, if they are free to attend to personal matters instead of performing employment duties, and students are otherwise occupied and are not a captive audience, teachers may engage in brief, quiet, personal, private prayer—even if some students might be able to see them.³ School employees also have the absolute right not to be pressured to participate in religious activities or exercises during staff meetings or trainings, even if students are not present.

But, when government employees are on the job and carrying out official duties, their speech is considered the government's speech, and the government may place limits on it.⁴ They must also be neutral with regard to religion—they cannot promote or disfavor religion or coerce anyone to participate in religion or religious exercise when on the job.⁵

³ See *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 529 (2022) (public school football coach allowed to pray privately after game where he did so outside the scope of official duties and at a time when students were occupied and other school employees could engage in private activity or speech).

⁴ *Garcetti v. Ceballos*, 547 U.S. 410, 421 (2006) (no First Amendment protection “when public employees make statements pursuant to their official duties”).

⁵ The Supreme Court has recently held that the Establishment Clause must be interpreted by reference to historical understandings. Six decades ago, the Court explained that the Founders knew that “one of the greatest

These principles are particularly important in public schools because teachers and coaches have tremendous authority over students. They assign students' grades, decide whether they get playing time, write college recommendations, and can make or break their shot at an athletic scholarship. Students know that disappointing a teacher or coach, such as by refusing to join them in prayer, could jeopardize their school experience or their future, making them especially vulnerable to coercion—subtle or otherwise—from their teachers and coaches.

Indeed, the Supreme Court has long recognized “there are heightened concerns with protecting freedom of conscience from subtle coercive pressure in the elementary and secondary public schools.”⁶ Because students are “impressionable, and their attendance is involuntary,” courts have been “particularly vigilant in monitoring compliance with the Establishment Clause in elementary and secondary schools.”⁷

The Supreme Court and other federal courts have made clear that when public school employees pray or read the Bible with students, it places the imprimatur of the school on the religious practice, violating the First Amendment.⁸ This is true whether the school employee initiates or leads the prayer, vocally joins a student-led prayer, or even participates in a prayer by bowing their head or taking a knee with students.⁹

2. Dispelling the Myths Associated with *Kennedy v. Bremerton School District*

In 2022, the U.S. Supreme Court decided *Kennedy v. Bremerton School District*, the latest case involving school officials praying in public schools. The Court affirmed the fundamental principle that public school employees cannot coerce students to participate in prayer. Justice Gorsuch explained

dangers to the freedom of the individual to worship in his own way lay in the Government's placing its official stamp of approval upon one particular kind of prayer or one particular form of religious services.” *Engel v. Vitale*, 370 U.S. 421, 432 (1962). Accordingly, the Establishment Clause’s “first and most immediate purpose rested on the belief that a union of government and religion tends to destroy government and to degrade religion” because “religion is too personal, too sacred, too holy to permit its ‘unhallowed perversion’ by a civil magistrate.” *Id.* at 431-32 (quoting Memorial and Remonstrance against Religious Assessments, II Writings of Madison, at 187). And just three years ago, Justice Gorsuch explained that government coercion of religion “was among the foremost hallmarks of religious establishments the framers sought to prohibit when they adopted the First Amendment.” *Kennedy*, 597 U.S. at 537.

The Establishment Clause therefore requires a “wholesome ‘neutrality’” with respect to religion. *Abington Sch. Dist. v. Schempp*, 374 U.S. 203, 222 (1963). “Government in our democracy . . . must be neutral in matters of religio[n]” and it “may not be hostile to any religion or to the advocacy of no[n]religion” or “aid, foster, or promote one religion.” *Epperson v. Ark.*, 393 U.S. 97, 103-04 (1968). In other words, “[t]he First Amendment mandates governmental neutrality between religion and religion, and between religion and nonreligion.” *Id.*

⁶ *Lee v. Weisman*, 505 U.S. 577, 592 (1992).

⁷ *Edwards v. Aguillard*, 482 U.S. 578, 583-84 (1987).

⁸ See e.g., *Schempp*, 374 U.S. at 222–26 (school officials violated Establishment Clause by leading students in recitation of Bible verses and Lord’s Prayer at beginning of school day); *Engel*, 370 U.S. at 430–33 (school officials forbidden to lead students in classroom prayer at beginning of school day); *Doe v. Duncanville Indep. Sch. Dist.*, 70 F.3d 402, 406 (5th Cir. 1996) (basketball coach must not pray with students at games or practices); *Steele v. Van Buren Pub. Sch. Dist.*, 845 F.2d 1492, 1493 (8th Cir. 1988) (band teacher must not lead students in prayer before practices or rehearsals).

⁹ *Borden v. Sch. Dist.*, 523 F.3d 153, 177 (3d Cir. 2008) (Establishment Clause prohibited high school football coach not only from leading prayers himself but also from “taking a knee and bowing” during prayers initiated and led by students).

that prayer by school employees is coercive if it “involve[s] leading prayers” with students or is “recited to a captive audience.”¹⁰

Although it affirmed the constitutional protection against coercion, as Justice Sotomayor explained in her dissent, the majority “misconstrue[d] the facts”¹¹ in order to rule for the plaintiff, public high school assistant football coach Joe Kennedy. For years, Kennedy led prayers at the 50-yard line and gave religious speeches to students, who often knelt around him.¹² He also invited opposing coaches and players to participate.¹³ His actions drew public attention, including major media coverage.¹⁴ It is also clear that Kennedy’s actions coerced students to participate in prayer, as “several parents reached out to the District saying that their children had participated in Kennedy’s prayers solely to avoid separating themselves from the rest of the team.”¹⁵ Justice Sotomayor explained that “[p]roperly understood, this case [was] not about the limits on an individual’s ability to engage in private prayer at work.”¹⁶ Rather, it was about whether a school district must permit an employee to repeatedly turn “personal religious beliefs into a school event, where that display is recognizable” to everyone as the “employee ministering religion to students as the public watched.”¹⁷

To avoid the perception that Kennedy was coercing or proselytizing students, the school district offered Kennedy opportunities to pray privately before or after games in a way that would both ensure his religious freedom and protect the religious freedom of students and families,¹⁸ but he insisted on continuing his 50-yard line prayers with students.¹⁹ As a result, the District took appropriate and necessary action to protect its students’ religious freedom and comply with the Constitution by placing him on paid administrative leave.²⁰ When his contract ended that year, Kennedy decided not to reapply as coach.²¹

Yet the majority ignored the extensive factual record, ultimately basing its opinion on just “three prayers that resulted in [Kennedy’s] suspension.”²² The majority portrayed Kennedy’s actions as brief, quiet, and personal prayers conducted while other employees were free to attend to personal matters.²³ Essentially, the Court rewrote the record to justify ruling in favor of Kennedy.²⁴

These misrepresentations matter. By ignoring the broader pattern of Kennedy praying with and in front of students and isolating only a few late-season games, the Court minimized the coercive pressure students faced and the disruption to school events. This distortion let the majority recast the case as

¹⁰ *Kennedy*, 597 U.S. at 525, 542.

¹¹ *Id.* at 545 (Sotomayor, J., dissenting).

¹² *Id.* at 549.

¹³ *Id.* at 548.

¹⁴ *Id.* at 551.

¹⁵ *Id.* at 555.

¹⁶ *Id.* at 558.

¹⁷ *Id.*

¹⁸ *Id.* at 550.

¹⁹ *Id.* at 552-54.

²⁰ *Id.* at 555.

²¹ Ian Millhiser, [The Supreme Court’s “Praying Coach” Case, Explained](#), Vox (Apr. 12, 2022).

²² *Kennedy*, 597 U.S. at 529.

²³ *Id.* at 538, 543.

²⁴ See Ian Millhiser, [The Supreme Court Hands the Religious Right a Big Victory by Lying about the Facts of a Case](#), Vox (Jun 27, 2022).

one about an employee's private, personal prayer rather than about a school official turning school events into religious exercises—obscuring the constitutional harm.

Since then, state legislators and others eager to impose religion on public schools have taken advantage of the decision. Because of the misrepresentations, these legislators claim that the decision is a free-for-all for the promotion of religion in schools, ignoring the important constitutional limitations—which the Court again affirmed. For example, in 2023, Idaho enacted a law called “Coach Kennedy’s Law”²⁵ that was designed to allow public school employees to pray at any time they can engage in personal conversations—during floor debate on the bill, the sponsor said employees would be able to vocally pray.²⁶ That same year, Kentucky enacted a similar law.²⁷ During a committee hearing on the bill, the sponsor said he was inspired by Kennedy’s case and that the bill “protects the faculty and staff’s religious freedom in public schools” and that staff are “protected from coercion,” ignoring the religious freedom of students and the coercion they will undoubtedly experience.²⁸

Legislators have tried to use the *Kennedy* decision to justify a slew of other measures that promote religion in schools as well. This year, Texas enacted SB 11, which allows public school districts to adopt a policy of prayer and Bible reading that would let teachers pray with students. The bill’s sponsor claimed that it “builds on the victory of the Coach Kennedy case.”²⁹ Indeed, when arguing in favor of an identical bill in 2023, the same Senator claimed the *Kennedy* decision was “an expansion . . . of our Free Exercise laws.”³⁰ Advocates have also cited the decision when pushing measures to require public schools to post the Ten Commandments in every classroom³¹ and to allow public schools to hire chaplains.³²

3. What Happens When Schools Minimize Threats to Religious Liberty

In its second meeting, the Commission cherry picked its witnesses to spin a narrative about threats to Christian students’ religious freedom while ignoring stories from students who belong to minority religions, are not religious, and even are Christian but who have been proselytized or coerced to

²⁵ Idaho Code § 33-6601 et. seq.

²⁶ *Debate on H.B. 182 Before the Idaho House of Rep.*, 2023 Leg., 67th Sess. (Mar. 2, 2023) (statement of Rep. Barbara Ehardt, Member, Idaho House of Rep.).

²⁷ Ky. Rev. Stat. § 158.193.

²⁸ [Religious Freedom Bill Clears House Education Committee](#), *KentuckyToday* (Mar. 7, 2023).

²⁹ Mayes Middleton (@mayes_middleton), Twitter (Feb. 10, 2025, 1:19 PM), https://x.com/mayes_middleton/status/1889016413077053693.

³⁰ *Hearing on S.B. 1396 Before the Tex. Sen. Comm. on Educ.*, 2023 Leg., 88th Sess. (Mar. 29, 2023) (statement of Sen. Mayes Middleton, Member, S. Comm. on Educ.).

³¹ *Hearing on S.B. 1515 Before the Tex. Sen. Comm. on Educ.*, 2023 Leg., 88th Sess. (Apr. 5, 2023) (statement of Sen. Phil King, Member, S. Comm. on Educ.) (explaining he introduced the bill because the *Kennedy* decision changed the “legal landscape”).

Longstanding Supreme Court precedent establishes that displaying the Ten Commandments in public schools is unconstitutional under the First Amendment. *Stone v. Graham*, 449 U.S. 39, 41 (1980) (per curiam). Despite this clear prohibition, three states (Louisiana, Arkansas, and Texas) have enacted legislation to require the display of the religious text in public schools. A unanimous Fifth Circuit panel and federal district courts in Arkansas and Texas declared all three laws unconstitutional. *Roake v. Brumley*, 141 F.4th 614 (5th Cir. 2025); *Nathan v. Alamo Heights Indep. Sch. Dist.*, No. SA-25-CV-00756-FB, 2025 WL 2417589 (W.D. Tex. Aug. 20, 2025); *Stinson v. Fayetteville Sch. Dist. No. 1*, No. 5:25-CV-5127, 2025 WL 2231053 (W.D. Ark. Aug. 4, 2025).

³² Michelle Boorstein, [Putting Chaplains in Public School Is the Latest Battle in Culture Wars](#), *Wash. Post* (Mar. 22, 2024).

participate in religion. The Commission failed to recognize the serious harm to religious freedom that occurs when school officials impose religion in public schools.

Public school employees have religious freedom rights. But as government employees who hold influence over schoolchildren, the Constitution also sets important limits on when, where, and how they can exercise these rights to protect the religious freedom of students and their families. When schools or school employees ignore those limits, the harms that follow are not speculative—they are real, serious, and lasting. When schools fail to take these issues seriously, children are left to suffer coercion, exclusion, or even physical harm. Here are just a few examples of these experiences:

- In Ohio, a middle school science teacher subverted the Mount Vernon City School's official curriculum by teaching creationism; promoted his religious views; refused to remove religious displays, including the Ten Commandments; and branded students with a Tesla coil.³³ The teacher intentionally inflicted a painful cross-shaped burn on a student's arm.³⁴
- An East Hamilton Middle School teacher in Chattanooga, Tennessee, who taught a Bible history course, wrote the English translation of the Hebrew name of God and told her class, "If you want to know how to torture a Jew, make them say this out loud." A Jewish middle school student was forced to sit through this lesson and many others in which Christianity was endorsed and other religions were mocked and denigrated.³⁵
- A Louisiana public school teacher proselytized and harassed a 6th grader, who is Buddhist, so badly that the student became physically sick every morning before school. The student was repeatedly mocked and disparaged because of his religious beliefs by his teacher, who coerced him into completing assignments and listening to lectures that promoted Christianity as truth, and at one point called Buddhism "stupid." When his parents attempted to resolve the issue, the Superintendent told them that the solution was to either change the child's religion or transfer him to another school with "more Asians."³⁶
- In South Carolina, New Heights Middle School officials mandated their students attend a school-day worship rally featuring a sermon by a Christian minister and a performance by the Christian rapper "B-SHOC." Students were pressured to pray and sign a pledge committing themselves to Jesus Christ. Those who declined to participate were sent to in-school detention instead. An atheist student endured repeated bullying and punishment, including at the hands of his teachers and school administrators, for his beliefs. When he forgot to wear a belt as part of the school uniform, he had to copy an essay stating that he thanks God every day and would not forget his belt again. School officials told him and his family that their beliefs were wrong and that they should "get right with God" because they were not Christian.³⁷
- School officials at Pace High School in Santa Rosa County, Florida, regularly led and directed students in prayer at extracurricular and athletic events, arranged for prayer during graduation

³³ *Freshwater v. Mt. Vernon City Sch. Dist. Bd. of Educ.*, 2013-Ohio-5000, at ¶¶16-37. See also [Freshwater Termination](#), Nat'l Ctr. for Sci. Educ. (Sep. 20, 2010).

³⁴ *Freshwater* at ¶32. See also [Doe v. Mount Vernon Board of Education et al.](#), Nat'l Ctr. for Sci. Educ. (Jun 12, 2009).

³⁵ See Sam Peña, [Chattanooga Mom Raises Concerns of Anti-semitism at East Hamilton Middle Bible Class](#), News Channel 9 ABC (Feb. 22, 2022). See also Rob Boston, [Course Correction: Parent Says A Tenn. Public School's 'Bible History' Class Belongs In Sunday School](#), Americans United (Mar. 1, 2022).

³⁶ *Lane v. Sabine Parish Sch. Bd.*, No. 5:14-cv-00100-EEF-KLH (W.D. La., filed Jan. 22, 2014) (order granting permanent injunction on Mar. 14, 2014). See also Scott Lane, [If You Want To Fit In At This Public School Just Become Christian](#), ACLU (Jan. 22, 2014).

³⁷ *Anderson v. Chesterfield Cnty. Sch. Dist.*, No. 4:11-cv-03300-RBH (D.S.C., filed Dec. 5, 2011) (order granting permanent injunction on Jan. 24, 2012). See also Jonathan Anderson, [Second-Class Citizens in the Classroom: Promoting Religion in Public Schools Is Hurting Our Family](#), ACLU (Dec. 5, 2011).

ceremonies, proselytized students during and outside of class, and sponsored religious baccalaureate services.³⁸ Indeed, the school's teacher handbook required school personnel to "embrace every opportunity to inculcate, by precept and example, the practice of every Christian virtue."³⁹

- In Tennessee, Rhea County schools worked for several years with a nearby Christian college to bring the college's students to teach Bible classes in elementary school. The classes taught the Bible as truth to children as young as five, without even informing parents. Lesson plans for second graders, for example, called for the Bible college students to "Teach the children God's commandments and that we should obey all of them," and "Teach them how God gives us the best and leads us where He wants us to go."⁴⁰

These are not minor inconveniences but genuine violations of the rights, safety, and religious freedom of children and families. Although many violations are a result of a single teacher or school district, there is also a concerted effort to use the government to impose one narrow view of religion on all of our children and undermine the foundational principle of church-state separation. This includes pushing laws and policies to require Ten Commandments displays and Bibles in all public school classrooms; instill religion and promote Christianity in public school curriculum standards; put chaplains in public schools; and encourage teachers to pray with public school students.⁴¹ These efforts only create confusion and embolden the individuals who want to proselytize and coerce students in violation of the Constitution.

B. Private School Vouchers and the Autonomy of Private Religious Schools

Private school voucher programs funnel taxpayer funds away from our public schools to pay for private school tuition for a small number of predominantly wealthy families. These programs are so unpopular that voucher advocates often sell them under the euphemism of "school choice." Private school vouchers do not work. They undermine public schools, fail to improve student achievement, funnel resources to private schools without any accountability, fund discrimination, and violate religious freedom.

Another element of this threat is the push to allow religious organizations to operate public charter schools as religious schools and get taxpayer funding. Earlier this year, the Supreme Court blocked the first attempt at a religious charter school in Oklahoma in the case *St. Isidore of Seville Catholic Virtual School v. Drummond*.⁴² Religious charter schools threaten the basic principles that public schools are—and must be—secular and serve all students. While charter schools, like other public schools, must accept all students and may not be run as religious schools, *St. Isidore* would have been operated as a Catholic school, integrating religious doctrine and beliefs into all subjects and maintaining policies and

³⁸ *Doe v. Sch. Bd. for Santa Rosa Cnty.*, No. 3:08-cv-00361 (N.D. Fla., filed Aug. 27, 2008).

³⁹ Heather Weaver, [Fox Wildly Distorts ACLU Religious Liberty Case](#), ACLU News (Aug. 19, 2019).

⁴⁰ *Doe v. Porter*, 370 F.3d 558, 562 (6th Cir. 2004) (prohibiting school district from offering class "teach[ing] the Bible as religious truth").

⁴¹ See American United's August 30, 2025 [Comments on the Religious Liberty Commission's Second Meeting](#) for further discussion of these policies.

⁴² *St. Isidore of Seville Catholic Virtual School v. Drummond*, 605 U.S. 165 (2025), *affirming by equally divided court*, 558 P.2d 1 (Okla. 2024) (holding creation of religious public charter school clearly violated state and federal constitutions).

practices that discriminate in student admissions, student discipline, and employment based on religion, sexual orientation, gender identity, or disability.⁴³

Public schools serve nearly 90% of America's schoolchildren. They are vital to our children, our communities, our workforce, our society, and our democracy. Our public school system is one of the institutions where we are most likely to encounter, interact with, and get to know people of different races, religions, abilities, socio-economic backgrounds, and political perspectives. Our public schools are subject to civil rights laws that protect students and teachers from discrimination. They include programs and protections for students with disabilities. They must adhere to teacher and curriculum standards. And they are secular and welcoming to students of all religions and none.

Taxpayer funds should go to strengthening public schools that are open to all children, not subsidizing schools that only serve a few.

1. A Failed Private School Voucher Experiment

In the last two decades, dozens of states across the country have adopted private school voucher programs. While many of the initial programs were limited to certain cities or restricted to particular students (such as students with disabilities or students from low-income families), states are increasingly adopting universal voucher programs that make all students in the state eligible to receive a subsidy, regardless of family income. These experiments have made abundantly clear that vouchers leave all of us worse off.

a. Vouchers Harm Students

Private school vouchers fail to achieve their most basic goal: improving educational outcomes. Large-scale studies show students using vouchers perform worse academically than their peers who are not in the voucher program.⁴⁴ In fact, studies have suggested that vouchers caused reductions in math scores equivalent to or greater than those caused by the COVID pandemic and Hurricane Katrina.⁴⁵

Voucher programs also provide fewer educational resources than public schools. U.S. Department of Education studies of the federally funded D.C. voucher program show that students participating in the

⁴³ [*OKPLAC, Inc. v. Statewide Charter Sch. Bd.*](#), No. CV-2023-1857 (Okla. Dist. Ct., Okla. Cnty., filed July 31, 2023), a parallel case filed by faith leaders, public-school parents, and public education advocates, in Oklahoma state court, included arguments concerning St. Isidore's discrimination against students and families and the school's treatment of students with disabilities. The plaintiffs were represented by Americans United for Separation of Church and State, the ACLU, Education Law Center, and Freedom From Religion Foundation, along with local counsel Benjamin H. Odom, John H. Sparks, Michael W. Ridgeway, and Lisa M. Mason of Odom & Sparks; and J. Douglas Mann. Following the Supreme Court decision in *Drummond*, the faith leaders, parents, and advocates dismissed the lawsuit.

⁴⁴ Ctr. for Evaluation & Educ. Policy, [Evolving Evidence on School Voucher Effects](#), *Ind. U. Sch. of Educ.* (Nov. 2022); see generally Nat'l Coalition for Public Educ., [Studies & Reports](#).

⁴⁵ See Nat'l Coalition for Pub. Educ., [Voucher Impacts on Academic Achievement](#); see also David Figlio & Krzysztof Karbownik, [Evaluation of Ohio's EdChoice Scholarship Program: Selection, Competition, & Performance Effects](#), Thomas B. Fordham Inst., 2 (2016) (Ohio); Jonathan Mills & Patrick Wolf, [The Effects of the La. Scholarship Program on Student Achievement after Four Years](#) 4 (EDRE Working Paper No. 2019-10, May 10, 2019) (Louisiana); U.S. Dep't of Educ., [Evaluation of the D.C. Opportunity Scholarship Program: Impacts Two Years After Students Applied](#) (June 2018) (2018 D.C. Study); R. Joseph Waddington & Mark Berends, [Impact of the Indiana Choice Scholarship Program: Achievement Effects for Students in Upper Elementary & Middle School](#), 37 J. Policy Analysis & Mgmt. 4, 738-808 (Aug. 2018) (Indiana).

program are less likely to have access to English Language Learner programs and services for students with disabilities than students not in the program.⁴⁶ Likewise, a survey of the private schools in Milwaukee's voucher program found that nearly 35% reported offering no art, music, physical education, library, or technology specialist teachers.⁴⁷

b. Vouchers Are Fiscally Irresponsible

Vouchers also misuse taxpayer funds by inviting abuse, subsidizing wealthy families at costs to poor kids, and draining public funds:

Vouchers invite waste, fraud, and abuse. Private school voucher programs often lack basic oversight and accountability to the taxpayers. Many voucher programs do not require schools to meet any basic standards, meaning taxpayers are footing the bill for schools that lack accreditation,⁴⁸ and do not require teachers to hold bachelor's degrees or other minimal qualifications.⁴⁹ Even when voucher programs do require minimal standards by law, the programs often fail to conduct monitoring⁵⁰ or maintain adequate records.⁵¹

This lack of accountability and oversight makes voucher programs a ripe target for waste, fraud, and abuse. In Florida, voucher schools took millions in public funds for students not even attending those schools.⁵² In Wisconsin, the voucher program paid \$139 million to schools that failed to meet the state's requirements for operation.⁵³ In North Carolina, an investigation found that the state lost approximately \$2.3 million to fraud by sending voucher funds to private schools to pay for students who don't exist and private schools that were actually closed.⁵⁴ And, in South Carolina, around \$1.5 million in taxpayer dollars was given to families of students who were ineligible for the state voucher program—about one in three students enrolled in the program were removed after initial payments were made.⁵⁵

Insufficient oversight also results in wasting taxpayer funds on frivolous items that have no, or at best questionable, educational value. In Arizona, vouchers were used to pay for diamond rings and

⁴⁶ 2018 D.C. Study at 16.

⁴⁷ Erin Richards, [Report: Choice Schools Lack Specialty Teachers](#), *Milwaukee J. Sent.* (Feb. 13, 2013).

⁴⁸ See, e.g., Eli Hager, [Arizona Regulators Closed a Failing Charter School. It Reopened as a Private Religious School Funded by Taxpayers](#), *ProPublica* (Dec. 31, 2024).

⁴⁹ U.S. Gov't Accountability Off., [Private School Choice Programs Are Growing and Can Complicate Providing Certain Federally Funded Servs. to Eligible Students](#), Pub. No. GAO-16-712, 24 (2016).

⁵⁰ U.S. Gov't Accountability Off., [Private School Choice: Accountability in State Tax Credit Scholarship Programs](#), Pub. No. GAO-19-664 (Sept. 2019).

⁵¹ U.S. Gov't Accountability Off., [District of Columbia Opportunity Scholarship Program: Actions Needed to Address Weaknesses in Admin. & Oversight](#), Pub. No. GAO-13-805 (Nov. 2013); U.S. Gov't Accountability Off., [District of Columbia Opportunity Scholarship Program: Additional Policies & Procedures Would Improve Internal Controls & Program Operations](#), Pub. No. GAO-08-9 at 26 (Nov. 2007).

⁵² Gus Garcia-Roberts, [McKay Scholarship Program Sparks a Cottage Industry of Fraud & Chaos](#), *Miami New Times* (June 23, 2011).

⁵³ Molly Beck, [State Paid \\$139 Million to Schools Terminated from Voucher Program Since 2004](#), *Wisc. State J.* (Oct. 12, 2014).

⁵⁴ Kris Nordstrom, [New Analysis Shows Many Private Schools in N.C. Have More Vouchers Than Students](#), N.C. Justice Ctr. (June 16, 2023).

⁵⁵ Hannah Wade, [SC Gave \\$1.5M in Scholarships to Students Who Didn't Qualify, State Oversight Agency Says](#), *The State* (Mar. 6, 2025).

necklaces, kitchen appliances, and even lingerie,⁵⁶ while in Florida, families used these funds to pay for paddle boards, big-screen televisions, foosball tables, and trips to Disney World.⁵⁷

Universal vouchers disproportionately benefit wealthy families while leaving poor kids behind.

Studies have repeatedly shown that vouchers largely subsidize the tuition of wealthy families whose children already attend expensive, selective private schools. In Arkansas, 95% of participating voucher students in 2023 never attended public school;⁵⁸ and in Florida, only 13% had previously attended public school.⁵⁹ The illusion of “school choice” is revealed for the lie that it is when so few students are actually using vouchers to leave their public schools.

In Florida, one quarter of state vouchers are going to families in the top income tier. These families use their \$8,000 vouchers to pay tuition at private schools that can cost more than \$20,000 a year.⁶⁰ For example, 98% of students attending a private Catholic school in a wealthy Central Florida community use taxpayer-funded vouchers to subsidize tuition costs. In response, this school and other similarly costly private schools have increased tuition costs. Likewise, in Iowa, private schools increased tuition by as much as 40% and required students who had previously received scholarships to apply for vouchers after the implementation of the state’s universal voucher program.⁶¹ Meanwhile, low- and middle-income families cannot afford to attend elite private schools because vouchers often cover less than half the cost—leaving families with the choice between the subprime private schools and increasingly underfunded public schools.

Vouchers drain public funds. While proponents claim that vouchers will cost less than or the same as funding public schools, once voucher programs take effect, costs quickly get out of control, leading to budget shortfalls, cuts to public school funds, and even tax increases.

In Arizona, where 75% of voucher users were already in private school, lawmakers underestimated the cost of voucher programs by about 1,100%. The voucher program was initially projected to cost \$65 million in 2023 but actually cost upwards of \$708 million. This has contributed to a massive state budget crisis, requiring Arizona to make significant cuts to various state programs, including water and highway infrastructure and community college funding.⁶²

⁵⁶ Craig Harris, [I-TEAM: ESA parents bought diamond rings, lingerie, and Kenmore appliances with education tax dollars](#), *12News* (Aug. 18, 2025).

⁵⁷ Jeffrey S. Solocheck, [Florida School Vouchers Can Pay for TVs, Kayaks and Theme Parks. Is That OK?](#), *Tampa Bay Times* (Sept. 1, 2023).

⁵⁸ Ark. Dep’t of Educ., [Education Freedom Account Annual Report, 2023-2024 School Year](#) 8 (Sept. 20, 2023).

⁵⁹ Danielle Prieur, [Florida Policy Institute Asked for School Voucher Data. Here’s What Step Up for Students Provided](#), *WMFE NPR* (Sept. 14, 2023).

⁶⁰ Annie Martin, [Millions Flow to Wealthy Families, Pricey Private Schools Under Florida’s Supercharged Voucher Program](#), *Orlando Sent.* (Feb. 14, 2025).

⁶¹ Jason Clayworth, [Iowa’s Private Schools Dash For Cash](#), *Axios Des Moines* (May 17, 2023); Robin Opsahl, [Reynolds Not Concerned By Private Schools Raising Tuition Because of ESA Program](#), *Iowa Capital Dispatch* (May 11, 2023).

⁶² Hilary Wething, [How Vouchers Harm Public Schools](#), *Econ. Pol’y Inst.* (Dec. 19, 2024); Eli Hager, [School Vouchers Were Supposed to Save Taxpayer Money. Instead They Blew a Massive Hole in Arizona’s Budget](#), *ProPublica* (July 16, 2024).

Other states have decreased funds to public schools while increasing budgets for voucher programs. The Florida Senate projected that its 2023 voucher expansion would cost the state \$646 million⁶³—the actual costs for Florida’s private education voucher program was more than \$4 billion for the 2024-25 school year and is estimated to be more than \$5 billion for the 2025-25 school year.⁶⁴ This is paid, in part, by diverting more than \$1 billion in public school funds each year.⁶⁵ Likewise, Ohio Governor Mike DeWine’s 2025 budget takes more than \$100 million from Ohio’s traditional public schools over the next two years, while costs for voucher programs and charter schools increased by \$500 million.⁶⁶ In August 2025, a state court judge held that the program violates Ohio’s constitution’s requirement to fund “a system of common schools” because it creates a system of “uncommon private schools” while underfunding the public school system.⁶⁷ And, Texas Governor Greg Abbott admitted that the state’s voucher program, which was only enacted this year, could lead to less funding for public schools.⁶⁸

c. Vouchers Exclude and Discriminate

Vouchers are rooted in discrimination and perpetuate segregation. Private school vouchers were first designed to evade desegregation orders in the wake of *Brown v. Board of Education*.⁶⁹ After *Brown*, Southern policymakers created voucher programs to fund tuition at “segregation academies.” For example, in Prince Edward County, Virginia, officials opened whites-only private schools, gave out taxpayer-funded tuition vouchers, and shuttered the public school system entirely for five years.⁷⁰ In Virginia and Georgia, legislators and voters approved amendments to their state constitutions to fund “tuition grants”—just another name for vouchers—for families to attend all-white private schools.⁷¹ Mississippi and South Carolina followed a similar playbook.⁷²

Each of these segregation voucher programs were sold using the same language that is being used to sell so-called “school choice” today. Georgia’s law claimed to “advance the constitutional rights of school children to attend private schools of their choice in lieu of public schools.”⁷³ The Alabama plan to give money to white students to attend all white private schools was called the “Freedom of Choice Plan” and advocates claimed it “had nothing to do with segregation, but aimed to advance each child’s

⁶³ Lynn Hatter, [Florida Expands Its Voucher Program to Every Student, Regardless of Income](#), *NPR* (Mar. 24, 2023).

⁶⁴ Norin Dollard, [Florida FY 2025–26 Budget Summary: Education](#), Fla. Policy Inst. (Aug. 27, 2025).

⁶⁵ Norin Dollard & Esteban Leonardo Santis, [Federal Voucher System — Like Florida’s — Would Divert Funding to Private Schools and Home-Schoolers](#), Fla. Policy Inst. (May 29, 2025).

⁶⁶ Morgan Trau, [Vouchers for Ohio Private Schools Score Double Funding Over Public Schools](#), *News 5 Cleveland* (Apr. 7, 2025).

⁶⁷ *Columbus City Sch. Dist. v. State of Ohio*, 22CV000067, Case No. 22-CV-67 (Franklin Cty. Ct. of Common Pleas, June 24, 2025) (“[T]he State provides hundreds of millions of dollars in funding to private schools through EdChoice while at the same time Plaintiffs are unable to educate their students because the General Assembly decided not to fully fund public schools.”); see also Patrick O’Donnell, [Ohio Judge Rules State’s \\$700 Million Voucher Program Is Unconstitutional](#), *The74* (Jul. 17, 2025).

⁶⁸ Benjamin Wermund & Edward McKinley, [Texas Gov. Greg Abbott Says Vouchers Could Lead to Less Funding for Public Schools](#), *Hous. Chron.* (Feb. 13, 2025).

⁶⁹ See Jon Hale, *The Choice We Face: How Segregation, Race, & Power Have Shaped America’s Most Controversial Education Reform Movement* (2021); Chris Ford, et al., [The Racist Origins of Private School Vouchers](#), Ctr. for Am. Progress (July 12, 2017).

⁷⁰ Hale at 34.

⁷¹ *Id.* at 25.

⁷² *Id.* at 24-25.

⁷³ Steve Suits, *Overturning Brown: The Segregationist Legacy of the Modern School Choice Movement* 15 (2020).

education.”⁷⁴ Supporters of vouchers in North Carolina also avoided mentions of race and instead argued that the voucher program would create “competition” that “would stimulate progress in public education” and would “offer all our citizens the broadest possible freedom of choice.”⁷⁵

Private school voucher programs continue the segregationists’ legacy of discrimination even today. National data continue to show that private schools tend to be more segregated than similarly situated public schools and enroll higher populations of white students compared to public schools. Nationwide, 69% of private school students are white, 9% are Black, and 10% are Hispanic or Latino.⁷⁶ According to a study, 43% of private school students across the country attended deeply segregated schools where white students comprise 90% or more of the school’s enrollment.⁷⁷ When students of color receive vouchers, they are likely to attend deeply segregated private schools. For example, a study of a Milwaukee voucher program found that 85% of Black students in the voucher program attended schools with 90% or more non-white students, as opposed to around 77% of those in public schools.⁷⁸

Vouchers harm rural students and communities. Vouchers do not provide actual choice for many students living in rural areas. While 92% of urban families have access to one or more private schools within five miles, only 34% of rural families have the same access.⁷⁹

Vouchers disproportionately harm rural public schools. When enrollment in rural public schools shrinks—even if only by a few students—communities suffer. Rural public schools are the hub of community life serving as emergency shelters, gathering places, healthcare and food distribution centers, and polling locations. They are also often the largest employers in their communities.⁸⁰ Because the margins for operating a public school in rural communities are incredibly small, the departure of a few students can leave rural schools with fewer resources to provide educational instruction, non-instructional benefits, and employment opportunities for the communities. These communities then must figure out how else they can get the resources and services they need—or go without them.⁸¹

Vouchers strip students of civil rights and protections. Public schools are open to, and must serve, all students. Private schools, on the other hand, often leave students and families without the educational choices they purport to provide. They can deny students admission or expel them for a host of reasons, such as their religion, sexual orientation, gender identity, academic abilities, or disability status.⁸² Often, families who receive a voucher will find themselves without any choice at all when private schools refuse to accept their child.

⁷⁴ *Id.* at 24-25.

⁷⁵ *Id.* at 42.

⁷⁶ Ke Wang et al., [School Choice in the United States: 2019](#), Nat’l Ctr. for Educ. Stats. 22 (Sept. 2019).

⁷⁷ *Suits* at 77.

⁷⁸ Lisa Kaiser, [Still Separate, Still Unequal](#), *Shepherd Express* (May 14, 2014).

⁷⁹ Kristin Blagg & Matthew M. Chingos, [Who Could Benefit From School Choice? Mapping Access to Public and Private Schools](#), 2 Brookings Evidence Speaks Reports #12 (Mar. 30, 2017).

⁸⁰ See, e.g., Allen Pratt, [As a Tennessee Rural Educator, I Fear That School Voucher Expansion Will Hurt Our Children](#), *The Tennessean* (Feb. 28, 2024).

⁸¹ For example, in West Virginia, declining student enrollment (in part due to the state’s voucher program) has led to the closure of 53 schools in the previous five years, and the planned closure of an additional 25 schools. The closure of local high schools has devastated towns. Amelia Ferrell Knisley, [West Virginia School Board Approves More Closures](#), *The74* (Dec. 14, 2024).

⁸² See, e.g., *Columbus City Sch. Dist.*, 22CV000067, Case No. 22-CV-67 at *11 (“A significant proportion of the non-public schools receiving EdChoice funding [in Ohio] are religious schools. Many of these religious schools

Private schools do not provide the same rights and protections to students as public schools, such as those in Titles IV and VI of the Civil Rights Act, Title IX of the Education Amendments Act of 1972, the Individuals with Disabilities Education Act, Title II of the Americans with Disabilities Act, the Every Student Succeeds Act, and the Constitution. So, students who attend private schools do not have the same free speech and religious freedom protections under the First Amendment, the same due process or other constitutional and statutory rights guaranteed to them as in public schools, or the same clear systems for oversight, reporting violations, or enforcing penalties for noncompliance as children and families attending public schools.

For students with disabilities, the consequences of losing the rights and protections provided in public schools are often especially damaging. Private schools accepting vouchers do not provide students with disabilities with the same quality and quantity of services available to students in public schools, including those mandated under each student's Individualized Education Program (IEP). Students who leave the public schools with a voucher forfeit many of the protections provided to students under the Individuals with Disabilities Education Act (IDEA)—including the right to a Free Appropriate Public Education (FAPE) tailored to their individual needs—because they are considered parentally placed in private schools. In many cases, students with disabilities are often categorically excluded from private school voucher programs because private schools cannot adequately serve them and there are no federal protections that require private schools to do so.

LGBTQ+ children and children with LGBTQ+ families also face disproportionate discrimination in voucher programs. Many private voucher schools teach anti-LGBTQ+ curriculum⁸³ and promote harmful conversion therapy for LGBTQ students.⁸⁴ Discrimination against LGBTQ+ students in voucher programs is widespread: for example, a 2023 survey of Wisconsin private schools receiving voucher funds found that about 40% of schools had policies discriminating against LGBTQ+ students.⁸⁵ Reports from Florida,⁸⁶ Pennsylvania,⁸⁷ and North Carolina have also documented voucher-funded private schools' discrimination against LGBTQ+ students.⁸⁸

Vouchers violate religious freedom. Voucher programs predominantly fund students to attend private, religious schools. For example, studies of Indiana's voucher program found that 98% of

reserve the right to reject applicants, including those seeking admittance with assistance from an EdChoice voucher because of: (1) behavioral or academic problems; (2) sexual preference; (3) religious or moral beliefs; (4) physical or emotional disability.”)

⁸³ Samantha Sunne & Donnell Suggs, [Some Ga. Tax Credit Scholarships Go to Anti-LGBT Schools](#), *The Current* (July 1, 2021) (Georgia private schools that accept vouchers have explicit anti-LGBTQ+ written policies (15 of 100 participating schools) and teach anti-LGBTQ+ curricula that would not be permitted in public schools (at least 12 participating schools)).

⁸⁴ Rebecca Klein, [Millions Of Taxpayer Dollars Are Going to Schools that Push Conversion Therapy](#), *HuffPost* (June 10, 2020) (Florida private schools accepting millions in taxpayer-funded vouchers promote conversion therapy for LGBTQ+ students).

⁸⁵ Phoebe Petrovic, [‘Unwanted and Unwelcome’: Anti-LGBTQ+ Policies Common at Wisconsin Voucher Schools](#), *Wisc. Watch* (May 31, 2023).

⁸⁶ Leslie Postal & Annie Martin, [Anti-LGBT Florida Schools Getting School Vouchers](#), *Orlando Sent.* (Jan. 23, 2020).

⁸⁷ Catherine Caruso, [Pennsylvania Taxpayers Are Funding Discriminatory Religious Schools](#), *New Republic* (May 2, 2024).

⁸⁸ Public Schools First NC, [How NC Tax Dollars Are Used to Discriminate Against Students and Families](#) (Jul. 2023).

participating schools were religious;⁸⁹ in the Arkansas voucher program, 87% of participating schools were religious;⁹⁰ and in the D.C. voucher program, 81% of participating students attended religious schools.⁹¹ This conflicts with one of the most dearly held principles of religious freedom: the government cannot compel anyone to fund religion, especially one with which they disagree. Parents certainly may choose a religious education for their children, but they may not demand that the taxpayers foot the bill.

Nor should taxpayer dollars be used to fund schools that can refuse to admit students or hire employees based on their religion. Yet many religious schools impose a religious litmus test on students, teachers, and their families.

2. The Federal Voucher Program Will Benefit Wealthy Donors to the Detriment of Local Schools and Communities

Despite clear evidence that vouchers harm students, taxpayers, and states, Congress bowed to the voucher movement's billionaire backers, creating the first nationwide federally funded voucher program as part of the July 2025 One Big Beautiful Bill Act.

The new school voucher program is primarily geared toward providing vouchers—described in the law as “scholarships”—for students to attend private school. The vouchers are funded by individual taxpayers who make donations to “scholarship granting organizations” in return for a tax credit. This tax credit overwhelmingly benefits wealthy donors, who can contribute up to \$1700 per year and reduce their tax bill by the same amount. This is the *only* federal tax credit that fully reimburses taxpayers for a donation (in contrast, traditional charitable donations only garner a tax deduction).⁹²

Despite claims of expanding opportunities for families who cannot afford private school, the program is not designed to help low-income families. While eligibility is based on family income, families who earn up to 300% of the area's gross median income—in some places, \$500,000 for a family of four—will be eligible.⁹³

With the creation of this program, the federal government is sacrificing revenue that could be used to invest in public education, and instead directing billions of dollars annually towards private schools.⁹⁴ There is no cap on the number of individuals who can claim tax credits under this program, nor on the total amount of money that will be given away in tax credits. The more taxpayers that claim the credit, the less tax revenue the federal government collects. The Joint Committee on Taxation has estimated

⁸⁹ Laura Meckler & Michelle Boorstein, [Billions in Taxpayer Dollars Now Go to Religious Schools Via Vouchers](#), *Wash. Post* (June 3, 2024).

⁹⁰ Steve Brawner, [Eighty-Four Private Schools Approved for LEARNS Money](#), *Magnolia Rep.* (Aug. 3, 2023).

⁹¹ U.S. Dep't of Ed., [Evaluation of the D.C. Scholarship Program: An Early Look at Applicants and Participating Schools Under the SOAR Act](#), 10, 29 (2014).

⁹² For further information on the program's design and outstanding questions, see Nat'l Coalition for Public Educ., Memo Re: [Federal Tax Credit Voucher Program in Public Law 119-21](#) (Sept. 2, 2025).

⁹³ Nat'l Coalition for Public Educ., [Subsidizing Private School for the Rich: Income Eligibility Limits for Each State Under the Federal Voucher Bill](#).

⁹⁴ Institute on Taxation and Economic Policy (ITEP), [Megabill Takes Cap Off Unprecedented Private School Voucher Tax Credit, Potentially Raising Cost by Tens of Billions Relative to Earlier Version](#) (July 6, 2025).

that over 10 years, the program will add \$26 billion to the federal debt.⁹⁵ There is enormous uncertainty behind this estimate, however, and the Institute on Taxation and Economic Policy estimates that the true cost could be much higher—up to \$51 billion annually.⁹⁶ In contrast, the federal government spends far less for its two largest discretionary investments in K-12 education—Title I-A of the Elementary and Secondary Education Act (\$18.4 billion) and the Individuals with Disabilities Education Act’s state grant program (\$14.6 billion). Public schools nationwide rely on these federal funds to ensure that low-income students and students with disabilities have access to robust support and qualified educators.

Finally, the program is vulnerable to significant abuse. Vouchers can be used for “qualified elementary or secondary education” expenses, which include costs associated with attending private and religious schools, but also allow for “additional expenses” related to enrollment. As with state-level voucher programs that use similar broad terms, this will likely be exploited to pay for luxury and entertainment expenses totally unrelated to education.

In sum, this federal voucher program comes at an enormous cost to our nation’s public schools. By redirecting federal funds to private education expenses, the program reduces the resources available for public school systems that serve over 90% of students.

3. States Can and Should Implement Safeguards for Students and Taxpayers in Voucher Programs

For many voucher advocates, the billions of taxpayer dollars being funneled to private and religious schools is not enough. They want the absolute right to receive taxpayer funds and participate in government programs while rejecting any—or even all—obligations and responsibilities that every other school receiving those funds must adhere to. States, however, should protect students, families, and taxpayers.

a. Legal Landscape

The Supreme Court has considered private school voucher programs in a handful of cases. In *Zelman v. Simmons-Harris*, the Supreme Court upheld a school-voucher program against an Establishment Clause challenge, concluding that the program was an indirect aid program of “true private choice,” in which the families, rather than the government, chose to attend a religious school.⁹⁷ The Court emphasized that, because the voucher program provided “genuine opportunities for parents to select secular educational options for their school-age children” in addition to religious options, parents were not unconstitutionally coerced into sending their children to religious schools.⁹⁸

Most recently, the Supreme Court’s 2022 decision in *Carson v. Makin* held that a Maine tuition funding program that allowed only nonsectarian schools to receive payments violated the Free Exercise

⁹⁵ Cong’l Budget Off., [Estimated Budgetary Effects of Public Law 119-21, to Provide for Reconciliation Pursuant to Title II of H. Con. Res. 14, Relative to the Budget Enforcement Baseline for Consideration in the Senate](#) (July 21, 2025).

⁹⁶ Carl Davis, [Megabill Takes Cap Off Unprecedented Private School Voucher Tax Credit, Potentially Raising Cost by Tens of Billions Relative to Earlier Version](#), Inst. on Taxation & Econ. Policy (July 6, 2025).

⁹⁷ *Zelman v. Simmons-Harris*, 536 U.S. 639, 662 (2002).

⁹⁸ *Id.* at 655-56.

Clause.⁹⁹ The *Carson* case involved a program for students in rural areas without traditional public schools, providing them access to attend a school of their parents' choice. The Court held that Maine's program was structured as an indirect aid program because parents—not the state—chose where to use the funding, and, therefore, it must fund religious private education equally with secular education.

Carson did not impact states' abilities to require schools taking taxpayer dollars to adhere to program-wide requirements, including nondiscrimination protections.¹⁰⁰ Nor does *Carson* alter the fundamental Establishment Clause limits that apply to direct-aid programs, where organizations get financial assistance or other support directly from the government, such as charter schools.

b. Protecting Students at Private Schools

It's no surprise that all states impose some requirements on all private schools, including religious schools. Because these schools are supposed to be educating children, states often ensure the school buildings are safe, schools offer a minimum number of instruction hours, or teachers are qualified.

Thus, when it comes to voucher programs, where the government is creating a program and committing taxpayer funds to it, the government can and should include requirements to ensure that the program is educating students, students and families don't face discrimination, and taxpayer funds are not being wasted. For example, it would be sound policy to ensure that teachers at voucher schools are certified, that voucher schools instruct students in core curriculum, that voucher schools do not discriminate against teachers, students, or families. Likewise, states should require transparency and accountability so that schools are safe, schools are financially sound and don't shut down in the middle of the school year, leaving families in the lurch, and that taxpayers don't fund wasteful spending on luxury items unrelated to any reasonable educational expense.

Although some may claim that these kinds of regulations should not apply to private religious schools, that is incorrect.

First, religion-neutral rules that apply generally to all private schools do not violate the Free Exercise Clause. Religious freedom is a foundational American value, but, as Justice Alito explained, the constitutional guarantee of religious freedom is not an entitlement to "general immunity from secular laws."¹⁰¹ Laws that apply generally¹⁰² and are neutral with respect to religion¹⁰³ do not trigger

⁹⁹ *Carson v. Makin*, 596 U.S. 767, 789 (2022).

¹⁰⁰ The Establishment Clause prohibits the government, government officials, or any state actor from supporting or disfavoring religion. See, e.g., *Epperson v. Ark.*, 393 U.S. 97, 103-04 (1968); *McCreary Cty. v. ACLU of Ky.*, 545 U.S. 844, 875-76 (2005). Thus, the government may not support religious indoctrination (see, e.g., *Agostini v. Felton*, 521 U.S. 203, 228-30 (1997)); religious coercion (see, e.g., *DeStefano v. Emergency Hous. Grp., Inc.*, 247 F.3d 397, 412 (2d Cir. 2001)); or religious discrimination (see, e.g., *Ams. United for Separation of Church & State v. Prison Fellowship Ministries, Inc.*, 509 F.3d 406, 425 (8th Cir. 2007)). This obligation also applies in directly funded programs.

¹⁰¹ *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 591 U.S. 732, 746 (2020).

¹⁰² The "government, in pursuit of legitimate interests, [must neither] in a selective manner impose burdens only on conduct motivated by religious belief" (*Church of the Lukumi Babalu Aye v. City of Hialeah*, 508 U.S. 520, 543 (1993)) nor use a "formal system of entirely discretionary" and "individualized" exemptions to favor requests for secular exceptions over religious ones (*Fulton v. City of Phila.*, 593 U.S. 522, 533, 536 (2021) (quoting *Emp't Div. v. Smith*, 494 U.S. 872, 884 (1990))).

¹⁰³ The government may not "target religious conduct for distinctive treatment." *Lukumi*, 508 U.S. at 534.

heightened scrutiny under the Free Exercise Clause, even if they “ha[ve] the incidental effect of burdening a particular religious practice.”¹⁰⁴

Second, exempting only religious private schools from rules and policies would “make the professed doctrines of religious belief superior to the law of the land, and in effect . . . permit every citizen to become a law unto himself.”¹⁰⁵ It would also violate the Establishment Clause, which requires the government to neither support nor disfavor religion—in other words to maintain neutrality among all religions and between religion and nonreligion—in its actions and policies.¹⁰⁶

States can create safeguards in their voucher programs that apply to all private schools without raising constitutional concerns. Given the clear evidence of harm and fraud perpetuated in voucher programs, states have a compelling reason to do so.

C. Conclusion

Public schools must be open to all and protect children and families’ religious freedom rights. When school officials pressure students to pray, proselytize students, or impose religion, it weakens our public schools. And, when taxpayer funds go to voucher programs that pay for a select few to attend unaccountable religious private schools, our public schools are also harmed.

Americans United remains steadfast in our work, as we have for nearly eighty years, to fight for church-state separation, which ensures that everyone can enjoy their right to religious freedom. We urge the Commission to address these pressing threats to religious freedom in education.

Sincerely,



Alessandro Terenzoni
Vice President of Public Policy



David O. Carter
Public Policy Counsel*

¹⁰⁴ *Id.* at 531 (citing *Smith*, 494 U.S. 872); accord *Mahmoud v. Taylor*, 145 S. Ct. 2332, 2360 (2025) (“Under our precedents, the government is generally free to place incidental burdens on religious exercise so long as it does so pursuant to a neutral policy that is generally applicable.”).

¹⁰⁵ *Smith*, 494 U.S. at 879 (quoting *Reynolds v. United States*, 98 U.S. 145, 166-67 (1878)).

¹⁰⁶ *E.g.*, *Catholic Charities Bur., Inc. v. Wisc. Labor & Indus. Rev. Bd.*, 605 U.S. 238, 247-48 (2025) (quoting *Larson v. Valente*, 456 U.S. 228, 244 (1982); *Epperson*, 393 U.S. at 106; *Zorach v. Clauson*, 343 U.S. 306, 314 (1952)); *McCreary*, 545 U.S. at 875-76.

* Not yet admitted to the Bar of the District of Columbia, but admitted to practice law in another jurisdiction. Practicing law in D.C. pursuant to D.C. Court of Appeals Rule 49(c)(8)(A) under the supervision of AU attorneys admitted to the D.C. Bar and in good standing.

December 1, 2025

Via Electronic Mail to RLC@usdoj.gov

Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue, NW
Room 5706
Washington, DC 20530



1310 L Street NW, Suite 200
Washington, DC 20005
au.org

Rachel Laser
President & CEO

Public Policy Department

Alessandro Terenzoni
Vice President of Public
Policy

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Eddie Tabash, Esq.

Sam Weisman, Ph.D.

Dear Chair Patrick, Vice Chair Carson, and members of the Religious Liberty Commission:

On behalf of Americans United for Separation of Church and State, we write to the Commission to outline important considerations regarding the landscape of religious liberty in America's military.

Founded in 1947, Americans United is a nonpartisan educational and advocacy organization dedicated to preserving the constitutional principle of church-state separation, which is the foundation of true religious freedom for all Americans. We fight to protect the right of individuals and religious communities to practice religion—or not—as they see fit without government interference, compulsion, support, or disparagement. We represent people of all faiths and none and have a network of more than 380,000 members and supporters across the country.

Americans United is the only organization in the country dedicated solely to defending and promoting the separation of church and state. Our 78-year legacy of protecting religious freedom and expertise as an organization staffed with constitutional lawyers means that we are uniquely positioned to offer guidance and information for your discussion of religious liberty issues in the military.

Religious freedom is a fundamental American value. It protects all of us, including service members and military chaplains. Religious freedom guarantees us the right to believe—or not—as we see fit. It does not give anyone the right to use religion as an excuse to discriminate or harm others or undermine obligations. This is true for all Americans—including service members. All service members must uphold the duty, shared regardless of their religion or background, to protect and defend our nation. People with different religious beliefs and who are nonreligious serve together in the military and treat one another with dignity and respect.

There are circumstances unique to the military that may affect religious freedom. First, the military has a clear and prevailing interest in maintaining military readiness, unit cohesion, good order, discipline,

health, well-being, and safety. Decisions concerning religious freedom, therefore, cannot be made without consideration of how they will affect these goals. Second, the command structure of the military creates an obvious potential for undue pressure on an individual to conform in order not to jeopardize their military career. This atmosphere “presents particular dangers of coerced religious activities.”¹ Thus, it is of particular importance that the military protect service members from unwanted pressure to engage in certain religious activities or adopt particular religious beliefs. Indeed, religious coercion and proselytization can have an even greater impact on service members than civilians, both because of the military chain of command and because service members are part of a small and sometimes isolated community.

Our comments focus on two important policy areas that shape service members’ religious freedoms in the military: protections for religious minorities and the military chaplaincy.

Recognizing and Protecting Religious Minorities

Members of the Armed Forces come from all religions and beliefs, reflecting the diversity of our nation. A 2019 Department of Defense Study found that about one-third of active duty personnel were non-Christian.² Over time, the Department has updated policies to better recognize and respond to the needs of all service members—ensuring that those who

For example:

- In 2017, the Pentagon updated its list of faiths and beliefs that service members can identify with, nearly doubling the number.³ The updated official list of religious preferences includes 221 different options spanning a wide range of faiths and non-theist belief systems, including the three main movements within Judaism, additional Protestant groups, Humanism, and earth-based religions.⁴ As a result, the military will have more accurate demographic information about its service members, allowing it to better plan for all service members’ religious support and assess the capabilities and requirements for chaplains.
- In 2014, the Air Force reversed a policy that violated the religious freedom of non-theist airmen.⁵ Even though other service members were allowed to omit the phrase, “so help me God” in their enlistment or appointment oaths, the Air Force forced all airmen to include the phrase.⁶ Before the policy reversal, an airman was told he had to leave the Air Force if he would not agree to the religious oath,⁷ which would have violated the Constitution and coerced non-theists to swear an oath in which they do not believe. The current policy aligns with other branches of the military and ensures that non-theists do not face discrimination.

¹ William J Dobosh, Jr., [Coercion in the Ranks: The Establishment Clause Implications of Chaplain-Led Prayers at Mandatory Army Events](#), 2006 Wis. L. Rev. 1493, 1527-28 (2006).

² See Kristy N. Kamarck, [Diversity, Inclusion, and Equal Opportunity in the Armed Services: Background and Issues for Congress](#), Congressional Research Service, Fig. 6 (June 5, 2019).

³ Kimberly Winston, [Defense Department Expands Its List of Recognized Religions](#), Religion News Service (Apr. 21, 2017).

⁴ Dep’t of Defense, Defense Manpower Data Center, *Faith and Belief Code Table* (2017).

⁵ [AF to Change Instructions for Oaths](#), Air Force (Sept. 17, 2014).

⁶ Stephen Losey, [Air Force Alone in ‘So Help Me God’ Requirement](#), Air Force Times (Sept. 11, 2014).

⁷ Stephen Losey, [Group: Airman Denied Reenlistment for Refusing To Say ‘So Help Me God’](#), Air Force Times (Sept. 4, 2014).

One of the most consequential ways the military has protected religious freedom is allowing service members to serve with their articles of faith. The military is stronger when service members can abide by the requirements of their faith—wearing, for instance, head coverings or a beard—when it does not undermine safety or other necessary objectives.

The policy allowing religious accommodations for articles of faith emerged in part from the successful efforts of Lt. Col. Kamaljeet Kalsi, a Sikh American, to wear a beard, unshorn hair, and turban while serving. Lt. Col. Kalsi grew up in New Jersey and came from a family with three generations of military service.⁸ The Army recruited him while he was in medical school and assured him that his religiously required articles of faith would be accommodated.⁹ Lt. Col. Kalsi spent several years as an Army reserve officer while in medical school. In 2009, upon completion of his medical education, he was called to active duty. That's when the Army told him that military policy actually prohibited his religious articles of faith. Unless he shaved his beard, cut his hair, and removed his turban, he could not attend basic training and continue his military duties.¹⁰

It took two years of advocacy and negotiation before the Army finally granted Lt. Col. Kalsi an accommodation to maintain his articles of faith. This was the first accommodation granted to a Sikh American in more than twenty-five years.¹¹ After receiving the accommodation, Lt. Col. Kalsi was deployed to Afghanistan as Officer-in-Chief of a tented emergency room in Helmand province. During his tour in Afghanistan, Dr. Kalsi personally treated over 750 combat casualties and local nationals who suffered from IED blasts, gunshot wounds, and other emergent conditions. For his service in Afghanistan, Lt. Col. Kalsi was awarded the Bronze Star.¹² Later at Fort Bragg, he directed the Army's largest EMS system.¹³

Although Lt. Col. Kalsi might have been the first service member in a generation to receive this kind of religious accommodation, he paved the way for a change in policy that has helped more people to serve their country. In 2017, the Army established a streamlined accommodations process.¹⁴ Finally, in 2020, the Armed Forces officially adopted a formal process for granting religious accommodations for grooming, appearance, and apparel policies in order to wear their articles of faith.¹⁵ And now, hundreds of Christians,¹⁶ Muslims,¹⁷ and Sikhs¹⁸ have served their country.¹⁹

⁸ [Personal Statement of Major Kamaljeet Singh Kalsi to the U.S. Comm'n on Civil Rights](#) (May 13, 2013).

⁹ Steve Elliott, [Sikh Soldiers Allowed to Serve, Retain Their Articles of Faith](#), U.S. Army (Mar. 25, 2010).

¹⁰ James Dao, [Taking On Rules to Ease Sikhs' Path to the Army](#), N.Y. Times (Jul. 7, 2013).

¹¹ *Id.*

¹² [Letter from U.S. Comm'n on Civil Rights to Chuck Hagel, U.S. Sec'y of Defense](#) (Dec. 3, 2013).

¹³ [Lieutenant Colonel Kamal S. Kalsi, D.O., FACEP, Civic Engagement Awardee](#), Asian Pacific Institute for Congressional Studies.

¹⁴ [Army Directive 2017-03 \(Policy for Brigade-Level Approval of Certain Requests for Religious Accommodation\)](#) (Jan. 3, 2017).

¹⁵ Dep't of Defense Instruction 1300.17, [Religious Liberty in the Military Services](#) (Sept. 1, 2020).

¹⁶ E.g., Haley Britzky, [Army Approves Christian Soldier's Request to Wear Long Hair for Religious Reasons](#), Task & Purpose (July 30, 2021).

¹⁷ E.g., Heather Weaver, [ACLU Client Makes History As First Air Force JAG Corps Officer to Wear Hijab](#), ACLU (May 16, 2018).

¹⁸ E.g., Oriana Pawlyk, [Air Force Allows Sikh Airman to Wear Turban and Beard](#), Military.com (June 7, 2019).

¹⁹ See [Letter from Congressional Asian Pacific American Caucus to Def. Sec. Pete Hegseth](#) (Nov. 10, 2025).

These accommodations have no negative effect on mission accomplishment, including military readiness, unit cohesion, good order, discipline, health, well-being, and safety.²⁰ For example,

There is no negative impact on the rights of
any third parties.

Unfortunately, Secretary Pete Hegseth has taken deeply concerning steps that could lead to reversing this progress. In a September speech, Secretary Hegseth stated that service members would need to meet grooming standards, declaring, “No more beards, long hair, superficial individual expression. We’re going to cut our hair, shave our beards, and adhere to standards.”²¹ His proclamation of “No more beardos. The era of rampant and ridiculous shaving profiles is done” was deeply troubling and offensive. These statements belittled and diminished service members who wear beards for religious reasons, as well as those who wear beards for medical reasons. And, they suggested that no allowances would be made for religiously compelled facial hair.

An accompanying memorandum on “Grooming Standards for Facial Hair Implementation,” threatens to severely limit individuals’ abilities to get religious accommodations.²² The memo calls for a return to pre-2010 standards, meaning a return to an era before Lt. Col. Kalsi’s accommodation opened the door to others seeking religious accommodations. It also states that pre-accession recruits will have to “meet existing standards” (i.e. shave) to even seek an accommodation—an impossible hurdle for people whose faith requires beards. Finally, it states that accommodation approvals will be limited to non-deployable roles, suggesting that individuals with facial hair could be denied equal opportunity to deploy and potentially harming their military careers.

The military should be applauded for the steps it has already taken to protect the religious freedom of all our service members. Inclusion and pluralism are essential to meet the needs of our diverse twenty-first century fighting force. The Pentagon should not retreat from these policies. Doing so would violate the religious freedom of our service members and, ultimately, undermine the Armed Forces from being able to defend and protect our nation.

Religious Programs and Military Chaplains

Military commanders are responsible for programs that provide for religious exercise, promote resilience and well-being, and protect the religious freedom of all service members and their families. Military chaplains implement the religious programs to support the diverse needs of service members and families in a pluralistic environment. This inherently requires chaplains to serve all, regardless of belief, without discriminating, proselytizing, or coercing others.

²⁰ The Religious Freedom Restoration Act (RFRA) has been an important tool to attain these accommodations. This is exactly what RFRA was designed to do—be a shield to safeguard religious freedom, not a sword to harm others. It provides heightened, but not unlimited, protections for religious exercise. RFRA cannot be used to grant exemptions that result in discrimination or cause harm.

²¹ Transcript, [Secretary of War Pete Hegseth Addresses General and Flag Officers at Quantico, Virginia](#) (Sept. 30, 2025).

²² Memorandum for Senior Pentagon Leadership et al. on [Grooming Standards for Facial Hair Implementation](#) (Sept. 30, 2025).

Role of Chaplains in the Military

Given the important roles of chaplains and the First Amendment interests at stake, the Department and branches of the Armed Forces have adopted a comprehensive series of policies, instructions, and regulations that govern the chaplaincy, including the appointment of chaplains, their roles and responsibilities, and their relationships with the chain of command.²³

Religious programs are under the authority of commanders, not individual chaplains.²⁴ The chaplains are stewards of their commanders' programs. Within the programs, chaplains play two important roles: military religious leaders and military religious staff advisers.²⁵ In their first role as religious leaders, chaplains provide or facilitate religious support that "accommodates the [service members'] right to the free exercise of religion, and support resilience efforts to sustain [them]."²⁶ Chaplains must fulfill their commitment to serve in a pluralistic environment, working with service members and their families who come from all faiths and are nonreligious.²⁷ Service members are often stationed far from home, including on ships, in foreign countries, and in combat zones, where they lack access to their houses of worship. Chaplains help accommodate service members' religious exercise in these instances, allowing service members and their families to worship where they are based within the military community.

In their second role, as religious staff advisors, chaplains advise commanders on, among other things, "the discharge of the commander's responsibility to support the free exercise of religion" and "matters of morale, morals, ethics, and overall wellbeing within the command."²⁸

In practice, this means that all denominations and faiths that sponsor military chaplains agree to provide chaplains who will honorably fulfill the office's responsibilities.²⁹ Military chaplains must be willing to serve every service member, even if that means refraining from proselytizing, sectarian prayer, or engaging in religious activity in certain situations. And, while the First Amendment and federal law ensure that chaplains cannot be required "to perform any rite, ritual, or ceremony that is contrary to [their] conscience, moral principles, or religious beliefs,"³⁰ if chaplains cannot perform certain services, they are expected to work cooperatively with other chaplains to ensure that service members' religious needs are met.³¹

²³ [Brief of the Forum on the Military Chaplaincy and Former Members of the Military and Military Chaplaincies](#), *Kennedy v. Bremerton Sch. Dist.*, No. 21-418 (U.S. Apr. 1, 2022), (providing thorough review of relevant policies, instructions, regulations, and laws).

²⁴ See, e.g., Army Regulation 165-1, [Army Chaplain Corps Activities](#), §§ 1-10; 2-1 (June 23, 2015); Sec'y of the Navy Instruction 1730.7E, [Religious Ministry Within the Department of the Navy](#) ¶ 5.d(1)-(2) (Mar. 11, 2019).

²⁵ E.g., Dep't of Defense Directive 1304.19, [Appointment of Chaplains for the Military Departments](#), ¶ 4.1 (current as of Apr. 23, 2007); Army Regulation 165-1, § 2-3.

²⁶ Army Regulation 165-1, § 2-3.

²⁷ E.g., Dep't of Defense Directive 1304.19, ¶ 4.2. See also *Katcoff v. Marsh*, 755 F.2d 223, 227 (2d Cir. 1985) (explaining that the "primary function of the military chaplain is to engage in activities designed to meet the religious needs of a pluralistic military community").

²⁸ Sec'y of the Navy Instruction 1730.10A, [Chaplain and Advisement Liaison](#), ¶ 4.d(1)-(2) (Aug. 28, 2018).

²⁹ E.g., Dep't of Defense Instruction 1304.28, [The Appointment and Service of Chaplains](#), § 4.1 (May 8, 2024).

³⁰ National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 533(b) (2013); Dep't of Defense Instruction 1304.28, § 2.2.b; Dep't of Defense Instruction 1300.17 § 1.2.c.

³¹ "If a chaplain is unable to support a specific request because of their religious endorsing organization's teachings, the chaplain must offer referral to another chaplain or professional. Such referrals are accomplished respectfully, professionally, and in a reasonable period of time." Dep't of Defense Instruction 1304.28, § 3.1.g(3).

The Navy describes chaplains' responsibilities as "care, facilitate, provide, and advise."³²

Care: Chaplains care for the welfare and morale of all service members, regardless of their religious faith. They must deliver care that "demonstrate[s] a dedication to the dignity of all," where the "well-being of the individual receiving service will always receive the highest priority."³³ This means they must be sensitive to the religious, spiritual, moral, and personal differences of those served.

This includes providing secular programming that is mandatory for all personnel in a military unit, including post-deployment transition counseling and suicide prevention training.

Military chaplains provide service members a safe, confidential space to discuss issues of conscience and ethics. Many service members are more comfortable seeking assistance from their unit chaplain than from a mental health provider. However, individual advice from chaplains should be faith-based only "when requested," and not when the chaplain unilaterally desires to engage in religious speech.³⁴

Facilitate: Chaplains facilitate the free exercise of service members of other faiths and beliefs.

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Provide: Chaplains provide religious services for those of the same faith group. Chaplains lead religious services, administer sacraments, and perform the rites or ceremonies according to their own religion.³⁶

Advise: Chaplains assist and advise officers in their chain of command regarding religious ministry requirements, ethics, morale, and quality of life among service members, unit enhancement, culture, and religious accommodations.³⁷

Military chaplains serve a vital role for commanders. Chaplains serve as counselors, advocates, and confidants for service members. Chaplains are integrated into the daily life of every unit, even during busy times and deployments, and actively seek opportunities to provide support to all service members and their families. And chaplains help build the resiliency of service members and their families by assisting them to follow their beliefs and providing counseling and care. This resiliency is key to military readiness, unit cohesion, and mission accomplishment.

³² Sec'y of the Navy Instruction 1730.7E, ¶ 2.i(3).

³³ *Id.*, ¶ 1.c(2). See also Dep't of Defense Instruction 1304.28, § 3.1.g.

³⁴ Sec'y of the Navy Instruction 1730.10A, ¶ 4.b ("Chaplains listen to individuals who come to them for help, regardless of religious affiliation, and offer advice to help individuals make sound decisions. Chaplain advice is rooted in ethics and morality, and when requested, can be faith-based."). See also Dep't of Defense Instruction 1304.28, § 3.1.g ("Such care and counseling are rooted in ethics and morality and may or may not be faith based at the person's request.").

³⁵ Dep't of Defense Instruction 1304.28, § 3.1.f.

³⁶ See 10 U.S.C. § 8221(a) ("An officer in the Chaplain Corps may conduct public worship according to the manner and forms of the church of which he is a member.").

³⁷ See Sec'y of the Navy Instruction 1730.10A, ¶ 4(d)(2); Army Regulations 165-1, § 3-3.

Service members and their families receive spiritual and emotional support according to the dictates of *their* conscience, regardless of an individual chaplain's religious beliefs. Chaplains must serve everyone and "be willing to function in the military's pluralistic environment, respecting the rights of individuals to determine their own religious convictions."³⁸

Efforts to Undermine Chaplains' Roles

Unfortunately, there have been efforts to disrupt the relationships between chaplains and service members and interfere with chaplains' roles and responsibilities.³⁹ But if individual chaplains were allowed to proselytize and engage in sectarian activities when carrying out their duties to serve all, the interests, rights, and needs of the service members they are supposed to serve would be harmed. Likewise, if chaplains were allowed to deny services to those who have different views or don't follow the same religious tenets, service members would face violation of their Free Exercise rights and discrimination, threatening the unity and cohesion necessary for military effectiveness.

These outcomes could put the whims of an individual chaplain ahead of the interests, rights, and needs of those they are required to serve, demonstrating a lack of respect for service members and the diversity in our military.

When chaplains are performing their own religious services, they have an almost unlimited opportunity to pray according to their own consciences and faiths. But military commanders have the authority to determine the appropriate role for chaplains at command functions, such as retirements, promotions, changes of command, or official memorial observances. These events are often mandatory for service members. Any religious elements "are included at the commander's discretion."⁴⁰ In other words, chaplains do not have the right to participate in these functions; instead, they are invited to do so. Indeed, commanders are constitutionally obligated to ensure that such functions are neutral with regard to religion and not used as an occasion to promote or disparage any religious belief. Service members attending mandatory events should not be forced to participate in sectarian prayers given by a chaplain. As a retired naval chaplain and Episcopal bishop explained, "[M]y responsibility when offering public prayers in uniform is to care for all of those who are present, not just those from my own faith tradition."⁴¹

Another retired naval chaplain, who is a rabbi, illustrated why this responsibility is so important: he estimated that more than 95% of the troops with whom he served were not Jewish. He "served the needs of Catholics and Protestants of every denomination, different groups of Latter-Day Saints, and numerous Christians of other affiliations[,] Buddhists and Muslims and more, as well as those with no affiliation, including agnostics and atheists."⁴²

³⁸ Sec'y of the Navy Instruction 1730.7E, ¶ 2.i(2). See also Dep't of Defense Instruction 1304.28, § 3.2.

³⁹ These efforts are often based on anecdotes that are misreported and politicized by those outside the military. And just as often, these anecdotes are either easily debunked or actually examples of religious coercion that the military should have stopped.

⁴⁰ Sec'y of the Navy Instruction 1730.7E, ¶ 3.a(6).

⁴¹ [Statement of Rt. Rev. James B. Magness, Bishop Suffragan for the Armed Forces and Federal Ministries, The Episcopal Church](#), to the House Armed Services Committee's Subcommittee on Military Personnel, Re: Hearing on "Religious Accommodation in the Armed Services" (Jan. 29, 2014).

⁴² [Statement of Rabbi Bruce Kahn to the House Armed Services Committee's Subcommittee on Military Personnel](#), Re: Hearing on "Religious Accommodation in the Armed Services" (Nov. 19, 2014). See also Dep't of Defense Instruction 1300.17, §4.a ("The DoD places a high value on the rights of members of the Military Services to observe the tenets of their respective religion or to observe no religion at all.").

A retired Rear Admiral and rabbi explained, when a rabbi helps a Catholic Marine to recite the rosary, he “has not abandoned his faith; he has found room in his heart to know and support the Marine in his, allowing him to find strength and solace there. . . . [The rabbi] is clear on the distinctions between his personal spiritual needs and his responsibility to help others to fulfill theirs.”⁴³ Indeed, “[t]he religious freedom of the troops is not to be sacrificed to meet the demands of the chaplain. The chaplain adjusts to meet the faith requirements of the troops. Doing so creates the right atmosphere for enhanced unit cohesion, enhanced readiness, and enhanced mission accomplishment.”⁴⁴

For more than two hundred years, military chaplains fostered a reputation for putting the needs of service members first. The trust in, and respect for, chaplains is based on the understanding that they will uphold their duty to serve fellow service members and avoid taking advantage of their role by interfering with the rights of those whom they serve.

Conclusion

We urge the Commission to support the continued protection of the religious freedom of our service members and their families. The military should accommodate service members’ religious exercise—like by allowing Sikh soldiers to wear head coverings, uncut hair, and beards—when it will not harm military readiness, health, well-being or safety, or lead to the harm of or discrimination against others. Military chaplains must support all service members, regardless of their religion or beliefs. And no member of the Armed Forces should face discrimination or religious coercion.

Sincerely,



Alessandro Terenzoni
Vice President of Public Policy



Dena Sher
Associate Vice President of Public Policy

⁴³ Harold L. Robinson, [Free Exercise Meets the Establishment Clause in Military Service](#), JCC Association of North America (Oct. 7, 2015).

⁴⁴ Kahn Statement.



June 13, 2025

Religious Liberty Commission
U.S. Department of Justice
950 Pennsylvania Avenue NW
Room 5706
Washington, DC 20530

**Re: Comments for First Hearing of the Religious Liberty Commission following
Presidential Executive Order 14291: Establishment of the Religious Liberty Commission**

Chair Patrick, Vice Chair Carson, and Members of the Commission:

The American Humanist Association strongly rejects the purported utility and partisan nature of the Religious Liberty Commission, established by President Donald Trump through Executive Order 14291 on May 1, 2025 under the guise of advancing religious liberty. As legally obligated by the Constitution of the United States of America, the U.S. government has a responsibility to ensure freedom of religion or belief for Americans of all faith and belief backgrounds, including nonreligious Americans. The Religious Liberty Commission is not prepared to do so.

About the American Humanist Association

Founded in 1941, the American Humanist Association (AHA) is the oldest national organization in the United States representing the interests of humanists, atheists, freethinkers, and the nonreligious. The AHA strives to bring about a society where being good without a god is an accepted and respected way to live life. We accomplish this through our defense of civil liberties and secular governance, by our outreach to the growing number of people without traditional religious faith, and through a continued refinement and advancement of the humanist worldview.

Humanism is a nontheistic life stance with ethical values informed by scientific knowledge and driven by a desire to meet the needs of people in the here and now. At the core of those values is an affirmation of the dignity of every human being. The positions we hold and the actions we take are not simply for our own benefit, but for the betterment of all of society and the world in which we live.

We defend the First Amendment by working to strengthen the separation of religion and government. The organization has historically opposed politically-motivated efforts by the Executive Branch to redefine religious liberty—including efforts to do so through the establishment of sham commissions and task forces that utilize religious claims to justify discrimination, weaken civil rights protections, provide preferential treatment for religiously-affiliated people and entities, and—ultimately—dismantle the very ideals they purport to advance. These efforts are used to justify the weaponization of a narrow interpretation of Judeo-Christian beliefs and run counter to the principle of Freedom of religion or belief and secular governance.

The United States is a richly pluralistic country with a growing number of nonreligious people residing within its borders. According to Pew Research Center, more than 1 in 4 people (28%) in the United States are religiously unaffiliated, making this group the largest in the U.S. Within this catch-all category (referred to as the “nones”), 37% of people surveyed described themselves as atheist or agnostic.¹

The Founding Fathers intended for the First Amendment to both empower the freedom of religion or belief, and protect from theocratic discrimination.

Christian Nationalists claim that America is a Christian nation and was founded as such. In reality, the Founding Fathers were deliberate in their goal to ensure that, to the greatest extent possible, America would not become a nation plagued by the same oppression that caused many to flee to it.

While the Founding Fathers may have been informed by aspects of their faith, they recognized the delicate relationship between supporting free exercise and preventing government-endorsed religion. To mitigate tyranny and support a thriving democracy, they forged the Constitution as a secular document and ensured that the Free Exercise Clause and the Establishment Clause both balance and compliment each other. In Jefferson's Letter to the Danbury Baptists, Thomas Jefferson's seminal words, which acknowledged that free exercise is made possible due to the building of a wall of separation between Church and State, came to be recognized as the First Amendment's cornerstone.²

On one hand, the Establishment clause protects us not only from an official state-established religion, but also from the government inappropriately aligning itself with one religion over another. On the other, the Free Exercise clause requires the government to protect the liberty to practice faith, or no faith at all. That liberty does not permit religious institutions, organizations, or individuals from freely discriminating against others because of their personally-held beliefs.

Freedom of religion or belief, internationally recognized as a human right,³ is effectuated by the tool of separation of religion and government. We know that in countries where the line between religion and government blurs, human rights as a whole suffer.⁴ A secular, open, and pluralistic society where government does not ascribe to one worldview over another is a right to which every American is entitled as guaranteed in the US constitution - and this separation is worth protecting.

The AHA fights to protect the First Amendment of the Constitution for the benefit of humanists, atheists, freethinkers, the nonreligious, *and* the religious, because an assault on anyone's religious liberty is an assault on everyone's liberties. Policy and jurisprudence derived from theocratic principles harm even the very members of the groups creating them. For example, are the religious freedom rights of LGBTQIA+ Christians not violated when they are denied services due to religious conscience laws? How about the religious freedom right of churches to provide water to people crossing the border, for whom thirst could otherwise mean death?

¹ <https://www.pewresearch.org/religion/2024/01/24/religious-nones-in-america-who-they-are-and-what-they-believe/>

² <https://www.loc.gov/loc/lcib/9806/danpre.html>

³ <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

⁴ <https://www.uscirf.gov/publications/implications-laws-promoting-state-favored-religions>

The examples provided in Executive Order 14291 as evidence of religious liberty violations are delusional.

Executive Order 14291 fallaciously points to several examples it claims necessitates the Religious Liberty Commission. For example, the order states certain policies and “opponents of religious liberty” threaten religious liberty in their intent to:

a. “infringe upon longstanding conscience protections”.

Although no one’s religion should ever be used to justify discrimination or refusal to provide service, laws already exist that allow individuals to refuse service because of religious objections. For example, businesses refuse to serve protected classes in some cases.⁵ Families opt their children out of education materials. Even healthcare providers that receive certain federal funds make religious or moral objections to providing abortions or other healthcare.⁶ Furthermore, this is not a widespread epidemic in the United States; there are few among us who truly wish to deny others equal access to services, education, and healthcare.

b. “prevent parents from sending their children to religious schools”.

Families in the United States are free to send their children to private religious schools. However, most Americans choose public schools to educate their children, and for good reason; public schools are required to adhere to federal civil rights laws so that all children have equitable educational opportunities and feel welcome at school - including disabled children, marginalized children, and children of all faith and belief backgrounds. Private schools, to which parents are welcome to send their children, are at liberty to discriminate against, for example, disabled students, girls, LGBTQ students, and religious minorities. If a parent chooses to send their child to a religious school, they have every right to do so - but the general public has no constitutional obligation to subsidize that decision.

c. “threaten loss of funding or denial of non-profit tax status for faith-based entities”.

All organizations designated by the Internal Revenue Service as 501(c)(3) status nonprofits, including religiously-affiliated institutions, are required to adhere to basic requirements, including the Johnson Amendment - a provision in the tax code that prohibits organizations that benefit from federal 501(c)(3) tax exemptions from participating in any activities that support or oppose political candidates.⁷ The Johnson amendment is not an attack on religious liberty - it ensures that organizations enjoying a tax exemption are not abusing that privilege with funds that would otherwise go to government expenses for public services and programs. If the Commission is worried about protecting nonprofits from loss of funding or denial of tax status, perhaps it will concern itself with protecting faith-based entities, like universities and immigration nonprofits, from having their status jeopardized by a vengeful president and

⁵ https://www.supremecourt.gov/opinions/22pdf/21-476_c185.pdf

⁶ <https://www.hhs.gov/conscience/your-protections-against-discrimination-based-on-conscience-and-religion/index.html>

⁷ <https://www.irs.gov/newsroom/charities-churches-and-politics>

Congress.

- d. *“single out religious groups and institutions for exclusion from governmental programs”.*

Any organization that receives federal funding - whether religious or not - must adhere to certain civil rights protections. Any organization that cannot adhere to these basic requirements to uphold the dignity of each and every person has no business receiving taxpayer dollars to aid in their discriminatory work. Religious groups and institutions are not being targeted because they do not get to receive a special exemption to this requirement, nor are they blocked from participating in programs when they are otherwise eligible.

- e. *“remove religion entirely from public life”.*

Notably reflective of the principle of separation of religion and government, the majority of Americans (55%) believe that churches and religious organizations do more good than harm in society; concurrently, a majority of Americans (63%) say that churches and religious organizations should keep out of politics.⁸ We agree that everyone should be able to freely practice their faith or have no faith at all. This is a human right. However, utilizing public policy to authorize discrimination or force the American public at large to adhere to religious tenets is a violation of the separation of religion and government rejected by the majority of Americans.

- f. *“characterize religious liberty as inconsistent with civil rights, despite religions’ vital roles in the abolition of slavery; the passage of Federal civil rights laws; and the provision of indispensable social, educational, and health services.”*

The examples listed here are comically irrelevant and provide no logical reason to justify the need for this Commission. One could simply point to the fact that Christian slaveholders used the bible to justify slavery⁹, that the Klu Klux Klan openly relies on Christianity in its rhetoric,¹⁰ and that some Christians fought against landmark civil rights laws and still do so to this day. Indeed, religious institutions that provide services often discriminate in who and how they serve the American public. Just as religion has been used as a shield in this country, it has been used as a sword as well. Further entangling the government in religious liberty only empowers those that seek to use it as a sword. The AHA is proud to work closely and partner with numerous faith organizations dedicated to protecting and strengthening civil liberties and human rights.

The AHA rebukes these arguments as arbitrary, factually-incorrect, and even contrary to the First Amendment. With a fundamentally-flawed understanding of religious liberty used as a justification for the Religious Liberty Commission’s establishment, we are concerned the Religious Liberty Commission will be unable to examine religious liberty in an objective or historically-accurate manner and make

⁸ <https://www.pewresearch.org/religion/2019/11/15/americans-have-positive-views-about-religions-role-in-society-but-want-it-out-of-politics/>

⁹ <https://time.com/5171819/christianity-slavery-book-excerpt/>

¹⁰ <https://voices.uchicago.edu/religionculture/2017/06/26/the-klan-white-christianity-and-the-past-and-present-a-response-to-kelly-j-baker-by-randall-j-stephens/>

legitimate recommendations to the executive branch.

The Religious Liberty Commission lacks balanced leadership and viewpoint diversity.

Executive Order 14291 mandates the Religious Liberty Commission include individuals who can “offer diverse perspectives on how the Federal Government can defend religious liberty for all Americans”. As it currently stands, the Commission is blatantly partisan and bereft of individuals who can offer diverse viewpoints and worthy contributions.

- Texas Lieutenant Governor Dan Patrick is an evangelical Protestant¹¹
- Dr. Ben Carson is a Christian, and is a Seventh-day Adventist¹²
- Ryan T. Anderson is a Catholic¹³
- Bishop Robert Barron is a Catholic¹⁴
- Carrie Prejean Boller is a Catholic¹⁵
- Cardinal Timothy Dolan is a Catholic¹⁶
- Pastor Franklin Graham is an evangelical Protestant¹⁷
- Public information regarding Allyson Ho’s faith - if any - is not readily-available, though she has worked closely with the First Liberty Institute¹⁸, a Christian Nationalist organization¹⁹
- Dr. Phil McGraw is a Christian²⁰
- Eric Metaxas is a Christian²¹
- Kelly Shackelford is a Christian²²
- Rabbi Meir Soloveichik is an orthodox Jew²³
- Pastor Paula White is an evangelical Protestant²⁴

It is worth noting that nearly all “of commission members have histories of extremist comments and ties to right-wing media²⁵”. This partisan and deeply-worrisome Judeo-Christian panel, which in no way reflects the religious diversity of America, risks stifling the religious liberties of all people of all faiths and none, including other Judeo-Christians.

¹¹ <https://www.danpatrick.org/standforchrist/>

¹² <https://www.washingtonexaminer.com/news/campaigns/presidential/3040838/who-is-ben-carson-trump-vp-short-list/>

¹³ <https://www.catholicnewsagency.com/news/259249/ryan-anderson-the-pro-life-movement-needs-to-shift-to-promoting-chastity-and-marriage>

¹⁴ <https://www.catholicnewsagency.com/news/264537/bishop-barron-talks-faith-freedom-and-tech-with-tucker-carlson>

¹⁵ <https://www.instagram.com/carrieprejeanboller/?hl=en>

¹⁶ <https://archny.org/about/cardinal-dolan/>

¹⁷ <https://billygraham.org/franklin-graham>

¹⁸ <https://www.gibsondunn.com/lawyer/ho-allyson-n/>

¹⁹ <https://www.au.org/first-liberty/>

²⁰ <https://chvnradio.com/articles/dr-phil-shares-personal-testimony-of-coming-to-christ>

²¹ <https://religionnews.com/2020/12/03/metaxas-jesus-trump-stolen-election-christian-nationalism-rod-dreher-sidney-powell/>

²² <https://www.instagram.com/reel/C-TqLxDMueC/>

²³ <https://www.uscifr.gov/about-uscifr/commissioners/meir-soloveichik>

²⁴ <https://paulawhite.org/about/>

²⁵ <https://www.mediamatters.org/salem-media-group/trumps-religious-liberty-commission-filled-right-wing-christian-media-figures>

Add a humanist to the Religious Liberty Commission.

The lack of religious diversity of the Religious Liberty Commission is disturbing. Why does a commission that professes to value pluralism not include Muslims, Buddhists, Hindus, Sikhs, and members of indigenous religions? While we defer to our interfaith partners to articulate their concerns, we respectfully ask that a prominent humanist, who can speak to the religious liberty of this country's more than 50 million nonbelievers, be added to the Commission.

In order for the Religious Liberty Commission to make honest, thorough, and legitimate findings, we urge the Commission to meet the legal requirements of the Federal Advisory Committee Act (FACA) and add an individual who identifies as a humanist to the Commission.

FACA governs advisory committees within the executive branch. These committees “operate under transparency laws that promote public access, input and accountability.”²⁶ In its current configuration, the Religious Liberty Commission does not meet the legal criteria of FACA.

If—as FACA articulates—the Religious Liberty Commission is to become “a useful and beneficial means of furnishing expert advice, ideas, and diverse opinions to the Federal Government”²⁷, and, if it meets FACA’s requirement that all advisory committees be fairly balanced, the membership must be altered. The U.S. General Services Administration (GSA), which supports the application of FACA, issued a rule in 2024 clarifying the executive branch’s mandate to ensure committee memberships reflect this requirement.²⁸ The rule affirmed that it is “highly recommen[ed] that executive departments and agencies apply these requirements” to all advisory committees.²⁹

Conclusion

When announcing the Religious Liberty Commission, President Trump openly disregarded the nation’s founding document and ‘Americans’ first freedom’: the President stated, “They say separation between church and state ... I said, ‘All right, let’s forget about that for one time.’” The President also stated, “Separation...is that a good thing or a bad thing? I’m not sure...we’re bringing religion back to our country, and it’s a big deal.”³⁰

Regardless of the President’s careless dismissal of the Constitution of the United States of America, the Religious Liberty Commission assumes the responsibility for its work; any conclusions or recommendations it makes must adhere to our nation’s constitutional principles. If the Religious Liberty Commission moves forward with its current premise and leadership, it will be ill-equipped and ill-informed to make any recommendations to the White House Faith Office and the Domestic Policy Council on steps to secure religious liberty through domestic and international policies or other opportunities. As a result, these conclusions and recommendations will only embolden the administration to spread further falsehoods that reflect a skewed and narrow interpretation of religious liberty in what is

²⁶ <https://www.gsa.gov/policy-regulations/policy/federal-advisory-committee-management>

²⁷ <https://www.law.cornell.edu/uscode/text/5/1002>

²⁸ <https://www.regulations.gov/document/GSA-FMR-2022-0015-0010>

²⁹ https://www.gsa.gov/cdnstatic/MembershipBalancePlanGuidance-November_2011.pdf

³⁰ <https://www.politico.com/news/2025/05/01/trump-religious-commission-church-state-00321814>

undeniably a pluralistic democracy of diverse religions and beliefs.

For these reasons and without significant changes, the AHA does not believe the Religious Liberty Commission to be a serious effort, and certainly not one worth wasting tax-payer resources on. We will be monitoring this commission's work, including how it uses taxpayer dollars.³¹

The notice by the Justice Department in the Federal Register informed the public that the Religious Liberty Commission intends to discuss the meaning of separation of church and state during its first meeting.³² As an organization dedicated to protecting and strengthening freedom of religion or belief in the United States and abroad, the AHA would be happy to extend its legal and policy expertise to the Commission if it struggles with the meaning and application of the First Amendment over the course of its charge.

Questions pertaining to the AHA's comments can be directed to Isabella Russian, the AHA's Policy Manager, via email ([REDACTED]@americanhumanist.org).

³¹ <https://www.facadatabase.gov/FACA/s/FACACommittee/a10SJ0000054xkzYAA/com046361>

³² <https://www.federalregister.gov/documents/2025/05/28/2025-09557/meeting-of-the-religious-liberty-commission>



September 22, 2025

Religious Liberty Commission
U.S. Department of Justice
950 Pennsylvania Avenue NW
Room 5706
Washington, DC 20530

**Re: Comments Preceding the September 29, 2025 Hearing of the Religious Liberty
Commission established by Presidential Executive Order 14291**

Chair Patrick, Vice Chair Carson, and Members of the Commission:

The American Humanist Association (AHA) reiterates its strong rejection of the purported utility and partisan nature of the Religious Liberty Commission, established by President Donald Trump through Executive Order 14291 on May 1, 2025 under the guise of advancing religious liberty; and strongly urges that the Commission be disbanded.

As legally obligated by the Constitution of the United States of America, the U.S. government has a responsibility to ensure freedom of religion or belief for Americans of all faith and belief backgrounds, including nontheistic Americans. The Religious Liberty Commission is not prepared to heed this charge, as evidenced by the political showmanship that has taken place during its hearings on June 16, 2025 and September 8, 2025.

Legal precedent has long affirmed the right to religious liberty in education and the critical balance between freedom of conscience and a neutral government. These principles are being consistently tested and withered in American schools across the country by extremist right-wing officials seeking to overturn democratic foundations through the courts and lawmaking bodies.

Rights protected by the Establishment Clause are at risk as religious extremists attempt to rewrite our laws to enable government promotion of a specific religion. Christian Nationalist public officials are deliberately funneling public funds into vouchers for exclusive, private religious schools. They're mandating the use of materials that falsely assert America is a Christian nation. They're converting instructional time into time for religious activities. They're requiring the reading of religious materials for nonacademic purposes. They're demanding the prominent display of the Ten Commandments and other religious symbols or images in every classroom. These initiatives all share the dangerous goal of promoting government-sanctioned proselytization.

Moreover, under the guise of religious liberty, Christian Nationalists are curtailing the individual rights of students and encouraging discrimination. They're obstructing comprehensive, evidence-based sexual and reproductive health education. They're outlawing LGBTQIA+ study. They're pushing creationism in science class. They're coercing students to pray during school activities - all while intimidating people of faith and the nonreligious, directly and indirectly. This is a complete assault on the religious liberty of non-Christians, as well as the religious liberty of Christians that do not ascribe to the implementation of theocracy in the name of their faith. It is an affront to student and parental rights.

Students succeed best in schools that foster a welcoming and inclusive environment for students of all faiths and none, and that encourage individual freedom of expression. This requires evidence-based curricula and school policies that prioritize equipping students for a lifetime of critical thought in our pluralistic country.

These are just some of the matters advocates, educators, experts, parents, and others agree must be confronted, and which a U.S. commission dedicated to expanding religious liberty for all should address. However, based on the preceding hearings and the composition of the Commission, we have no confidence the Religious Liberty Commission will do so. The Commission has proven itself to be unconcerned with freedom of religion or belief and religious liberty in a balanced and inquisitive manner, and we note it has not once addressed discrimination and stigma against nontheists. Instead, it is alarmingly using its platform as a vehicle to perpetuate and legitimize Christian Nationalism.

The Religious Liberty Commission has not pursued the opportunity offered by the American Humanist Association, as well as others, to provide assistance as experts in the areas of religious liberty and freedom of religion or belief, including as they pertain to public education; thus, we must conclude that there is no genuine interest in the operation of balanced hearings or report findings. Therefore, we respectfully and strongly request the disbandment of the Religious Liberty Commission.

Questions pertaining to the AHA's comments can be directed to Isabella Russian, the AHA's Policy Manager, via email [\[REDACTED\]@americanhumanist.org](mailto:[REDACTED]@americanhumanist.org).

June 14, 2025

Via Electronic Mail to RLC@usdoj.gov

Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue NW, Room 5706
Washington, DC 2053

Dear Chair Patrick, Vice Chair Carson, and members of the Religious Liberty Commission:

On behalf of Americans United for Separation of Church and State (Americans United), we write to provide necessary context and clarity to the threats against religious freedom and the erosion of foundational American principles. Thank you for the opportunity to submit comments ahead of the Commission's first meeting.

Founded in 1947, Americans United is a nonpartisan educational and advocacy organization dedicated to preserving the constitutional principle of church-state separation, which is the foundation of true religious freedom for all Americans. We fight to protect the right of individuals and religious communities to practice religion—or not—as they see fit without government interference, compulsion, support, or disparagement. We represent people of all faiths and none and have a network of more than 380,000 members and supporters across the country.

Americans United is the only organization in the country dedicated solely to defending and promoting the separation of church and state. Our 77-year legacy of protecting religious freedom and expertise as an organization staffed with constitutional lawyers means that we are uniquely positioned to offer guidance and information for your discussion on the historical context of the United States Constitution's protections for religious liberty in the First Amendment and how the U.S. Supreme Court has interpreted those rights.

The agenda for the Commission's meeting includes "the history of religious liberty in America, from the founding to the present day." It indicates the meeting "will provide historical context of the founders' intent to protect religious liberty in the First Amendment, and how the Supreme Court has interpreted those rights, particularly since the mid-twentieth century." The Commission will also "discuss the meaning of separation of church and state." In response to this agenda, this letter sets forth 1) the history of religious liberty in the United States; 2) the U.S. Supreme Court's interpretation of the law relating to religious liberty; 3) the harm in weaponizing religious liberty; and 4) the true promise and meaning of church-state separation.

Despite the Trump Administration's weaponization of the language of religious freedom, this Commission is positioned to strengthen an inclusive and accurate vision of religious liberty that protects the rights of all people—regardless of their faith—and upholds the constitutional principles on which our country was founded. We urge the Commission to take our words into consideration and treat its responsibility to understand the significance of church-state separation with the utmost integrity.

Religious freedom is a fundamental American value and a cornerstone of our democracy. It is meant to be a shield that protects and should not be used as a sword to discriminate. Yet today, these foundational principles of religious freedom are under threat in our country. Our national history of religious freedom has been misrepresented and misused by those who wish to use the government to promote their religion and to force others to live by their religious beliefs. We have witnessed the Supreme Court issue opinions that twist or abandon precedent, which has led to the weaponization of religious freedom to discriminate against others. We write the Commission to assert that the true threats to religious freedom in this country come from Christian Nationalists and their extremist allies that are working to erode the separation of church and state and impose their specific set of values on all Americans.

History of Religious Liberty in America

Religious freedom is a foundational value of the United States. There were many reasons people came to what would become this country, including to escape religious persecution and have the freedom to worship. Although once here, that cycle continued. For example, Baptist minister and theologian Roger Williams was banished from the Massachusetts Bay Colony by its Puritan leaders and established a refuge for liberty of conscience—what would later become the state of Rhode Island. He believed that "forced worship stinks in God's nostrils,"¹ and explained that "[a]n enforced uniformity of religion throughout a nation or civil state, confounds the civil and religious, denies the

¹ Roger Williams, "Mr. Cotton's Letter, Lately Printed, Examined and Answered" (1644).

principles of Christianity and civility.”² Williams also famously wrote of “the hedge or wall of separation between the garden of the church and the wilderness of the world.”³

More than a century later, religious dissenters continued to face persecution. Influenced by Enlightenment principles of freedom of conscience, Thomas Jefferson wrote the Virginia Statute for Religious Freedom, and James Madison led the effort to pass it. The 1786 statute guaranteed everyone—including religious dissenters—the freedom to worship without fear of discrimination or penalty and ensured no one would be forced to support religion or engage in religious practice.⁴

Both Madison and Jefferson argued that freedom of conscience is an inalienable right and that it could only truly flourish if the government stayed out of religious affairs, including by refusing to fund religion or grant it special privileges. Madison explained that “[w]hilst we assert for ourselves a freedom to embrace, to profess and to observe the Religion which we believe to be of divine origin, we cannot deny an equal freedom to those whose minds have not yet yielded to the evidence which has convinced us.”⁵

Many of the Framers of the Constitution were believers, and even Christians. But they were also well aware of the dangers of the government endorsing or requiring an official religion. They had studied and seen first hand religious wars and persecutions in Europe. During the American colonial period, alliances between religion and government resulted in oppression and tyranny on our own shores. Our nation’s founders drew on the thinkers, scholars, and theologians who came before them to envision a nation with strong religious freedom protections, where no one faith was privileged over another and all had the right to live and believe as they choose, so long as they did not harm others or trespass on their rights. This stemmed not out of a hostility toward religion, but out of a desire to protect both government and faith communities from corruption and coercion.

² John Fea, The original separationist: A review of Roger Williams and the Creation of the American Soul, by John M. Barry, The Christian Century, The Christian Century (Nov. 14, 2012). <https://www.christiancentury.org/reviews/2012-10/original-separationist#:~:text=It%20stems%20from%20the%20work%20of%2017th-century%20dissenter,the%20church%20and%20the%20wilderness%20of%20the%20world.%E2%80%9D>. Accessed June 13, 2025.

³ “Mr. Cottons letter lately printed, examined and answered: by Roger Williams of Providence in New-England.:.” In the digital collection Early English Books Online 2. <https://name.umd.umich.edu/A96614.0001.001>. University of Michigan Library Digital Collections. Accessed June 13, 2025.

⁴ Va. Code Ann. § 57-1 (West)

⁵ James Madison, Memorial and Remonstrance Against Religious Assessments (1785)

“Religions and government will both exist in greater purity the less they are mixed together,” explained Madison.⁶ The federal Constitution fully embodied this principle that religious freedom could only truly flourish if the government stayed out of religious affairs. It is the first modern constitution that does not mention God or a deity. It derives its power solely from the people, not the divine. Article VI ensures that no one can be disqualified from serving in government because of their religious beliefs.⁷ And the First Amendment guarantees religious freedom for all.

The First Amendment protects religious freedom by erecting a “wall of separation between church and state” that has stood for more than two centuries. Thomas Jefferson, who authored the Virginia Statute for Religious Freedom that served as the model for the First Amendment, first wrote this metaphor in an 1802 letter to the Danbury Baptists, and it has endured, becoming synonymous with the First Amendment.⁸

In 1879, the Supreme Court cemented this foundational truth when it adopted the metaphor of “the wall of separation of church and state” in the first case where it interpreted the religion clauses of the First Amendment. In *Reynolds v. United States*, the Court reviewed the history of religious freedom from before and through the founding, noting that before the adoption of the Constitution, “attempts were made in some of the colonies and States to legislate not only in respect to the establishment of religion, but in respect to its doctrines and precepts as well.”⁹ The Court then described the effort to amend the Constitution to protect religious freedom by Madison, Jefferson, and others. The Court held that the phrase “separation of church and state” is “almost . . . an authoritative declaration of the scope and effect of” the First Amendment.¹⁰

As one reviewer pointed out, “the Supreme Court adopted the wall metaphor in 1878, and employed it in 1947, 1948, 1961 (three times), 1962, 1963, 1968, 1973, 1977, 1982, and again and again in countless concurrences, dissents, and lower court opinions.”¹¹ The Supreme Court issued many opinions throughout the mid-20th Century reinforcing the history and tradition of religious freedom in our country by making clear

⁶ “From James Madison to Edward Livingston 10 July 1822,” *Founders Online*, National Archives, <https://founders.archives.gov/documents/Madison/04-02-02-0471>. [Original source: *The Papers of James Madison*, Retirement Series, vol. 2, 1 February 1820–26 February 1823, ed. David B. Mattern, J. C. A. Stagg, Mary Parke Johnson, and Anne Mandeville Colony. Charlottesville: University of Virginia Press, 2013, pp. 542–545.]

⁷ U.S. Const. art. VI.

⁸ Letter from Thomas Jefferson, President of the United States, to the Danbury Baptist Association, Connecticut. (Jan. 1. 1802) (on file with the Library of Congress, June 1998 - Vol 57, No. 6).

⁹ *Reynolds v. United States*, 98 U.S. 145, 162 (1878).

¹⁰ *Id.* at 164.

¹¹ Andrew L. Seidel, *Bad History, Bad Opinions: How “law office history” is leading the courts astray on school board prayer and the First Amendment*, 12 N.E. U. L.R. 248 (2020).

that the First Amendment bars the government from endorsing, funding, or promoting religion.

Despite this well-documented history, Christian Nationalists and their extremist allies rely on cherry-picked quotes, out-of-context documents, and flawed historical methods to insist that the United States was founded as a “Christian nation.” This is a myth. Indeed, the Constitution is a wholly secular document, containing no mention of Christianity or any deity or specific religion. It refers to religion only twice: to prohibit religious tests for office in Article VI and to protect religious freedom in the First Amendment.

The Supreme Court’s Interpretation of Religious Freedom

The Supreme Court historically sought to strike a reasonable balance that protected religious freedom by invalidating laws that promoted religion, favored one religion over another, or favored religion over nonreligion. The Supreme Court first incorporated the Establishment Clause against the states in the 1947 case *Everson v. Board of Education*,¹² which was the first of a string of cases that protected religious freedom. Over the last several decades, however, the Supreme Court has bent toward revisionist interpretations, eroding important Establishment Clause protections in favor of ever-growing Free Exercise rights. By disrupting the intricate relationship between these two clauses, the Supreme Court has allowed Christian Nationalists to impose their narrow set of beliefs on all Americans.

In a series of cases over the last decade, the Supreme Court has held that states’ denial to religious private schools of certain types of aid offered to secular private schools violated the Free Exercise Clause—coming close to eliminating any state action permitted by the Establishment Clause but not required by the Free Exercise Clause.¹³ In practice, these cases have come to mean that certain kinds of funding offered to secular private entities must be offered to religious entities—forcing taxpayers to fund and promote religion despite decades of jurisprudence upholding the idea that the government cannot fund religious activity. For example, states with private school voucher programs overwhelmingly fund (largely Christian) private religious schools, leaving fewer resources for the 90% of America’s children attending public schools.

Simultaneously, the Court has expanded religious exemptions, requiring broad grants of government exemptions to religious entities—even where these exemptions harm

¹² 330 U.S. 1.

¹³ *Trinity Lutheran v. Comer*, 582 U.S. 449 (2017); *Espinoza v. Montana Dep’t of Revenue*, 591 U.S. 464 (2020); *Carson v. Makin*, 596 U.S. 767 (2022).

others.¹⁴ This has included exempting government-funded foster care agencies from nondiscrimination law, in certain circumstances, allowing them to turn away otherwise eligible couples seeking to serve as foster parents based on sexual orientation;¹⁵ requiring broad carveouts for houses of worship from COVID-era restrictions on public gatherings, endangering public health;¹⁶ and opening the door for religiously-affiliated non-profit corporations—including large hospitals and social service providers—to avoid paying into unemployment tax systems.¹⁷

In combination, these two doctrinal developments lead to the privileging of traditional, often Christian, religious institutions, allowing religious entities to access benefits extended to others while exempting them from government regulations imposed on secular entities. This evolving landscape threatens our religious freedom.

The Trump Administration's Weaponization of Religious Liberty Harms Everyone

The current administration has leveraged the decades-long effort of warping the understanding of religious liberty to silence opposing views and harm others. Early in this administration, President Trump announced the creation of an “anti-Christian bias task force,”¹⁸ which provided misleading examples of supposed “anti-Christian bias” to target both government and private actors and facilitate greater discrimination under the guise of protecting Christians. One of the first actions of the task force was to set up “investigations” in federal agencies for employees to report on coworkers—chilling speech and sidelining employees who don’t conform to the Administration’s particular right-wing Christian agenda.¹⁹

In early June, President Trump issued a proclamation restricting travel from more than a dozen countries, many of them predominantly Muslim and non-white.²⁰ This new ban builds off of the Muslim Ban enacted during the first Trump administration and is part of the white Christian Nationalist playbook to use immigration law to make the country more white and more Christian.

¹⁴ The Religious Freedom Restoration Act (RFRA) has been used to similar effect, allowing, for example, employment discrimination against LGBTQ+ employees, *Braidwood Mgmt. v. EEOC*, 70 F. 4th 914 (5th Cir. 2023), and exempting for-profit corporations from the Affordable Care Act’s requirement to provide employees with insurance covering contraceptives. *Burwell v. Hobby Lobby Stores*, 573 U.S. 682 (2014).

¹⁵ See, e.g., *Fulton v. City of Philadelphia*, 593 U.S. 522 (2021).

¹⁶ *Tandon v. Newsom*, 593 U.S. 61 (2021); *Roman Catholic Diocese of Brooklyn v. Cuomo*, 592 U.S. 14 (2020).

¹⁷ *Catholic Charities Bureau, Inc. v. Wisconsin Labor and Industry Review Commission*, 605 U.S. ____ (2025).

¹⁸ [Eradicating Anti-Christian Bias \(Executive Order 14202\)](#) (Feb. 6, 2025).

¹⁹ [State Department wants staff to report alleged anti-Christian bias during Biden’s term](#), CBS News (Apr. 14, 2025).

²⁰ [Restricting The Entry of Foreign Nationals to Protect the United States from Foreign Terrorists and Other National Security and Public Safety Threats](#) (June 4, 2025).

This very Religious Liberty Commission appears to represent a continuation of efforts described above to create a misleading historical and legal record on religious freedom in this country and weaponize that inaccurate understanding. The executive order establishing the Commission and the accompanying fact sheet assert that, among other allegations, “[t]he previous administration’s Department of Justice targeted peaceful Christians while ignoring violent, anti-Christian offenses” and that “[r]ecent Federal and State policies have undermined [religious freedom] by targeting conscience protections, preventing parents from sending their children to religious schools, threatening funding and non-profit status for faith-based entities, and excluding religious groups from government programs.” This list provides examples of our justice system not extending special treatment to Christians simply because they are Christian.

The composition of the Commission further accentuates concerns that the Trump Administration seeks to use the Commission to entrench Christian Nationalism. Despite a statutory requirement that “the membership of the advisory committee . . . be fairly balanced in terms of the points of view represented,”²¹ the Commission’s members appear to bring minimal religious or political diversity. The members are overwhelmingly Christian, many have worked for or affiliated themselves with a closely knit network of institutions, and many have shared similar opposition to LGBTQ+ rights. Likewise, of the Commission’s advisory board members who are not Christian, all are still deeply conservative. There is no representation of the Hindu, Buddhist, Sikh, Humanist, Indigenous, or countless other traditions that Americans practice, nor are there any experts serving the Commission who can advise on the rights of religiously unaffiliated or non-religious Americans.

The location of the Commission meeting—at the Museum of the Bible—does nothing to ameliorate our concerns about the true intent of the Commission. Advisory committees generally meet in government buildings or neutral private locations, such as hotels or conference centers. Here, the Commission has chosen to meet at a museum with the “whole purpose” of “show[ing] this country as a Christian country governed by Christian morality.”²²

²¹ 5 U.S.C. 1004(b); see also 5 USC 1004(c) (applying requirements to advisory committees, like this one, created by the President).

²² Gordon Haber, [Investigating the Hobby Lobby Family: An Interview with Candida Moss and Joel S. Baden](#), Religion & Politics (Nov. 8, 2017); see also Candida Moss & Joel Baden, [Op: Just What Is the Museum of the Bible Trying to Do?](#), Politico (Oct. 15, 2017) (“We have found that despite genuine efforts at nonsectarianism, the museum’s version of the Bible’s history . . . it tells about the Bible, and especially the Bible’s place in American culture, is essentially a Protestant one, and it excludes other traditions when they might come into conflict with that basic story.”).

If the Commission truly aims to “restore and safeguard religious liberty for all Americans,” then we urge the members to work to safeguard the separation of church and state and ensure that religion is not misused to discriminate against others.

The True Promise and Meaning of Church-State Separation

Given this country’s robust, foundational commitment to the separation of church and state, it makes perfect sense that the United States is among the most religious, and religiously diverse, nations in the world. Indeed, religious liberty is alive and well in this country precisely *because* our government cannot tell us whether, when, where, or how to worship. Church-state separation, grounded in the protections of the First Amendment, is the principle that guarantees true religious freedom and protections for all Americans, religious and non-religious alike.

Properly construed, separation of church and state means that no one should ever have to live under the laws of someone else’s religion. It is a promise that our laws should always have a secular rationale in order to avoid imposing the religious beliefs of one group of people onto another. Equally, it promises that no one should have to pay for another person’s religion or religious education. The separation of church and state ensures that we enjoy true religious freedom in this country and promises us certain rights. We have the right to a government that does not fund or otherwise promote religion, nor disparages it generally, nor any faith in particular. We have the absolute right to believe whatever we want about God, faith, and religion. We have the right to act on our religious beliefs, so long as those actions do not harm others. We have the right to have no belief and not be forced to believe or engage in religious activity.

Some people fundamentally misunderstand what true religious freedom means. They view it not as protecting our right to practice religion as we choose without harming others, but as granting them the right to force their religion on others, including through the use of government authority. These same people often criticize church-state separation by claiming that it curtails religious freedom. In fact, the opposite is true. Church-state separation is good for religion, houses of worship, and people of faith, as well as the nonreligious. Separation protects religious communities from government intrusion and protects the right of individuals to believe or not, without interference from the government, as long as their actions don’t harm others. Many religious denominations, organizations, and clergy members cherish this founding principle.

As religious extremists attack our nation’s religious freedom, the Supreme Court has interpreted the Free Exercise Clause in increasingly broader terms while diminishing the Establishment Clause. Under the guise of protecting Christians and those who want to

impose their religion on others, our laws risk being distorted and reshaped to privilege one religion over another and pressure Christians who are the “wrong” denomination and non-Christians to conform to beliefs and practices they do not share. This troubling shift distorts the true meaning of religious freedom and the intent of the Constitution. The First Amendment relies on the Establishment Clause and Free Exercise Clause working together to protect our rights; disrupting that communion endangers the separation of church and state and threatens the very foundation of equal protection and religious freedom for all.

Conclusion

America is a greater nation when we protect religious freedom for all, not just for some; when we are all free to believe or not, as we see fit, and to practice our faith—without hurting others; and when the government does not elevate the religious beliefs of some over the rights of others. Americans United remains steadfast in our work, as we have for nearly eighty years, to fight back against these threats to religious freedom.

We urge the Commission to consider and address the real threats to religious freedom today: religious extremists and leaders who weaponize religion to harm others. Additional resources can be found in the attached addendum.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alessandro Terenzoni', with a stylized flourish at the end.

Alessandro Terenzoni, Esq.
Vice President of Public Policy

Addendum

Recommended content on the history of religious liberty in America:

- Rob Boston, Taking Liberties: Why Religious Freedom Doesn't Give You The Right To Tell Other People What To Do (2014)
- Erwin Chemerinsky & Howard Gillman, The Religion Clauses: The Case for Separating Church and State (2020)
- John Fea, Was America Founded as a Christian Nation?: A Historical Introduction (2011)
- Steven K. Green, Inventing a Christian America: The Myth of the Religious Founding (2015)
- Andrew L. Seidel, The Founding Myth: Why Christian Nationalism Is Un-American (2019)
- Matthew Stewart, Nature's God: The Heretical Origins of the American Republic (2014)
- Warren Throckmorton, Telling Jefferson Lies (Podcast)

Recommended content on the Supreme Court's interpretation of the First Amendment:

- Derek W. Black, Religion, Discrimination, and the Future of Public Education, 13 UC Irvine L. Rev. 805 (2023)
- Andrew Koppelman, The Increasingly Dangerous Variants of the "Most-Favored-Nation" Theory of Religious Liberty, 108 Iowa L. Rev. 2237 (2023)
- Zalman Rothschild, The Impossibility of Religious Equality, 125 Columb. L. Rev. 453 (2025)
- Richard Schragger, Micah Schwartzman & Nelson Tebbe, Reestablishing Religion, 92 U. Chi. L. Rev. 199 (2025)
- Nelson Tebbe, The Principle and Politics of Equal Value, 121 Columb. L. Rev. 2397 (2021)

August 30, 2025

Via Electronic Mail to RLC@usdoj.gov

Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue, NW
Room 5706
Washington, DC 20530

Dear Chair Patrick, Vice Chair Carson, and members of the Religious Liberty Commission:

On behalf of Americans United for Separation of Church and State, we write to the Commission to outline the historic landscape of religious liberty in public education; explain the threats to religious liberty that come from policymakers; provide examples of how students' and families' religious liberty is violated in public schools and the grave harms they face for taking action to protect their rights; and recommend that the Commission work to secure everyone's religious liberty in public education.

Founded in 1947, Americans United is a nonpartisan educational and advocacy organization dedicated to preserving the constitutional principle of church-state separation, which is the foundation of true religious freedom for all Americans. We fight to protect the right of individuals and religious communities to practice religion—or not—as they see fit without government interference, compulsion, support, or disparagement. We represent people of all faiths and none and have a network of more than 380,000 members and supporters across the country.

Americans United is the only organization in the country dedicated solely to defending and promoting the separation of church and state. Our 78-year legacy of protecting religious freedom and expertise as an organization staffed with constitutional lawyers means that we are uniquely positioned to offer guidance and information for your discussion of religious liberty issues in public education.

Religious freedom is a fundamental American value and a cornerstone of our democracy that is meant to be a shield that protects and should not be used as a sword to discriminate. But our national history of religious freedom has been misrepresented and misused by those who wish to use the government to promote only their religion and to



1310 L Street NW, Suite 200
Washington, DC 20005
au.org

Rachel Laser
President & CEO

Public Policy Department

Alessandro Terenzoni
Vice President of Public
Policy

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Sam Weisman, Ph.D.

force others to live by their religious beliefs. The true threats to religious freedom in this country come from Christian Nationalists and their extremist allies that are working to erode the separation of church and state and impose their specific set of values on all Americans.¹ Efforts to undermine religious freedom are especially egregious in our public schools, where families and students suffer the most harm.

In our diverse society, America's public schools are a unifying factor among people of different religions and beliefs. One of the hallmarks of public education is that it is secular and accepts all students, regardless of what religion—if any—they follow. When public schools promote religion or coerce students to participate in it, departing from the neutrality required by the Constitution, it weakens public schools, and undermines students' and families' religious liberties.

Historic Landscape of Religious Liberty in the Public Education Setting

Students' religious freedom rights are guaranteed by the Establishment Clause and Free Exercise Clause of the First Amendment to the United States Constitution. Religious freedom ensures that students and their families—not politicians or public school officials—get to decide whether and how to engage with religion. No student should ever be made to feel excluded, whether it's in a classroom or a locker room, because they don't share the religious beliefs of their teachers, coaches, or fellow students. And no parent should have to worry that their child is receiving religious instruction in a public school.

In recent decisions, the Supreme Court has held that the Establishment Clause “must be interpreted ‘by reference to historical practices and understandings,’” and that the “‘line’ . . . ‘between the permissible and the impermissible’ has to ‘accor[d] with history and faithfully reflec[t] the understanding of the Founding Fathers.’”² Helpfully, the Court itself has explained the historical understanding of the meaning of the First Amendment at the founding and the relevant historical practices.

The Supreme Court explained more than 60 years ago that the Establishment Clause was in part based “upon an awareness of the historical fact that governmentally established religions and religious persecutions go hand in hand.”³ Our Founders knew “from bitter personal experience, that one of the greatest dangers to the freedom of the individual to worship in his own way lay in the Government's placing its official stamp of approval upon one particular kind of prayer or one particular form of religious services.”⁴ Accordingly, the Establishment Clause's “first and most immediate purpose rested on the belief that a union of government and religion tends to destroy government and to degrade religion.”⁵ “The Establishment Clause thus stands as an expression of principle on the part of the Founders

¹ See Americans United's June 14, 2025 [Comments on the Religious Liberty Commission's first meeting](#) for further details on the history and meaning of religious liberty and church-state separation.

² *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 535-36 (2022) (quoting *Town of Greece v. Galloway*, 572 U.S. 565, 577 (2014) (alterations in original)).

³ *Engel v. Vitale*, 370 U.S. 421, 432 (1962).

⁴ *Id.* at 429.

⁵ *Id.* at 431.

of our Constitution that religion is too personal, too sacred, too holy to permit its ‘unhallowed perversion’ by a civil magistrate.”⁶

The Establishment Clause requires a “wholesome ‘neutrality’” with respect to religion, which “stems from a recognition of the teachings of history that powerful sects or groups might bring about a fusion of governmental and religious functions,” which “the Establishment Clause prohibits.”⁷ Specifically, the government may not “promote one religion or religious theory against another or even against the militant opposite” because the First Amendment “mandates governmental neutrality between religion and religion, and between religion and nonreligion.”⁸ This includes a prohibition on the government coercing anyone to participate in religion. Indeed, just three years ago, Justice Gorsuch explained that the government coercion of religion “was among the foremost hallmarks of religious establishments the framers sought to prohibit when they adopted the First Amendment.”⁹

These principles are particularly important for public school students. The Supreme Court has long recognized “there are heightened concerns with protecting freedom of conscience from subtle coercive pressure in the elementary and secondary public schools.”¹⁰ Because students are “impressionable, and their attendance is involuntary,” courts must be “particularly vigilant in monitoring compliance with the Establishment Clause in elementary and secondary schools.”¹¹

Students are especially vulnerable to the coercion (subtle or otherwise) and influence of their teachers and coaches. Teachers and coaches have tremendous authority over students, and vast power over students’ experiences. They assign students’ grades, decide whether they get playing time, write college recommendations, and can make or break their shot at an athletic scholarship. Students know that disappointing a teacher or coach, such as by refusing to join them in prayer, could jeopardize their school experience—or their future.

This tremendous potential for coercion has led the Supreme Court to repeatedly hold that public schools, school officials, and school employees are forbidden to sponsor, support, lead, initiate, participate in, arrange for, or encourage prayer involving students or otherwise

⁶ *Id.* at 431-32 (quoting *Memorial and Remonstrance against Religious Assessments*, II Writings of Madison, at 187).

⁷ *Abington Sch. Dist. v. Schempp*, 374 U.S. 203, 222 (1963).

⁸ *Epperson v. Arkansas*, 393 U.S. 97, 104 (1968); accord *McCreary County v. ACLU of Kentucky*, 545 U.S. 844, 875-76 (2005) (reaffirming, based on history of religious conflict in England and the American colonies, that “the government may not favor one religion over another, or religion over irreligion”). See also *Cath. Charities Bureau, Inc. v. Wis. Lab. & Indus. Rev. Comm’n*, 605 U.S. 238, 247 (2025) (“The clearest command of the Establishment Clause is that government may not officially prefer one religious denomination over another.”) (internal quotation marks omitted).

⁹ *Kennedy*, 597 U.S. at 537.

¹⁰ *Lee v. Weisman*, 505 U.S. 577, 592 (1992).

¹¹ *Edwards v. Aguillard*, 482 U.S. 578, 583-84 (1987).

to promote religion to students.¹² In *Lee v. Weisman*, for example, the Court held that a school violated the Establishment Clause's prohibition against religious coercion when a public school invited a member of the clergy to deliver prayers at a middle school graduation ceremony.¹³ And in *Santa Fe Independent School District v. Doe*, the Court prohibited a public high school from offering student-led, student-initiated invocations at football games because "[t]hese invocations are authorized by a government policy and take place on government property at government-sponsored school-related events."¹⁴

The Constitution's prohibition against public school-sponsored religion is not limited to school-sponsored prayer. For example, nearly 80 years ago, in *McCullum v. Board of Education*, the Court invalidated a public school program that invited religious instructors to provide religious instruction in classrooms during the school day.¹⁵ The Court explained that the Establishment Clause prohibits using a "tax-supported school system in aid of religious instruction."¹⁶ The Court also struck down a law requiring public schools to post the Ten Commandments in every classroom, explaining its only effect would be to "induce schoolchildren to read, meditate upon, perhaps to venerate and obey, the Commandments," which is barred by the Establishment Clause.¹⁷ In order to protect against school sponsored religion, federal courts have also struck down displays of religious items¹⁸ and distribution of religious texts¹⁹ in schools.

The historic landscape of religious liberty in public education is one that protects the religious freedom of all students and their families, regardless of their specific religious

¹² See, e.g., *Lee*, 505 U.S. at 587, 592 (principal prohibited from allowing clergy to give prayer at graduation); *Schempp*, 374 U.S. at 222-26 (school officials violated Establishment Clause by leading students in recitation of Bible verses and the Lord's Prayer at beginning of school day); *Engel*, 370 U.S. at 430-33 (school officials forbidden to lead students in classroom prayer at beginning of school day).

¹³ 505 U.S. at 587.

¹⁴ 530 U.S. 290, 302 (2000). Federal courts have repeatedly prohibited student-delivered prayers at school events. See, e.g., *Borden v. Sch. Dist.*, 523 F.3d 153, 176-78 (3d Cir. 2008) (team meals); *Lassonde v. Pleasanton Unified Sch. Dist.*, 320 F.3d 979, 983-84 (9th Cir. 2003) (graduation); *Cole v. Oroville Union High Sch. Dist.*, 228 F.3d 1092, 1102-04 (9th Cir. 2000) (graduation); *ACLU of N.J. v. Black Horse Pike Reg'l Bd. of Educ.*, 84 F.3d 1471, 1479-80, 1487 (3d Cir. 1996) (en banc) (graduation); *Ingebretsen ex rel. Ingebretsen v. Jackson Pub. Sch. Dist.*, 88 F.3d 274, 279-80 (5th Cir. 1996) (assemblies, sporting events, and other school events); *Collins v. Chandler Unified Sch. Dist.*, 644 F.2d 759, 761-62 (9th Cir. 1981) (assemblies); *Skarin v. Woodbine Cmty. Sch. Dist.*, 204 F. Supp. 2d 1195, 1198 (S.D. Iowa 2002) (graduation).

¹⁵ 333 U.S. 203 (1948).

¹⁶ *Id.* at 204-05.

¹⁷ *Stone v. Graham*, 449 U.S. 39, 42 (1980) (per curiam).

¹⁸ See, e.g., *Johnson v. Poway Unified Sch. Dist.*, 658 F.3d 954, 965 (9th Cir. 2011), cert. denied, 566 U.S. 906 (2012) (public school teacher could not display religious posters on classroom bulletin board); *Lee v. York Cnty. Sch. Div.*, 484 F.3d 687, 690 (4th Cir. 2007) (public school teacher could not display various religiously themed materials in classroom); *Roberts v. Madigan*, 921 F.2d 1047, 1057-58 (10th Cir. 1990) (public school teacher could not display Bible on desk during class).

¹⁹ See e.g., *Walz v. Egg Harbor Twp. Bd. of Educ.*, 342 F.3d 271, 279-81 (3d Cir. 2003) (upholding school officials' refusal to allow elementary school student to hand out pencils labeled "Jesus [Loves] The Little Children" and candy with religious messages attached during class hours); *Berger v. Rensselaer Cent. Sch. Corp.*, 982 F.2d 1160, 1167 (7th Cir. 1993) (enjoining Bible distributions in public school classrooms because "children are a captive audience" and "they are most assuredly not free to get up and leave").

beliefs. It is one that guarantees a student the right to pray, or otherwise engage with religion, in school so long as it is voluntary, non-disruptive, student-led, and student-initiated while also ensuring the school does not sponsor prayer or allow employees to initiate or participate in these practices with students. The United States is home to more than 2,000 religious groups, traditions, denominations, and sects.²⁰ This diversity of thought and religion is one of our nation's greatest assets, and public schools should foster an environment where everyone feels welcome and included. That's why the government is constitutionally required to remain neutral between religions, and between religion and nonreligion.

Present Threats to Religious Liberty in the Public Education Setting from Policymakers

In the past few years, there has been an increase in threats to religious liberty in public schools through harmful state legislation and policies.

Religious Public Charter Schools

A hallmark of our public schools, including public charter schools, is that they are open to all students and do not teach religion nor instill religious beliefs in students.

Yet in 2023, the Oklahoma Statewide Virtual Charter School Board approved the nation's first religious public charter school, St. Isidore of Seville Catholic Virtual School. The school, which would have been controlled by the Catholic Archdiocese of Oklahoma City and the Diocese of Tulsa, demanded the right to receive taxpayer funding to operate as a public school while simultaneously operating "as a Catholic School," integrating religious teaching into every aspect of the school. St. Isidore's policies and practices would have discriminated against students, families, and employees on the basis of the school's religious beliefs.

The Constitution ensures that public schools do not teach religious curriculum. This protects the religious freedom of public school students, their families, and taxpayers by ensuring that public-school students are not forced into religious instruction and public funds are not used to pay for religious education. Public charter schools, just like any other public schools, must abide by the Constitution.

There were two separate lawsuits challenging the Charter School Board's action—one brought by faith leaders, public-school parents, and public-education advocates²¹ and one brought by Republican Oklahoma Attorney General Gentner Drummond. The Oklahoma Supreme Court decisively ruled that St. Isidore violated the Oklahoma Constitution, state law, and the federal Establishment Clause, explaining that "St. Isidore's educational philosophy is to establish and operate the school as a Catholic school. Under both state and

²⁰ J. Gordon Melton, *Melton's Encyclopedia of American Religions* 1 (8th ed. 2009).

²¹ [*OKPLAC, Inc. v. Statewide Virtual Charter Sch. Bd.*](#), No. CV-2023-1857 (D. Okla. Cty., filed Jul. 31, 2023). Americans United served as counsel in this case, along with the ACLU, Education Law Center, Freedom From Religion Foundation, and local counsel Benjamin H. Odom, John H. Sparks, Michael W. Ridgeway, and Lisa M. Mason of Odom & Sparks, and J. Douglas Mann.

federal law, the State is not authorized to establish or fund St. Isidore.”²² In May 2025, the U.S. Supreme Court issued a *per curiam* opinion affirming the decision of the Oklahoma Supreme Court by an equally divided vote.²³

Ten Commandments Displays

In recent years, state legislators across the country have introduced bills to post a version of the Ten Commandments—a religious text—in public schools. Just this year, Americans United has tracked nearly 40 bills across 20 states. Many of these bills mandate a state-endorsed version of the text be displayed in every K-12 classroom in the state.

Displaying the Ten Commandments in public schools violates the religious freedom of public school students and their families, and violates the U.S. Constitution.²⁴ Doing so coerces students to read, reflect on, and obey a religious text.²⁵ Families should be able to trust that their public school will not impose religion on their children nor pressure them to adhere to a religious code—that’s the safeguard provided by the Constitution.

Despite the avalanche of bills introduced, only Louisiana, Arkansas, and Texas have enacted legislation. These acts were immediately challenged in court by families who are Jewish, Baptist, Presbyterian, Unitarian Universalist, non-denominational Christian, interfaith, Hindu, humanist, agnostic, atheist, and nonreligious.²⁶ Whether they adhere to the Ten Commandments as part of their faith traditions or not, the families have acted to vindicate their religious freedom rights.

A unanimous Fifth Circuit panel and federal district courts in Arkansas and Texas declared all three laws “plainly unconstitutional.”²⁷ Judge Timothy L. Brooks went even further in his opinion asking, “Why would Arkansas pass an obviously unconstitutional law? Most likely because the State is part of a coordinated strategy among several states to inject Christian religious doctrine into public-school classrooms.”²⁸

Judge Brooks’ rhetorical question makes clear that the real threat to religious liberty in public schools comes from efforts to use public schools to force religion on students.

²² *Drummond ex rel. State v. Oklahoma Statewide Virtual Charter Sch. Bd.*, 558 P.3d 1 (2024).

²³ *Oklahoma Statewide Charter Sch. Bd. v. Drummond ex rel. Oklahoma*, 605 U.S. 165 (2025).

²⁴ *Stone*, 449 U.S. at 41-42.

²⁵ *Id.* at 42.

²⁶ See *Roake v. Brumley*, 756 F.Supp.3d 93 (M.D. La. 2024), *aff’d* 141 F.4th 614 (5th Cir. 2025); *Nathan v. Alamo Heights Indep.*, No. SA-25-CV-00756-FB, 2025 WL 2417589 (W.D. Tex. Aug. 20, 2025); *Stinson v. Fayetteville Sch. Dist. No. 1*, No. 5:25-CV-5127, 2025 WL 2231053 (W.D. Ark. Aug. 4, 2025). Americans United represents these families along with the ACLU, state ACLU affiliates, the Freedom from Religion Foundation, and Simpson Thacher Bartlett LLP.

²⁷ *Roake*, 141 F.4th at 645; see also *Nathan*, 2025 WL 2417589 (order granting preliminary injunction); *Stinson*, 2025 WL 2231053 (same).

²⁸ *Stinson*, 2025 WL 2231053 at *1.

Chaplains in Public Schools

Another way legislators have sought to promote religion in schools is by pushing laws to bring chaplains into public schools. Legislators disingenuously point to shortages of school counselors when championing the introduction of chaplains to public schools. But chaplains are clergy members who are trained to provide religious and spiritual care, not serve as replacements for qualified, licensed school counselors. Public schools are constitutionally prohibited from inviting religious leaders into schools to offer spiritual guidance and counseling.²⁹

Nonetheless, Texas, Louisiana, and Florida have enacted school chaplain laws and, in 2025, twenty-four states introduced similar bills.

Chaplains themselves understand that they should not provide services in public schools. More than 300 chaplains signed an open letter explaining that these proposals “are harmful to our public schools and the students and families they serve.”³⁰ They also write that as “trained chaplains, we strongly caution against the government assertion of authority for the spiritual development and formation of our public school children.”³¹

Faith communities also oppose the idea of chaplains in public schools. Thirty-eight organizations that represent or serve religious denominations or are formally affiliated with religious communities explained that “proposals to place chaplains in our public schools are greatly flawed and threaten the well-being, education, and religious freedom of our students.”³² They recognize that having “a school chaplain of any faith would amount to government-sponsored religion and create an environment ripe for religious coercion and the indoctrination of students.”³³

Families can rely on clergy in their communities if and when they want religious counsel. Allowing chaplains—who aren’t required to have any training—to provide critical services like mental health counseling will endanger students, waste educational resources, and create liability for public schools. Students need counselors, not chaplains.

Teacher- and School-Sponsored Prayer

Religious freedom promises that all of our children can attend public schools without being coerced by teachers or coaches to join in someone else’s prayers. This ensures that public schools are a welcoming place to all families, regardless of religious belief.

That’s why the Supreme Court has, for more than 60 years, repeatedly ruled that school-sponsored prayer is unconstitutional. No public school student should feel like they

²⁹ See *McCullum*, 333 U.S. at 210-11.

³⁰ [Letter from 300+ Chaplains](#), Baptist Joint Comm. for Religious Liberty (June 17, 2024).

³¹ *Id.*

³² [Faith Organizations’ Open Letter Regarding Public School Chaplains](#), Americans United (Mar. 6, 2024).

³³ *Id.*

have to pray to play sports or get a part in the school play. And no student should ever be made to feel excluded—whether it’s in the classroom or on the football field—because they don’t share the religious beliefs of their teachers or coaches.

The Court’s 2022 decision in *Kennedy v. Bremerton School District* reaffirmed this vital constitutional safeguard, explaining that protecting against government coercion of religion was a key purpose of the First Amendment.³⁴ In *Kennedy*, the Supreme Court simply held that a public school had to allow a football coach to say a brief, quiet, private, and personal prayer. As the Court explained, the prayer was permissible because the coach “offered his prayers quietly while his students were otherwise occupied”³⁵ and during a time when “coaches were free to attend briefly to personal matters.”³⁶ But prayer that is coercive—including where teachers pray with or in front of students—is still unconstitutional.

Yet, after *Kennedy* several state legislatures went well beyond the limits of that opinion. They introduced bills explicitly designed to permit teachers to pray in front of, with, or over students. Although the sponsors alleged these bills merely codified the *Kennedy* decision, they are blatant attempts to encourage teachers and other public school employees to pray in ways that violate the Constitution. Just this year, Texas enacted a law allowing schools to adopt a “period of prayer and reading of the Bible or other religious text” that would let teachers to pray with students.³⁷ In 2023, Idaho enacted a law that might have similar effects.³⁸

These measures grossly misinterpret the *Kennedy* decision and therefore invite religious freedom violations and put schools at risk of litigation.

Misinterpreting Student Religious Freedom Rights

The First Amendment not only protects students’ rights to be free from religious coercion in public schools but also protects their rights to voluntarily pray and express religious viewpoints. Students may engage in prayer, so long as it is voluntary, student-initiated, student-led and does not coerce other students. They also have the right to read a religious text, including the Bible, whenever they have free time to read other texts.

At the same time, schools may maintain control of student expression in curricular activities³⁹ and are constitutionally required to prohibit certain types of religious expression

³⁴ *Kennedy*, 597 U.S. at 537.

³⁵ *Id.* at 513-14.

³⁶ *Id.* at 530.

³⁷ TX Educ. Code § 25.0823; see also Evie Blad, [What’s Behind a Legislative Push for Prayer and Bible Study in Public Schools](#), Ed Week (May 28, 2025).

³⁸ Idaho Code Ann. § 33-6601-03; see also Nik Nartowicz, [Dangerous School Prayer Bills Are Surfacing In State Legislatures](#), Americans United (Apr. 4, 2023).

³⁹ *Hazelwood Sch. Dist. v. Kuhlmeier*, 484 U.S. 260, 271-73 (1988).

that could result in coercion or disrupt the schools' education mission.⁴⁰ Schools also must prevent students from using the classroom and assignments to proselytize fellow students, even if the work meets the requirements of the assignment. There is a constitutionally significant difference between a student making a speech about Christianity's influence on world history versus speech asserting that all students must accept Jesus Christ in order to achieve salvation.

Under the guise of protecting public school students' religious expression, legislators have introduced bills, often called "Religious Viewpoint Antidiscrimination Acts" or "Student Religious Liberty Acts," that are designed to encourage students to pray and proselytize in public schools. Although they may correctly outline students' existing religious and free speech rights, these bills fail to include the necessary limits imposed by the Establishment Clause. Rather than creating stronger protections for students, they instead cause confusion and harm. School districts and teachers would face pressure to follow such a state law, but doing so could easily lead to unconstitutional student religious activities in public schools.

Teaching Religion, including the Bible, in Public Schools

Public schools may teach *about* religion, but they may not *teach* religion. To be sure, the Bible has considerable significance in Western literature, art, and history. But the Constitution requires that any lessons about religion or the Bible, including courses designed to focus specifically on the Bible, must be taught from a secular, non-devotional, noncoercive, and objective perspective that does not favor any religion.⁴¹ Public schools cannot teach that the Bible is a true and literal historical record. Despite these clear constitutional requirements, public schools often fail, violating families' religious freedom.⁴²

⁴⁰ *Walz v. Egg Harbor Twp. Bd. of Educ.*, 342 F.3d 271, 279-81 (3d Cir. 2003); see also *Busch v. Marple Newtown Sch. Dist.*, 567 F.3d 89, 99 (3d Cir. 2009); *Lassonde v. Pleasanton Unified Sch. Dist.*, 320 F.3d 979, 983-85 (9th Cir. 2003); *Cole v. Oroville Union High Sch. Dist.*, 228 F.3d 1092, 1101-04 (9th Cir. 2000); *Ingebretsen v. Jackson Pub. Sch. Dist.*, 864 F. Supp. 1473, 1488 (S.D. Miss. 1994) ("If students are subjected to prayer in a 'captive audience' situation, the state, although not officially delivering the prayer, may be effectively coercing students who do not wish to hear or participate in a prayer to do so."), *aff'd* 88 F.3d 274 (5th Cir. 1996).

⁴¹ See, e.g., *Schempp*, 374 U.S. at 225; *Hall v. Bd. of Sch. Comm'rs*, 656 F.2d 999, 1002 (5th Cir. 1981); *Gibson v. Lee County Sch. Bd.*, 1 F. Supp. 2d 1426, 1432 (M.D. Fla. 1998); *Herdahl v. Pontotoc County Sch. Dist.*, 933 F. Supp. 582, 592 (N.D. Miss. 1996); *Doe v. Human*, 725 F. Supp. 1503, 1508 (W.D. Ark. 1989), *aff'd mem.* 923 F.2d 857 (8th Cir. 1990); *Wiley v. Franklin*, 468 F. Supp. 133, 149-50 (E.D. Tenn. 1979).

⁴² See, e.g., *Doe v. Porter*, 370 F.3d 558, 562 (6th Cir. 2004) (prohibiting school district from offering a class "teach[ing] the Bible as religious truth"); *Hall*, 656 F.2d at 1002-03 (review of textbook "reveals a fundamentalist Christian approach to the study of the Bible devoid of any discussion of its literary qualities"); *Gibson*, 1 F. Supp. 2d at 1434; *Herdahl*, 933 F. Supp. at 596-97 (prohibiting school district from offering classes teaching "the Bible not as a work of fiction, but as a historic record, i.e., as a record of what actually occurred in the past"); *Human*, 725 F. Supp. at 1506 (prohibiting school district from offering Bible classes that are "predominantly religious and devotional in nature"—even if other parts of the course are "predominantly secular"); *Crockett v. Sorenson*, 568 F. Supp. 1422 (W.D. Va. 1983).

Yet state legislators and politicians continue to try to require public schools teach the Bible. For example, in 2024, Oklahoma Superintendent of Public Instruction Ryan Walters issued a mandate that all the state's public schools incorporate the Bible into the curriculum in grades 5 through 12.⁴³ Earlier this year, Walters released a new set of academic standards for social studies that unconstitutionally present Bible stories as literal, historical facts; inaccurately proclaim the Bible and Christianity's influence on the founding of America and the country's laws; and favor Christianity over other faiths and beliefs.⁴⁴ Dozens of students, parents, public school teachers, and faith leaders have filed two lawsuits challenging Walters.⁴⁵

The intent behind these efforts is not to teach about the Bible in an objective manner, but instead is to promote one specific type of Christianity. Supporters of these efforts often claim they need to put God "back" in public schools. Indeed, Walters said during an interview that the Supreme Court had "lo[st] their mind" by "driving God and prayer out of school," and his efforts will counter that, claiming that "[w]e're going to have prayer in school" and "[w]e're going to have the Bible in school in Oklahoma."⁴⁶

Attempts to teach religion in public schools are not limited to the Bible. Despite long-standing Supreme Court precedent that teaching creationism is unconstitutional,⁴⁷ we continue to see efforts to replace the teaching of sound science with religious beliefs. Last year, West Virginia enacted a law designed to pave the way for presentation in the classroom of a kind of creationism called "intelligent design." Like in West Virginia, these policies may not explicitly reference creationism, but often use euphemisms like "theory of how the universe came to exist," "scientific weaknesses," "full range of scientific views," and "evidence for and against," intended to misrepresent scientific knowledge and undermine students' education about evolution. That's why a federal court prohibited a school not only from referring to "intelligent design" creationism in science class, but also from "denigrating or disparaging the scientific theory of evolution."⁴⁸

Release Time Programs

Some schools offer release time programs that allow public school students to leave school to receive religious instruction. The Supreme Court has ruled that these programs are

⁴³ See [Memorandum from Ryan Walters State Superintendent of Pub. Instruction to Oklahoma Superintendents](#) (Jun. 27, 2024); see also Josh Wallace, [Ryan Walters: Bible required to be taught in Oklahoma classrooms](#), KOCO News (Jun. 27, 2024).

⁴⁴ Murray Evans, [Controversial new social studies academic standards are in place in Oklahoma. Now what?](#), The Oklahoman (Jul. 6, 2025).

⁴⁵ [Randall v. Walters](#), No. MA-123237 (Okla., petition for declaratory & injunctive relief filed Jul. 1, 2025); [Walke v. Walters](#), No. MA-122592 (Okla., petition for declaratory & injunctive relief filed Mar. 10, 2025). Americans United is counsel in both cases, partnering in one or both with the Oklahoma Appleseed Center for Law & Justice, the American Civil Liberties Union, the American Civil Liberties Union of Oklahoma, and the Freedom From Religion Foundation.

⁴⁶ *Randall*, No. MA-123237 at 26.

⁴⁷ *Edwards v. Aguillard*, 482 U.S. 578 (1987).

⁴⁸ *Kitzmiller v. Dover Area Sch. Dist.*, 400 F.Supp.2d 707, 721, 766 (M.D. Pa. 2005). Americans United served as co-counsel in this case.

constitutional—but only if there are important safeguards to ensure public schools do not get involved in religious instruction in any way.⁴⁹

In recent years, legislators have introduced bills to *require* every school in their state to adopt a release time policy, regardless of the desire and capacity of the school, local board of education, and community. There have even been bills that would allow students to receive academic credit for attending religious classes.

Release time programs, particularly when offered for credit, create pressure for students to participate to fit in with their peers who attend. Students who belong to minority faiths that do not have institutions to offer religious courses and nonreligious students could feel ostracized by their classmates and teachers for not enrolling in a release time course.

How Public Schools Have Harmed the Religious Freedom of Students and Families

When schools promote religion or coerce students to engage in religious practices, children and their families—particularly those who are nonreligious or follow nonmajority faiths—face marginalization and harassment.⁵⁰

Here are just a few examples of students' experiences:

- A Louisiana public school teacher proselytized and harassed a 6th grader who is Buddhist so badly that the student became physically sick every morning before school. The student was repeatedly mocked and disparaged because of his religious beliefs by his teacher, who coerced him into completing assignments and listening to lectures that promoted Christianity as truth, and at one point disparaged Buddhism as “stupid.” When his parents attempted to resolve the issue, the Superintendent told them that the solution was to either change the child’s religion or transfer him to another school with “more Asians.”⁵¹
- Native American students have faced numerous challenges to their religious freedom in public schools. School officials conducting routine lice checks cut the hair of two Lakota students in Nebraska, in violation of their Native American religious tradition and without the permission or consent of their parents.⁵² This practice continued even after the parents raised concerns. A Texas public school suspended a 5 year-old boy because he wore his long hair in two braids, in accordance with his father’s Native American religious tradition.⁵³

⁴⁹ *Zorach v. Clauson*, 343 U.S. 306, 308-12 (1952) (classes must not take place on public school grounds, no public funds can be expended, and school officials cannot promote the program or coerce students).

⁵⁰ Around 75 percent of church-state separation violations reported to Americans United alone involve proselytizing to students, forcing them to pray, and other religious coercion in schools. [Praying for Common Sense: The Truth About Religion in Public Schools](#), Americans United (Jan. 18, 2020).

⁵¹ *Lane v. Sabine Parish Sch. Bd.*, No. 5:14-cv-00100-EEF-KLH (W.D. La., filed Jan. 22, 2014) (order granting permanent injunction on Mar. 14, 2014). See also Scott Lane, [If You Want To Fit In At This Public School Just Become Christian](#), ACLU (Jan. 22, 2014).

⁵² *Johnson v. Cody-Kilgore Unified Sch. Dist.*, No. 4:21-cv-03103 (D. Neb., filed May 17, 2021) (consent decree filed on Oct. 4, 2023).

⁵³ *A.A. v. Needville Ind. Sch. Dist.*, 611 F.3d 248 (5th Cir. 2010).

- When an Ohio second grader did not attend a release time program, she was bullied, ostracized, and told she was going to hell by her classmates. She was called a “leftover” and had to report to study hall in the gym during the release time.⁵⁴
- A South Carolina middle schooler, who is nonreligious, was forced to attend a middle school assembly that included a sermon, a performance by a Christian rapper, and a prayer with local church members where students were pressured to pledge themselves to Christ. He endured repeated bullying and punishment, even at the hands of his teachers and school administrators, for his beliefs. When he forgot to wear a belt as part of the school uniform, he had to copy an essay stating that he thanks God every day and would not forget his belt again. School officials told him and his family that their beliefs were wrong and that they should “get right with God” because they were not Christian.⁵⁵
- In Florida, a school district spent a decade developing policies and practices encouraging school-sponsored prayer, proselytization of students, and school-sponsored religious services.⁵⁶ The handbook at one of the District’s schools instructed teachers to “embrace every opportunity to inculcate, by precept and example, the practice of every Christian virtue.”⁵⁷ Teachers and coaches regularly assigned students religiously oriented school work, led or invited students to lead pre-game prayers, preached to students using a bullhorn, and pressured students to join religious clubs.
- In another Louisiana case, parents and students challenged rampant violations of their religious freedoms, including faculty harassment of minority-religion and nonreligious students, forced memorization of prayer in class, and proselytization and encouragement of religious practice through school athletic programs. A teacher even told students they had to believe in Jesus to be “good people.”⁵⁸
- A head high school football coach prayed with his students, encouraged students to pray, invited local clergy to deliver religious messages to the team, hosted team dinners at local churches, used school social media to endorse religious student clubs, and attended religious club meetings to directly proselytize attending students. After he retired, the next head football coach engaged in almost the same behavior, taking it a step further by baptizing one of his players at a team meeting he held at a local church.⁵⁹
- School officials too often host religious assemblies in elementary, middle, and high school with missionaries or clergy members to give them an opportunity to

⁵⁴ Megan Henry, [LifeWise Academy draws criticism from some Ohio parents, support from religious organizations](#), Ohio Cap. J. (Jan. 15, 2025).

⁵⁵ [Anderson v. Chesterfield Cnty. Sch. Dist.](#), No. 4:11-cv-03300-RBH (D.S.C., filed Dec. 5, 2011) (order granting permanent injunction on Jan. 24, 2012). See also Jonathan Anderson, [Second-Class Citizens in the Classroom: Promoting Religion in Public Schools Is Hurting Our Family](#), ACLU (Dec. 5, 2011).

⁵⁶ [Doe v. School Board for Santa Rosa County](#), No. 3:08-cv-00361 (N.D. Fla., filed Aug. 27, 2008).

⁵⁷ Heather Weaver, [Fox Wildly Distorts ACLU Religious Liberty Case](#), ACLU News (Aug. 19, 2019).

⁵⁸ [Complaint, Does v. Bossier Parish School Board](#), No. 5:18-cv-00152 (W.D. La. Jul. 6, 2018); see also Liz Hayes, [Victory In Bossier: Americans United Secures Agreement To Protect Students’ Religious Freedom In Louisiana School District](#), Church & State Mag. (Feb. 15, 2019).

⁵⁹ [Praying for Common Sense: The Truth About Religion in Public Schools](#), Americans United (Jan. 18, 2020).

proselytize and pray with students. These assemblies have featured rappers, rock bands, weight lifters, martial artists, dazzling light shows, and more. Sometimes the assemblies are mandatory for students and sometimes students are threatened with in-school suspension if they don't attend. At the assemblies, students are pressured to pray, take devotional materials, attend local churches, and even join an altar call to the stage and be saved.⁶⁰

Retaliation Against Students and Families Protecting their Religious Freedom Rights

Unfortunately, the fear of intimidation and physical harm is all too real for people who take action to protect their religious freedom. Students and families who challenged unconstitutional religious practices in their public schools have faced community backlash, direct hostility from local officials, and targeted acts of violence against them. This kind of retaliation not only undermines our constitutional rights, but also sends a chilling threat to anyone who might speak up against a violation of religious freedom.

Many of the following examples include graphic details of violence and threatened violence, references to the Holocaust, and abhorrent language. We include these details because we believe it is important to document the reality of what families and students who are not part of the majority faith experience when they seek to uphold their rights and be fully included in their public schools.

Here are a few examples of what students and their families have faced:

- The Lane family, in Louisiana, faced severe harassment after challenging the prolific promotion of religion in their children's school. The family had to transfer one of their children to a different school 25 miles away, in an attempt to avoid the daily bullying and harassment the student faced because he was Buddhist. The children's mother received threatening calls and was accosted outside her home by three people wearing KKK-type hoods who called her a "f—ing n—r Asian-loving b—ch."⁶¹
- Students in New Jersey who complained about the high school football coach leading the team and other students in prayer during pre-game meals and before games were subjected to racist, antisemitic, misogynistic, and violent slurs. Jewish cheerleaders were harassed and threatened. Fellow students sent anonymous antisemitic emails, wrote virulent chat room posts accusing these cheerleaders of lodging complaints, and made threats against the cheerleaders and any students who defended them. Comments included:
 - "First they crucify Jesus, then they got [the coach] fired . . . Jews gotta learn to stop ruining everything cool."
 - "The jew is wrong. [The coach] is right. Let us pray."
 - "d**n jews . . . then you wonder why hitler did what he did back in the day."

⁶⁰ See, e.g., *Praying for Common Sense*; *Anderson*, No. 4:11-cv-03300-RBH; complaints on file with Americans United.

⁶¹ Heather Weaver, [Buddhist Student, Religious Liberty Prevail in Louisiana](#), ACLU (Mar. 14, 2014) (obscenities and racial slur modified).

- “MAYBE if [the coach] held a gun to the jjjwwws head and was like b*tch get on ur knees and pray to jesus!! then that might be breaking the law . . . ehhe maybe not! . . . just suck it up if u don’t fu*ing like whats going on in america then GO THE FU*K BACK TO YOUR COUNTRY AND STAY THERE AND PRAY . . .”
- “Heil Hitla!!! sieg heill.”⁶²

The cheerleaders also faced harassment and bullying—taunts, spitting, and items being thrown at them—from their fellow students at pep rallies and football games. They suffered severe stress and feared escalating attacks.⁶³

- The Anderson family, from South Carolina, received hate comments online and were harassed at home after they challenged school-sponsored prayer, preaching, and religious activities in their school district.⁶⁴
- Jessica Ahlquist required a police escort to and from school in Rhode Island after she challenged a prayer banner in her school.⁶⁵ Many in her community, including her state representative, publicly labeled her “an evil little thing.”⁶⁶ She was sent a tweet that noted her home address was posted online, called her a “****ing worthless c***,” and hoped she would get “curb stomped.”⁶⁷ Months after she won her case, Ahlquist received a letter that said the police would not watch her forever, people knew where her father worked and what cars they owned, and “WE WILL GET YOU—LOOK OUT!”⁶⁸
- Tammy Kitzmiller received a death threat that told her to “watch out for a bullet” after she challenged the unconstitutional teaching of creationism in her children’s public school in Pennsylvania.⁶⁹ When Judge John E. Jones III ruled that the school had violated the Constitution, he received threats against him and his family, serious enough to warrant 24/7 U.S. Marshal protection.⁷⁰
- After Louisiana families challenged the religion-infused practices of their public school, the school responded with a series of events and campaigns designed to further ostracize these students, including urging students to draw a blue line on their hands on a specific school day to show solidarity with the board—and, thereby, putting a clear target on any students not supporting school-sponsored religion.⁷¹ Similarly, after Catholic and Latter Day Saints families challenged school-sponsored prayers at their Texas high school, “Administrat[ors], officials, counsellors, teachers,

⁶² *Borden v. Sch. Dist.*, 523 F.3d 153, 184 (McKee, J., concurring) (obscenities as altered in source).

⁶³ [Brief of Jo Ann Magistro & Alan Brodman](#) at 10-12, *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507 (2022).

⁶⁴ Heather Weaver, [Don’t B-SHOcked: Settlement Shows Public Schools Can’t Proselytize](#), ACLU (Jan. 24, 2012).

⁶⁵ Elisabeth Harrison, [R.I. Student Draws Ire Over School Prayer Challenge](#), NPR (Feb. 14, 2012).

⁶⁶ [Jessica Ahlquist – Thomas Jefferson Youth Activist Award](#), *Freedom From Religion Foundation*, Freedom From Religion Foundation (2012).

⁶⁷ Mark Schieldrop, [Ahlquist: Fight Over Mural, Despite Harassment, Threats, “Worth It.”](#) Patch (Jan. 12, 2012) (obscenities and epithets as altered in source).

⁶⁸ Mark Schieldrop, [Ahlquist Family Told to ‘Get out of RI’ in Threatening Letter](#), Patch (Apr. 12, 2012).

⁶⁹ Ed Brayton, [Plaintiff Intimidation in Church/State Cases](#), Talk To Action (Jan. 17, 2007).

⁷⁰ Michelle Simmons, [Independent From the Ground Up](#), Dickinson (Nov. 5, 2014).

⁷¹ Liz Hayes, [Victory In Bossier: Americans United Secures Agreement To Protect Students’ Religious Freedom In Louisiana School District](#), Church & State Mag. (Feb. 15, 2019).

[and other] employees ‘overtly or covertly [attempted] to ferret out the[ir] identities . . . by means of bogus petitions, questionnaires, individual interrogation, or downright ‘snooping,’”⁷²

- Lisa Herdahl, from Mississippi, received bomb threats and harassing phone calls after she challenged school prayer, eventually being driven to quit her job to stay home and protect her family.⁷³ She faced extreme ostracization, as nearly every house and business posted signs opposing her suit.⁷⁴ Herdahl’s children were also bullied by their classmates, who called them “devil worshippers.”⁷⁵
- Joann Bell’s home, in Oklahoma, was burned to the ground after she challenged school-sponsored prayers. She was also assaulted by a school employee who smashed her head against a car door multiple times, and school authorities celebrated the attack.⁷⁶ Her son’s prize goats were “slashed and mutilated with a knife,”⁷⁷ and callers threatened to physically assault her children and rape her.⁷⁸
- After Madalyn Murray O’Hair, from Maryland, challenged official prayer and Bible readings in public schools, her children were physically attacked. Her home was firebombed, and the fire department took a “particularly circuitous route” that took them forty minutes to respond.⁷⁹
- Vashti McCollum, from Illinois received more than a thousand threats in the mail after she challenged a school program that offered religious instruction.⁸⁰ She was fired from her job and pelted with rotten produce, and the family cat was lynched.⁸¹

Opportunities to Secure Religious Liberty in Education for the Future

Everything outlined above poses a real, ongoing threat to students’ and families’ religious freedom and full inclusion in their schools and communities. The Constitution protects the rights of students to attend public school without being pressured to participate in religious activities. Many of these efforts, including religious charter schools, Ten Commandments displays, and school-sponsored prayer, violate the Constitution. Even those that could be constitutional in specific circumstances, such as teaching about the Bible and release time programs, are blatantly being pushed beyond their constitutional limits in order to unlawfully coerce students.

Using our public schools to promote a specific type of Christianity is also part of a broader attack on their role as a unifying, inclusive, and democratic force in our communities—and

⁷² *Santa Fe*, 168 F.3d 806, 809, n. 1 (5th Cir. 1999), *aff’d* 530 U.S. 290.

⁷³ Gary Borg, [Judge Strikes Down School’s Prayers](#), Chi. Trib. (June 4, 1996).

⁷⁴ Nadine Strossen, [How Much God in the Public Schools](#), 4 W. & Mary Bill Rts. J. 607, 614 (1995).

⁷⁵ Stephanie Saul, *A Lonely Battle in the Bible Belt: A Mother Fights to Halt Prayers at Miss. School*, *Newsday* (Mar. 13, 1995).

⁷⁶ Sandhya Bathija, [Hell in Little Axe: An Oklahoma Mom’s Chilling Battle With Religious Bigotry](#), *Americans United* (Nov. 25, 2008).

⁷⁷ *Id.*

⁷⁸ See Robert S. Alley, *Without a Prayer: Religious Expression in Public Schools* 107-8 (1996).

⁷⁹ Katie Koch, [Bypassing the Bible](#), *Harvard Gazette* (Nov. 2, 2012).

⁸⁰ Vashti McCollum, *One Woman’s Fight* 98 (rev. ed. 1961).

⁸¹ Douglas Martin, [Vashti McCollum, 93, Who Brought Landmark Church-State Suit, Is Dead](#), *N.Y. Times* (Aug. 26, 2006).

on public education more broadly. The same groups pushing the laws and policies outlined in these comments are also engaging in a dangerous campaign to undermine, defund, and replace public schools. They have created false controversies over books, curricula, and policies to sow distrust in our public schools, in order to push for radical changes to our education system, including the creation of universal private school vouchers and religious public charter schools. These efforts are all part of a plan to use the government to impose one narrow view of religion on all of our children and undermine the foundational principle of church-state separation.

Sadly, the harm of these efforts is not limited to threats to our Constitution, the law itself, or our public schools. These attacks on religious freedom ultimately harm children and families. They harm students who do not belong to the majority faith, whether they belong to a different Christian denomination, belong to a minority faith, or are nonreligious. They send the message to some that they “are outsiders, not full members of the . . . community, and an accompanying message to [only certain] adherents that they are insiders, favored members of the . . . community.”⁸²

As shared above, these efforts also result in chilling threats of physical harm to the real people who must go to court to enforce their religious freedom rights. Students and their parents who filed lawsuits to challenge the promotion of religion in public schools have been physically assaulted, received death threats, been fired from their jobs, and more. These horrific incidents will only increase if states continue to push problematic and unconstitutional policies like the ones described here.

The Religious Liberty Commission has unique power. It can use its platform to highlight the issues discussed in these comments and to ensure they do not continue. It can work to guarantee that all our students and families, no matter their faith or beliefs, are protected, feel welcomed, and are not threatened by merely showing up at school.

The Commission can also help people understand what religious freedom means and how state legislatures and school officials can best protect everyone. At a future hearing, we urge the Commission to call on parents and students who had to speak out to vindicate their rights and experienced retaliation to better understand their stories—and ask how the Commission and the law can better work to protect them.

Conclusion

America is a greater nation when we protect religious freedom for all, not just for some; when we are all free to believe or not, as we see fit, and to practice our faith—without hurting others; and when the government does not use our public schools to promote religion or coerce students to participate in religious exercise. Americans United remains steadfast in our work, as we have for nearly eighty years, to fight back against any threats

⁸² *Santa Fe*, 530 U.S. at 309-10 (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O’Connor, J., concurring)).

to religious freedom, particularly in the public education setting, and ensure everyone enjoys their right to religious freedom.

We urge the Commission to address the real threats to religious freedom in public education. In doing so, the Commission must consider the ostracization, bullying, religious coercion, and even physical violence that students and families face when public schools are used as a platform to proselytize and promote a single set of religious beliefs—the very threats the First Amendment was designed to prevent.⁸³

Sincerely,

A handwritten signature in black ink, appearing to read 'Alessandro Terenzoni', with a stylized flourish at the end.

Alessandro Terenzoni
Vice President of Public Policy

A handwritten signature in black ink, appearing to read 'Nik Nartowitz', with a stylized flourish at the end.

Nik Nartowitz
Lead Policy Counsel

⁸³ The Founders, aware of the “anguish, hardship[,] bitter strife[,]” (*Engel*, 370 U.S., at 429) “turmoil, civil strife, and persecutions” caused by seeking “absolute political and religious supremacy,” (*Everson*, 330 U.S. at 8-9) intended the First Amendment “to avoid that divisiveness based on religion that promotes social conflict.” (*Van Orden v. Perry*, 545 U.S. 677, 698 (2005) (Breyer, J., concurring) (quoting *Schempp*, 374 U.S. at 305 (Goldberg, J., concurring))).



110 Maryland Avenue, NE
Suite 509
Washington, DC 20002

(202) 466-0567
Interfaithalliance.org

December 15, 2025

To President Donald J. Trump and Attorney General Bondi,

Interfaith Alliance is writing to nominate its President, Rev. Paul Brandeis Raushenbush, to serve as a member of the federal Religious Liberties Commission, which President Trump created in Executive Order 14291. There was no advertised process for Commission membership; therefore, Interfaith Alliance is submitting this request through the Commission's publicly available contact information.

The Religious Liberties Commission is tasked with, among other things, "increasing" awareness of and celebrating America's peaceful religious pluralism." The Commission, as it is currently configured, is not structured to achieve this goal because its composition is skewed towards conservative, predominantly Christian viewpoints. Indeed, no minority faith group, other than Orthodox Judaism, or interfaith group, is represented in the Commission's Membership.

Since 1994, Interfaith Alliance has advocated for an America that respects the freedoms of belief and religious practice for all persons, including those subscribing to minority religions such as Hinduism, Islam, Buddhism, and Sikhism. We maintain a diverse network of clergy from all faiths and religious backgrounds to push back against all manner of threats to religious liberty.

To ensure the Religious Liberties Commission can accomplish its mission, we believe the Commission needs a more balanced membership that includes the voices of minority faith groups and interfaith groups committed to religious pluralism. Interfaith Alliance is uniquely positioned to represent the religious diversity currently lacking in the Commission's membership. Accordingly, we hope that you will agree to appoint Rev. Raushenbush to the Commission immediately.

We look forward to hearing from you, and thank you for your consideration.

Regards,

The Interfaith Alliance Foundation

Christian Heritage Week, 2025

A Proclamation

Today, I am very pleased to be the first President to officially proclaim Christian Heritage Week.

The influence of Christianity upon American communities is evident by their many churches and Christian charities, ministries, missions and schools; cherished Christmas, Easter and Thanksgiving holiday seasons; and a willingness of Americans to love thy neighbor as thyself.

Commemorating America's Christian heritage provides an opportunity for those choosing to participate to thank God for His "Blessings of Liberty", to ask His help to "insure domestic Tranquility" and to recognize our national need and "unalienable Rights" in reaffirming our "reliance on the Protection of Divine Providence" for keeping our families secure, communities safe and America a "Free and Independent" "one Nation, under God."

Churches nationwide are encouraged to celebrate Christian Heritage Week with relevant Sunday school lessons, sermons, youth programs, patriotic song services and prayer meetings.

In the Church of The Holy Trinity vs. United States (February 29, 1892, Decided); David J. Brewer, Associate Justice of the Supreme Court of the United States, stated, "These, and many other matters which might be noticed, add a volume of unofficial declarations to the mass of organic utterances that this is a Christian nation."

Notably, the "Sundays excepted" clause in Article I, Section 7 of the Constitution of the United States historically recognizes Sunday as a day of rest and worship; and the United States Capitol regularly served as a church building for over 70 years beginning in 1795.

NOW, THEREFORE, I, DONALD J. TRUMP, President of the United States of America, by virtue of the authority vested in me by the Constitution and the laws of the United States, do hereby proclaim November 23, 2025, through November 29, 2025, as Christian Heritage Week. I invite all citizens to acknowledge, appreciate and celebrate, each in their own way, the Christian heritage of this great Nation where our motto is, *In God We Trust*.

IN WITNESS WHEREOF, I have hereunto set my hand this _____ day of _____, in the year of our Lord two thousand twenty-five, and of the Independence of the United States of America the two hundred and forty-ninth.

The First Congregational Church
AND THE FIRST ECCLESIASTICAL SOCIETY OF WOODBURY
214 Main Street South
Woodbury, Connecticut 06798
(203) 263-2846

THE REV. JACOB W. DELL, PASTOR

June 29, 2025

To: The Honorable Pam Bondi
United States Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Cc: Religious Liberty Commission

Subject: Urgent: Investigate National Threat of Law-Breaking Churches

Dear Attorney General Bondi:

As pastor of The First Congregational Church of Woodbury, I urgently request your investigation into law-breaking churches posing national threats to religious liberty, as detailed in the enclosed letter to Connecticut Attorney General William Tong, my sermon transcript, "Regime Change: Fighting with Faith, Not Fire" (June 29, 2025), and two Project Veritas video transcripts.

The videos expose a Hartford-area pastor providing a minor with a chest binder without parental consent and contributing to a teen's suicide by encouraging gender-affirming care against parental wishes. These unlawful acts, like counterfeit currency, devalue law-abiding congregations' worship, damaging their reputation and social and spiritual capital.

Connecticut's Constitution (Article First, Section 3) offers a remedy against such licentiousness, but these acts harm communities nationwide, as falling church attendance shows. I urge you and the Religious Liberty Commission to investigate, halting practices that undermine true religious liberty.

Please act swiftly to protect law-abiding churches. I am available for discussion at the contact information below.

Sincerely,

The Rev. Jacob W. Dell, Pastor
The First Congregational Church of Woodbury
Mobile: [REDACTED]

Email: [REDACTED]@pm.me

Enclosures: Letter to Attorney General William Tong; Sermon Transcript; Project Veritas Video Transcripts (Parts 1 and 2)

Executive Summary

Chaplain, Lt Col [REDACTED] - Case

Goal

To restore Chaplain, Lt Col [REDACTED] career to a position commensurate with his rank, skills, and experiences by removing all negative paperwork and actions so that he can continue to minister to and equip our warfighters for future conflicts.

Brief Bio of Chaplain [REDACTED]

18+ years Active Duty, B.A. Wheaton College, MDiv Westminster Seminary, earned PhD South African Theological Seminary, BDE Distinguished Graduate (against Line Officers), a top 15% Air Force Chaplain, Chaplain of the Year (<https://www.afsoc.af.mil/News/Article-Display/Article/495064/air-force-special-tactics-chaplain-named-best-among-cgos/>), War College alternate, hand-selected to work with some of the most elite Special Operations units, with Drill Sergeants, with 8 trips to Middle East and Africa deployments, and hand-selected to work at USAFA.

Wrongs

1. Supervisor (Col [REDACTED]es) never discussed concerns with him or sought to counsel
2. USAFA/IG and SAF/IG substantiated finding of “restriction” [REDACTED]
3. Given a Letter of Admonishment (LOA)
4. Fired from job as Wing Chaplain (Feb 2024)
5. Given a sub-par performance report and (possibly) unfavorable information file opened
6. Sent to work in a non-chaplain job for 6 months (in violation of DAFI 52-101 sect. 1.1.1) (Ch Montgomery was told by the Chaplain Corps O6 Career Field Manager (Pentagon) that there was no regulation or policy requiring him to be sent to an O3 position, but that it was happening anyway).
7. PCS'd from CO to MS (Supervisor would not approve High School Senior stay-in-place)
8. Negative family impacts (lived apart due to daughter's Sr Yr in a great school)
9. Sent to an O-3 position (not allowed to supervise) for at least 2 years (career-killer)
10. The cumulative impact is that he is not competitive for promotion – even if cleared?
11. A stellar AF Chaplain with Joint experience restrained from delivering his skills to warriors

Advocates & Arguments against these Wrongs (in attached documentation)

1. First Liberty Institute Report: facts thoroughly dismantling the case against him
2. Davis Younts Law Firm Report: facts thoroughly dismantling the case against him
3. Area Defense Counsel Report: facts thoroughly dismantling the case against him
4. Character Reference Letter from the sitting AF Deputy Chief of Chaplains (1-Star)
5. Character Reference Letter from the recently retired Head ANG Chaplain (1-Star)
6. “The War on Warriors”: the same problems listed in the book impacted Ch Montgomery

Avenues for Relief that were Pursued (all to no avail thus far)

USAFA Supervisor, USAFA Superintendent, USAFA/IG, USAFA/EO, SAF/IG, DOD/IG, ERAB

Significant Faults with the claims and accuser(s)

1. Inconsistent Testimony against Ch Montgomery (perjury?) vs. Ch Montgomery's consistency

2. Ch [REDACTED]'s alleged statement went through 2 people before getting to SrA [REDACTED] ('whisper down the lane' via a deputy who often altered Ch [REDACTED]'s message and held his own meeting with the Capt prior to the message being delivered) – ironically, EO won't believe the direct racist statement Col [REDACTED] said but does believe 'whisper down the lane'.
3. Supervisor said to Ch [REDACTED] in private: "I have issues with white males"
4. Ch [REDACTED]'s pastoral and caring message was completely misunderstood
5. Supervisor forbade Ch [REDACTED] from speaking to USAFA Superintendent
6. Supervisor decided to move him BEFORE informing him of any concerns (attached)
7. Supervisor cancelled all award packages he submitted for his teammates
8. Supervisor disallowed an EOT Medal for Ch [REDACTED] and his former deputy
9. The IG complainant (SrA [REDACTED]) is a serial complainer (at least 5 teammates accused)
10. SrA [REDACTED] was reportedly recently divorced a 2nd time after a reported affair with a Chaplain Corps member.
11. Supervisor did not set up a conference with USAFA Deputy Superintendent that Ch [REDACTED] requested in order to address religious freedom concerns at USAFA (reprisal on Ch [REDACTED] for bringing up religious liberty concerns?)
12. Witnesses who had past negative interactions with Col [REDACTED] (i.e. physically choked, doc# 16)
13. Col [REDACTED] was very open about her support for then-candidate Biden (doc #18) – violation of which SecDef's 16 Sep 2025 Memo reminds all service members? Was she biased against Ch [REDACTED] because of his denomination and its beliefs?
14. Under a USAFA leadership that pushed DEI on campus while demurring in public
<https://www.foxnews.com/politics/gaetz-air-force-general-gender-identity-labels?msocid=2a26b51a8efe6f6811bca37d8fa96e45>
15. **Inconsistent Discipline:** another member of Ch [REDACTED] staff was investigated at USAFA more recently. It was substantiated for saying racist statements to the USAFA Choir – many witnesses, yet this person is reportedly still working at USAFA, doing the same job.
16. **Wrong Target:** Col [REDACTED] and CMSgt [REDACTED] for Chaplain Corps at USAFA are the true bosses. Nothing significant happened without their permission, yet they are not blamed for anything.
17. **History of Ignoring the Real Boss:** Previous leaders (Col [REDACTED] and CMSgt [REDACTED]) made the key decisions, went against guidance given to stay in the clear, while passing the blame.
18. **USAFA's poor prioritizing:** USAFA continued to have sexual assault and suicide incidents. Ch [REDACTED] helped stop assaults and suicides (including directly intervening with a Senior USAFA leader with a plan). Ch [REDACTED] was taken out from continuing this due to the discipline against him. Apparently, cadets can die and be assaulted on Senior Leaders' watch and keep their jobs, but if a chaplain who is helping to stop those suicides and assaults is misunderstood by a sub-performing subordinate with a history of complaining, he must go.
19. **Concern of IG Bias:** given the cultural/political climate at the time, it encourages them to not believe a white male in a position of authority (Col [REDACTED] was the real decision maker) in favor of those who are not, and then later save face by not changing their mind.
20. **Misappropriation:** of a resource (a good chaplain) to a non-chaplain job while appeasement of a sub-par and serial complaining worker thus encouraging more insubordination and less ministry.

Requests for Action

1. **Chaplain [REDACTED]'s record fully restored** (no negative paperwork, removal of IG substantiation, receive an O-5 End of Tour Medal for the 2 ½ years of service at USAFA, etc.).
2. **Chaplain [REDACTED] is given a position commensurate with his rank and experience** so the military can better utilize his skill sets. We need our best for future conflicts.
3. **Accountability for previous supervisor:** Made a racist statement to Chaplain [REDACTED] spoke at a Joe Biden campaign event before he got up to speak, never mentored or discussed concerns (if any) she had with Chaplain [REDACTED]. A history of mistreatment (doc #16).
4. **Accountability for IG:** While they may have life or military experience, the amount of time it takes to be a trained IG representative (a few months?) pales in comparison to the training pipeline chaplains go through (typically 7-8 years) to do their respective jobs. IG bias is astounding given all of the facts. Their case would never hold up in court. Chaplains learn ethics, virtue, and go through character formation and mentoring prior to becoming chaplains. It is not apparent that IG has to go through these lengthy ordeals before making inconsistent decisions that radically alter a Godly family's course. The investigator at USAFA was a Political Science professor on loan to IG.

Overview of Supporting Documentation

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October 16, 2025

Members of the Religious Liberty Commission,

On behalf of Feds For Freedom, a non-profit organization committed to safeguarding the constitutional rights of federal employees, contractors, and American citizens, thank you for your critical efforts in alerting Americans to the escalating threats against religious liberties. Throughout COVID-19, the US government repeatedly violated First Amendment rights. These violations have been recognized by the courts. *We respectfully request you thoroughly examine how the U.S. federal government ignored the law and trampled citizens' rights.* We have numerous witnesses, federal and military, who are willing to speak at the November 17 and future hearings.

During the COVID-19 years, the federal government enacted broad vaccine mandates that infringed upon the First Amendment rights of millions of Americans. Government and military leaders employed coercive measures to compel individuals to act against their consciences by receiving COVID-19 vaccines and other COVID mitigation measures —disregarding the individuals' sincerely held beliefs and requests for exemptions. This represents an unprecedented violation of American principles and demands the Religious Liberty Commission's rigorous scrutiny, extending beyond a single hearing.

The federal government's failure to honor religious objections to the COVID-19 vaccine mandates constitutes the most significant religious liberty violation in U.S. history.

We respectfully urge the Commission to take the following actions:

1. Include Testimony from Military Servicemembers Regarding COVID-19 and Current Vaccine Discrimination at the November 17 Hearing on Military Affairs

At the Religious Liberty Commission's hearing dedicated to military issues, we strongly recommend including testimony from military servicemembers who experienced egregious and repeated violations of their religious rights. The military's COVID-19 vaccine mandate resulted in the termination of nearly 9,000 active-duty and reserve servicemembers *within one year of implementation* and resulted in the forced or coerced departure of approximately 80,000 more service members — due significantly to the military leadership's disregard for their religious liberties. *This represents a significant national security risk, stemming from the federal government's unlawful mandate and refusal to comply with legal requirements for granting religious accommodations.*

Furthermore, current active-duty servicemembers are facing separation from the military due to their requests for religious accommodations regarding the flu vaccine mandate. The ongoing

violations of religious liberty within the military in 2025 are astounding and demand urgent attention and action.

Feds For Freedom proposes two compelling witnesses:

1LT Schuyler Skipper, US Marine Corps (USMC), sought a religious exemption during the COVID-19 pandemic. Liberty Counsel secured an injunction on his behalf when he faced separation without due process for adhering to his faith. The discrimination didn't stop with the COVID mandates: Skipper's subsequent requests for accommodation from additional shot requirements, including the flu shot, resulted in the USMC issuing blanket denials and, as of October 2025, marking him for imminent administrative separation.

Reference: [Liberty Counsel Press Release, July 17, 2025](#)

Former military attorney (JAG) Kacy Dixon left the military in 2024 after witnessing blanket denials of religious accommodation requests and widespread, coercive tactics to require the use of a non-FDA-approved vaccine. Through pro-bono advocacy, Ms. Dixon's efforts led to Pentagon policy changes and a Presidential Pardon for a servicemember convicted of upholding his oath to the Constitution and disobeying unlawful orders related to the COVID-19 mandates.

Reference: [Feds For Freedom Interview with Kacy Dixon, 2025](#)

If this topic is of interest for inclusion in the November 17 hearing, we will promptly compile a comprehensive list of interested speakers.

2. Convene a Dedicated Hearing on Religious Liberty Violations Within the Federal Government

These legal violations extended beyond the military. We urge the Commission to hold a hearing focused on violations of religious liberty within the federal government, featuring testimony from federal employees and contractors.

Feds For Freedom secured a preliminary injunction against the COVID-19 vaccine mandate in January 2022 for federal employees, preserving 400,000 jobs. Despite this, *employees faced discrimination for refusing the vaccine primarily on religious grounds*, including exclusion from duties, coerced testing and masking, investigations for non-compliance, labeling as "insider threats," loss of security clearances, forcible removal from positions, and pressure to violate their consciences. Executive Order 14043 permitted an accommodation process for federal employees, with a 90-day requirement to process religious accommodation requests. The Biden administration failed to process these requests, violating federal law, and most remain unprocessed to this day.

Feds For Freedom can provide multiple federal employee and contractor witnesses, from our member base of 9,000, who are ready to testify about these violations, including anti-Christian bias, within their agencies.

In addition to the above proposed actions, Feds For Freedom encourages the Commission to explore proactive policy recommendations to safeguard against future government overreach and preserve the First Amendment rights of all Americans. Specifically, we recommend:

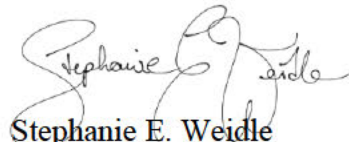
1. Recognition of the importance of bodily autonomy and informed consent, by providing military servicemembers the option to decline medical interventions to include vaccines.
2. Agency accountability (conceivably Congressional action to withhold funding) for refusing to process religious accommodations according to the Religious Freedom Restoration Act (RFRA).
3. Presidential acknowledgment that the COVID-19 vaccine mandates for federal employees and contractors were, in fact, illegal.

The Religious Liberty Commission has the President's mandate and a critical responsibility to investigate these violations by the federal government as well as the military against its own citizens and to warn the American public of the risk of recurrence without sustained vigilance. *Neglecting these issues would be a glaring failure to uphold the Commission's duty to accurately report on the state of religious liberty in our nation and such oversight would constitute a significant disservice to the American public.*

We respectfully request the prompt implementation of these recommendations. We, again, thank you for allowing aggrieved parties the opportunity to present their cases.

Feds For Freedom is available for a call next week to discuss the issue further, including witness logistics. Please contact Feds For Freedom at [REDACTED] or [REDACTED] [@fedsforfreedom.org](mailto:[REDACTED]@fedsforfreedom.org).

Sincerely,



Stephanie E. Weidle
Executive Director, Feds For Freedom



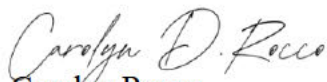
Marcus W. Thornton
President & Co-founder, Feds For Freedom



Michael Kevin McAfee
Vice President, Feds For Freedom
Dept. of Army Civilian



James E. Erdman III
Co-founder, Feds For Freedom



Carolyn Rocco
Lt Col, USAF



Robert A. Green, Jr.
Commander, USN



Olivia Degenkolb
Commander, USN (Ret.)

Faith for Literacy Nationwide

A Simple, Scalable National Campaign

Purpose

This concept paper proposes mobilizing America's faith communities to address the nation's literacy crisis. We seek dialogue with the White House Faith Office, and the U.S. Department of Education, as well as other congressional leaders, to explore partnership opportunities around influence, resources, and support. Our aim is not to prescribe every detail, but to introduce a bold idea and invite collaboration—marshaling the moral authority, and volunteer capacity to spark a national faith-and-literacy movement.

The Core Problem: America's Literacy Crisis

Scope of the Crisis

- Early literacy is a decisive factor in a child's future. Illiteracy and crime are connected. The Department of Justice states, "The link between academic failure and delinquency, violence, and crime is welded to reading failure. Over 70% of inmates in America's prisons cannot read above a fourth-grade level."
- According to NAEP 2024, 40% of 4th graders cannot read at even a basic proficiency level.
- The Annie E. Casey Foundation states that children not reading by the 3rd grade are four times more likely to drop out of high school.
- 85% of juveniles in the justice system are functionally illiterate; 75% of inmates read at the lowest levels (Office of Justice Programs/Department of Justice).
- Children from generational poverty who are not reading proficiently by 3rd grade are 19x more likely to drop out (Center for Civil Rights Remedies).
- Each dropout costs society an estimated \$272,000. With 1.2 million children dropping out annually, that equates to \$300 billion in costs every year (National Center for Education Statistics).

Why It Matters Now

This is a nonpartisan, nationwide crisis affecting urban, suburban, and rural communities alike. Without urgent intervention, declining literacy will perpetuate generational poverty and weaken America's economic and social fabric.

The Big Vision

The vision is simple and scalable: activate churches across every state as central players in solving illiteracy by mobilizing millions of trained volunteers to tutor children in reading.

Achieving this scale requires partnership not only with faith communities, but also with governors, state and local education leaders, philanthropists, and policymakers. The movement will be fueled by:

- A robust national media campaign,
- Simple, replicable tutoring models, and
- Coordinated resources to ensure lasting impact.

About the Children's Literacy Project (CLP)

Children's Literacy Project (www.childrensliteracyproject.org) is a national education nonprofit dedicated to improving literacy through **storytelling and strategic action**. Our primary purpose is to activate people and communities of faith into the cause of early childhood literacy.

Notable Work:

- *SENTENCED*: a feature documentary on illiteracy and generational poverty, co-produced and narrated by NBA superstar Stephen Curry, premiered at the Library of Congress.
- *MOONSHOT*: a 10-part docuseries chronicling how one Florida district achieved 90% reading proficiency.
- *Read: How God's People Can Bring Justice Through Literacy*: a book inviting communities of faith into the cause of early childhood literacy.

CLP's Unique Value:

- Mobilizes the church as the largest volunteer network in the U.S.
- Builds bridges between schools, families, and faith communities.
- Creates compelling media that shifts national awareness and inspires action.
- Equips congregations with training, toolkits, and accountability systems to ensure real results.

About ARISE2Read

ARISE2Read (www.arise2read.org) is one of the most effective volunteer tutoring models in the nation. Rooted in Memphis, it has consistently partnered with the local school district to improve student reading outcomes by pairing hundreds of trained church volunteers with struggling 2nd graders.

- **Simple & Scalable**: Easy to replicate in any church context. It is currently in several states, Uganda, and South Africa.
- **Evidence-Based**: Uses structured training, assessment, and progress tracking.
- **Accessible & Effective**: Volunteers need no teaching background yet achieve consistent measurable results in just one hour a week.

ARISE2Read leaders bring decades of experience at the intersection of faith and education. They have shown how churches can serve schools with rigor and credibility. Their frameworks ensure volunteer efforts are structured, accountable, and effective—helping new partnerships launch well and enabling struggling organizations to strengthen their impact for children.

The Faith & Literacy Collective: A National Network Already Formed

CLP has convened the **Faith & Literacy Collective**, a growing alliance of publishers, nonprofits, pastors, and influencers committed to literacy.

Current partners include:

- **Dozens of literacy organizations nationwide** – prepared to align and scale best practices.
- Randy Frazee and other influential pastors – bridging broad church networks.
- **Evangelical Christian Publishers Association (ECPA)** – aligning the publishing industry around literacy.
- **HarperChristian Publishing** – leveraging content and reach to mobilize churches.
- **National Prayer Breakfast** – positioning literacy as a moral and national priority before bipartisan leaders.
- **National Cathedral** – elevating literacy in one of America's most visible symbolic faith forums.
- **Kids Hope USA** – operating thousands of church-school partnerships nationwide.
- **Campaign for Grade-Level Reading** – the nation's largest coalition addressing literacy.
- **The Learning Alliance (Moonshot Moment)** – proof that 90% literacy is achievable.
- Stephen & Ayesha Curry / Eat.Learn.Play. Foundation – linking literacy with justice and equity.

This broad-based coalition proves the movement is **credible, coordinated, and already in motion**.

Core Campaign Strategies

1. **National Media Campaign** – Faith-affirming storytelling to make literacy the church's top service mission.
2. **Test & Learn Pilots** – Launch in diverse cities (e.g., Kansas City) to refine and scale best practices.
3. **Scalable Models** – Use proven approaches like ARISE2Read while encouraging local adaptation.
4. **Collaborative Coalition** – Leverage partners like ECPA, HarperChristian, and Jesus Does for reach.
5. **Measurement & Accountability** – Establish a national framework for outcomes and transparency.
6. **National Convenings & Networks** – Annual summits and regional gatherings to share lessons and accelerate momentum.

The Potential Role of the White House Faith Office

The White House Faith Office can catalyze by:

- Supporting content creation and media campaigns to raise national awareness.
- Amplifying urgency through public messaging and convening power.

- Strengthening training programs and volunteer development to expand church engagement.
- Facilitating collaboration among publishers, pastors, educators, and philanthropists.
- Reducing barriers to school-faith partnerships.
- Promoting national frameworks for measuring outcomes and volunteer contributions.
- Encouraging governors and local officials to champion literacy initiatives in their states.

Next Steps

- **Washington Launch:** Convene a Faith & Literacy Roundtable with DOE, the White House Faith Office, Senator Lankford, and national faith leaders.
- **Pilot Cities:** Expand ARISE2Read and partner models in diverse contexts.
- **National Campaign Rollout:** Partner with Jesus Does/He Gets Us, ECPA, and HarperChristian to reach churches nationwide.
- **Ongoing Evaluation & Scaling:** Track results, refine models, and expand city by city.

Closing Call

The opportunity before us is historic. With the support of the White House Faith Office, the Department of Education, and congressional champions, we can unite faith communities, schools, and philanthropists around a shared mission: **ensuring every child reads by the end of the 3rd grade.**

This is more than an education initiative—it is a moral imperative, a justice issue, and an opportunity to demonstrate the positive, transformative power of faith in public life. With your leadership and partnership, we can ignite a nationwide movement that ensures America’s children have the gift of reading—and the hope of a brighter future.

Contact Information

Children’s Literacy Project

Dr. Steve Sammons
Chief Executive Officer
Children’s Literacy Project
[REDACTED] [\[REDACTED\]@childrensliteracyproject.org](mailto:[REDACTED]@childrensliteracyproject.org)

Mr. Jeff Martin
Founder and President Emeritus
Children’s Literacy Project
[REDACTED] [\[REDACTED\]@childrensliteracyproject.org](mailto:[REDACTED]@childrensliteracyproject.org)

ARISE2Read

Dr. La Tonya Mouzon
Executive Director
ARISE2Read
[REDACTED] [\[REDACTED\]@arise2read.org](mailto:[REDACTED]@arise2read.org)

Mrs. Donna Gaines
President/Founder
ARISE2Read
[REDACTED] [\[REDACTED\]@arise2read.org](mailto:[REDACTED]@arise2read.org)

June 14, 2025

M. Ashleigh Bondoc
Acting Designated Federal Official
Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue NW, Room 5706
Washington, DC 20530

Re: Written Comment on Notice of Meeting: Federal Advisory Committee—Religious Liberty Commission (Docket No. 2025-09557; 90 FR 22514, May 28, 2025)

Interfaith Alliance is a national, nonpartisan organization dedicated to protecting the integrity of both religion and democracy, and to ensuring that people of all faiths and none are treated equally under the law. We are committed to defending democracy and preventing authoritarian theocracy. Since 1994, we've mobilized mainstream religious leaders to respond to the weaponization of religion in America to harm vulnerable communities and distort our politics.

Out of this longstanding commitment to religious freedom, we write to the Religious Liberty Commission to request an urgent investigation into how the Trump administration is attacking faith communities that don't bend the knee in obedience to him. We can all agree that authoritarian regimes throughout history and around the world have not been good for religious freedom. This Commission's mandate is to identify threats to religious freedom. In fulfilling that charge, it must not ignore clear evidence that the gravest threats are in fact arising from the Administration's own policies and rhetoric.

In this comment, we highlight ten such incidents and policies, each of which warrants scrutiny. By examining this pattern of religious liberty violations and their impacts, the Commission can help ensure that the principle of religious freedom is upheld in fact, not just in name. We ask that you consider the following examples, which illustrate this dangerous pattern, and take appropriate action to safeguard the rights and dignity of all faith communities. Our nation's promise of religious freedom for all hangs in the balance.

1. Retaliation Against a Prominent Bishop's Sermon

President Trump has shown a willingness to punish religious leaders who challenge his agenda. When the Rt. Rev. Mariann Edgar Budde, Episcopal Bishop of Washington, delivered a sermon at the National Cathedral urging compassion for immigrants and LGBTQ people at the Inaugural Prayer Service, he used the immense force of his platform to single out Bishop Budde and attack her.¹ His allies in Congress went so far as to introduce a resolution condemning her. This extraordinary attack on a clergy member for preaching her conscience not only spurred a barrage of hate mail and threats toward her, but also sent a chilling warning to other religious leaders that speaking up for their values could invite government reprisal.

¹ <https://www.nytimes.com/2025/01/22/us/trump-bishop-plea.html>

2. False Accusations Levelled at U.S. Catholic Bishops and Lutheran Church

While working with President Trump, Elon Musk singled out Lutheran-affiliated social service agencies and falsely accused them of illegality.² Bishop Elizabeth Eaton, Presiding Bishop of the Evangelical Lutheran Church in America, issued a strong denunciation of the attacks and referenced a Roman Empire persecution of Christians in 258. Vice President J.D. Vance delivered one of the ugliest attacks on the Catholic Church by a political leader in modern American history.³ He suggested that Catholic bishops are out for financial gain rather than serving the vulnerable. In a rare move, Pope Francis appeared to rebuke Vance.⁴ Pope Francis's successor, Pope Leo XIV (then Cardinal Robert Prevost), also shared criticism publicly.⁵

3. Refugee Ban and a New Muslim Ban

The administration has nearly shut down refugee resettlement, forcing faith-based resettlement agencies to close offices and leaving thousands of people who are persecuted because of their faith in limbo around the world.⁶ The most egregious violation of religious freedom from the first Trump administration was him delivering on his campaign promise to ban Muslims from entering the country.⁷ President Trump reinstated and expanded this ban this year, renewing fear in Muslim communities at home and abroad.

4. Immigration Raids in Sacred Spaces

The administration has dismantled long-standing safeguards that protected the sanctity of houses of worship from immigration raids. It rescinded policies that had barred armed government agents from entering churches, synagogues, mosques, and other sacred spaces for enforcement actions. As a result, immigrants who once found sanctuary in their faith communities now fear that attending worship could lead to arrest and family separation. A coalition of Baptists, Quakers, and Sikhs sued the Trump administration on religious freedom grounds and has won a preliminary injunction.⁸ President Trump's allies in Congress just began an investigation targeting a range of faith-based NGOs for their ministries with immigrants.⁹

5. Dismantling Diversity and Inclusion Initiatives

President Trump signed executive orders to dismantle diversity, equity, and inclusion (DEI) programs across the federal government. Celebrating our country's religious pluralism and diversity is one way of advancing religious freedom. A Christian employees' affinity group in the State Department was even suspended in reaction to the anti-DEI mandate.¹⁰

² <https://religionnews.com/2025/02/03/musk-spotlights-federal-funds-for-lutheran-social-services-calls-them-illegal-payments/>

³ <https://www.cbsnews.com/news/jd-vance-interview-face-the-nation-catholic-bishops-ice-order/>

⁴ <https://www.ncronline.org/news/vance-surprised-pushback-pope-us-bishops-new-immigration-policies>

⁵ <https://www.cnn.com/2025/05/08/politics/pope-prevost-trump-vance-social-media>

⁶ <https://www.christianitytoday.com/2025/01/trump-refugee-resettlement-agencies-christian/>

⁷ <https://www.nbcnews.com/politics/2016-election/his-words-donald-trump-muslim-ban-deportations-n599901>

⁸ <https://www.cbsnews.com/news/trump-judge-immigration-arrests-places-of-worship-quakers-baptists-sikhs/>

⁹ <https://homeland.house.gov/2025/06/11/chairmen-green-brecheen-launch-probe-into-200-ngos-over-their-use-of-tax-payer-dollars-during-the-biden-harris-border-crisis/>

¹⁰ <https://www.theguardian.com/us-news/2025/feb/03/christian-employee-group-state-department-suspended>

6. Deploying the U.S. Military in Los Angeles

The administration's unwarranted mobilization of the National Guard and Marines in Los Angeles has needlessly raised tensions with peaceful protests that have included clergy and faith leaders.¹¹ The right to protest, the right to free speech, and the right to peacefully assemble go hand-in-hand with religious freedom in our country. The attempt to squash dissent and force obedience to the would-be king would severely undermine the prophetic nature of faith communities across the political and ideological spectrum. We are concerned, in particular, about immigration arrests that took place at Downey Memorial Christian Church on June 11, 2025.¹²

7. Taking Advantage of Antisemitism to Stifle Dissent

“In recent weeks, escalating federal actions have used the guise of fighting antisemitism to justify stripping students of due process rights when they face arrest and/or deportation, as well as to threaten billions in academic research and education funding,” a broad coalition of Jewish organizations said together in a statement on April 15, 2025.¹³ “These actions do not make Jews—or any community—safer. Rather, they only make us less safe. We reject any policies or actions that foment or take advantage of antisemitism and pit communities against one another; and we unequivocally condemn the exploitation of our community’s real concerns about antisemitism to undermine democratic norms and rights, including the rule of law, the right of due process, and/or the freedoms of speech, press, and peaceful protest.”

8. Manufacturing the Threat of Anti-Christian Bias Domestically

The administration created a "Task Force to Eradicate Anti-Christian Bias." This body was charged with scrutinizing federal departments and agencies for alleged bias against Christians, despite no credible evidence that American Christians face systemic persecution in the United States. Interfaith Alliance organized a letter from 26 prominent Christian leaders condemning the Task Force’s creation, noting that the administration itself appears eager to target Christians who do not align with its narrow ideology.¹⁴ The creation of this task force pulls focus away from real Christian persecution by authoritarian regimes around the world.

9. Undermining Faith-Based Humanitarian Work

The Administration’s foreign aid decisions have dealt blows to religious charities. President Trump ordered a sweeping suspension of U.S. foreign assistance and dismantled the U.S. Agency for International Development. This drastic freeze abruptly halted thousands of humanitarian projects worldwide and forced numerous aid workers – many from faith-based organizations like Catholic Relief Services and World Vision.¹⁵ By ending these lifelines of aid, the Administration impaired the ability of faith communities to carry out their mission, with dire consequences for communities in need.

¹¹ <https://religionnews.com/2025/06/11/in-la-faith-leaders-work-to-provide-comfort-and-moral-courage/>

¹² <https://ktla.com/news/local-news/ice-agents-make-arrest-at-los-angeles-area-church/>

¹³ <https://jewishpublicaffairs.org/press-release/jewishcommunalstatement/>

¹⁴ <https://www.axios.com/2025/05/01/christian-leaders-denounce-white-house-task-force>

¹⁵ <https://apnews.com/article/usaaid-christian-nonprofits-funding-freeze-bbb000ea0e232765db1280c093301a8a>

10. Dismantling a Peacebuilding Institution

The administration attempted to shut down the United States Institute of Peace, a congressionally chartered institution devoted to conflict resolution that has worked at the intersection of religion and peacebuilding. President Trump fired USIP's leadership, and a DOGE team forcibly seized the Institute's headquarters. The blatant overreach triggered lawsuits, and a federal judge has since ruled that the administration exceeded its authority; nevertheless, the attempt to abolish USIP sent a clear signal that even non-partisan peace and religious diversity efforts were not safe from political interference.¹⁶

Conclusion

We urge the Religious Liberty Commission to use its authority to confront and correct the harms outlined above. The integrity of America's commitment to religious freedom depends on holding leaders accountable for actions that violate this principle. Each of the above incidents is not only a breach of our nation's ideals, but has made people of faith feel less safe, less welcome, and less free to worship. We believe our country is strongest when no religion is scapegoated or elevated at the expense of others, and when the government safeguards the rights of every community.

At this critical juncture, silence would signal consent to the marginalization of religious groups who don't align with Trump's authoritarian regime. Instead, we must reaffirm that religious liberty is a universal right. We call on this Commission to investigate the administration's actions thoroughly, to stand against any abuse of religion for political power, and to champion policies that protect the equal rights and dignity of all faith communities. By doing so, you will help restore a much-needed moral and constitutional balance in our nation. Thank you for your consideration and for your commitment to upholding true religious liberty for all.

¹⁶ <https://www.cnn.com/2025/05/19/politics/us-institute-of-peace-judge-overturn>



The GRACE Act and Religious Liberty in Education

Background

- On August 29, 2025, Congressman Greg Steube (FL-17) introduced the GRACE Act (Guaranteeing Religious Accommodation in Childhood Education Act).
- The bill prohibits federal education funding to schools and agencies that deny students religious exemptions from vaccination requirements for classroom attendance, athletics, and other activities.
- This legislation addresses the urgent crisis in states such as New York, California, Connecticut, and Maine, where children are barred from schools because their families uphold religious convictions regarding vaccination.

Why This Matters for the September 8th and September 29th Hearings

The Religious Liberty Commission's upcoming hearings on religious liberty in education provide a critical platform to address:

- One of the most severe violations of religious liberty in education today: the exclusion of children from schools based on their families' faith.
- A direct infringement of the First Amendment's Free Exercise Clause, undermining the constitutional rights of families.
- A real-world crisis impacting countless families across multiple states, who face educational exclusion, legal penalties, or economic hardship.

Key Points on the GRACE Act

- ***Restores fairness:*** Ensures equitable treatment by requiring religious exemptions where medical exemptions are permitted.
- ***Protects families of faith:*** Guarantees that no child is denied education for honoring their beliefs.
- ***Broad precedent:*** Forty-six states already balance public health and religious liberty by allowing exemption, demonstrating a workable model.
- ***Constitutional grounding:*** Conditions federal education funds in a narrowly tailored manner, designed to withstand judicial scrutiny.

Why Urgent Action by the Religious Liberty Commission and the President Is Critical

- Families in affected states are suffering immediate harm -- denied education, facing legal penalties, or forced into economic hardship due to their faith.
- The GRACE Act offers a concrete, active legislative response to this crisis.
- Including the GRACE Act in the September 8th or September 29th hearings would amplify the voices of impacted families, underscore the Commission's commitment to religious liberty, and urge swift presidential action through an Executive Order to provide immediate relief.



White House Religious Liberty Commission

Written Testimony of Rev. Graham B. Glover Senior Chaplain Fellow Religious Freedom Institute

December 9, 2025

Mr. Chairman and members of the Commission:

Thank you for the opportunity to submit these written comments to the Commission as you continue your important work of ensuring religious liberty protections for all Americans, including the brave men and women serving in our nation's Armed Forces. Please note that the following statement is solely my own and does not necessarily represent the views of the US Department of War (DoW), the US Army, or the US Army Office of the Chief of Chaplains.

For the past 6 years I have served as a Chaplain Fellow at the Religious Freedom Institute (RFI) in Washington, DC, and the last 18 years as a Chaplain in the US Army – 12 on Active Duty and as a Reservist for the last 6, assigned to the Army Office of the Chief of Chaplains at the Pentagon since August of 2017. My responsibilities at RFI and my service to our nation have allowed me to observe how the US Chaplain Corps is the most important governmental organization in ensuring that American servicemembers have the freedom to exercise their faith and in understanding the role of religious freedom in contexts of engagement.

In every instance, the Chaplain Corps is, without question, the first line of defense in protecting the religious liberties of our nation's warriors. As this Commission advises the White House on what steps to take to ensure that American servicemembers' religious liberties are upheld, it must ensure that the Chaplain Corps remains strategically positioned to continue its critical role as the primary defender of this sacred American right.

Over the course of my career, I have also seen how chaplains assigned to the DoW are instrumental in advancing the cause of religious freedom abroad, assisting time and again in the advancement of our National Security Strategy. To that end, and as this Commission prepares its recommendations to the administration, it should never lose sight of the profound reality that if our own freedoms as Americans aren't guaranteed, the US military cannot continue to advance the cause of freedom abroad.

With this background in mind, I offer below 3 areas where I believe the US Chaplain Corps excels in protecting the religious liberties of our nation's servicemembers, along with recommendations on how I believe the administration can further enhance these important capabilities of the US Chaplain Corps.

- 1) ***Continuing and Strengthening Religious Freedom Training for Military Chaplains.*** For years, the DoW, as a result of Department of Defense Instructions, has required that Commanders, Chaplains, and Judge Advocate Generals (JAGs) receive annual training and instruction on the religious freedom protections in place in US law, as well as in DoW policies and doctrines. Although these protections are for all servicemembers, chaplains, in the discharge of their duties, are afforded an extra layer of protection that ensures they are never asked to violate the tenets of their faith or the dictates of their conscience.

While the DoW continues to lean forward in ensuring that these policies and doctrines are updated to reflect the ever changing legal and cultural landscape of our nation, **I cannot emphasize enough how important it is that the DoDI continues to require Commanders, Chaplains, and JAGs to receive annual, updated training and instruction on religious liberty protections.** This is especially important when laws are changed or court decisions are rendered that affect how Commanders and JAGs should understand and adjudicate servicemembers' freedom to exercise their faith.

For the past 10 years, RFI has been privileged to assist in this training across the Army, Navy, and Air Force Chaplains Corps', to include the Active, Reserve, and Guard components, witnessing first-hand how a sound training curriculum profoundly impacts how the military, and in particular chaplains, can ensure that the religious liberties of servicemembers are never denied. Since the purpose of the military is to defend the Constitution, the first liberty of which is the free exercise of religion, our nation's military leaders must never lose sight of the fact that the military exists to serve the cause of religious liberty.

RFI also recognizes that changing political dynamics will always pose challenges to this first freedom, and that while our military leaders at every level need to be annually educated on the laws, policies, and doctrines of religious freedom, **Congress can also lean forward in passing legislation that provides a greater sense of permanency than military doctrine and policy.** This commission can recommend that the White House propose and support such legislation.

- 2) ***Emphasizing the Critical Role of US Military Chaplains in Advising their Commanders.*** While a chaplain's primary responsibility will always be performing religious functions for servicemembers or providing them time, space, and resources to practice their religion if it is different from their chaplain, US military chaplains also serve as one of the principal advisors to their Commander. This is true for the First Lieutenant Chaplain serving a Battalion, as well as the Major General/Rear Admiral (upper half) Chief of Chaplains serving their respective Chief of Staff/Chief of Operations and Service Secretaries.

Ensuring that chaplains always have a "seat at the table" – from the tactical level to the most senior strategic level, is an absolute necessity if our nation's military leaders are to be properly advised on the religious dynamics affecting warrior readiness and the religious landscape of their respective theater. As this Commission knows, and as RFI professes in everything we do, our nation is a deeply religious land, where faith directs much of how we live our lives. Chaplains must regularly reiterate the importance of religion – not philosophy or non-religious spirituality – to every military Commander. This point was highlighted in the recent National Security Strategy, noting that: "Finally, we want restoration and reinvigoration of American spiritual and cultural health, without which long-term security is impossible." RFI believes that

the US military chaplain, serving as both an advisor and religious practitioner, will help bring about such restoration and reinvigoration to our military, and consequently, to our nation. **In its report to the White House, this commission should emphasize this important role and recommend that this and future administrations continue to recognize it in practice and written policy.**

- 3) ***Expand Interagency Involvement for U.S. Military Chaplains in Support of the National Security Strategy.*** Finally, RFI has been privileged for the last several years to be a part of the annual International Military Chiefs of Chaplains Conference (taking place in Athens, Greece in January 2026), as well as the annual International Religious Freedom Summit in Washington, DC, co-hosted by former US Ambassador at-large for Religious Freedom Sam Brownback. Through these conferences and others, we are afforded the awesome privilege of training US military chaplains across all services, at every grade, on the role of religion in US national security and the importance of religious freedom in advancing US foreign policy. At these conferences and in these trainings, RFI notes and subsequently observes how the US military champions the principle that faith is central to liberty.

Through our other educational and advocacy engagements across the globe, we also witness how the principle of faith transforms foreign militaries and governments to advance the cause of freedom in their own nation and region. **This is why RFI recommends that the administration explore new and innovative ways for US military chaplains to be more involved with other governmental agencies (e.g., the Department of State) to assist in the advancement of the administration's National Security Strategy** that is, as noted above, deeply rooted in the importance of a spiritually healthy and religiously vigorous society, including the US military.

Allow me to conclude my statement by thanking the church body where I serve as a pastor, the Lutheran Church-Missouri Synod (LCMS). The LCMS has always followed the Holy Scriptures lead in recognizing government as a good and God-ordained part of God's created order (Romans 13:1-7). We have followed Paul's apostolic mandate in offering prayers and other support for "our leaders and all in authority" so that, living in a peaceful and well-ordered society, we might share the Gospel freely. We have understood this ordering to be "pleasing to God, who wants all men to be saved and come to the knowledge of truth" (1 Timothy 2:2). As this Commission continues its critical work on behalf of our nation and its government, my prayers remain with you, that all of us may never hinder "the knowledge of truth."

I remain available to the Commission to provide any additional insight beyond my comments and recommendations, or to clarify anything noted above.

INTERNATIONAL CONFERENCE OF EVANGELICAL CHAPLAIN ENDORSERS TOP FIVE MILITARY RELIGIOUS LIBERTY ISSUES

Issue 1. Continuing retaliation against chaplains and others who are still serving in the Armed Forces and whose careers were destroyed in retaliation for filing religious accommodation requests (RAR s) for Sec. Austin's Covid-19 Mandate. That retaliation is in the form of, noncompetitive performance reports or failure of selection for not completing the mandatory training, e.g., Army Chaplain Captain Career Course (C4) required for promotion to major. This includes the 38 military chaplains who challenged Sec. Austin's authority to issue his Covid-19 Vaccine Mandate, its implementation's legality, and DOD's retaliation against them for filing RARs.in *Alvarado v. Austin* That retaliation included separation for twice failing promotion to Major for failure to complete the C-4 course due to Mandate travel restrictions and failures of promotion caused by Mandate inspired noncompetitive performance reports.

Secretary Austin's statements to Congress, the Courts, and the public that he had "rescinded" his COVID 19 Mandate are false. Congress's use of the word "rescind" means the action rescinded was void from its inception and the government had the duty to restore those injured by the Mandate to their status prior to its implementation. The Dept. of War (DOW) has taken no *effective* steps to restore RAR filers' careers, chaplains or non-chaplains.

Sec. Hegseth's 4/23/25 Memorandum to the Under Secretary of Defense for Personnel and Readiness (USD-P&R) directive him to address Mandate Injuries. The USD-P&R's May 7, 2025 Memo to the Secretaries and Boards of Correction of Military Records (BCMRs) shifts the restoration burden from the DOW to the victims, provides ineffective remedies because they use Austin's discriminatory language," solely related to the Mandate"; improperly emphasize removing records which prejudices the applicant; do not publicly change the presumption of regularity for Covid related retaliation claims; do not recognize the problem is **bad reports** based on prejudice which need to be changed to **good** reports; and therefore the efforts ignore the statutory tools that allows the Service Secretaries to actively change bad reports to good reports and recognize the RAR filers' courage, commitment, personal integrity and loyalty to their faith and the Rule of Law.

Status. President Trump and Sec. Hegseth have labeled the Mandate illegal, destructive and unfair. They have publicly committed to defending religious liberty and repairing the Mandate's damage to the military and individuals. However, there is a "Deep State which seeks to undermine Sec. Hegseth's efforts to correct the serious damage President Biden and his woke military leadership team inflicted on the Armed Services.

Solution. The attached ICECE Restoration action plan provides a remedy to the continuing prejudice based on the former Secretary of Defense's hostility to religious people of conscience, commitment, and courage.

Issue 2. The Army Marriage Enrichment Retreat Program (currently called "Building Strong and Resilient Teams" (BSRT)) policy is to remove Bible believing Evangelical chaplains from the event they organized and planned if a same-sex couple registers for such an event. This is

denominational prejudice toward Bible believing/Evangelical chaplains based on “theological differences”, a reason the Supreme Court has found is unconstitutional. The practice also penalizes chaplains for exercising their faith.

Removing a chaplain from his BSRT undermines the unit chaplain with his commander who may not understand the theological differences, prevents continued marriage counseling for couples the chaplain may already have a relationship with, and causes the chaplain to lose status and respect from his unit’s soldiers because he is not participating in an event that he planned. The program also prejudices those who share the chaplain’s biblical perspectives and who have committed to the activity based on their relationship with the unit chaplain..

Some ICECE member chaplains have suffered in their performance reports because the unit chaplain is not with his unit’s BSRT. Many unit commanders don’t understand chaplains’ theological differences and the necessity to obey endorser related imposed religious doctrine. *E.g.*, some faith groups do not allow their chaplains to provide marriage counseling with same-sex couples because their faith does not recognize same-sex marriage.

ICECE’s former Chairman asked the Army Chief of Chaplains on 09/20/24 to change the “remove the Evangelical chaplain” policy citing the prejudice to chaplains, the BSRT programs and their participants and recommended a returned to the well-established “perform or provide” model for the Chaplain Corps, *i.e.*, perform the service or provide an alternative when the chaplain’s theology prohibits performing the service. The Chief rejected the request.

ICECE’s new Chairman wrote the Army Chief on 06/19/25 to again ask the Army end its “remove the Biblical chaplain policy” citing significant changes since ICECE’s 2024 letter. This included President Trump’s Executive Order addressing anti-Christian bias” and the Supreme Court’s June 5, 2025 unanimous decision in *Catholic Charities v. Minnesota*, S.Ct. No. 24–154. The Court found Minnesota violated the Religious Neutrality Mandate the Religion Clauses impose on the government by expressing preference for some religious denominations over others “based on **theological choices**.”

Solution. Require the Army Chaplain Corps to stop programs preferring some theological choices while prejudicing others and follow its well-established principle of perform [a religious service or duty] or provide [someone who could perform the requested service].

Issue 3. The recent Army Spiritual Fitness Guide appears to officially endorse Secular Humanism. The Guide has no reference to a Divine connection or authority; it emphasis on “Me” undermines competing civic, military, religious, and moral authority.

Solution. The mission of the chaplain is to connect the soldier with God and bring God to the soldier. American history is replete with evidence that our motto, “In God we trust” is based on historical facts showing “God’s intervention in the affairs of men”, a fact that Benjamin Franklin noted to the Constitutional Convention

Issue 4. Current DOW policies exclude chaplains from key role in addressing important reoccurring moral issues that have serious operational effects. This includes suicide, PTSD, sexual assault and harassment, and substance abuse. Secular solutions do not solve moral issues.

Solution. Recognize and address moral issues that underlie and define what would appear to be societal behavioral problems.

Issue 5. The Department of War's failure to comply with the FY 2018 NDAA "directive language" to develop a comprehensive education program and curriculum on religious liberty including § 533 of the 2013 NDAA provides protections for conscience all service personal and specific provision for protection of chaplains' decisions based on their conscience as formed by their faith. This training needs to begin in basic training, both enlisted and officer, and be reinforced through subsequent education/training. Congress wanted the DOW with its many joint bases and installations to have a common understanding of religious liberty, especially for Chaplains, JAGs and commanders.

This issue parallels and complements the need for a statutory definition of a chaplain that includes chaplains' duties, roles, missions, and protections. Hopefully, this would put an end to the use of equal opportunity, IG, and other inspections generated by complaints that often display a lack of understanding that the chaplain is not a government religious official but a religious group's representatives who must operate within that group's theological constraints.

An ICECE endorser is currently addressing this lack of knowledge problem. A sailor grieving for his deceased shipmate asked the chaplain to pray for the dead shipmate. Some denominations pray for the dead with the hope that prayer can change the deceased's eternal resting place. ICECE chaplains believe that is contrary to Scripture, *e.g.*, "Just as people are destined to die once, and after that to face judgment ...", Heb. 9.27. The chaplain responded he could not pray for the dead but would and did pray for the deceased sailor's family, friends, shipmates, etc. The grieving sailor apparently complained to his leadership believing the chaplain had a duty to pray for dead people. That chaplain had to explain to the investigator why doing such a public act would violate his personal and endorsing agency's beliefs. A grieving sailor may believe he can pray a shipmate out of hell but he's Commander and unit leaders should have an understanding a chaplain is free to follow his conscience and his Endorser's tenants of belief. Section 533 protects the chaplain; why did not the CO and others in leadership know that?

Arthur A. Schulcz, Sr.
ICECE Ex. Dir & Gen. Counsel

@chaplainscounsel.com

Attachment: AS

RESTORING CHAPLAINS' CAREERS DESTROYED FOR FILING COVID-19 VACCINE MANDATE RELIGIOUS ACCOMMODATION REQUESTS

I. INTRODUCTION

Former Sec. Austin's report to Congress and the public that he had rescinded his Covid vaccine Mandate is a false official statement. To rescind an action means the action rescinded was void from the beginning, and the parties have been restored to their "status quo" before the rescinded action was taken. It is undisputed those given uncompetitive fitness reports for filing RARs have not been restored to their status quo, *i.e.*, a clean, honest record.

A. The Biden DOD's response to the February 28, 2024, House Armed Services Committee' questions on the scope of the Mandate's rescission show DOD did not acknowledge the Mandate was void from its beginning. DOD has taken no effective steps to restore careers destroyed for following their conscience by filing religious accommodation requests ("RARs").

B. Section 533(b) of the 2013 NDAA established protections for chaplains from "negative personnel actions" resulting from their exercise of conscience based on their faith. Chaplain RAR filers received uncompetitive performance reports for filing RARs that still speak loudly ever time their file is reviewed, continuing Sec. Austin's unlawful retaliation.

C. The President and Sec. Hegseth have correctly labeled the Mandate as illegal. It violated the "major questions doctrine", *see Nat'l Fed'n of Indep. Bus. v. DOL, OSHA*, 142 S. Ct. 661, 665 (2022) ("We expect Congress to speak clearly when authorizing an agency to exercise powers of vast economic and political significance."). Sec. Austin lied to the Nation when he claimed the "vaccine" would protect the F for yes dear of course one another scope will will question is what Orce chocolate ignoring evidence it did not protect from Covid.

II. SALVAGING CAREERS BY CHANGING BAD REPORTS TO GOOD

A. The *Alvarado* chaplains and others who filed RARs, received uncompetitive and/or career killing fitness reports for following their conscience. Under 10 U.S.C. §§ 1552 and 1558, only a Board of Corrections for Military Records ("BCMR") can remove unfavorable reports.

B. Removing reports leaves prejudicial holes in a person's file. 10 U.S.C. §§ 628(b) (new promotion board) and 1552 allow DOD and the Secretaries' to change the nature and consequence of uncompetitive reports from "bad" to "good." See below.

C. 10 U.S.C. §1552(b) grants the "Secretary of the military department" authority to "file a request for correction of a military record [] if the request is made on behalf of a group of members or former members of the armed forces who were similarly harmed by the same error or injustice."

D. Some Chaplains have failed promotion boards that meet 10 U.S.C. §1552(b)'s criteria and that of 10 U.S.C. § 628 for new promotion boards.

E. 10 U.S. § 628(b), “Persons Considered By Promotion Boards in Unfair Manner”, allows the respective Secretaries to convene special promotion boards if the Secretary determines “there was material unfairness with respect to that person [previously considered but not selected for promotion].” The record shows § 628(b)(1)’s criteria for material unfairness is met here.

F. The respective Secretaries should also issue letters for every RAR filer’s official record stating that (1) performance reports on RAR filers made during the time of Covid (a) must be presumed to be “not regular”, unlawfully biased by erroneous command influence, prejudicial to RAR filers, and (b) the government has the burden to show otherwise; (2), filing a RAR under the COVID-19 conditions is evidence of courage, great personal integrity, and commitment to faith and the rule of law in the face of official unlawful hostility, opposition and coercion; (3) the Mandate was illegal and, unfortunately, unconstitutionally implemented by zealous leaders, and, (d) the duty of selection board members is to restore to the RAR chaplains what has illegally and prejudicially stolen from them by official retaliation.

III. PRESIDENT TRUMP’S AND SEC. HEGSETH’S EFFORTS TO ADDRESS THE INJUSTICE AND ILLEGALITY OF THE MANDATE MISS THE TARGET

A. The President’s Executive Order (“EO”) addressing the Mandate’s damage and injustice addressed **only** military personnel discharged or separated for refusing the Mandate. The EO does not address the retaliation injuries to those who filed RARs and continued to serve.

B. Secretary Hegbeth’s 4/23/2025 Order to the Under Secretary of Defense for Personnel and Readiness (“USD-P&R”) to address military personnel who had filed RARs, suffered injury to their careers, and are still serving, and the subsequent USD-P&R May 7, 2025 Order to the Service Secretaries and their BCMRs miss the remedial target for two reasons. First, DOD’s directives continue to use the deceptive and prejudicial Biden term “**solely**” as in “solely due to the Mandate”, ignoring the resulting damage caused by filing the RAR which lead to separation for failures of promotion. For example, Army Reserve Chaplain (Capt) David Calger’s RAR filing prevented his traveling to attend the two week “in resident” Reserve Chaplain Captain Career Course (“C4”) at Fort Jackson, SC, necessary for promotion to Major. Having failed promotion on his first review, after Congress ordered the mandate “rescinded”, Calger asked his headquarters if he could attend the last C4 course before his next Major board met. His Reserve chain of command denied his request stating Army Headquarters had issued no instructions. He was allowed to finish C4 **after** the promotion board met and denied his promotion. That led to his separation under 10 U.S.C. § 632 for two failures of promotion to the rank of Major. On contacting his chain of command about the President’s EO addressing return to the Army Reserve, he was told he was not eligible since he was separated for “twice failing promotion”, not **solely** because of the mandate. This is corrupt “deep state” thinking.

C. The USD-P&R’s specific instructions in his last sentence in his last ● paragraph (page 2) guarantee the Mandate initiated retaliation and its career effects will not be remedied. “Adverse actions in a Service member’s records **solely associated with** the refusal to take a COVID-19 vaccination or seeking exemption from that COVID-19 vaccine mandate **should be**

removed.” (Emphasis added). Use of the word “solely” suggests either the Under Secretary does not understand how the Services’ evaluation systems work and/or; that the wording was chosen or influenced by deep state staff to continue retaliation against those who filed RARs, sabotaging the President’s desire to restore trust in military leadership by fixing careers, not destroy them.

The word “solely” is unduly restrictive and belies the actual workings of the military personnel systems. The Chaplains’ career killing reports do not mention filing a RAR or refusing the Mandate; most senior rater’s understand that such a connection would automatically show the report was biased and retaliatory. Instead, raters ignore important accomplishments and avoid using necessary “buzz words” or terms indicating the quality of the chaplain and his/her work, *e.g.*, “Most qualified” (Army) or “must promote immediately”.

D. The reality in all military promotion systems is the removal of more than one report sends a message to promotion board members that the applicant has had a performance problem; it leaves a big hole and therefore a big question. The competitive nature of promotions often involves comparing applicants’ records and histories or, in the case of special boards, the files of those who were selected and not selected as samples of the original actual promotion board.

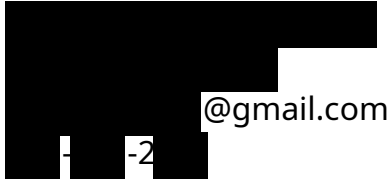
E. Current BCMR board procedures, absent further DOD instruction, place the burden on the applicant to show that relief is warranted to what is often a skeptical audience. This essentially requires applicants relive their history of prejudice to explain how their careers were destroyed. Boards considering chaplains (and others) who filed RARs for promotions must be instructed that the overriding presumption for those who filed RARs is that the rating systems were prejudiced against RAR filers, a serious injustice.

SUMMARY

The only way to fix RAR Filers’ careers is for the Secretaries to use their power and authority to make the Filers’ bad reports good. That starts with the Service Secretaries stating publicly that (i) there was an unified, unlawful effort to penalize those who filed RARs; (ii) that section 533's protections for chaplains were deliberately ignored; (iii) that those who filed RARs should be recognized and rewarded for their personal courage, integrity, and duty to their faith and the rule of law in the face of the prior Administration’s and its Military Services’ misplaced zeal and/or hostility in pursuit of an illegal Mandate through illegal means and unconstitutional religious hostility; (iv) that promotion board members should presume prejudice in performance evaluations for those who filed RARs; and (v) it is the Board’s duty to correct the severe injustice and criminal conduct that resulted in retaliation instead of praise for chaplains who follow their conscience in the face of overwhelming prejudice and a corrupt command influence

POC: Arthur A. Schulcz, Sr.
ICECE Ex. Dir. & Gen Cnsl


Kenneth Bartlett Miller



@gmail.com

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August 25, 2025

Inspector General
Office of the Inspector General of the Intelligence Community
ICIGHotline@odni.gov
CC: Director of National Intelligence
Office of the Director of National Intelligence
ATTN: Office of Civil Liberties, Privacy and Transparency
Washington, DC 20511

Subject: Complaint Regarding Religious Discrimination in Polygraph Process Leading to Wrongful Security Clearance Cancellation

Dear Inspector General,

I am writing to lodge a formal complaint regarding the wrongful cancellation of my security clearance, which I believe stemmed from religious discrimination during a polygraph examination conducted by the NRO. As a devout Catholic nearing 65 years of age, with 23 years of dedicated service as a defense contractor in the Intelligence Community and 45 years of computing experience, I was pressured to cease praying during the polygraph process, a directive that violated my sincerely held religious beliefs and federal protections for religious freedom. While I have no intention of returning to employment, I am compelled to file this complaint to ensure that other faithful Christians are not subjected to similar discrimination. I am copying the Director of National Intelligence to highlight the significance of this issue within the Intelligence Community.

Description of the Incident

During a recent polygraph session on July 23, 2025, examiner identified as "Kathy" questioned why I was thinking about Jesus, to which I responded that I was praying, as is my lifelong practice as a Catholic, guided by 1 Thessalonians 5:17, which instructs believers to "pray without ceasing." At a subsequent examination on August 12, 2025, an examiner identified as "Harry," and his "bosses boss Ashlyn," informed me that praying, even silently between questions, was prohibited. I offered to limit my prayers

to a simple phrase, "Jesus, I Trust in You," but this was deemed unacceptable. I was told I must either cease praying entirely or decline to participate in the polygraph process.

Under duress, I signed a "Declination Letter," which I paraphrase my explanation as follows:

I fully wish to participate in this polygraph process; however, we are at an impasse because I have been directed not to pray during the sessions. I am a faithful Catholic who takes 1 Thessalonians 5:17 to heart, praying as often as I think of it. While I acknowledge the authority of the U.S. Government and this polygraph office, this authority does not extend beyond my duty to God.

This led to the cancellation of my security clearance on August 22, 2025, an action I believe was unjust and discriminatory.

Two incidents during the process further underscore what I perceive as intolerance toward my faith:

1. Examiner "Harry" claimed he had polygraphed "thousands of faithful Christians" without this issue arising. When I asked if he had ever explicitly directed those individuals not to pray, he admitted he had not. This suggests the prohibition on prayer was uniquely applied in my case, raising concerns about discriminatory practices.
2. After signing the declination letter, "Harry" referenced Matthew 5:28, implying that my refusal to comply was akin to a moral failing, and cited Matthew 18:9, suggesting I "still had two eyes." I explained that the Catholic Church interprets this passage allegorically, as noted in the Catechism. This exchange felt like an inappropriate judgment of my faith, highlighting a lack of respect for religious beliefs.

Legal and Executive Order Violations

The polygraph office's actions violate Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.), which prohibits discrimination based on religion and requires reasonable accommodation of sincerely held religious beliefs unless it causes undue hardship. Prohibiting silent prayer, a non-disruptive practice integral to my faith, does not meet the threshold of undue hardship, especially given my willingness to compromise. The

Supreme Court's decision in *Groff v. DeJoy*, 600 U.S. 447 (2023), clarified that undue hardship requires a substantial burden, which was not demonstrated here.

Furthermore, the prohibition on prayer constitutes a procedural violation reviewable under constitutional protections. In *National Federation of Federal Employees v. Greenberg*, 983 F.2d 286 (D.C. Cir. 1993), the D.C. Circuit held that constitutional challenges to the methods used in security clearance decisions are justiciable, particularly for violations of religious freedom or due process. While *Department of Navy v. Egan*, 484 U.S. 518 (1988), limits judicial review of the merits of clearance decisions, it permits challenges to discriminatory or unconstitutional methods, such as the polygraph office's directive against prayer.

The actions also contravene executive mandates. The Clinton Guidelines on Religious Exercise and Religious Expression in the Federal Workplace, 62 Fed. Reg. 43657 (August 14, 1997), permit federal employees and contractors to engage in private religious expression, such as silent prayer, to the same extent as non-religious expression, provided it does not interfere with workplace efficiency. My silent prayers posed no such interference. Executive Order 13798, 82 Fed. Reg. 21675 (May 4, 2017), promotes religious liberty and prohibits discriminatory enforcement against individuals based on their beliefs. Similarly, Executive Order 13985, 86 Fed. Reg. 7009 (January 20, 2021), reinforces protections against discrimination, including on the basis of religion, in federal programs. Finally, Executive Order 12968, 60 Fed. Reg. 40245 (August 2, 1995), requires fair and non-discriminatory processes in security clearance adjudications, which were not upheld in my case due to the imposition of a discriminatory condition prohibiting prayer.

Moreover, recent actions by the Trump administration further underscore the unlawfulness of the polygraph office's directive. On May 1, 2025, President Trump signed an Executive Order establishing the Religious Liberty Commission to safeguard religious freedom, explicitly protecting practices like prayer in federal settings (White House Fact Sheet, May 1, 2025). Additionally, the Office of Personnel Management's memorandum of July 28, 2025, titled "Protecting Religious Expression in the Federal Workplace," clarifies that federal employees and contractors may engage in silent prayer and other religious expressions unless it imposes an undue hardship, citing Title VII, *Groff v. DeJoy*, and *Kennedy v. Bremerton School District*, 597 U.S. 507 (2022). The polygraph office's blanket prohibition on prayer contradicts these recent mandates and existing protections.

Personal Perspective and Call to Action

With 23 years of service in the Intelligence Community and 45 years of computing experience, I have dedicated much of my life to supporting our nation's security. At nearly 65, I am not seeking to resume employment. However, I am deeply troubled that the polygraph process, which I navigated successfully for decades, now penalizes faithful Christians for practicing their religion. The cancellation of my clearance due to my commitment to prayer—a practice that has strengthened my integrity and service—reflects a troubling intolerance that must not be allowed to persist.

My primary concern is ensuring that other faithful Christians, particularly younger professionals who rely on security clearances for their livelihoods, are not forced to choose between their faith and their careers. I urge your office to take decisive action to prevent such discrimination in the future.

Requested Relief

I respectfully request the following:

1. A thorough investigation by the Inspector General into the polygraph office's actions, including the conduct of examiners "Kathy," "Harry," and "Ashlyn."
2. Policy changes to ensure polygraph procedures respect religious freedoms, in compliance with Title VII and applicable executive orders.
3. Mandatory training for polygraph examiners on accommodating religious practices to prevent future violations.
4. A formal apology for the discriminatory treatment I experienced, to affirm the Intelligence Community's commitment to religious liberty.

Conclusion

After a long career serving my country, I am disheartened that my final interaction with the Intelligence Community involved discrimination against my Catholic faith. I trust that your office, in coordination with the Director of National Intelligence, will address this matter to protect others from similar experiences. Please contact me at [REDACTED] - [REDACTED] - [REDACTED] or [REDACTED]@gmail.com for additional information or to discuss this complaint. I am prepared to provide further details or participate in any investigative process.

Thank you for your attention to this critical issue. I look forward to your response.

Sincerely,

Kenneth Bartlett Miller
Former Defense Contractor, Zeta Associates



Independent Sector



December 10, 2025

Religious Liberty Commission
Debate Chamber, Pavilion Building
3819 Maple Ave
Dallas, TX 75219

Via Email: RLC@usdoj.gov

RE: Hearing on Religious Liberty in the Military

Dear Religious Liberty Commissioners:

Thank you for the opportunity to provide testimony during the fourth hearing to discuss religious liberty issues in the military as well as “state and local religious liberty issues.” On behalf of the Council on Foundations, Independent Sector, National Council of Nonprofits, and United Philanthropy Forum, we submit this testimony to underscore the importance of maintaining and preserving the Johnson Amendment, the part of Section 501(c)(3) of the Internal Revenue Code, which, for more than 70 years, has safeguarded the integrity of America’s charitable nonprofits, houses of worship, and foundations. The federal law keeps nonprofits focused on mission, not partisan politics, by prohibiting charitable organizations from endorsing or opposing political candidates. Federal law preserves public trust and protects these vital institutions from partisan pressure and manipulation.

Our organizations collectively represent tens of thousands of charitable and philanthropic organizations that employ millions of individuals in every state, engage tens of millions of additional individuals who serve as board members and other volunteers, and touch the lives of virtually every American every day. We stand united with the majority of charitable, religious, and philanthropic organizations across America in opposition to any effort to repeal or weaken the Johnson Amendment.

The Johnson Amendment protects public trust in civil society.

Charitable nonprofits exist to serve the public good, not partisan interests. Efforts to make nonprofits partisan or politicized threaten their ability to provide essential services and undermine public trust in these vital institutions. The Johnson Amendment protects nonprofits' and foundations' ability to serve while keeping the focus on fairness, trust, and preserving spaces that unite – not divide – our communities. Nonprofits need broad public support and bipartisan cooperation to fulfill their missions. If the Johnson Amendment is weakened, charitable nonprofits will be drawn into partisan battles. This will divide who they serve; undermine what makes them effective; weaken our communities; threaten the independence of charitable nonprofits; undermine public trust; give tax breaks to donors for campaign contributions; and distract nonprofits, houses of worship, and philanthropy from their missions.

By contrast, when nonprofits stay out of partisan politics, they can serve the whole community without fear of political favoritism; maintain credibility with donors, congregants, and the broader public; and focus on their mission, not political endorsements.

Protection against partisanship is not about silencing voices. Faith leaders and charitable nonprofits *can* and *should* speak out on moral, social, and public policy issues that impact their missions. They serve as vital voices in our society on a wide range of issues, including justice, freedom, community values, civic engagement, and more. Federal law draws the line at endorsing or opposing candidates for office – a line that protects the independence of the pulpit, nonprofits, and the ballot box. The independence of these community institutions depends on keeping partisanship out of them.

The majority of nonprofits and foundations oppose partisan politics in nonprofits.

Local nonprofits are lifelines for communities across the country. According to polling from Independent Sector, eight in 10 voters (81%) [trust nonprofits](#) to serve their community in a nonpartisan way — including at least 78% of Republicans, Democrats, and Independents.

During previous legislative attempts to weaken the Johnson Amendment, the majority of charitable nonprofit organizations also supported keeping partisan politics out of their organizations, as reflected in a [community letter](#) signed by more than 5,800 organizations in all 50 states, in the [Faith Voices letter](#) signed by more than 4,300 faith leaders, in a separate letter signed by more than [100 denominations and major religious organizations](#), and in letters from the [law enforcement community](#).

Our organizations, representing the 501(c)(3) community of charitable, religious, and philanthropic organizations, strongly oppose any effort to repeal or weaken the Johnson Amendment.

Sincerely,

Kathleen P. Enright
President and CEO
Council on Foundations

Dr. Akilah Watkins
President and CEO
Independent Sector

Diane Yentel
President and CEO
National Council of Nonprofits

Deborah Aubert Thomas
President and CEO
United Philanthropy Forum

[REDACTED]

August 17, 2025

President Donald J. Trump
1600 Pennsylvania Avenue NW
Washington, DC 2500

Dear Mr. President,



I am grateful for all the sacrifices you and your family have made in defense of our great nation, its people, and its service members. For fifteen years, I honorably served in the Army—six of those as a Sergeant in 5/19 Special Forces Group (Airborne), deploying in 2016-17. In 2020-21, I proudly commissioned as an Arizona National Guard chaplain. During the mandate, I respectfully requested to pay for and take a COVID-19 vaccine with no ties to unethically sourced aborted fetal stem cells—available on the EU's list. Religious discrimination in the workplace occurred when the *Army and National Guard* directed my resignation. Currently, Army HRC/Board of Correction of Military Records (BCMR) refuses to reinstate me.

First, I appeal to the President's wisdom and discernment to direct the hearing of our case alleging religious discrimination in the workplace by *federal and state* military and civilian state military contractors. Decisions by the Court of Federal Claims (CoFC) are non-binding for states. Further, the CoFC refuses to hear non-monetary issues of justice, e.g., religious discrimination in the workplace by state military & civilians. We have been shamed, slandered, humiliated, placed under investigation on false pretenses, mocked and ridiculed; a moral injury. This is bearable in the enemy's hands, but a grave injustice in the hands intending to protect you.

Second, given the President's EO, Secretaries of the military have the power and bear the burden to correct discriminatory administrative actions against plaintiffs. Per 10 U.S.C. §§ 628(b), please request that Congress enforce 10 U.S.C. §1552(b), granting the "Secretary of the military department" authority to "file a request for correction of a military record." The remand/BCMR process in Botello, Botello et al v. USA, Alvarado v. Austin, inflicts moral injuries on plaintiffs, considering the BCMR's prejudice is "guilty until proven innocent." As is evidenced by HRC's refusal to reinstate me. I requested an HRC Commander's inquiry.

Third, reinstate servicemembers without requiring a Religious Accommodation Request (RAR) for current Army vaccinations. A RAR is not necessary because my civilian medical provider already provides military vaccines consistent with my religious convictions. The National Guard routinely allows citizen soldiers to receive dental and medical care from civilian medical providers. This already established practice means I can easily receive vaccinations consistent with my faith and receive equal treatment regarding deployments. Mandating RARs is a tactic to target, punish, and eliminate conservatives from the military by stifling their careers.

President Trump, thank you for your time and consideration.

Make America Great Again,
Jeremiah Botello
[REDACTED]



200 Manor Avenue Langhorne, PA 19047-2990 • 215. 752.5800 • cairn.edu

The President's Religious Liberty Commission

September 3, 2025

Dear Members of the Commission,

My name is Dr. Adam Porcella, Senior Vice President and Provost at Cairn University in Langhorne, Pennsylvania. Along with Dr. Todd Williams, President of Cairn University and Chairman of the Board of Governors of The John Jay Institute, I respectfully request the opportunity for us to address the Commission at its upcoming meeting at the Museum of the Bible in Washington, D.C., on September 29, specifically regarding issues of regulation and accreditation in relation to religious liberty.

Allow me to briefly introduce Cairn University. Founded in 1913, Cairn is a private, evangelical Christian university committed to integrating faith and learning. Our community is grounded in sincerely held religious convictions based on the authority of the Bible, which we affirm as the inspired, authoritative Word of God. At Cairn, we firmly believe that the integrity of biblical higher education depends on a consistent application of historically understood biblical truths to all areas of life, thought, and practice.

Like many Christian colleges and universities committed to teaching from a distinctively biblical perspective, Cairn has faced significant challenges in recent years from accrediting bodies and state agencies. These include the Middle States Commission on Higher Education (MSCHE), the Council on Social Work Education (CSWE), the Council for Accreditation of Counseling and Related Educational Programs (CACREP), and the Pennsylvania Department of Education (PDE).

Several years ago, after more than fifty years of operating a School of Social Work, our Board of Trustees made the difficult decision to close the program. While multiple factors contributed to this decision, an important consideration was the trajectory of CSWE requirements, standards, and cultural commitments that increasingly conflicted with our mission and biblical convictions. [Here is an article](#) Dr. Williams wrote not long ago on Cairn's decision to close our School of Social Work due to accreditation overreach from CSWE.

Cairn also recently decided to withdraw from pursuing CACREP accreditation for our counseling program. CACREP required changes that would have fundamentally altered the program's quality and distinctly biblical focus. These changes would have made it difficult, if not impossible, for us to continue educating students to become biblically minded, well-educated, and professionally competent men and women of character who serve Christ as professional counselors.

Our School of Education faced additional challenges when the Pennsylvania Department of Education adopted the Culturally Relevant and Sustaining Education (CR-SE) Framework in 2022. This framework was designed to shape both educator preparation programs and ongoing professional development throughout the state. Among the competencies, the framework required educators to "Design learning experiences and spaces for learners to identify and question economic, political, and social power structures in the school, community, nation, and world" (CRSES.E). While training students to think

critically about structures of power has value, this standard appeared to suggest that authority structures are inherently flawed and untrustworthy. Such a perspective is difficult to reconcile with Scripture, which teaches that authority is instituted by God (Romans 13:1-7; 1 Peter 2:13) and is part of God's design for creation (Matthew 28:18; Philippians 2:10-11).

Even more concerning, several of the CR-SE standards used credal language. For instance, CRSE9.A required educators to "Believe and acknowledge that microaggressions are real." Similarly, CRSE6.A and CRSE7.E adopted the same credal formulation. Such language raised significant constitutional questions because it is nearly impossible to assess the internalization of belief, and because compelling an educator to "believe" appears to require an affirmation of ideological conviction. The establishment of this type of credal language in state standards risked infringing on First Amendment protections.

Unsurprisingly, these standards became the subject of legal scrutiny. In April 2023, several school districts, educators, and parents filed suit against the Pennsylvania Department of Education, arguing that the CR-SE framework compelled ideological beliefs and had been adopted without proper legal procedures. That case concluded in October 2024 with a settlement that rescinded CR-SE and replaced it with a new framework known as the Common Ground Framework, which removed some of the most prescriptive and credal elements.

Dr. Williams and I would be honored to share with the Commission Cairn University's experiences in navigating these challenges. We believe they raise significant questions about the boundaries of accreditation, the overreach of accrediting bodies, the protections of religious liberty, and the rights of faith-based institutions to remain faithful to their convictions while continuing to provide excellent education. It would be our privilege to provide any perspective and experiences that might aid in the advisement of our nation's leaders and policy makers.

We are grateful for the Commission's important work and respectfully request the opportunity to present at your September 29 meeting. Please let us know how we might serve you and the Commission's mission.

Sincerely,



Dr. Adam Porcella

Senior Vice President and Provost
Cairn University



Dr. Todd J. Williams

President, Cairn University
Chairman of the Board of Governors, The John Jay Institute



August 8th, 2019

Dear Honorable Judge Hartman,

I am distraught at the state of affairs in the aftermath of the rushed change of New York State's religious exemption for immunizations that has impacted thousands upon thousands of students across the state this summer. New York has become a place that is hostile to religious individuals and their freedoms. Instead of the land of the free, home of the brave; our State is the land of the oppressed, home of the lobbyists. As the Superintendent of a private school, I have seen the devastating impact of this ill-advised, rushed, and half-baked legislation to our community. By removing the ability for a parent to decide if an injection is best for their child's individual needs and using the basic fundamental right of an education to put pressure on our families, the lobbyists are using manipulative games to push an un-american agenda.

The individual stories of our families whose lives are thrown into disarray are heartbreaking, even though not a single one of them has ever posed a health risk to our school population. The children who have attended our school their entire lives will no longer be able to receive any services from their religious community which they've called home. All over the state, the horrible individual situations are multiplied by the tens of thousands: students on the cusp of finishing their academic career now graduating from nowhere; jobs and income lost as one parent must stay home to educate their children the best they can despite little or no training; and families with young children leaving the state.

The first vote of this bill on June 13th in committee denied access to the floor. Moments later, the vote is changed because the "powers that be" didn't like the outcome? This is truly embarrassing for the State of New York. I hope you can bring reason to a failed roll out of new legislation, and grant a stay to this grossly implemented change.

Also, this is the second time this year an assault has been aimed at religious schools. The first was the planned new roll-out of substantial equivalency which attempted to give local public school boards the authority to close down their private competition. After a great outcry from private and public administrators, the new rules that would handcuff private schools in the state of New York were repealed. This last minute removal of religious exemptions for immunizations is another dirty political trick of the same design, of the same material, and it's wrong.

Please grant a stay for the thousands of kids negatively impacted by this poorly conceived bill. Give parents time to adequately plan for their child's educational and medical needs. Give students time to say goodbye to their supportive communities instead of being ripped away from them in the middle of the night. Please let wisdom prevail, and let America be the land of the free, the home of the brave.

Sincerely,

Rev. Joel Maus
Superintendent

A handwritten signature in dark ink, appearing to read "Joel Maus", written over a light blue horizontal line.



St. John Lutheran School

August 29, 2019

To Whom it May Concern:

It is with deep sorrow that I am writing to you regarding the recent decision by New York State to remove the religious exemption for vaccinations. As principal of St. John Lutheran, we are faced with the ramifications of this new law. This bill clearly did not consider the effects students, parents, and educators would feel in this.

I know these families make these decisions based on their deeply held religious beliefs. They were given virtually no time to make other arrangements. The state is forcing them to vaccinate, home educate, or move out of the state. Children are deeply hurting because of the negligence of our leaders. Schools throughout the state are dealing with so many unknowns. There has been virtually no time to prepare. Private schools, like ours, rely very little on state funding. Please consider the financial and ethical ramifications. We rely on tuition for salaries and programs. In losing these families, many schools are facing financial hardship. Our teachers have invested so much time into building relationships with these children and nurturing their development.

It appears as though New York State has become very hostile toward religious families. The plan for substantial equivalency only reinforces what families of faith are already feeling is an attack. What has happened to religious and parental freedom? These children deserve the right to a quality education. It appears as though the pharmaceutical industry has a greater influence in our legislature, than our families of ethical religious beliefs. Were pediatricians consulted with the untimely deadlines of these vaccinations? Some pediatricians in our area are refusing to give this number of vaccines in such a short period of time.

Please, I implore you, grant a stay for these tens of thousands of children and all those affected by this bill. Let New Yorkers, our families continue to have this freedom.

Sincerely,

Katie Gundell
Administrator
St. John Lutheran School
[REDACTED]@stjohnnt.com

Honorable Denise Hartman
Justice, Supreme Court
County of Albany
16 Eagle Street
Albany, New York

August 9, 2019

Honorable Judge Hartman,

It is with a heart full of pain and perplexity that I am writing to you regarding a recent decision by the New York State legislature to remove the religious exemption for vaccinations from students and their families who make these decisions based on their deeply held religious beliefs. As Headmaster of Faith Christian Academy, as a father of two children, and simply as a human being, I find it inexcusable that those we elect to public office grant themselves full access to our health decisions without learning all the facts and without following due process.

To allow a law to go into effect just a few weeks before schools throughout the state begin the new school year offers parents no alternative except to pull their children out of school and thrusts them into the outrageous choice between their religious convictions and attendance in school. In a state that prides itself on being a national leader in the area of education it is inconceivable that our government officials would even contemplate depriving our families of the freedom to exercise their beliefs and receiving the education of their choice. I fully understand the issues of public health, however, this shortsighted decision by the governor and the legislature does more harm than good, and reflects nothing more than political posturing. It is a sad day, when we witness the political ambitions of adults being pursued at the expense of our children and their future.

Next month, we are opening the doors of our school for the new academic year and are already facing sweeping ramifications because of this new law. We are losing scores of precious children and their families who love our school and dream about coming to Faith Christian Academy to receive an education that they desire. I know that I represent not only our school and families but thousands of others throughout the state facing the same crisis. This decision is far reaching and detrimental for all children regardless of the school they attend, private or public. Therefore,

we appeal to you to hear our voices and grant a stay on the execution of this law until a wise and balanced decision is made.

Respectfully,



Alexander Averin, Ph.D.
Headmaster
Faith Christian Academy

Cc:

Michael Sussman
P. O. Box 1005
Goshen, New York 10924

Helena Lynch, Esq.
Assistant Attorney General
The Capitol, Albany, NY 12224



THE BRIDGES ACADEMY

CHARACTER • CONFIDENCE • KNOWLEDGE

August 7, 2019

Honorable Judge Hartman,

As an independent school administrator on Long Island, I am writing to express my disappointment with the decision in June to no longer allow religious exemptions for student vaccinations within our public and private schools. While I understand and appreciate the complexities of the issues and science behind vaccinations, the process that was followed in this matter was unacceptable and completely unfair to the children and families that were impacted.

What concerns me most is the accelerated timeline and process behind the passing of this law. As it was being passed through the legislature, my school, as well as hundreds of others, were celebrating the end of the year at our moving up day and graduation. In my 20 years in education, I have always witnessed these events to be joyous occasions as each child is celebrated for their accomplishments for the school year, thereby setting the stage for a smooth transition to the next. This occasion was no different, until, on the way home I had heard what had happened. Several of the very children we were congratulating that evening were given the hard news that they would no longer be allowed to attend our school unless their families would make a nearly impossible decision which would violate their first amendment right for religious freedom.

Furthermore, as I have witnessed this unfortunate situation unfold, I can't help but to draw a comparison to the equally unfair and unnecessary pursuit of "substantially equivalent" legislation that hundreds of independent, parochial and charter schools are currently disputing. While that case is far from over, you may know that a stay was granted last spring to at least allow for the appropriate process and public discourse to take place. It startles me that the state of New York is not willing to at least consider the same course of action when addressing this very serious situation. With the pursuit of extreme pieces of legislation such as these as well as the rising costs to live here, it is no wonder that families are choosing to leave the State of New York.

Finally, let's not forget the ripple effects of this legislation. Independent schools are fully self-funded, relying on little to no state funding at all. Because of this, we rely on tuition paying families to develop our programs, pay our teachers the salaries and benefits that they deserve and provide an exceptional experience for each of our students. Due to the loss of families who have been impacted by this law, many are now, unexpectedly, facing shortfalls in their budget planning and implementation. In other words, this could potentially impact jobs. With that in mind, I only hope that the state is taking into account the enormous financial and ethical ramifications that this matter has created.

It is my sincere hope that this law be given a thorough reexamination and a compromise is developed that will not only act in the best interest of the public but will allow our children the education that they deserve and are entitled to as we begin the 2019-2020 school year. Anything else, would simply be Un-American.

Respectfully,

Stephen E. Rubenacker
Head of School

CC:

Michael Sussman
Helena Lynch, Esq.



175 South 11th Street
Lindenhurst, NY 11757
(631) 226 - 3066
mainoffice@sparkelementary.com

August 6, 2019

Honorable Judge Hartman,

As an educator, school administrator, creative arts therapist and mother of four children, I am deeply concerned with New York State's decision to remove religious exemption for vaccinations without a fair and comprehensive process. As a private school we are being forced by this legislation to exclude children and families who are in need of our unique services and who are deeply connected to our community. Both emotionally and financially this is devastating.

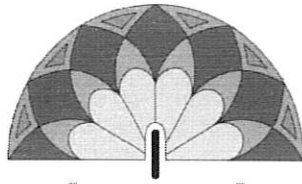
New York State has made great strides in advocating for the social and emotional health of all students. The impact of this faulty vaccination legislation is now a mental health issue. Families are panicking, children are depressed at the thought of not going to school with their friends, and the community is being divided between vaccinated and non-vaccinated mindsets. The state has created a fear-based climate in which families are being bullied into having their children vaccinated in an untimely manner. This is a tremendous setback in New York State's claim to support emotionally intelligent problem solving and to implement restorative policies that take all voices into consideration.

I fully understand the value of vaccinations as a public health issue. I also know as an educator and mental health professional that it is unethical and negligent to expect a family to abandon their religious beliefs in order to have their children vaccinated by the time school begins in September. This is a complicated and moral decision that takes careful consideration. The timing of this legislation also feels deeply disrespectful to the value of our input as educators. This bill was passed in June, without much public notice, at a time when educators were celebrating the culmination of a year of hard work and service. There was no consultation with us regarding the impact of such a decision on our community. It was clearly pushed through rather than, thoroughly thought through.

Your Honor, we work diligently to teach our children the power of our judicial system and the obligation we hold as American citizens to speak out against injustice. I most respectfully implore you to look again. Please see the suffering this will cause if it stands as it is. From the heart of my devotion to children and families, I ask you to grant a stay that takes into consideration the whole child in developing a plan of action that is socially, emotionally and physically healthy.

Most Sincerely,

Marianne Franzese Chasen
Principal and Founder, Spark Elementary
cc: Michael Sussman, Helena Lynch



Progressive School of Long Island

1425 Merrick Ave., Merrick, NY 11566-1645 516-868-6835 fax 516-868-7033 @ProgressiveSch ProgressiveLi.org

8/1/2019

cc: Michael Sussman, Esq. and Helena Lynch, Esq.

Honorable Judge Hartman:

Words cannot express what this rash and poorly conceived legal action taken by the NY government has done to my life, our non-profit school, our teachers, and the many **healthy** families affected. While I agree that the public health is a priority, the Dept. of Health already has tools at its disposal to deal with a potential outbreak, including quarantine, vaccinations, and temporary school closings.

In an attempt to gain the upper hand over a small group of Hassidic Jewish students with measles, we, the healthy bystanders, are caught in the crossfire and then ignored as collateral damage.

Progressive School is the flagship school of a global mission to bring people together, care for the environment, promote universal human values, and bring ethics to the forefront of education. It is one of the only schools in the world that doesn't promote competing for dominance over other countries, but actually uniting our efforts, and working together to solve collective global problems. I have gone to Australia, China, Sweden, Italy, Holland, India, Venezuela, Mexico and other countries to train teachers and bring people together as sisters and brothers. But now, our 35 year mission is on the brink of bankruptcy, literally overnight, due to this new law. Does anyone care? Our final day of school was transformed from a joyous family picnic to a crying funeral-like state of shock. We have already had to fire a quarter of our staff!

The new law claims the public health as its priority, but it allows all children to attend camps where everyone knows disease spreads most readily. It allows non-vaccinated families to go to the movies, use public transportation, eat in restaurants, attend public functions. The only thing it does do is take away their right to an education—which will not protect the health of society, rather it will harm it.

At a minimum, time should be given to allow programs like ours and all the people it serves to adjust and be given support to find solutions. Right now, we have had the rug pulled out from under us with no warning, and in my case, have had to watch as my life's work goes down the drain, taking the lifelong dreams of many good families with it.

Yours Sincerely,

Eric Jacobson, Director



Matthew J. McDonald, Superintendent of Schools
29 East Oneida Street • Baldwinsville, NY 13027
315-638-6043 (office) • 315-638-6041 (fax) • www.bville.org

August 12, 2019

Honorable Denise Hartman
Justice, Supreme Court
County of Albany
16 Eagle Street
Albany, NY 12207

Honorable Judge Hartman:

I write you today to respectfully share my concern with the recent decision to remove the religious exemption option from our students without dialogue with all constituents impacted by the decision. As a school official who is required by law to educate every child, I find myself in a position where I now have to turn children away because of their religious belief(s).

In my 23-year career, the religious exemption has never caused an issue or problem. Accordingly, I ask that you please grant a stay to the children who will be adversely impacted by this exclusion from school. Doing this will hopefully allow us to give our input and ask clarifying questions related to the future impact of this decision. Granting a stay will also allow the professionals in the field to explain the impact to the children and their future endeavors.

As my team prepares for the opening of the new school year, we find ourselves buried with parent meetings asking, "What do they do"? I got in the business of education because I love children and will do anything to help them thrive and be successful. Now I am put in a position to turn some students away due to this new law. As an educator and as a parent, I implore you to grant a stay so that we can work together for a solution to this situation.

Respectfully,

Matthew J. McDonald
Superintendent of Schools
Baldwinsville Central School District

John V. Dolan
Superintendent of Schools



1 Craig B. Gariepy Avenue, Islip Terrace, NY 11752
Phone: 631-224-2010 Fax: 631-581-1617
www.eischools.org

August 6, 2019

Honorable Judge Hartman:

As an educator for 34 years, I am deeply disturbed by the 11th hour cover of darkness attempt to remove the religious exemption from our students without fully vetting the facts and in effect denying due process. As a school district we are now in the middle of cross fire between federal and state legislation, but the true victims here are the children and families who will be excluded from school without a full vetting of the facts and repercussions of this decision.

Your Honor, we strongly urge you to grant a stay so these children will not be adversely affected by this exclusion from school. It is not about the dollars and cents, it is about the irreparable damage done to even one child who is denied a free and public education.

In my 34-year career, the religious exemption has never caused one issue or one problem. It is unconscionable that legislators passed a bill on June 13th which for educators is akin to 4/14 for accountants. We were not consulted, we were not able to give our input and we were not asked to explain the full ramifications for this decision.

The bill was passed under the cover of darkness with very little public notice. We were busy preparing for graduation, moving up ceremonies, closing out the year when this bill was slipped under the radar.

As we begin to prepare for the upcoming school year, we are now faced with the horrific ramifications of this decision with no clear direction on how to serve these children. Students who commit crimes at least have clear guidelines on how to receive an education. As an educator, as a parent and a member of the human race, I implore you to grant a stay so that we can work together for a solution to this situation.

Very truly yours,

John V. Dolan
Superintendent of Schools

JV/sp

Sayville Public Schools



Dr. John E. Stimmel
Superintendent of Schools

BOARD OF EDUCATION

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T. Andrew Brown, Vice Chancellor
Regents Office
State Education Building
89 Washington Ave.
Albany, NY 12234

September 6, 2019

Dear Vice Chancellor Brown,

The Sayville Board of Education would like to express our concerns for students with sincere and genuine religious objections to mandatory vaccinations. Such children may be denied access to a public education and services by the hastily enacted revision to the Public Health Law Section 2164. These parents and students have expressed the harmful impact this will have on them. We support all of the children of our district and their religious and medical freedom. We strongly object to this law. We urge you to repeal and/or delay the implementation of this revision to the law so that these children may continue to attend school after the 14 calendar days.

While the Sayville Board of Education recognizes its obligation to follow the current laws of New York State, members of our community believe this law is unconstitutional and discriminatory. In following this law, we may be forced to exclude our children who attended our schools with religious exemptions. We strongly object to excluding such students. We also recognize this law puts our district at risk of a lawsuit being filed against us.

We fail to see the need for such an extreme and hasty revision to the law. As such, we ask you once again to reconsider the recent amendments to Public Health Law 2164.

Sincerely,

The Sayville Board of Education

August 22, 2019

To Whom it May Concern:

I am writing you in regards to the recent passing of the law passed by the New York State legislature which removed the religious exemption to vaccinations from students based on their sincere religious beliefs. As a Board of Education Member for McGraw School District I am seeing the repercussions of this decision and know the irreparable harm it is already causing our students and their families. Some will now not receive special education services that they are in dire need of, some will be bullied outside of school at social events as their private medical information will now be obvious in a small town, some will have to move out of this state, some will suffer severe anxiety & depression as they feel the affects of being segregated and not welcomed in the school they love. I could go on and on about the harm as I know these families, I see their pain and the hard decisions they now have to make. Our students and families are being pressured to hurry and vaccinate with a large amount of vaccines in an untimely and unjust manner, against their sincerely held beliefs.

As a person in a position that is meant to help my community, my hands are tied and I am asking that you grant the stay so that all of these children can receive the education they deserve and deeply desire. These families deserve more time to make arrangements and make big changes in their lives that can forever affect them. We have no proof that any children who held a religious exemption have ever caused a problem in our school. Our school's policy is against religious discrimination. Our school in McGraw, NY was once the location of the New York Central College which opened in 1849 and was the first school in America to appoint black professors and allow people of all races, gender and religious beliefs to be educated together in the same classroom without prejudice. Our school's history means a lot to our community and we want to uphold protecting our student's constitution rights and religious freedoms and make sure no one is ever excluded for any reason.

Thank you for your time and consideration in this sensitive matter.

Respectfully,

Michael Murray
Board of Education Member
McGraw Central School District
10 West Academy Street
McGraw, NY 13101

██████████

RIVERHEAD CENTRAL SCHOOL DISTRICT

700 Osborn Avenue
Riverhead, NY 11901-2996
FAX (631) 369-6816 · www.riverhead.net

Dr. Aurelia L. Henriquez
Superintendent of Schools
([REDACTED])



Sam M. Schneider
Deputy Superintendent
([REDACTED])

Christine Tona
Assistant Superintendent for Curriculum & Instruction
([REDACTED])

September 11, 2019

Via E-Mail: rerepeal@gmail.com

Dear Judge Sher:

On behalf of the Riverhead Central School District and Board of Education, I write to you once again to share our concerns with the decision to remove the religious exemption option from our students, without input from school leaders. As a result, we are in a position where we are to violate the constitution and the civil rights of our students and their families.

I implore you to grant a stay to the students who have been impacted by this. More time will allow us to work together toward a better solution to this dire situation. Families are not able to plan and/or adjust with the current looming deadline. Adequate time has not been given so that families can make informed decisions with medical professionals about how to proceed. As educational leaders, we want to support a plan that respects the constitutional rights of all students. Please right this wrong, by granting a stay.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Henriquez", written over the printed name and title.

Dr. Aurelia L. Henriquez
Superintendent of Schools

Aquebogue Elementary School • Phillips Avenue Elementary School • Pulaski Street Elementary School • Riley Avenue Elementary School
Roanoke Avenue Elementary School • Riverhead Middle School • Riverhead High School

My Dream Team

Self-Appointed Master Sergeant ® Wendell Linder

Congressman John Lewis - You must find a way to get in the way and get in good trouble, necessary trouble - You cannot be afraid to speak up and speak out for what you believe. You have to have courage, raw courage - If you see something that is not right, not fair, not just, you have a moral obligation to do something about it-

Reverend Martin Luther King Jr. - to help you remember the power of a vision - We cannot turn back. I have a dream that my four little children will one day live in a nation where they will not be judged by the color of their skin but by the content of their character- "Injustice anywhere is a threat to justice everywhere. We are ... On April 3, 1963, Martin Luther King

James Baldwin - Anyone who has ever struggled with poverty knows how extremely expensive it is to be poor - You think your pain and your heartbreak are unprecedented in the history of the world, but then you read. It was books that taught me that the things that tormented me most were the very things that connected me with all the people who were alive, or who had ever been alive."

Malcolm X - American Muslim minister and human rights - Be peaceful, be courteous, obey the law, respect everyone; but if someone puts his hand on you, send him to the cemetery. Malcolm X - The media's the most powerful entity on earth. They have the power to make the innocent guilty and to make the guilty innocent, and that's power. Because they control the minds of the masses.

Bernard Shaw - Journalists, hear me - There are some owners in the business — bosses, parent companies — whose profit fixation and staffing directives and decisions sabotage the public good they profess to serve. They are turning the people's right to know into the people's fight to know - Beyond this ballroom tonight, white males, wake up -Globally, you are an island speck in an ocean of color. The reins of power will weaken and so will

your grip — if you do not faithfully support our nation's greatest strength, diversity. To you, caught in the middle, stay vigilant. You must stay strong.

Maxie Cleveland "Max" Robinson - Robinson was known to speak against what he felt was racism while working at the station, which caused a lot of conflict on the job. He became the first African-American anchor on a local television program. From there Robinson went on to become the first Black man to anchor a nightly network - Never given the credit he deserved. Never.

Frank Serpico (The Police Are Still Out of Control - I should know) these are the leaders that shape my life - The fight for justice against corruption is never easy. It never has been and never will be. It exacts a toll on our self, our families, our friends, and especially our children. In the end, I believe, as in my case, the price we pay is well worth holding on to our dignity.

It's your turn, your day, your moment to get into trouble, necessary trouble to make the world a better place.

I am honored to introduce myself to you. I am who I am. Who am I? Glad you asked; my name is Mr. Wendell Linder; I retired from the U.S. Army as a Staff Sergeant, but after watching to France open Tennis with John McEnroe, I decide to name myself –Self-Appointed Master Sergeant® Wendell Linder (I will explain later) I am a 56-year-old disabled Army veteran; retired from the United States Army and I am currently unemployed living in Bad Mergentheim Germany. I am an amateur writer, photographer, advocate for Soldier's rights and Entrepreneur.

22 November 2016 giving to me by Gwendolyn Finley +

17 December 22, 2016 give to me by Terry Swanson + Ecclesiastes 3:1 everything that happens in this world happens at the time God chooses. I believe I showed up that day because we are supposed to cross paths in this life. Like I said before if there is ever a time you just need someone to talk I am here for you. And if you want me to write a letter call someone just let me know, I am here for you. Have a wonderful holiday and God Bless.

After 20 years in the U.S. Army and 12 years with the Department of defense – Europe. **I had been treated unfairly, discriminated, humiliated and left to live in shame!** I am truly offended, outraged, and embarrassed that, I am asking for financial assistance to get out of debt – **Luke 11 – 9 “Ask, and it will be given to you; seek, and you will find; knock, and it will be opened to you.** For everyone who asks receives, and the one who seeks finds, and to the one who knocks it will be opened. Father who is in heaven gives good things to those who ask him!

TALKING PAPER
ON
CHRISTIAN GENOCIDE IN NIGERIA

- Purpose: To provide Mr. Metaxas with speaking points for upcoming Religious Liberty Commission meeting in order to have the Department of State (DoS) designate Nigeria as a Country of Particular Concern (CPC)
 - - CPC: a designation by the U.S. Secretary of State for countries that engage in severe violations of religious freedom. Economic sanctions are imposed. This designation is based on the International Religious Freedom Act of 1998
- 10 August 2025 Report from Nigeria-based human-rights NGO International Society for Civil Liberties and the Rule of Law (Intersociety):
 - - Since 2009, jihadist militants have massacred over 50,000 Christians and destroyed over 20,000 churches and Christian schools
 - - More than 7,000 Christians have been killed in the first seven months of 2025; 7,800 were abducted in the same period
 - - The Nigerian government is complicit as they enforce strict blasphemy / Sharia laws that limit religious freedom
- More Christians have been killed for their faith in Nigeria than the rest of the world combined according to Open Doors
- Recent efforts to designate Nigeria as a CPC:
 - - Family Research Council President Tony Perkins petitioned Congress to designate Nigeria as a CPC in March 2025
 - - Senator Ted Cruz proposed new legislation in October 2025, The Nigeria Religious Freedom Accountability Act, which would target Nigerian officials with sanctions and other tools. His legislation would also designate Nigeria as a CPC
- Proposed objective: open up a third initiative through the President's Religious Liberty Commission. During our 1 Oct Bonhoeffer Society Zoom call, Eric stated that the Commission is tasked to generate a periodic report to the President. Nigeria's designation as a CPC should be at the top of the list.



October 16, 2025

The Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. President,

On behalf of the undersigned health freedom and religious liberty organizations, we write to express our profound gratitude for your bold leadership in addressing the autism crisis at your White House press conference on September 22, 2025. Your candid remarks on childhood vaccines - urging parents to delay the Hepatitis B shot until age 12, to space out shots more gradually, and to avoid combining multiple vaccines like MMR because they're overwhelming delicate infant immune systems - resonate deeply with millions of American families who share your concerns about the aggressive CDC schedule and its potential links to rising autism rates. As you stated, there's "no reason" to administer the Hepatitis B vaccine to the 99% of newborns whose mothers are negative for Hepatitis B, given its association with sexual transmission and the low risk to infants. You emphasized that "we should be spacing them out" to allow the body more time to process each one - insights echoed in your Truth Social posts and more recently at your October 9th Cabinet meeting. You even spotlighted faith communities like the Amish, noting: "I think I can say that there are certain groups of people [Amish] that don't take vaccines and don't take any pills that have no autism," validating the spiritual convictions of families who object on religious grounds. These words empower parents to make informed choices, beg for an end to all coercive vaccine mandates, and align perfectly with your America First commitment to protecting children from unnecessary medical interventions.

However, Mr. President, we must urgently highlight the devastating real-world consequences of following your wise recommendations in states that trample religious freedom. Families in New York,

California, Connecticut, and Maine face unconstitutional barriers because these Democrat-led states offer no religious or philosophical exemptions to school vaccination mandates. Only medical exemptions are permitted, which are rarely granted and prioritize secular judgments over faith. If parents heed your advice to delay the Hepatitis B shot or space out vaccines, their children will be summarily excluded from public, private, and even faith-based schools, robbing them of education during critical developmental years.

This has already caused irreversible academic setbacks, social isolation, and emotional trauma for hundreds of thousands of children since these bans took effect (2015 in California, 2019 in New York and Maine, and 2021 in Connecticut), disproportionately harming Jewish, Amish, Christian, Muslim, Hindu, Sikh and other religious communities who view their bodies as sacred temples and object to vaccines - particularly those developed using aborted fetal cell lines - on deeply held spiritual grounds. This forces religious families into untenable choices: violate their faith by adhering to the full schedule, homeschool amid work and financial hardships, or relocate at great personal cost. Your February 14, 2025, Executive Order ending COVID-19 vaccine mandates liberated many from similar tyranny; now, extending that protection to childhood vaccines would safeguard faith as fiercely as you have fought for freedom.

The harm extends beyond schools. If families across the nation heed your advice to space out or delay vaccines, they risk being abruptly dismissed from their pediatricians' practices for deviating from the rigid CDC schedule. Nationwide, pediatricians - often pressured by federal funding guidelines, health insurance incentives for achieving high vaccination rates, and guidance from the American Academy of Pediatrics encouraging dismissal after repeated refusals - are increasingly denying routine non-emergency care like well-child visits, treatments for illnesses, or even access to specialists.

To fix this, Mr. President, we respectfully urge you to enforce constitutional protections for religious families under the First Amendment and the Religious Freedom Restoration Act through executive action, legal enforcement, legislative leadership, and advancing evidence-based public health reforms by directing federal agencies to withhold funding from non-compliant states and providers, championing reforms in Congress, and by pursuing legal action against violators. Specifically:

- **Issue the Proposed Executive Order Immediately:** Withhold discretionary federal funds from any educational institution that denies religious exemptions to federally recommended vaccines, ensuring access to schools, daycare, and college for families of faith. This would preempt state overreach without infringing on public health, as less restrictive means exist to protect communities while honoring faith. Attached is a proposed draft for your consideration prepared by Guiding the Impact.
- **Direct the Attorney General to Enforce the Constitution:** Instruct Attorney General Pam Bondi to pursue legal action against New York, California, Connecticut, and Maine for Free Exercise violations, building on the Mississippi precedent in *Bosarge v. Edney*, which struck down similar discriminatory policies. This is especially timely, as the Supreme Court is now reviewing a petition in *Miller v. McDonald* (Docket No. 25-133, filed August 4, 2025), where Amish families challenged New York's ban - a case that rejected their claims under a flawed "rational basis" test and could set a nationwide precedent for religious liberty if decided in favor of families.
- **Protect Healthcare Access via HHS:** Direct Secretary Robert F. Kennedy, Jr., to issue regulations barring federally funded providers from denying medical care based on religious objections, and support legislation to end the discriminatory practice of conditioning care on vaccine compliance.

- **Champion Legislation to End All Vaccine Mandates:** Partner with Congress to enact comprehensive federal legislation prohibiting any vaccine mandates - whether for schools, employment, or public services - unless they include full exemptions for religious, philosophical, and medical reasons, while demanding that gold standard science be used to identify the safest vaccination schedule for children.

By championing these steps publicly - as you did so powerfully on vaccines and autism - you can reaffirm America as a beacon of faith and freedom, ending the persecution of religious families and allowing every child to learn and thrive without compromising their parents' convictions. Your legacy as liberty's defender will endure for generations.

Sincerely,

Elyse Young, Founder, **Guiding the Impact**

Tony Lyons, President, **MAHA Action**

Mary Holland, President, **Children's Health Defense**

Aimee Villella McBride, Executive Director, **Global Wellness Forum**

Dr. Shannon Kroner, Executive Director, **Freedom of Religion - United Solutions (FOR-US)**

Stephanie E. Weidle, Executive Director, **Feds For Freedom**

Meryl Nass, M.D., President, **Door to Freedom**

Michael Kane, **Teachers for Choice**

Christina Hildebrand, **A Voice for Choice Advocacy**

Reverend Wendy Silvers, **Million Mamas Movement**

Chaplain Matthew Miller CCC, CTR, **First Responders Assistance Team, Inc.**

Dian Dossias, Lead Organizer, **Stop College Mandates**

Michael Sweeney, **OutsideIn Strategies, Inc.**

John Gilmore, Executive Director, **Autism Action Network**

Reverend Jeffrey A. Graves, **Church ONEighty**

Greg Glaser, General Counsel, **Physicians for Informed Consent**

Kathleen Miller, Executive Director, **California Health Coalition Advocacy**

Scott C. Tips, President & General Counsel, **National Health Federation**

Jane Orient, M.D., **Association of American Physicians and Surgeons**

Michael Smith, Executive Director, **Foundation for Autism Information & Research**

Reverend Victoria LaRowe, **Universal Life Church**

Tyler Ohta, Virginia State Director, **Moms for America**

Ginger Taylor, MS, **No Deception**

Kevin Barry, **Liberty Now**

Kate Prokop, President and Founder, **Connecticut Residents Against Medical Mandates Inc.**

Reverend Deborah van Deusen Hunsinger, Ph.D.

The Constitutional Coalition of NYS

CC: The Religious Liberty Commission

The Honorable Pam Bondi, Attorney General

The Honorable Robert F. Kennedy, Jr., Secretary of Health and Human Services

The Honorable Linda McMahon, Secretary of Education

Preserving Access to Education and Free Exercise of Religion

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

Section 1. Purpose and Policy. The United States is founded on the principle of religious liberty, enshrined in the First Amendment, which guarantees the free exercise of religion. No right is more fundamental to a free and virtuous society than the ability of parents to direct the upbringing and education of their children in accordance with their sincerely held religious beliefs. The Founders envisioned a nation in which religious families and institutions are free to practice their faith without fear of discrimination or hostility from the government. Yet, in certain states, policies that deny children access to education or daycare because of their religious objections to vaccination unconstitutionally infringe upon these rights. Such actions disproportionately harm religious communities, including Jewish, Christian, Amish, Muslim, Hindu, and others, who object to vaccines on grounds such as the sanctity of the body, divine protection, or ethical concerns about vaccine development, particularly the use of aborted fetal cell lines. My Administration is committed to protecting the liberty and freedom of our religious communities and students and has a longstanding commitment to safeguarding the fundamental right to religious freedom.

It is the policy of the United States to ensure that no child is denied access to in-person education or daycare due to their parents' religious objections to federally recommended vaccines, and that discretionary Federal funds should not be used to directly or indirectly support or subsidize an early childhood education program, elementary school, local educational agency, State educational agency, secondary school, clinical training program, or institution of higher education that violates the First Amendment by denying religious exemptions.

Sec. 2. Findings. Based on available evidence and constitutional analysis, the President finds that:

- (a) Vaccination mandates without any option for religious accommodation, constitute a substantial burden on religious exercise;
- (b) Any compelling governmental interest in preventing disease transmission can be achieved through less restrictive means that protect both public health and religious exercise;

(c) Blanket policies that provide medical exemptions while categorically denying religious exemptions fail to satisfy the least restrictive means requirement and violate equal protection principles as well as the First Amendment; and
(d) Therefore, federal funding of educational institutions that maintain such overbroad policies would violate the federal government's obligations under the Religious Freedom Restoration Act.

Sec. 3. Definitions. For the purposes of this order:

- (a) The term “educational service agency” has the meaning given in 20 U.S.C. 1401(5).
- (b) The term “elementary school” has the meaning given in 34 C.F.R. 77.1(c).
- (c) The term “institution of higher education” has the meaning given in 20 U.S.C. 1001(a).
- (d) The term “local educational agency” has the meaning given in 34 C.F.R. 77.1(c).
- (e) The term “secondary school” has the meaning given in 34 C.F.R. 77.1(c).
- (f) The term “State educational agency” has the meaning given in 34 C.F.R. 77.1(c).
- (g) The term “early childhood education program” has the meaning given in 20 U.S.C. § 1161i–1 and includes summer camps providing care and educational services to children typically aged birth to 5 years, designed to promote early learning and development, operated by public, private, or nonprofit entities.
- (h) The term “clinical training program” means any educational program or component of an institution of higher education or secondary school that involves supervised practical training in a healthcare setting, including but not limited to hospitals, clinics, or other medical facilities, as part of a course of study in fields such as medicine, nursing, dentistry, pharmacy, or allied health professions.
- (i) The term “federally recommended vaccines” means vaccines included in the childhood immunization schedule recommended by the Centers for Disease Control and Prevention Advisory Committee on Immunization Practices.
- (j) The term “religious exemption” means an exemption from vaccination requirements requested by a parent or guardian based on sincerely held religious beliefs, as protected by the First Amendment, the Religious Freedom Restoration Act (42 U.S.C. § 2000bb et seq.), and other applicable federal law.

Sec. 4. Requiring Religious Accommodation from School Vaccination Mandates. (a) The Secretary of Education shall as soon as practicable issue guidelines to early childhood education programs, elementary schools, local educational agencies, State educational agencies, secondary schools, clinical training programs, and institutions of higher education regarding those entities'

legal obligations with respect to parental authority, religious freedom, disability accommodations, and equal protection under law, as relevant to vaccination mandates that deny religious exemptions.

(b) Within 45 days of the date of this order, the Secretary of Education, in consultation with the Secretary of Health and Human Services, shall provide to the President, through the Assistant to the President for Domestic Policy, a plan to end vaccination mandates that preclude religious exemptions, consistent with applicable law, and including, as appropriate, any proposed legislation. Such plan shall also include:

(i) a list of discretionary Federal grants and contracts provided to early childhood education programs, elementary schools, local educational agencies, State educational agencies, secondary schools, clinical training programs, and institutions of higher education that are non-compliant with the guidelines issued pursuant to subsection (a) of this section; and

(ii) each executive department or agency's process for, to the maximum extent consistent with applicable law, preventing Federal funds from being provided to, and rescinding Federal funds from, early childhood education programs, elementary schools, local educational agencies, State educational agencies, secondary schools, clinical training programs, and institutions of higher education that are non-compliant with the guidelines issued pursuant to subsection (a) of this section.

Sec. 5. Scope and Limitations. (a) This order applies only to discretionary federal funds and does not preempt state authority to establish vaccination requirements, provided such requirements include religious exemptions consistent with the First Amendment.

(b) This order is not intended to moot or otherwise interfere with ongoing litigation challenging state vaccination policies, including lawsuits seeking declaratory or injunctive relief to protect religious exemptions.

(c) Nothing in this order shall be construed to impair or otherwise affect the authority of states to grant medical or other exemptions to vaccination requirements.

Sec. 6. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof;

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals; or

(iii) the authority of the Department of Justice, under the Religious Freedom Restoration Act (42 U.S.C. § 2000bb et seq.), 42 U.S.C. § 1983, the First

Amendment, or other applicable federal law, to independently investigate, initiate lawsuits, intervene in private litigation, or file amicus briefs or statements of interest in cases related to religious exemptions or accommodations, including those challenging state or local policies on vaccination requirements.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

(d) Severability. If any provision of this order, or the application of any provision to any person or circumstance, is held to be invalid, the remainder of this order and the application of its other provisions to any other persons or circumstances shall not be affected thereby.



The Secular Coalition for America comprises 20 large and small organizations that support the separation of church and state and the rights of nonreligious Americans. We represent the 30 percent of the population or 81 million Americans who state that they have no religious affiliation. We have significant concerns about the Commission's approach to these Americans given the composition of the Commission. Among the 13 Commission members and the 26 advisory board members we are not confident that the members would protect the constitutional principle of the separation of state and church.

Similarly, when the Commission looks at the history of religious liberty in America we see no one who is likely to show that when the Founders assembled to write the Constitution they were wise enough to set aside their personal religious beliefs and create a secular government so that all Americans could enjoy freedom of religion, belief or lack of.

Yes, the nation was founded by Protestants and Deists who chose not to establish a theocracy. The words Christian, Jesus, God and Bible do not appear in the Constitution. Religion only appears when the document says there will be no religious test for any public office. It is clear that America was established as a secular nation.

As one of many examples of this, when Thomas Jefferson was recounting the passage of his landmark Virginia Statutes for Religious Freedom, he was gratified that the legislative effort to insert "Jesus Christ" in the preamble was defeated, establishing that religious freedom was "meant to comprehend, within the mantle of it's protection, the Jew and the Gentile, the Christian and Mahometan, the Hindoo *and infidel* of every denomination."

The following questions are based on our concerns and apprehensions about the direction of the Commission. We at the Secular Coalition for America would appreciate seeing your answers that show how the Commission will represent the views and beliefs of all Americans:

- Given the administration's directive to align [federal regulations with recent Supreme Court rulings](#), what safeguards will be put in place to prevent these changes from becoming a license to discriminate under the banner of religious freedom?
- The White House recently directed [federal agencies to repeal regulations deemed inconsistent with ten recent Supreme Court rulings](#). Will the Religious Liberty

Commission's findings be used to guide or accelerate those repeals, particularly in areas involving nondiscrimination, reproductive rights, and secular public services? If so, how will the Commission ensure that these rollbacks do not undermine constitutional protections for the nonreligious and religious minorities?

- How is the Religious Liberty Commission coordinating with the Anti-Christian Bias Task Force, and are their findings being used to shape government-wide rules that disproportionately center Christianity as the primary protected belief system?
- How does the Commission ensure that its work does not privilege Christianity above other belief systems—or nonbelief—particularly when “parental rights” and “religious education” are often invoked to justify discrimination against LGBTQ+ individuals, religious minorities, and secular Americans?
- The Commission appears poised to recommend enhanced civil rights enforcement in cases of perceived anti-Christian bias, including in contexts like allowing greater school prayer. Will these efforts be matched by equal enforcement of protections for students, employees, and patients who may be coerced into participating in religious activities or penalized for holding minority or nonreligious views? How will the Commission ensure that civil rights enforcement does not become a tool for advancing one religious viewpoint over others—or over the right to abstain from religion altogether?
- Will findings from the Commission be used to justify changes to Title IX, Section 1557 of the Affordable Care Act, or federal contractor nondiscrimination rules? If yes, how will public transparency and Congressional oversight be ensured in that rulemaking process?

We appreciate your attention to these important questions and hope they will be answered promptly. The Commission's work can benefit all Americans if all Americans are considered during the Commission's hearings and deliberations. You can contact us through Steven Emmert, the executive director of the Secular Coalition for America, at [REDACTED]@secular.org

The Secular Coalition for America is comprised of the following organizations:

American Ethical Union	American Humanist Association
Atheist Alliance of America	Black Nonbelievers
Center For Inquiry/Richard Dawkins Foundation for Reason and Science	
Camp Quest	Ex-Muslims of North America
Freedom From Religion Foundation Action Fund	Freethought Society
Hispanic American Freethinkers	Military Association of Atheists and Freethinkers

Recovering From Religion

Secular Student Alliance

Secular Woman

Society for Humanistic Judaism

The Clergy Project

Unitarian Universalist Humanist Association

Dear Religious Liberty Commission,

My name is Dana and I am writing to exercise my rights under the US constitution to receive Religious Exemption from vaccination due to my genuine and sincere beliefs.

I want to first start off by saying I am honored to be a US citizen and to live in the beautiful state of NY. I want to raise my family in this state and have my children go to the wonderful schools here!

1 Corinthians 6:19-20 and 10:31 remind us that we are to regard our bodies as a temple of God's Holy Spirit and that we are to honor God, our Creator and possessor of our very bodies by not defiling them.

The use of cells, cellular debris, protein, and DNA from willfully aborted human children found in Adenovirus, Polio, Dtap/Polio/HiB Combo, Hep A, Hep A/Hep B Combo, MMR, MMRV Pro Quad, Rabies, Varicella, and the Shingles vaccines violate this right.

I think everyone should have a choice as to what they put into their body, and I don't believe it should be mandatory to attend a *fundamental human right* to go to school.

I sincerely thank you for reading this and adhering to the First Amendment right and the right for this to be *reinforced on the state level* by the Fourteenth Amendment without prejudice.

Thank you for your consideration.

Respectfully,
Dana Licari

Religious Liberty Commission
Office of the Associate Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530-0001
Via electronic service

October 17, 2025

Dear Members of the Religious Liberty Commission,

We are writing to respectfully request that, at your upcoming hearing on Religious Liberty in the Military on November 17, 2025, in Dallas, Texas, you include testimony from a Sikh American who has served in the military with an accommodation for their religious articles of faith. Such testimony will be a powerful way to elevate the importance of maintaining robust religious accommodations policies for religious beards and other articles of faith in the U.S. Armed Forces.

For context, our organization has worked on the issue of religious freedom in the military for more than 15 years, including via bipartisan [advocacy](#) and landmark litigation cases. Given this body of work, we are particularly concerned about a recent memorandum, "[Grooming Standards for Facial Hair Implementation](#)," from Secretary of War Peter Hegseth, which directs the Department of Defense to "revert to pre-2010 standards" when facial hair waivers were generally not authorized and that "approvals will be limited to non-deployable roles with low risk of chemical attack or firefighting requirement." The mention of "pre-2010 standards" is especially significant, as 2010 marked a historic milestone when two Sikh soldiers—then-Captain Tejdeep Singh Rattan and then-Captain Kamaljeet Singh Kalsi—were [granted](#) accommodations to serve in the U.S. Army with their articles of faith, following a [bipartisan](#) request from 49 members of Congress. These were the first such accommodations for Sikh Americans since military grooming policies changed in 1981, marking a pivotal step toward religious freedom for all of our servicemembers. It is our concern that the new guidance appears to overlook the work to change these policies—as well as the capable and honorable service of Sikh, Muslim, Jewish, Christian, Rastafarian, and other troops who have defended our nation while staying true to their faith.

As you are likely aware, Sikhs are followers of Sikhism, or Sikhi, the world's fifth-largest organized [religion](#), founded in the Punjab region of South Asia nearly 600 years ago. With roughly 750,000 adherents in the United States and 27 million worldwide, Sikhi is an independent, monotheistic faith tradition centered on belief in one all-pervading, eternal God. Sikhs maintain articles of faith as a central part of their religious practice, a

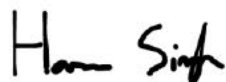


requirement established by the tenth Sikh Guru in 1699 when he formally convened the community of initiated Sikhs. These five articles—Kesh (unshorn hair, usually maintained by a turban), Kanga (small comb), Kara (steel bracelet), Kirpan (religious article resembling a knife), and Kachera (soldier-shorts)—carry deep spiritual and temporal significance. They publicly affirm a Sikh's commitment to the values and ethics of the tradition, including service, compassion, honesty, and a resolve to combat injustice, including physically when necessary.

Sikhs have a longstanding history of military service—both in militaries around the world, and in the United States prior to 1981 and after accommodation policies began changing in 2010. Upholding a fair process for religious accommodations, rooted in respect for sincerely held beliefs, is vital to safeguarding the religious liberties valued by this administration. Should it be of interest, we would be honored to facilitate the participation of a Sikh servicemember to offer testimony at the November 17, 2025, hearing in Dallas, sharing firsthand insights that underscore the compatibility of faith and service, honor the contributions of religious servicemembers, support the military's recruitment from the broadest talent pool, and upholding the religious rights of all Americans—all priorities that we know align with this administration's commitments.

The Sikh Coalition stands ready to support the Commission in this endeavor in any way we can. Thank you for your consideration, and for the Commission's important work in advancing religious liberty across the nation.

Sincerely,



Harman Singh
Executive Director
The Sikh Coalition

Dear Representatives of the Religious Liberty Commission,

My name is **Boris Perchatkin**. I am a former dissident of the Soviet Union and a former political prisoner. For many years, I worked to defend freedom of religion and documented the persecution of believers in the USSR, work that resulted in five years in prison camps. Over the decades, I have testified before the U.S. Congress, the Helsinki Commission, and international human rights bodies, providing evidence of violations of freedom of conscience.

My family was granted refugee status thanks to the support of the United States and the enduring American commitment to protecting religious liberty.

Current Situation of Christian Pacifists

The ongoing conflict between Russia and Ukraine has placed Christian believers in an impossible position: many are being compelled to fight against one another, while those who refuse to bear arms face severe and often violent persecution.

Across both Russia and Ukraine:

- More than **400 criminal cases** have been opened against Christian pacifists, with **approximately 800 additional cases** under investigation.
- Families of such believers face intimidation, loss of access to education, and confiscation of property.
- There are documented cases of torture, beatings, and prison sentences ranging from **3 to 10 years** for refusing military service.
- In Russia particularly, repression is systemic: church closures, confiscation of church property, and severe restrictions on religious activity and missionary work.

Situation of Christian Pacifists in the United States

We estimate that **4,000–8,000** Christian pacifists from post-Soviet countries entered the United States through the Uniting for Ukraine program (U4U), Temporary Protected Status pathways, and CBP One procedures.

These individuals fled **specifically due to persecution for refusing military service**. They represent a very small proportion—approximately **2–3%** of the total arriving population—but they are among the most vulnerable.

Today, many face:

- risk of ICE detention or deportation (with documented precedents),

- near-certain imprisonment, torture, and family separation if returned,
- bullying, discrimination, and educational disruption for their children.

We possess extensive documentation confirming these risks.

Our Delegation and Purpose

Our delegation includes:

- former prisoners of conscience,
- pastors and clergy,
- human rights defenders and analysts

—individuals who have personally experienced persecution and have documented violations of religious freedom for decades.

We advocate on behalf of the **4,000–8,000 Christian pacifists** who arrived through U4U, TPS, and CBP One. This is a small, peaceful, and deeply at-risk group urgently needing protection.

Our Goal

To ensure that these individuals have a **clear legal pathway to safety** in the United States so they can avoid imprisonment and persecution and continue to live, work, and worship freely.

We respectfully ask you to consider **targeted legislative or administrative measures** that would provide federal protection for Christian pacifists who conscientiously refuse to participate in war.

Our Request

We respectfully ask:

1. For your support of this initiative;
2. For assistance in facilitating the review of cases involving Christian pacifists at risk of removal;
3. For guidance in developing a reliable legal protection mechanism for this group within the United States.

We stand ready to provide additional documentation, case files, and expert testimony. We would also welcome the opportunity for an in-person meeting at your convenience.

Warm regards,

Boris Perchatkin ([REDACTED]) [REDACTED]-[REDACTED]

President ARRC | Former Political Prisoner, USSR | Witness of Christian Persecution

Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue NW, Room 5706
Washington, DC 20530

Public Comment on Parental Rights, Substantial Equivalency, and School Choice

As a Research Fellow at The Heritage Foundation’s Center for Education Policy, I submit this comment to express deep concern over rising threats to parental rights in education, particularly through the push to limit the right of parents to opt their children out of lessons in public schools that are inimical to their values, as well as the enforcement of “substantial equivalency” standards that threaten the autonomy of private and religious schools. I urge federal policymakers to ensure that states respect the fundamental rights of parents to direct the upbringing and education of their children, including the right to choose educational environments that differ substantially from government-run schools.

1. The Inherent Tension Between Government Schooling and Fundamental Freedoms

From the nation’s earliest days, America has striven to make education universal, viewing it as essential both for self-government and for individual advancement. In the words of Thomas Jefferson: “If a nation expects to be ignorant and free, in a state of civilization, it expects what never was and never will be.” The Northwest Ordinance of 1787 declared that “schools and the means of education shall forever be encouraged,” setting the tone for the rise of common schools across the states over the next century. Over time, states began to adopt compulsory education laws to ensure that all children learn the knowledge and skills necessary to be good citizens and productive members of their community.

There is, however, an unavoidable tension between compulsory schooling and the rights of parents, particularly in matters of speech, conscience, and religion. Government-run schools, by their nature, reflect the values and priorities of the state. As John Stuart Mill warned in *On Liberty*, government-run schooling runs the risk of “establishing a despotism over the mind, leading by natural tendency to one over the body,” especially where the government has a monopoly over education.

This tension is especially acute in areas involving moral and religious instruction. When public schools promote ideologies that contradict the deeply held beliefs of families, parents are placed in an impossible position: either surrender their children to an educational environment that undermines their values or bear the financial burden of seeking alternatives.

2. Parents Are the Primary Educators of Their Children

A century ago, the U.S. Supreme Court made clear in its unanimous decision in *Pierce v. Society of Sisters* (1925) that “the child is not the mere creature of the state” and that parents have a

“right, coupled with the high duty, to recognize and prepare [their children] for additional obligations.” In striking down a Ku Klux Klan-supported law to ban private schooling in Oregon, the Supreme Court recognized that parents—not the state—have the right and primary authority “to direct the upbringing and education” of their children.

This is not to say that the government has no role in education whatsoever. The *Pierce* decision affirmed the power of the state “to require that all children of proper age attend some school,” as well as the power to regulate schools to some extent. Nevertheless, the government’s role in education is limited and secondary at best.

Nearly 50 years later, the Supreme Court reaffirmed in *Wisconsin v. Yoder* (1972) that the “primary role” of parents in the upbringing of their children is “established beyond debate as an enduring American tradition.” The Court also clarified that the U.S. Constitution protects the “fundamental interest of parents... to guide the religious future and education of their children,” sometimes even against a compelling state interest, such as universal compulsory education. The Court stressed that only “interests of the highest order” can override the First Amendment’s guarantee of free exercise of religion, and found that forcing Amish children into high school would “contravene the basic religious tenets” of their faith while offering little benefit to the state. The Court concluded that a “way of life that is odd or even erratic but interferes with no rights or interests of others is not to be condemned because it is different.”

3. School Choice Respects and Reflects America’s Freedom and Pluralism

In recent years, ideologues have coopted many public schools to push radical agendas on a captive audience of children. Parents have increasingly objected to lessons that are inimical to their values, especially those dealing with gender and sexuality. While some parents have sought to exercise their right to opt their children out of such instruction, as recognized in *Mahmoud v. Taylor* (2025), many schools have embedded the same ideological themes across the curriculum, leaving families with no meaningful escape. In effect, the only option left is to withdraw from the public school system entirely. However, this solution imposes a significant financial burden on parents who must shoulder the costs of private schooling or home education. As the Supreme Court held in *Mahmoud*, the “availability of [private and home schooling] is no answer to the parents’ First Amendment objections” as “many parents cannot afford such a substitute.”

The best way to resolve these tensions is through a robust system of universal school choice. As Nobel laureate economist Milton Friedman observed, the government’s interest in ensuring that every child has access to a quality education does not imply that the government should run the schools. Instead, public funds should follow the child to the educational environment that best meets their learning needs and aligns with their family’s values.

School choice respects parental rights and religious liberty, and fosters a more diverse set of schooling options that better reflects the great diversity of American families than the one-size-fits-some status quo. School choice also promotes educational excellence by encouraging

innovation and making schools directly accountable to parents. Research consistently shows that school choice programs improve academic outcomes, raise graduation rates, increase parental satisfaction, and boost civic knowledge and participation.

4. For School Choice to Be Meaningful, Private School Autonomy Must Be Preserved

In the landmark *Pierce* decision, the Supreme Court held that “the fundamental theory of liberty upon which all governments in this Union repose” prevents the government from attempts “to standardize its children by forcing them to accept instruction from public teachers only.” The same fundamental liberty should prevent the government from imposing regulations on private schools that would standardize private education.

Unfortunately, some states have sought to do just that. For example, New York has sought to impose public school curricular norms on private yeshivas serving Orthodox Jewish communities. State law requires that private schools provide an education that is “substantially equivalent” to that offered by the public schools. In recent years, New York’s department of education has interpreted this statute to require private schools to provide instruction in eleven specific subjects for a minimum of 17.5 hours per week. Although the Court in *Pierce* held that states may require private schools to teach “certain studies plainly essential to good citizenship,” that is a far cry from requiring them to be “substantially equivalent” to public schools. Such burdensome requirements exceed a state’s constitutional authority. The Constitution protects the right of parents to choose schools that are substantially *different* from public schools.

This is not merely a local dispute. Just as the *Pierce* and *Yoder* cases had implications far beyond the Catholic and Amish communities, the New York yeshiva case concerns fundamental issues regarding parental rights, religious liberty, and the limits of state power in education. The federal government has a compelling interest in ensuring that states do not violate constitutionally protected parental rights. It should not stand idly by while states use regulatory tools to coerce conformity and suppress educational freedom and pluralism.

Conclusion

America’s constitutional tradition has long recognized that parents are the primary educators of their children. Parental rights and religious liberty place meaningful limits on state power over education. To honor those principles, policymakers must both safeguard the autonomy of private and religious schools against regulatory encroachment and ensure that public funding follows students to the schools of their families’ choice. Only by protecting parental rights and empowering parents with school choice can we ensure that America’s education system respects and reflects our deepest commitments to freedom, diversity, and self-government.

Respectfully submitted,

Jason Bedrick

Research Fellow, Center for Education Policy, The Heritage Foundation



The Christ School

Joyful curiosity. Faithful confidence.

Submitted to: The Religious Liberty Commission

Submitted by: Dr. Jerry Eshleman, Head of School, The Christ School, Orlando, Florida

Date: September 18, 2025

Title of Testimony - "Educating the Next Generation in the Heritage and Future of Religious Liberty"

I am currently the Head of The Christ School, an independent Christian K-8 school. I have served for over 30 years at the intersection of faith, education, and civic responsibility. I also taught in a Christian university for nearly 15 years, preparing future teachers and administrators in the Christian foundations of American education—emphasizing how our forefathers envisioned religiously integrated schooling as a means of shaping virtuous citizens.

In my current role, I work daily to prepare students and their families to cherish and exercise their religious liberty in ways that respect America's pluralism while remaining rooted in Biblical truth. Schools provide a unique vantage point into both the blessings and challenges of religious freedom, as cultural, legal, and societal pressures increasingly shape how young people understand and live out their rights.

I seek the opportunity to provide testimony that will:

- Celebrate America's heritage of religious liberty and its essential role in education and civic life.
- Highlight current threats to faith-based schools, including regulatory pressures, cultural misunderstandings, and efforts to privatize expressions of faith.
- Share real stories from families, teachers, and students experiencing both the blessings and struggles of religious freedom.
- Propose strategies for cultivating the next generation of leaders who will defend liberty with both conviction and civility.

Key themes I would address include:

- Foundations of Liberty in Education – teaching students the meaning and practice of religious freedom.
- Peaceful Pluralism in Practice – modeling respect for diverse beliefs without surrendering conviction.
- Emerging Threats – accreditation, legislation, and cultural narratives that distort religious freedom.
- Strategies for Preservation – parent engagement, curriculum development, student leadership training, and community partnerships.
- Future Generations – equipping students to be faithful and respectful defenders of conscience.

Christian schools play a critical, under-recognized role in safeguarding religious liberty. By raising informed, principled citizens, we ensure that freedom of conscience endures for all.

I respectfully request the opportunity to present testimony before the Religious Liberty Commission and contribute to its mission of preserving this foundational American right for generations to come.

Dr. Jerry Eshleman, PhD

Head of School, The Christ School
Orlando, Florida

From: Thea Eve Alfes

[REDACTED]

[REDACTED]

Subject: My testimony for The Religious Liberty Commission

To: The Religious Liberty Commission

U.S, Department of Justice

Office of The Associate Attorney General

950 Pennsylvania Avenue N.W. Room 5706

Washington, D.C. 20530

Dear distinguished members of The Religious Liberty Commission,

Have any of you ever looked at your child and known that the suffering they were experiencing was something you could have prevented? My daughter's name is [REDACTED]. She has brown eyes and a heart for God. She compares reading books to breathing fresh air. [REDACTED] a high honors student all through her high school and college education, received her degree in History, and set her sights on another in toxicology. I look at [REDACTED] and I see a beautiful and intelligent Christian woman, but I also wish that I knew the truth about vaccines; that I had researched Gardasil before allowing her pediatrician to give it to her.

At the age of 14, [REDACTED] life was changes forever. Even now, she struggles with allergies to foods and gluten, autoimmune disorders, and severe joint pain improved by diet and homeopathic vitamins and treatments. I'll never forget how my daughter suffered the first two years after getting that shot. The treatments and tests from Yale, UCONN, and CCMC for two years offered false diagnosis and false hope. Her pain was so bad walking was impossible at times. I had to carry her up and down the stairs of our home because she walked with the gate of a 90-year-old and she withered down to a fragile, frail, and frightened 95 pounds; and when the tests didn't reveal a cause they could get behind, they said it was all in her head. They crushed her in that moment. Not one doctor would entertain that my daughter had a negative reaction to a vaccine.

big, beautiful, brown eyes looking to me to make the pain go away and being abandoned by the people entrusted to help her was life altering and I realized just how essential it is for parents to be the primary caregivers and decision makers in their children's health, and that parents should be entitled to the truth behind all vaccines and medications, allowed to advocate for the children God has given to them, never shamed or pressured for refusing or questioning anything with a potential to harm them. It seems like common sense, but the battle is real.

When the Covid pandemic came, was working part time and going to school. The pressure and threats of termination at work and expulsion from school, if she didn't agree to take the Covid shot and all boosters to follow, were relentless. Having been vaccine injured, did her own research into the shot and didn't like what she read. Her discernment through prayer told her not to and I supported her right to refuse it. Her pastor was willing to write her a religious exemption, but The State of Connecticut Legislature removed the religious exemptions. The Senate Majority Leader, Bob Duff, testified that there was no way to tell if Christians were lying about their faith in God. He decided that if we could not prove our faith, then we didn't deserve to exercise it. Her employer allowed her to remain employed but made her wear a double mask. Naugatuck Valley Community College was not as understanding. Her dream was to pursue toxicology, which required labs that could not be done with online classes, so she was forced to leave school. This interruption in her life, and in her pursuits, was unfair and hardly constitutional.

If I were to look for a blessing in the Covid chaos, it would be my decision to homeschool my youngest son, . struggled in school and part of special education. Covid came, and with it, distance learning. Distance learning was a disaster. Everybody knows that. Then, the regional BOE announced a mandatory 14-day quarantine following a household member traveling out of state. state. My husband's work required significant travel, and it appeared would never be admitted in school. I sent the letter of intent to homeschool and didn't look back. Today, is in 10th grade. He, like , loves to read. He is above grade level in all subjects. He enjoys boxing, bicycling, and horseback riding. He has benefitted enormously from homeschool and we engage with many other homeschool families having picnics, going fishing, swimming, sledding, and many other activities.

's success is one of many in the homeschool community. Home school children in our state are outperforming their public-school peers academically and are more active and socialized, eliminating the falsehood that our children are isolated. Public school children are facing depression and anxiety at epidemic levels, being prescribed medications for this diagnosis, including marijuana. Homeschooled kids are not suffering

from the mental and emotional disorders seen in the public schools. Teaching our kids at home allows us to incorporate God and our Christian Faith into their learning. We read The Bible. We openly talk about our Faith and take pride in our family, our community, and our home.

Connecticut schools have subjected students to Critical Race Theory, pornographic material passed off as education tools for children as young as 8 years old, and transgender activism. Last legislative session, Democrats tried to undermine homeschool families by using the tragic incident of a man from Waterbury, Ct, who was held captive in a home for almost 20 years. While he attended the Waterbury public school system, numerous complaints were filed to the Department of Children and Families. A family member removed him from the school stating they were moving to Wolcott, Ct. The Department of Children and Families and Waterbury School system never followed up with this child. There was no letter of intent to homeschool but Democrat legislators in Connecticut deliberately lied, twisting the story with the help of media, disparaging and defaming the homeschool families here in The Constitution State. They attempted to pass legislation to regulate us without giving us an opportunity to testify before passing a bill. Homeschool families flooded the capitol building in Hartford with a very peaceful but very powerful protest. Connecticut Democrats have publicly promised to try again despite having no reason to regulate us. I believe that it is a parent's First Amendment right, their religious liberty, to raise up their children in a Godly manner. The state of Connecticut, if allowed to regulate home schoolers, would prevent that; and then expose our children to hateful and divisive teachings, sexual deviance, and ideology that is against our own.

Homeschool families are not currently pressured to vaccinate as they are in the public school system. With enrollment in the Connecticut public schools down, and the test scores demonstrating their failures, legislators have promised to attack the heart of religious liberty itself; the nuclear families, especially the homeschool families that are indeed following their faith. It is my hope and my prayer that this commission investigates The State of Connecticut for its unconstitutional attacks on its citizens during Covid, eliminating the religious exemptions. I also hope it exercises whatever powers are given to it to investigate and intervene on behalf of homeschool families being unjustly targeted for our faith and family-based decisions, by Democratic legislators.

Sincerely,

Thea Eve 



Cases and Trends Implicating Religious Liberty in the United States

Submission to the Religious Liberty Commission

August 11, 2025

By Ismail Royer

*Lay Leaders Advisory Board Member
Director, Islam and Religious Freedom
Religious Freedom Institute*

Executive Summary

Our survey of the landscape of religious liberty reveals several categories of religious liberty violations that continue to stand in the way of fulfilling the promise of religious liberty freely exercised in America. Among these categories are: government impingement on religious institutional autonomy; discrimination against religious institutions in state programs; infringement of parental rights; infringement of the free exercise rights of public school students; discrimination in religious land use; the failure to accommodate inmate religious practice; hate-motivated violence against persons and institutions; and discrimination in employment and housing. We have collated representative cases in each of these categories to illustrate the nature and extent of the threat to religious liberty.

We have also identified cases under each of these categories that we recommend the Religious Liberty Commission examine in future hearings. The following cases may be of particular interest to the commission:

- **A Minneapolis-area public school district** is refusing to give Christian and Muslim parents a real (as opposed to illusory) opportunity to opt their children out of religiously-objectionable material aimed at changing their beliefs on sexual orientation and gender (p. 13).
- **The Montgomery County, Maryland, public school district** is refusing to graduate at least two students because it denied their parents, who are traditional Christians, a right to opt their children out of religiously-objectionable LGBTQ instruction in a mandatory health class (the “Jane Doe” case) (p. 16).
- **The Loudoun County, Virginia, public school district** is punishing Christian and Muslim students for their faith-based objections to a female using the boys locker room with them, and discriminating against the Christian students by dropping its disciplinary proceedings only as to the Muslim student (p. 19).

To aid the commission, we have conducted an in-depth review of each of these cases. We have collected key documents and spoken with the parties themselves or their representatives. We provide detailed information in this report or will provide it upon request, and have suggested witnesses for the commission to call.

Finally, we provide the commission with actionable recommendations to submit to the White House to address each area of religious liberty violations, including specific cases such as those cited above.

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I. Introduction

On May 1, 2025, the President established the Religious Liberty Commission through Executive Order , with a mandate to “vigorously enforce the historic and robust protections for religious liberty enshrined in Federal law.” The commission will achieve this by investigating the history and foundational principles of religious liberty in America as well as specific issues and cases in which religious liberty is under threat.

The Executive Order creating the commission states that it will issue a “comprehensive report” about threats to religious liberty and strategies to “increase awareness of and celebrate America’s peaceful religious pluralism.” The report will address issues such as parental rights in education, conscience protections in healthcare, free speech for religious bodies, institutional religious freedom, and attacks on houses of worship. Furthermore, the commission will recommend policies to safeguard religious liberty for all Americans.

The commission’s mission is serious and urgent. As a member of the Lay Leaders Advisory Board, and in my capacity as Director of Islam and Religious Freedom at the Religious Freedom Institute (RFI), I and my colleagues respectfully submit this report with the aim of aiding the members of the commission in achieving this mission.

This report highlights for the commission categories of religious liberty violations, which are of particular concern. We define those categories and illustrate them with representative cases that are either recent or live controversies. Furthermore, within each category, we identify one or more cases of religious liberty violation that we recommend the commission investigate, along with the names of suggested witnesses should the commission choose to investigate the case. Finally, we suggest recommendations that the commission can make to the President in order to address these specific cases or the broader categories of religious liberty violation.

In preparing this report, we consulted with several religious liberty advocacy organizations and attorneys, who in turn contributed their insights and, in some cases, statements for inclusion in the report. In particular, RFI would like to thank for their contributions and advice: the American Hindu Coalition, the Sikh Coalition, Agudath Israel of America, the Center for Public Justice, Attorney Avi Schick, and Attorney Paul M. Rivera. Finally, this report would not have been possible without the research and writing contributions of Kimberly Blood and Olivia Spivey, both RFI summer 2025 interns.

II. Trends and Cases

We have organized this section of our report by category of religious liberty violation. First, the nature and scope of each category is described in broad terms, then illustrated with representative cases. We then include detailed case studies of violations for each category. Finally, we provide the names and contact information for proposed witnesses to the incidents described. In many cases, we have included statements provided to RFI from witnesses and experts to these events.

A. Autonomy of Religious Institutions

1. Summary

“Church autonomy is usually explained as a means of protecting religious institutions from state control, ensuring that religious organizations can control their own beliefs and internal affairs, or ensuring that the state does not establish a religion.”¹ A steady stream of media reports and litigation in recent years illustrates that institutional religious autonomy continues to be an area in which the religious liberty of Americans is in need of robust defense.

For instance, in *Catholic Charities Bureau v. Wisconsin Labor & Industry*,^{2,3} Catholic Charities Bureau was discriminated against for “not being religious enough” to meet the requirements for a tax exemption, to which the Supreme Court responded, “[T]he government should not entangle itself in second-guessing the religiosity of a faith-based organization’s activities.”⁴ Another instance of government infringement on church autonomy is the ongoing case *Union Gospel Mission of Yakima v. Ferguson*, in which a Christian non-profit shelter is challenging Washington state’s anti-discrimination law that restricts the religious organization’s right to decline employment to individuals who do not align with its beliefs regarding sexual

¹ Lael Weinberger, *The Limits of Church Autonomy*, 98 Notre Dame L. Rev. 1253 (2023).

² *Catholic Charities Bureau, Inc., et al. v. Wisconsin Labor and Industry Review Commission*, No. 24-154 (U.S. 2025). For an analysis of this case, see Ian Speir and Nathan A. Berkeley, “Wisconsin Supreme Court Punishes Catholic Charities for Serving Everyone,” *National Review*, March 28, 2024.

<https://www.nationalreview.com/2024/03/wisconsin-supreme-court-punishes-catholic-charities-for-serving-everyone/>.

³ Brief of the Minnesota-Wisconsin Baptist Convention, Lutheran Church—Missouri Synod, National Association of Evangelicals, American Islamic Congress, The Church of Jesus Christ of Latter-day Saints, General Council on Finance and Administration of the United Methodist Church, the Ethics and Religious Liberty Commission, and the Islam and Religious Freedom Action Team of the Religious Freedom Institute as Amici Curiae Supporting Petitioners, *Catholic Charities Bureau v. Wisconsin Labor & Industry Review Commission*, No. 2020-AP-2007 (Wis. Sup. Ct. 2024).

⁴ “Explainer: Supreme Court Unanimously Upholds Vital First Amendment Protections in Religious Autonomy Case,” *Ethics & Religious Liberty Commission*, June 5, 2025, <https://erlc.com/resource/explainer-supreme-court-unanimously-upholds-vital-first-amendment-protections-in-religious-autonomy-case/>.

orientation, a right protected by the establishment clause.^{5,6} Similarly, in *Foothills Christian Church et al v. Johnson et al*, a group of California churches is appealing the dismissal of their challenge to a state law that requires religious preschools to allow children to opt out of religious services, arguing it violates their right to self-govern their religious institution.^{7,8} Finally, Yeshiva University, an Orthodox Jewish school, was sued for denying recognition to a student Pride Alliance group. In response, New York courts refused to recognize the school as a religious institution,⁹ yet another illustration of the state undermining a religious organization's autonomy.

2. Case Study: New York Targets Yeshivas

An ongoing case underscoring this pattern of violating the autonomy of religious institutions (as well parental rights) is New York State's war on the Orthodox Jewish education system. The New York City education departments "[want] to force religious schools to come into substantial equivalence with the [public] schools," but attempts to do so by significantly infringing on the Jewish community's constitutionally protected institutional autonomy.¹⁰ The key attorney representing Orthodox Jewish institutions, Avi Schick, provided RFI the following outline of what this case entails:

Since at least 2018, the New York State and New York City education departments have been trying to gain greater control over Jewish parochial schools (known as yeshivas). As part of those efforts, the New York State Education Department enacted regulations in 2022 that required local school districts (such as the New York City Department of Education) to conduct review of private schools operating within their districts.

As we feared, those reviews have focused exclusively or just about exclusively on Jewish schools. And as we feared, the local school authorities have used their leverage in conducting those reviews to subject them to discriminatory treatment

⁵ *Union Gospel Mission of Yakima v. Ferguson*, No. 23-2606 (9th Cir. 2024).

⁶ Brief of Christian Legal Society, Center for Public Justice, Christian Medical and Dental Associations, Citygate Network, CRISTA Ministries, General Conference of Seventh-Day Adventists, Institutional Religious Freedom Alliance, and Islam and Religious Freedom Action Team of the Religious Freedom Institute as Amici Curiae Supporting Plaintiff-Appellee and Affirmance, *Union Gospel Mission of Yakima v. Ferguson*, No. 23-2606 (9th Cir. 2025).

⁷ *Foothills Christian Church et al v. Johnson et al*, No. 3:2022cv00950 (S.D. Cal. 2023).

⁸ Monique Merrill, "Religious Preschools Push to Prevent Kids from Opting Out of Church," *Courthouse News Service*, June 5, 2025,

<https://www.courthousenews.com/religious-preschools-push-to-prevent-kids-from-opting-out-of-church/>.

⁹ "YU Pride Alliance v. Yeshiva University," *Becket Fund for Religious Liberty*, accessed June 10, 2025, <https://becketfund.org/case/yu-pride-alliance-v-yeshiva-university/>.

¹⁰ Fox News Digital, "New York's Faith Community Alarmed by Department of Education's Proposed 'Intrusion' into Religious Schools," *Fox News*, June 28, 2022, <https://www.foxnews.com/media/new-yorks-faith-community-alarmed-by-department-of-education-proposed-intrusion-on-religious-schools>.

that threatens their missions and jeopardizes their ability to educate students in the faith and tradition chosen by their parents.

Below is a summary of this concerning discrimination—discrimination that I believe warrants the federal government’s attention. I also encourage the Advisory Board and the Religious Liberty Commission to review the complete complaint that several yeshivas filed with the Office of Civil Rights on January 13, 2025. It provides a full account of the discriminatory conduct and the grounds to take action to prevent further discrimination.

Here are some of the most egregious forms New York’s discrimination has taken:

1. Forcing yeshiva students to read specific secular texts from reading lists it approves;
2. Interfering with yeshivas’ constitutional autonomy to select their faculty;
3. Refusing to respect cultural and religious classroom norms of the Yeshivas;
4. Targeting Jewish Studies curricula for disfavored and discriminatory treatment;
5. Prohibiting Yeshivas from providing dual-language instruction.

1. Forcing Religious Schools to Use State-Approved Secular Texts

New York is forcing private religious schools to use state-approved secular texts to instruct their students in order to be deemed compliant. Specifically, New York requires religious schools to use “a range of fiction and non-fictions texts” approved by New York to instruct their students.

Shockingly, Robin Singer, Deputy Counsel for the NYC Department of Education, has explicitly admitted that the reason for this requirement is to ensure that students at religious schools are exposed to material that “parents and schools wouldn’t otherwise” put before them. On at least three other occasions, Ms. Singer has threatened religious schools that their instruction would be deemed insufficient unless they submitted in writing a list of the fiction and non-fiction texts to her and others for pre-approval. In each instance, Ms. Singer explained that the reason for this requirement was to ensure that students are exposed to material and ideas that their parents and schools wouldn’t otherwise put before them.

This is no idle threat. New York has already penalized one of my clients by deeming its curriculum deficient because it doesn't include enough "fiction and **secular** nonfiction texts to create opportunities for students to engage with a variety of topics and texts."

2. Micromanaging Who Religious Schools Select as Faculty

Even though the United States Constitution protects religious educational institutions from government interference in matters of faith and doctrine—particularly as the instructors they select to sustain their faith and tradition—New York is interfering with that core right. New York is scrutinizing religious schools' hiring decisions under the pretense of assessing competence.

For example, New York is actively intruding on the hiring decisions made by yeshivas by demanding that they allow them to review their hiring processes and criteria, including resumes, interview materials, and other hiring documentation. The stated purpose is to determine whether my clients' instructors are "competent." But we know that is not the real reason.

After New York observed in-class instruction by my clients' faculty, the reported observations plainly reflected teacher competence. But New York nevertheless concluded that "there was insufficient evidence demonstrating that [the yeshiva] teachers have the appropriate knowledge, skill, and disposition to deliver substantially equivalent instruction."

New York should be confirming that students are learning, not what criteria religious schools use to select their faculty.

3. Disrespecting Religious Schools Cultural and Religious Norms

New York is also using the review process to disrespect important cultural and religious norms in private schools. For reasons of modesty, gender separation is a widely observed practice in chasidic communities. Their schools are single-sex, not coeducational, with female faculty teaching at schools for girls and male teachers providing instruction in boys schools.

But when a Brooklyn yeshiva requested that the City send male evaluators for an eighth-grade classroom observation, it refused. Since eighth-grade students are generally 13 years old and thus obligated by chasidic custom and their faith to observe strict sex separation, my client made a respectful request that the City

accommodate the cultural norms and faith practiced by the school and its students and send a male evaluation team to observe the eighth-grade classroom. The City flatly refused the yeshivas' several requests for reasonable accommodation.

4. Targeting Religious Curriculum for Disfavored Treatment

New York is also using its purported regulatory oversight to punish religious schools for having religious instruction. Like most religious schools, the yeshiva curriculum includes instruction in matters of faith and tradition, sometimes referred to as "Jewish Studies." The instruction students receive in Jewish Studies courses integrates and satisfies key learning objectives from the required subjects with Jewish texts, history, and culture. It is intellectually rigorous, and it instills and preserves culturally important values and traditions.

But New York wholly discredits that instruction. It has advised my clients that their Jewish Studies classes do not count at all toward satisfying New York's educational requirements. Yeshivas are being told by New York that their instruction will be deemed deficient unless they replace their current emphasis on Jewish Studies.

5. Prohibiting Religious Schools from Instructing in Culturally and Religiously Important Languages

New York has also put religiously and culturally important languages in its cross hairs. And it has done so with no shame for the patent hypocrisy of its double standard. New York City alone operates more than 200 dual-language programs in its public schools. These are not classes geared to non-English speakers. Rather, these programs permit English speakers to learn a foreign language by receiving up to 90% of their instruction in that foreign language. It is clear that New York generally is a proponent of dual-language instruction.

Yet when it comes to religious dual-language instruction, New York takes a very different position. That is deeply concerning. Instruction in Yiddish, Hebrew, and Aramaic is a critical component of the mission of virtually all Jewish schools. Those languages are part of the shared ancestry and tradition of the Jewish people. Instruction in English alone is impossible in the context of Jewish Studies because most of the material is in the original vernacular.

Incredibly, New York education officials have openly admitted that they have different standards for yeshivas and for public schools. On November 2, 2023,

David Frank, the senior official within the New York State Education Department with responsibility for parochial schools admitted at a training for local school authorities that its English-only language requirement “is one difference between...what happens in district [public] schools” and nonpublic schools. Mr. Frank acknowledged that public schools are permitted to teach required classes in languages other than English but that Yeshivas do not have that right. And he made clear that this double standard targets yeshivas. He explained: “[I]f you do go to a school where they say we have great history instruction and it’s actually happening in the morning in our Talmudic class, and you go to see it and it is in Aramaic, that would not qualify” as credited instruction.

That double standard is plainly discriminatory. Whatever New York’s reasons, they aren’t legitimate. New York cannot credit the instruction of publicly educated students in Spanish or Chinese but discredit the instruction of yeshiva students in Yiddish, Hebrew, or Aramaic.

* * * * *

What is happening in New York deserves attention and action. Parents choose to send their children to private religious schools because they are *different* from public schools. New York has no right to come in and impose secular uniformity where the Constitution and federal law protect religious distinctiveness.¹¹

Witness:

Avi Schick
Attorney Representing Orthodox Jewish Institutions
Faegre Drinker Biddle & Reath



@faegredrinker.com

¹¹ See also Mr. Schick’s January 15, 2025 complaint under Title VI of the 1964 Civil Rights Act submitted to the Department of Education’s Office of Civil Rights on behalf of several New York yeshivas.
<https://yeshivaworld.b-cdn.net/wp-content/uploads/2025/01/1.13.25-FINAL-OCR-Complaint.pdf>

B. Discrimination Against Religious Institutions in State Programs

1. Summary:

The First Amendment’s prohibition on religious discrimination extends to public benefit programs that enlist private organizations to advance public goals.¹² The Supreme Court has affirmed that when the government implements a program extending public benefits to private organizations, the Free Exercise Clause prohibits the exclusion of religious organizations from participation and prevents the government from requiring these organizations to secularize as a condition for inclusion. In cases like *Carson v. Makin* (2022), the Court ruled that states cannot exclude religious schools from generally available public benefits solely because of their religious status. This decision reaffirmed that government programs must remain neutral toward religion and cannot discriminate against faith-based organizations. Despite these clear principles, state programs habitually discriminate against and withhold funding from religious institutions. As legal scholars Nicole Garnett and Tim Rosenberger have demonstrated, many state programs continue to sideline religious entities, often under the guise of maintaining secularism.¹³ This persistent exclusion not only defies the Constitution but also threatens to limit the availability of essential services, particularly for underserved communities that often rely on faith-based providers. Such prejudicial exclusion has been repeatedly imposed upon Pre-K programs, as examined below.

2. Case Study: States Restrict Religion in Pre-K Programs

Publicly funded Pre-K programs have become a universal priority for state funding. However, a pattern has emerged in which religious institutions’ efforts to provide Pre-K schooling have been frustrated by funding restrictions placed on the schools by state program leaders. Religious institutions have faced unjust restrictions in Georgia,¹⁴ Alabama,¹⁵ and California,¹⁶ where state funding is contingent on their not promoting concepts such as religious worship, praying before meals, or the use of religious symbols on holidays—clearly a biased demand for secularization.

¹² Nicole S. Garnett and Tim Rosenberger, “Unconstitutional Religious Discrimination Runs Rampant in State Programs,” *Manhattan Institute*, February 14, 2024, <https://manhattan.institute/article/unconstitutional-religious-discrimination-runs-rampant-in-state-programs>

¹³ *Ibid.*

¹⁴ GA Dept. of Early Care and Learning, “Pre-K Program 2023–2024 School Year: Pre-K Providers’ Operating Guidelines,” § 4.5, at 17 (2023).

¹⁵ AL Dept. of Early Childhood Education, “First Class Pre-K Program Guidelines 2023–2024” (2023), 20.

¹⁶ CA Dept. of Education, “California State Preschool Contract Terms and Conditions,” § II.E (2022).

Witness:

Girien R. Salazar
Director of Faith-Based Policy and Research
Center for Public Justice

@cpjustice.org

C. Parental Rights¹⁷

1. Summary

Parents have a fundamental right to guide the upbringing of their children according to their religious conscience.¹⁸ Notwithstanding the strong basis of this principle, parental rights in the context of religion have been severely challenged in recent years.

A paradigmatic recent case of the violation of parental rights in public schools is that of the public school district in Montgomery County, Maryland.. RFI worked closely to support the parents in this case. This author spoke at¹⁹ and helped to organize²⁰ rallies outside school board meetings. We prepared parents and citizens to testify at those meetings and helped compose their testimony, met with municipal officials to advocate on behalf of the parents, and, along with local parents associations, helped lead strategy meetings. We led the media relations campaign for the parents, and advocated for them on multiple broadcast media outlets,²¹ and wrote published essays about the case.²² We helped introduce the Becket Fund to parents as they sought legal representation. RFI also joined four amicus briefs in *Mahmoud v. Taylor* at all stages of the proceedings, from the appellate court to the Supreme Court.²³

Montgomery County is not an isolated case. The St. Louis Park School District near Minneapolis, Minnesota refused to let parents opt their children out of “gender identity” and

¹⁷ As we show with our list of examples, the rights of parents are relevant in many contexts, such as custody, medical decisions, and legal representation. In this report we focus primarily on parental rights in the context of public education.

¹⁸ *Wisconsin v. Yoder*, 406 U.S. 205 (1972).

¹⁹ As in [this video](#) of a rally in front of the MCPS school board meeting on June 27, 2023.

²⁰ See, e.g., [this media interview](#) of the author at a rally outside MCPS school board meeting in the Summer of 2023..

²¹ See, e.g. the author’s appearances on Fox News talk shows [here](#) and [here](#).

²² See, e.g., this author’s essay, “Supreme Court Protects Religious Freedom in Maryland,” *Dallas Morning News*, July 5, 2025.

<https://www.dallasnews.com/opinion/commentary/2025/07/05/supreme-court-protects-religious-freedom-in-maryland/>

²³ See our briefs [here](#), [here](#), [here](#), and [here](#).

sexuality curriculum, disregarding their religious objections.²⁴ Additionally, in February 2024, an infant was removed from her parents' custody and subsequently administered a vaccination against the religious beliefs of her Rastafarian parents which require natural methods of healing.²⁵ Furthermore, as discussed in greater detail below, a Christian high school senior in the Montgomery County School District who has been identified in media reports as “Jane,” was prohibited from graduating because she and her parents, citing their religious objections, refused to let her participate in an “anti-Christian, pro-LGBTQ+ health class that insists Christians are effectively white supremacists and that queer lifestyles are normal and healthy.”^{26,27,28} In an equally troubling case currently awaiting approval for an *en banc* rehearing, *Littlejohn v. School Board of Leon County*, two parents sued the school because it facilitated their 13-year-old daughter's “social transition” without their consent and in opposition to their religious beliefs.^{29,30} These cases reflect a broad pattern of infringements on parents' rights to direct their children's religious upbringing—an issue further highlighted by similar disputes in another Minneapolis-area school district and the Montgomery County School District, both summarized below.

2. Case Study 1: Minneapolis-area School Districts Versus Parents

Osseo Area Schools, a school district near Minneapolis, informed parents on March 8, 2024 of a scheduled “LGBTQIA+ High School Advisory Lesson,” which included content on identity, pronouns, and “creating a brave space.” This instructional material was met with widespread resistance from parents. Liberty Counsel, representing some of the parents, sent a letter on March 28, 2024, demanding that the district honor the religious rights of teachers, parents, and students to opt out of the LGBTQ lesson scheduled for early April, underscoring the legal grounds for suitable accommodations under Minnesota State laws, Title VII of the Civil Rights Act of 1964, the First and Fourteenth Amendments, and the Protection of Pupil Rights Amendment. Following their letter, the district acknowledged that both teachers and students

²⁴ “Minnesota School District Allows Muslim Families to Opt-Out of ‘Gender Identity’ and Sexuality Curriculum,” *Religious Freedom Institute*, February 14, 2024, <https://religiousfreedominstitute.org/mn-school-district-allows-muslim-families-to-opt-out-of-gender-identity-and-sexuality-curriculum/>.

²⁵ *Care and Protection of Eve*, SJC-13672 (2025). RFI's position on parental rights and vaccinations is that strict scrutiny is the proper legal standard for any proposed invasion of a fundamental right, and that the government may be able to demonstrate a compelling interest in the vaccination of children in particular cases.

²⁶ Liberty Counsel, “School Refuses to Let Christian Graduate,” *Liberty Counsel*, last modified May 27, 2025, <https://lc.org/newsroom/details/250527-school-refuses-to-let-christian-graduate>.

²⁷ Kristine Parks, “Christian Family Says School District Won't Allow Daughter to Graduate over Mandatory LGBTQ Health Class,” *Fox News*, April 25, 2025, <https://www.foxnews.com/media/christian-family-says-school-refusing-allow-daughter-graduate-over-mandatory-lgbtq-health-class>.

²⁸ For related court documents in Jane's case, see the folder titled *Janss* (“Jane Doe”), available at: <https://drive.google.com/drive/folders/1QvI-gSx2LrktTssLWtJiQj6YmGI6-0NF?usp=sharing>.

²⁹ *Littlejohn v. School Board of Leon County*, No. 23-10385 (11th Cir. 2025).

³⁰ Brief of the Religious Freedom Institute as Amicus Curiae Supporting Plaintiffs-Appellants, *Littlejohn v. School Board of Leon County*, No. 23-10385 (11th Cir. 2025).

could request religious accommodations, leading to nearly 2,000 high school students and over a dozen teachers opting out. However, parents criticized the opt-out process as overly burdensome, requiring in-person visits and ID checks, while the opt-out form itself was difficult to locate. Therefore, despite the letter demonstrating obvious legal precedent and the effectiveness of legal pressure in securing limited but significant policy concessions, full relief was unmet as the district appeared to make the process intentionally difficult.^{31,32}

Naima,³³ a Muslim parent and community leader who lives in the Osseo area school district, provided RFI with a narrative describing what parents have been experiencing. Naima has chosen to send her children to a private school because of the district's attempts to indoctrinate students, but she serves as an interpreter for Somali parents in their negotiations with school officials. Her statement is as follows:

In June 2021, Gender Inclusion Policy 508 was passed by the Osseo School Board. In June 2022 the LGBTQIA+ History and Culture Resolution was approved by the School Board by a vote of 4-2, with no input from the community and the families Osseo Area District serves. The families were disheartened to find out that The Resolution and 508 policy require students to celebrate and embrace the LGBTQIA+ lifestyle by dedicating lesson time to teach them about the culture and history of Lgbt lifestyle, as well as dedicating a whole month celebrating Lgbt lifestyle and raising Pride flag on school buildings. Elementary students are being taught about gender identities and that gender social construct rather than biological reality. All of these issues contradict Muslim families' deeply held religious beliefs.

As a result, many families have been compelled to withdraw their children from public schools and seek refuge in private or charter schools that better align with their convictions. This decision, though made out of deep concern for their children's well-being and religious upbringing, has come at a significant cost. Families are now facing substantial financial burdens to cover tuition fees, additional transportation expenses, and logistical challenges, all while continuing to pay taxes that fund the very public school system from which they felt forced to withdraw.

³¹ Center of the American Experiment, "Diverse Group of Osseo Parents Voice Concerns over Gender Ideology before School Board," *Center of the American Experiment*, June 21, 2023, <https://www.americanexperiment.org/diverse-group-of-osseo-parents-voice-concerns-over-gender-ideology-before-school-board/>.

³² Liberty Counsel, *Letter to Osseo Area Schools Regarding Parent, Student, and Teacher Opt-Outs of LGBTQ Lesson* (March 28, 2024), <https://lc.org/PDFs/Attachments2PRs/LAs/2024/032824LtrtoOsseoAreaSchoolsreParent-Student-TeacherOptOutsofLGBTLessonREDACTED.pdf>.

³³ Naima asked that her last name be withheld from the public version of this document.

We believe that families are being penalized for seeking an education consistent with their beliefs. We believe that public schools should be a place where all children can learn in an environment that respects and accommodates diverse religious backgrounds, not one that forces families to choose between their faith and their access to public education.

Similarly, in St. Louis Park, Minnesota, six Somali-Muslim families raised concerns in October 2023 after third- and fourth-grade students encountered LGBTQ-themed children's books—such as *My Shadow Is Pink*—during English instruction, complete with teacher-led discussions on LGBTQ identities that conflicted with the families' religious beliefs. Their opt-out requests to the school were initially denied, prompting them to submit testimony at a school board meeting and later issue legal demand letters in November 2023 via First Liberty Institute and True North Legal, citing violations of parental notice requirements under Minnesota law and free exercise rights under the First Amendment.³⁴ Within weeks, the district implemented a new "Alternative Learning Procedure." However, like Osseo's, this program proved excessively cumbersome. It included a mandatory section requiring parents to provide complex, detailed written explanations of the religious basis for their objection. After continued pressure from parents, the district finally relented in early 2024 and granted opt-out accommodations for all six families (as well as dozens of others) across elementary, middle, and high school levels—establishing a compliant opt-out process that no longer required parents to explain their religious beliefs.³⁵

These two cases reveal a troubling inconsistency in how Minnesota school districts respond to parental and religious objections to LGBTQ-inclusive instruction. While St. Louis Park eventually permitted exemptions following legal notice and then reformed its needlessly complicated procedures to establish a clearer, more accessible, and religion-neutral opt-out process, Osseo Area Schools has refused to fully cooperate. Although Osseo also eventually acknowledged students' and teachers' rights under federal and constitutional law to opt-out, Osseo's persistent imposition of unnecessary administrative hurdles effectively discouraged participation in the opt-out process, propagating a subtle but dangerous obstruction of rights. The district engaged in ploys seen in other districts, including selectively granting opt-outs on a case-by-case basis, allowing schools like Osseo to reduce the outrage and momentum needed for widespread parental or legal pushback without having to formally acknowledge a policy shift. This demoralizes concerned parents, complicates legal challenges (which generally favor clear-cut violations), and strategically diffuses controversy. While these tactics may reduce the

³⁴ Ismail Royer, "RFI Defends Somali Muslim Parents against Minnesota School Board," *Religious Freedom Institute*, December 13, 2023, <https://religiousfreedominstitute.org/rfi-defends-somali-muslim-parents-against-minnesota-school-board/>.

³⁵ First Liberty Institute, "Minnesota Moms," *First Liberty Institute*, accessed June 25, 2025, <https://firstliberty.org/cases/minnesota-moms/>.

risk of lawsuits, they do not reflect a good-faith respect for parental rights. Rather, they present an opportunity for advocates to expose the performative nature of such methods and highlight the urgent need for genuine transparency and accountability in educational settings. RFI expects to see an increase in similarly illusory accommodations following the Supreme Court's recent ruling in *Mahmoud v. Taylor*,³⁶ which reaffirms the obligation of schools to permit parents to opt their children out of material that seeks to change their religious views. This will further complicate school districts' tenacious efforts to provide compulsory LGBTQ instruction.

Witnesses:

Naima³⁷

Representative of Muslim parents of Osseo students

Kayla Toney

Counsel with First Liberty Institute

Representative of Muslim and Christian parents in St. Louis Park, Minnesota

2004 W. Plano Pkwy

Suite 1600

Plano, TX 75075



3. Case Study 2: Montgomery County Board of Education Refuses to Let Traditional Religious Believers Graduate

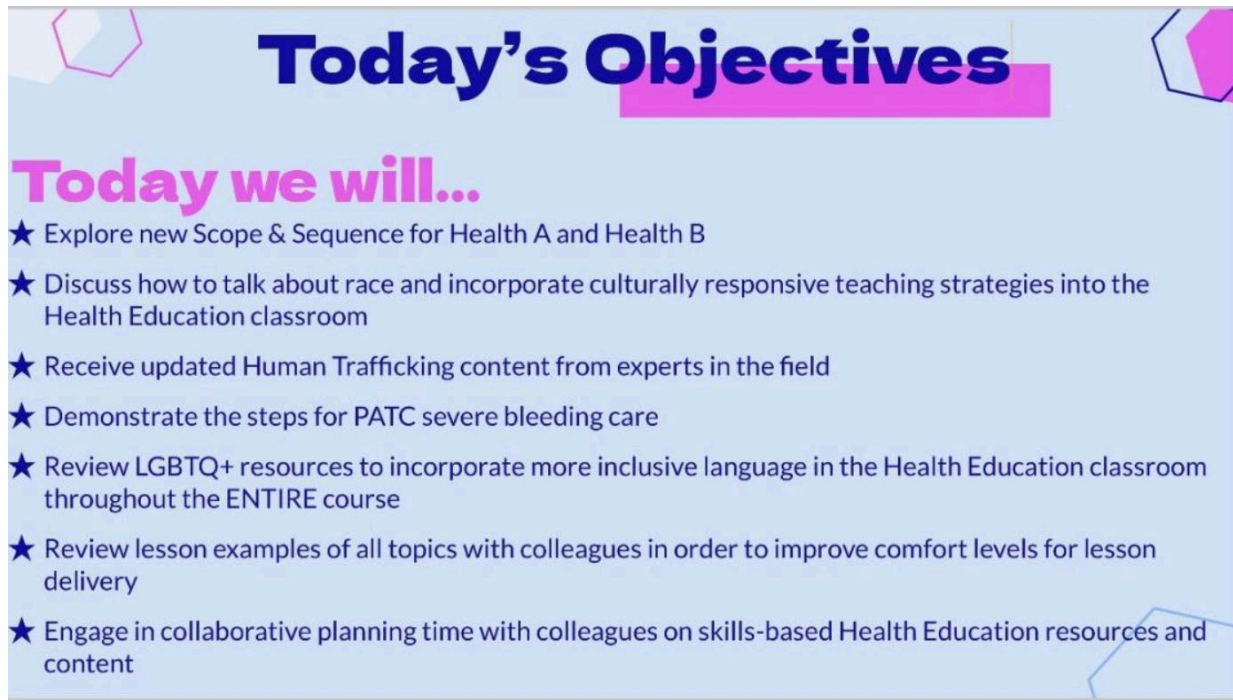
There are at least two cases of Montgomery County Public Schools (MCPS) refusing to allow students to graduate because their parents sought to opt their children out of LGBTQ instruction in the district's health class. These are the cases of "Jane," referenced above, which is being litigated in state court under the name *Janss v. Montgomery County Board of Education*, and *Gottesman v. Montgomery County Board of Education*, which has been removed to federal district court.³⁸ Both cases arose in early 2022 when new internal training materials introduced by MCPS for health teachers were leaked and circulated among the community. These materials stated that LGBTQ "resources" would now be used in every unit of the health class rather than solely in the Family Life and Sexuality unit. Notably, MCPS has affirmed what is stated in this training materials in administrative and court proceedings in both cases. This is significant

³⁶ *Mahmoud et al. v. Taylor et al.*, No. 24-297, slip op. (U.S. June 27, 2025).

³⁷ The author will provide Naima's last name and contact information at the commission's request.

³⁸ As noted at note 23, above, court documents for both *Janss* and *Gottesman* are available at: <https://drive.google.com/drive/folders/1QvI-gSx2LrktTssLWtJiOj6YmGI6-0NF?usp=sharing>.

because Maryland state law requires schools to permit opt outs from this unit.³⁹ As with the LGBTQ language arts curriculum at issue in *Mahmoud v. Taylor*, MCPS's strategy is clearly to take LGBTQ materials from the unit which parents have a statutory right to opt out of, spread those materials throughout the curriculum, and then deny opt outs on various specious grounds. The parents of the students in both *Janss* and *Gottesman* proposed alternative instruction to the health course, but MCPS rejected those options as unapproved. For its part, MCPS proposed alternatives to the health class, but—as in the Minnesota cases—this was an illusory opt out, since, among other reasons, the “alternative” instruction would have contained the same material the parents objected to. MCPS informed the parents that it would not allow their children to graduate on the grounds that the students had failed to complete the required health course. On May 29, a federal judge denied Mr. Gottesman's motion for a temporary restraining order to allow his son to graduate.⁴⁰ Ultimately, MCPS did not allow either student to graduate with their class on May 30, 2025. The Board of Education's motion to dismiss Mr. Gottesman's lawsuit is currently pending.



Today's Objectives

Today we will...

- ★ Explore new Scope & Sequence for Health A and Health B
- ★ Discuss how to talk about race and incorporate culturally responsive teaching strategies into the Health Education classroom
- ★ Receive updated Human Trafficking content from experts in the field
- ★ Demonstrate the steps for PATC severe bleeding care
- ★ Review LGBTQ+ resources to incorporate more inclusive language in the Health Education classroom throughout the ENTIRE course
- ★ Review lesson examples of all topics with colleagues in order to improve comfort levels for lesson delivery
- ★ Engage in collaborative planning time with colleagues on skills-based Health Education resources and content

One of the internal training materials leaked in 2022 used by MCPS to train health teachers, stating that “LGBTQ+ resources” will be incorporated “throughout the ENTIRE course.”

³⁹ “Code of Maryland Regulations (COMAR) 13A.04.18.01 allows parents and guardians to opt their student out of instruction related to family life and human sexuality.” Maryland State Department of Education, “Comprehensive Health Education - Frequently Asked Questions,”

<https://www.marylandpublicschools.org/about/Documents/DCAA/Health/Health-Education-FAQs-A.pdf>.

⁴⁰ Ian Round, “Judge Denies MD Graduation Bid over Gender Curriculum Dispute,” *The Daily Record*, June 2, 2025, <https://thedailyrecord.com/2025/06/02/student-graduation-denied-gender-curriculum-lawsuit/>.

Witness:

Paul R. Rivera

Attorney for Seth Gottesman and Timothy and Dagmar Janss

PO Box 394

Rockville, MD 20848

@gmail.com

D. Free Exercise in Public Schools

1. Summary

The Supreme Court recently affirmed that “the right to free exercise, like other First Amendment rights, is not ‘shed . . . at the schoolhouse gate.’ Government schools, like all government institutions, may not place unconstitutional burdens on religious exercise.”⁴¹ As such, students have the right to freely express and exercise their religious convictions in school. However, a pattern of schools disregarding free exercise rights continues to afflict religious students in America. Notably, in the 2023 case, *Fellowship of Christian Athletes v. San Jose Unified School District*, the San Jose Unified School District discriminated against a student Christian club by derecognizing them when they required its leaders to affirm the group’s religious beliefs, even though other student groups can enforce their own membership criteria.⁴² Likewise, a young man’s request to start a Bible club was denied by his middle school despite the school’s support of other secular extracurriculars. In December of last year, after two years and a legal demand letter, the school yielded and recognized the student’s constitutional rights.^{43,44} In *Jane Doe v. Fairfax County Public Schools*, a Virginia court ruled in December 2024 that the district’s policies that required students to use each other’s preferred pronouns and allowed bathroom access based on gender identity violated students’ constitutional rights to free speech and religious exercise.^{45,46} This year, students from the Moses Lake School District in Washington were asked to conceal rosaries and only wear them “discreetly,” on the ground that

⁴¹ *Mahmoud v. Taylor*, No. 24-297, slip op. at 16-71 (U.S. June 27, 2025) (citing *Tinker v. Des Moines Independent Community School District*, 393 U.S. 503 (1969)).

⁴² “Fellowship of Christian Athletes v. San Jose Unified School District,” *The Becket Fund for Religious Liberty*, <https://becketfund.org/case/sinclair-v-san-jose-school-district/>.

⁴³ John Manning, “New York School Says ‘NO!’ to 8th Grader’s Bible Club,” *First Liberty Institute*, December 6, 2024, <https://firstliberty.org/news/new-york-school-says-no-to-8th-graders-bible-club/>.

⁴⁴ Jorge Gomez, “New York School Reverses Course, Approves Student-Led Bible Club,” *First Liberty Institute*, December 20, 2024, <https://firstliberty.org/news/new-york-school-approves-bible-club/>.

⁴⁵ “Major Victory — Court Rules Fairfax County Public School’s Pronoun and Bathroom Policies Violate Students’ Constitutional Rights,” *America First Legal*, December 6, 2024, <https://aflegal.org/major-victory-court-rules-fairfax-county-public-schools-pronoun-and-bathroom-policies-violate-students-constitutional-rights/>.

⁴⁶ *Jane Doe v. Fairfax County School Board*, No. CL-2024-03171 (Va. Cir. Ct. 2024).

rosaries are “associated with gang affiliations.”⁴⁷ In several instances, including one this May, high schools have attempted to limit the free exercise rights of graduating seniors by censoring their commencement speeches to remove any mention of God or religious language—until legal counsel informed them of the students’ constitutional protections.^{48,49,50,51} Another graduating senior was initially prohibited from wearing an eagle feather and receiving a traditional quilt at her graduation ceremony, consistent with her Native American spiritual convictions, despite Mississippi state law allowing the practice. The school board reversed their decision after receiving a legal demand letter.⁵² The case of a Muslim and two Christian boys, outlined below, once again underscores the persistent problem of religious discrimination faced by students in public schools.

2. Case Study: Virginia School District Punishes Christian and Muslim Students for their Faith-Based Objection to a Female Using The Boys Locker Room

When three male students, two Christians and one Muslim, expressed discomfort with sharing a locker room with a transgender-identifying female student, the Loudon County, Virginia school district brought a Title IX sexual harassment investigation against them. The female student also filmed the three boys discussing their discomfort in the locker room despite strict school rules prohibiting the use of recording devices in locker rooms. All three boys explained that their discomfort at being in a changing room with a female stemmed at least in part from their religious beliefs. The students secured legal representation with the Founding Freedoms Law Center and lodged a complaint with the Department of Education’s Office of Civil Rights (OCR), claiming that Loudon County Public Schools (LCPS)’s investigation was intended to punish them on the basis of their religious beliefs and sex. The school subsequently dropped the charges against the Muslim student but added an additional charge to each of the

⁴⁷ “Moses Lake School’s Rosary Ban Sparks Outrage: Grieving Students Forced to Conceal Religious Symbols,” *Source ONE News*, March 27, 2025, https://www.yoursourceone.com/columbia_basin/moses-lake-schools-rosary-ban-sparks-outrage-grieving-students-forced-to-conceal-religious-symbols/article_de16830b-7c32-4666-9db9-573786847c3f.html.

⁴⁸ Lacey McNeil, “High School Student’s Fight for Religious Freedom Secures Victory for Future Students,” *First Liberty*, November 30, 2017, <https://firstliberty.org/cases/moriah-bridges/#simple2>.

⁴⁹ Lacey McNeil, “Michigan School Reverses, Will Allow ‘One-Time’ Exception for High School Valedictorian’s Speech,” *First Liberty*, June 2, 2021, <https://firstliberty.org/cases/savannah-lefler/#simple2>.

⁵⁰ Lacey McNeil, “Breaking: Michigan School Reverses, Will Allow Religious References in Student’s High School Graduation Speech,” *First Liberty*, May 27, 2021, <https://firstliberty.org/cases/elizabeth-turner/#simple2>.

⁵¹ “Valedictorian Delivers Faith-Filled Speech After Censorship Attempt,” *Liberty Counsel*, May 27, 2025, <https://www.lc.org/newsroom/details/052725-valedictorian-delivers-faithfilled-speech-after-censorship-attempt>.

⁵² Shajaka Shelton, “Pearl High student wins battle to wear Native American regalia at graduation ceremony,” *WLBT3*, July 3, 2023, <https://www.wlbt.com/2023/07/03/pearl-high-school-student-wins-battle-over-native-american-tribal-regalia-graduation-ceremony/>.

Christian students, leading them to raise a further claim of religious discrimination, given that the facts were identical for each student.⁵³

On July 25, 2025, the Department of Education announced that it had concluded its investigation of LCPS's conduct in this case and found that the district had discriminated against the male students on the basis of sex in violation of Title IX of the Education Amendments of 1972.⁵⁴ However, the Department's OCR has advised that it does not have jurisdiction over the charge of religious discrimination and that it has referred that claim to the Department of Justice.

Witness:

Josh Hetzler, Esq.
Attorney for the Students
Founding Freedoms Law Center

()

E. Religious Land Use

1. Summary

The land use provisions of the Religious Land Use and Institutionalized Persons Act of 2000 (RLUIPA) "protect individuals, houses of worship, and other religious institutions from discrimination in zoning and landmarking laws."⁵⁵ However, recent years have seen numerous transgressions of this protection. For example, as of April 30, 2025, the city of Toms River, NJ plans to seize Christ Episcopal Church's 10-acres of property for a recreational center, seemingly in retaliation for the church's request to build a homeless shelter.⁵⁶ Additionally, on June 2, 2023, the city of Miami Beach agreed to pay \$1.3 million to a small Orthodox Jewish group over claims of discrimination and code enforcement harassment. The group cited excessive inspections and surveillance and the city treating its home-based prayer gatherings as an illegally

⁵³ Benjamin Rothove, "Virginia School District Accused of Religious Discrimination in Transgender Locker Room Investigation," *National Review*, June 17, 2025, <https://www.nationalreview.com/news/virginia-school-district-accused-of-religious-discrimination-in-transgender-locker-room-investigation/>.

⁵⁴ U.S. Department of Education, "U.S. Department of Education Finds Five Northern Virginia School Districts in Violation of Title IX," July 25, 2025, <https://www.ed.gov/about/news/press-release/us-department-of-education-finds-five-northern-virginia-school-districts-violation-of-title-ix>

⁵⁵ U.S. Department of Justice, Civil Rights Division, "Religious Land Use and Institutionalized Persons Act," accessed June 10, 2025, <https://www.justice.gov/crt/religious-land-use-and-institutionalized-persons-act>.

⁵⁶ Sarah Rumpf-Whitten, "Religious Freedom Battle Erupts as New Jersey Town Attempts to Turn Church Property into Pickleball Courts," *Fox News*, May 26, 2025, <https://www.foxnews.com/us/new-jersey-town-moves-seize-church-turn-pickleball-courts-fields-religious-freedom-claim>.

operating religious institution.⁵⁷ Stafford County in Virginia similarly violated RLUIPA by creating new zoning laws to block the construction of an Islamic cemetery.⁵⁸ Finally, Micah's Way, a nonprofit that feeds people experiencing homelessness in Santa Ana, sued the city in 2023 after being denied an operating permit due to zoning restrictions. The city claimed food distribution is not allowed in the area, but Micah's Way argued, and the U.S. Department of Justice agreed,⁵⁹ that its charitable work is a protected religious practice. The dispute was ultimately resolved through settlement.^{60,61} Regrettably, the Apache plaintiffs in *Apache Stronghold v. United States* have not yet received the same level of government support afforded to Micah's Way through the Department of Justice, a matter detailed below.

2. Case Study: Congress Hands Over Apache Religious Sites to a Foreign Corporation for Destruction

A multinational mining corporation was granted control of an Arizona Apache worship site by Congress in 2014 where it plans to construct a copper mine on the land valued at over \$150 billion for its copper reserves.⁶² The Apache sued, arguing that the federal government's transfer of the land was a substantial burden on their religious exercise protected under the Religious Freedom Restoration Act (RFRA). "Our way of teaching is through oral stories, but these oral stories are connected to the land. Our teachings are connected to the land," said Nosie, a member of the Apache. "How do I teach [my daughter] to become an Apache woman when that place is gone forever?"⁶³ For centuries, Oak Flats has been used by the Apache to perform sacred acts that cannot be conducted anywhere else.⁶⁴

The Oak Flat copper deposit in Arizona has been at the center of controversy for decades. Originally protected from mining in 1955 by President Eisenhower, the land remained off-limits

⁵⁷ *Congregation 3401 Prairie Bais Yeshaya D'kerestir, Inc. et al v. City of Miami Beach*, No. 1:2022cv21213 (S.D. Fla. 2023).

⁵⁸ *Stafford County, Virginia, to Allow Islamic Cemetery in Response to Justice Department Lawsuit*, U.S. Department of Justice, October 14, 2021.

⁵⁹ United States Department of Justice, *Statement of Interest in Opposition to Defendant's Motion to Dismiss Plaintiff's Complaint*, in *Micah's Way v. City of Santa Ana*, No. 8:23-cv-00183-DOC-KES (C.D. Cal. May 9, 2023).

⁶⁰ Jill Replogle, "A Nonprofit Feeds People Experiencing Homelessness in Santa Ana. The City Wants It to Stop," *LAist*, June 2, 2023,

<https://laist.com/news/housing-homelessness/micahs-way-homeless-santa-ana-lawsuit-carter-doj-rluipa#>.

⁶¹ *Micah's Way v. City of Santa Ana*, 8:23-cv-00183, (C.D. Cal. 2023).

⁶² Derry Lenehan, "As Massive Oak Flat Copper Mine Clears Legal Hurdles, Apache See Religious Freedom Being Trampled," *Cronkite News*, June 11, 2025, <https://cronkitenews.azpbs.org/2025/06/11/oak-flat-copper-mine-clears-legal-hurdles-apache-religious-freedom-trampled/>.

⁶³ "Apache Stronghold Takes Oak Flat Fight over Copper Mine to Supreme Court," *Navajo-Hopi Observer*, September 16, 2024, https://www.nhoneews.com/news/apache-stronghold-takes-oak-flat-fight-over-copper-mine-to-supreme-court/article_72ed4c2a-7487-11ef-bfc1-6bd5e1e9ac4d.html.

⁶⁴ *Apache Stronghold v. United States*, 605 U.S. ____ (2025) (Gorsuch, J., dissenting), No. 24–291, decided May 27, 2025.

until a 2014 legislative maneuver by Senator John McCain authorized a land swap allowing mining company Resolution Copper to acquire the area. Efforts to reverse this transfer, including a 2021 bill led by Rep. Raúl Grijalva, ultimately failed.⁶⁵

After the Apache filed their initial complaint in 2021, a 3-judge panel of the U.S. Court of Appeals for the Ninth Circuit ruled against the Apache, holding that the destruction of a sacred worship site does not constitute a “substantial burden” under its interpretation of RFRA. Despite their perseverance, the Apache were once again ruled against under limited *en banc* review and subsequently denied a request for full *en banc* review. Prospects for judicial relief were totally eliminated when the U.S. Supreme Court declined to hear their case on May 27, 2025.^{66,67}

RFI filed two separate amicus briefs in the Supreme Court in support of the Apache’s petition for review and other briefs in lower court proceedings. The first refutes the Ninth Circuit’s concern that granting the Apache relief in this case would require an interpretation of RFRA that would afford Native Americans a veto over the use of all public land.⁶⁸ The second, a multifaith brief joined by RFI’s Islam and Religious Freedom Action Team, argues that, contrary to the Ninth Circuit’s interpretation of RFRA, the federal government’s plan to annihilate a site central to Apache religious practice constitutes a clear “substantial burden” under the statute’s protections, a position affirmed by Justice Gorsuch in his dissent to the Supreme Court’s denial of the petition for a writ of certiorari.^{69,70,71}

On June 16, 2025, the U.S. Forest Service issued its Final Environmental Impact Statement (FEIS), triggering a sixty-day countdown to the transfer of Oak Flat to Resolution Copper.⁷² With regard to the impact that the mine will have on Tribal Cultural Places (TCPs), the FEIS states:

⁶⁵ “Apache Stronghold Takes Oak Flat Fight over Copper Mine to Supreme Court,” *Navajo-Hopi Observer*, September 16, 2024, https://www.nhnews.com/news/apache-stronghold-takes-oak-flat-fight-over-copper-mine-to-supreme-court/article_72ed4c2a-7487-11ef-bfc1-6bd5e1e9ac4d.html.

⁶⁶ *Apache Stronghold v. United States*, 605 U.S. ____ (2025) (Gorsuch, J., dissenting), No. 24–291, decided May 27, 2025.

⁶⁷ Religious Freedom Institute, “Apache Stronghold v. United States III,” *Religious Freedom Institute*, October 18, 2024, <https://religiousfreedominstitute.org/apache-stronghold-v-united-states-iii/>.

⁶⁸ Brief of Religious Freedom Institute and Ethics and Public Policy Center as Amici Curiae Supporting Petitioner, *Apache Stronghold v. United States*, No. 24-291 (U.S. Sup. Ct. filed Oct. 15, 2024).

⁶⁹ *Apache Stronghold v. United States*, 605 U.S. ____ (2025) (Gorsuch, J., dissenting), No. 24–291, decided May 27, 2025.

⁷⁰ Religious Freedom Institute, “Apache Stronghold v. United States III,” *Religious Freedom Institute*, October 18, 2024, <https://religiousfreedominstitute.org/apache-stronghold-v-united-states-iii/>.

⁷¹ Brief of the Sikh Coalition, Christian Legal Society, and Islam and Religious Freedom Action Team of the Religious Freedom Institute as Amici Curiae Supporting Plaintiff-Appellant, *Apache Stronghold v. United States*, No. 21-15295 (9th Cir. 2024).

⁷² U.S. Forest Service, Final Environmental Impact Statement, Resolution Copper and Land Exchange, June 15, 2025, <https://www.resolutionmineeis.us/documents/final-eis>.

Physical and visual impacts on TCPs, special interest areas, and plant and mineral resources caused by construction of the mine would be immediate, permanent, and large in scale. Mitigation measures cannot replace or replicate the Tribal resources and TCPs that would be destroyed by project construction and operation. The landscape, which is imbued with specific cultural attributions by each of the consulting Tribes, would also be permanently affected...

The direct impacts on the TCP and special interest areas from construction of the mine and associated facilities constitute an irreversible commitment of resources. TCPs cannot be reconstructed once disturbed, nor can they be fully mitigated. Sacred springs would be eradicated by subsidence or construction of the tailings storage facility, and affected by groundwater drawdown. Changes that permanently affect the ability of Tribal members to access the TCP and special interest areas for cultural and religious purposes also consist of an irreversible loss of resources.⁷³

Witnesses:

Stephanie Barclay, Counsel for Apache Stronghold
Georgetown University Law School
600 New Jersey Ave., NW
Washington, DC 20001
[REDACTED]@georgetown.edu

Wendsler Nosie, Sr.
Tribal Chairman
San Carlos Apache Tribe
[REDACTED]@yahoo.com

F. Free Exercise of Institutionalized Persons

1. Summary

The First Amendment protects a prisoner's right to practice his or her religion of choice. Congress has acted to reinforce this protection through its passage of RLUIPA.⁷⁴ Regardless, inmates representing various religions in U.S. prisons still struggle to practice their beliefs freely and without constraints. The Chair of the U.S. Commission on Civil Rights, Rochelle Garza,

⁷³ *Ibid*, Vol. 3, p. 892.

⁷⁴ "Religious Freedom in Prison," American Civil Liberties Union, February 15, 2022, www.aclu.org/issues/prisoners-rights/civil-liberties-prison/religious-freedom-prison.

says, “Religious freedom is a constitutional right that does not end at the prison gate. Yet, our [2025] report shows that incarcerated individuals, especially those from minority faiths, continue to face serious barriers in practicing their religion. These challenges often stem from bias, inadequate accommodations, and broken grievance systems.”⁷⁵ These issues, emphasizing their impact on Sikh individuals, are further explained in a letter sent to RFI by Harman Singh, Executive Director of the Sikh Coalition:

Individuals who are being held by the government for any number of reasons still have civil rights. Unfortunately, incarcerated and detained Sikhs have seen their rights—specifically, their religious rights—infringed upon by the federal government and state governments alike.

Staff in federal and state prisons must respect the civil and religious rights of all incarcerated persons. For Sikhs, this often means accommodations for articles of faith as well as religiously-mandated dietary needs. Instances of egregious disrespect (including forced shavings or the wanton destruction of turbans) are completely unacceptable, and betray a lack of humanity towards one’s fellow man that many faith traditions would find abhorrent.

Sikh migrants who are detained in DHS (including ICE and CBP) custody have encountered similar issues. In addition to the confiscation and destruction of articles of faith as well as issues related to diet, public reporting has indicated that detained Sikhs have faced a lack of clean places to pray and inadequate access to Punjabi language translation services. How we choose to treat these vulnerable people, many of whom may be seeking asylum for their political and/or religious beliefs, is a reflection of not just our laws and policies, but our values—who we are as a nation.

The failure of officials to accommodate prisoners’ religious practices seems to be a perennial pattern. In 2022, Quaker inmates at New York’s Green Haven Correctional Facility lost their latest court battle when the U.S. Supreme Court declined to hear their challenge to a decision by prison officials to shut down a longstanding weekly Quaker worship service and unilaterally replace it with a service designed by the officials.⁷⁶ A 2019 study by the organization Muslim Advocates “reviewed more than 160 free exercise lawsuits filed by incarcerated Muslims in federal court, and found that many involved a lack of religiously-approved meals, an

⁷⁵ “U.S. Commission on Civil Rights Releases Report: Enforcing Religious Freedom in Prisons,” *U.S. Commission on Civil Rights*,

www.usccr.gov/news/2025/us-commission-civil-rights-releases-report-enforcing-religious-freedom-prisons.

⁷⁶ See, e.g., Friends Journal, “Court refuses to reinstate Quaker practices at New York’s Green Haven Prison,” December 15, 2021,

<https://www.friendsjournal.org/court-refuses-to-reinstate-quaker-practices-at-new-yorks-green-haven-prison/>.

inability to observe traditional religious fasting or being barred from praying in groups.”⁷⁷ For example, in the case *Holt v. Payne*,⁷⁸ Alabama prison officials ended their previous practice of providing fasting Muslim inmates a fast-breaking meal equivalent to the meals served to non-fasting inmates, forcing Muslim inmates to choose between practicing their faith and receiving the caloric intake received by other inmates.⁷⁹ A similar case involving a Native American inmate is presented below.

2. Case Study: *Jerome Meraz v. Dexter Payne*⁸⁰

Jerome Meraz, an inmate in the Arkansas Division of Corrections, filed a civil rights complaint on March 13, 2024, alleging that prison officials violated his First Amendment right to freely exercise his Native American religion. Meraz claimed he was denied access to essential religious practices, including use of a sweat lodge, medicine bag, peace pipe, and ceremonial herbs. His subsequent request for a transfer to another facility that might accommodate his religious needs was refused. Following Meraz’s complaint, the defendants filed a motion for summary judgment, arguing that Meraz had failed to exhaust the prison’s grievance procedures. However, on June 13, 2025, the district court adopted a magistrate judge’s recommendation and denied the motion, finding that Meraz had sufficiently exhausted administrative remedies and permitting Meraz to proceed to trial on his free exercise claims.^{81,82}

Witness:⁸³

John Echohawk
Executive Director
Native American Rights Fund (NARF)
250 Arapahoe Ave.
Boulder, CO 80302
info@narf.org

G. Hate Crimes Against Individuals and Institutions

⁷⁷ Muslim Advocates, Fulfilling the Promise of Free Exercise for All: Muslim Prisoner Accommodation in State Prisons, July 2019.

⁷⁸ *Holt v. Payne*, No. 4:22-cv-00553 (E.D. Ark. 2022).

⁷⁹ Brief of Religious Liberty Organizations as Amicus Curiae Supporting Appellant, *Holt v. Payne*, No. 25-1507 (8th Cir. 2025).

⁸⁰ *Meraz v. Payne*, No. 2:24-cv-00048-LPR-PSH (E.D. Ark. 2024).

⁸¹ *Meraz v. Payne*, No. 2:24-cv-00048-LPR-PSH, Document 39 (E.D. Ark. Apr. 22, 2025).

⁸² *Meraz v. Payne*, No. 2:24-cv-00048-LPR-PSH, Order, Document 42 (E.D. Ark. June 13, 2025).

⁸³ Mr. Echohawk does not represent Mr. Meraz, who is proceeding pro se, but is among other things an expert in Native American religious liberty issues, including religious accommodation in prisons.

1. Summary

A fundamental principle of the American constitutional order is that every human being has the right to be secure from violence inflicted on them by others on the basis of their religion. This is equally true of religious institutions. Nonetheless, Americans continue to be vulnerable to religion-based hate crimes. According to the most recent FBI Hate Crime Report released in 2023, “There were 2,699 reported incidents based on religion. More than half of these (1,832) were driven by anti-Jewish bias. Incidents involving anti-Muslim (236) sentiments rose from last year, while anti-Sikh (156) incidents fell slightly compared to 2022.”⁸⁴ We list below significant incidents illustrating this disturbing trend.

2. Case Studies

a) Catholics and Catholic Institutions

Catholics and their churches, charities, and institutions have faced a persistent pattern of violence and property defacement over the past several years. A catalog of the hate crimes their institutions have undergone from January 1, 2020 through June 21, 2025 in the forms of vandalism and property destruction is presented in the Appendix. The recorded statistics are from instances that have been publicly reported in news media and compiled in a list by the United States Conference of Catholic Bishops.⁸⁵ RFI produced a similar report documenting attacks on religious pro-life Americans from 2020-2022, including Catholic sites of various kinds.⁸⁶

Witness:

Kevin C. Rhoades
Bishop of Ft. Wayne-South Bend
Chairman of the Committee for Religious Liberty
United States Conference of Catholic Bishops
[REDACTED]

b) Jews and Synagogues

The Jewish community has experienced escalating incidents of violence, in many cases arising over tensions related to the Israel-Hamas conflict. According to one report, in 2024 there

⁸⁴ U.S. Department of Justice, “2023 Hate Crime Statistics Released,” *Office of Justice Programs*, September 5, 2024, <https://www.justice.gov/crs/news/2023-hate-crime-statistics>.

⁸⁵ United States Conference of Catholic Bishops, *Backgrounder: Attacks on Catholic Churches in the U.S.*, Committee on Religious Liberty, https://www.usccb.org/committees/religious-liberty/Backgrounder-Attacks-on-Catholic-Churches-in-US#tab--_020.

⁸⁶ “Religious Pro-Life Americans Under Attack: A Threat Assessment of Post-Dobbs America.” Religious Freedom Institute, 2022, <https://religiousfreedominstitute.org/religious-pro-life-americans-under-attack/>.

were 9,354 antisemitic incidents across the United States, marking a “5% increase from the 8,873 incidents recorded in 2023, a 344% increase over the past five years and a 893% increase over the past 10 years.”⁸⁷ These incidents included 196 assaults and 2,606 acts of vandalism against synagogues, cemeteries, cultural sites, and educational institutions.⁸⁸

The injuring of nine people by Molotov cocktails thrown at a pro-Israel gathering on June 1, 2025 and the murder of two Israeli Embassy staffers in late May 2025 prompted the FBI to issue a public warning: “The ongoing Israel-HAMAS conflict may motivate other violent extremists and hate crime perpetrators with similar grievances to conduct violence against Jewish and Israeli communities and their supporters. Foreign terrorist organizations also may try to exploit narratives related to the conflict to inspire attacks in the United States.”⁸⁹ Unfortunately, the recent war is only exacerbating a pre-existing pattern of violence against Jewish communities.

One instance of such violence occurred when an undocumented immigrant of Moroccan origin shot and killed a 39-year-old Jewish man walking to a synagogue. The victim was easily identifiable as Jewish as he was wearing a kippah at the time of the attack and the community where the shooting took place, West Rogers Park, has a large Orthodox Jewish population. After the assailant shot the Jewish man, he targeted the first responders who arrived at the scene, firing his gun and yelling “Allahu Akbar,” meaning “God is most great,” which led officers to conclude that the crime was motivated by religious hatred.⁹⁰ The suspect committed suicide while in custody shortly after his arrest.⁹¹

Witness:

Michael G. Masters
National Director
Secure Community Network



⁸⁷ Anti-Defamation League, *Audit of Antisemitic Incidents 2024* (New York: ADL, 2025), published April 22, 2025, <https://www.adl.org/resources/report/audit-antisemitic-incidents-2024>.

⁸⁸ Ibid.

⁸⁹ Internet Crime Complaint Center, Federal Bureau of Investigation, "Recent Attacks Highlight Elevated Threat to Israeli and Jewish Communities," Public Service Announcement I-060525-2-PSA, June 5, 2025, <https://www.ic3.gov/PSA/2025/PSA250605-2>.

⁹⁰ "Hate Crime, Terrorism Charges Filed After Jewish Man Shot in 'Targeted' Attack," *NBC News*, October 31, 2024, <https://www.nbcnews.com/news/us-news/hate-crime-terrorism-charges-filed-jewish-man-shot-targeted-attack-rcna178348>.

⁹¹ "Chicago hate crime shooting suspect dead after being found unresponsive at jail's health center," *ABC7*, December 1, 2024, <https://abc7chicago.com/post/west-rogers-park-chicago-shooting-hate-crime-suspect-sidi-mohamed-abdallahi-found-dead-cook-county-jail-sheriff/15610901/>.

Chicago, IL 60610
(844) 726-3375

c) Muslims and Mosques

As one community leader puts it, “hate crimes—such as mosque vandalism, threats during Ramadan or Eid, and harassment during prayer—continue to endanger Muslim communities.”⁹² An example of such aggression occurred on March 1, 2025, the first day of Ramadan, when a physical therapy clinic owned by Iranian American Muslim Negeene Mosaed was vandalized with anti-Muslim graffiti.⁹³ Additionally, on June 20, 2025, a Muslim woman was violently attacked on the subway in Queens, New York after confirming her faith to her assailant. The man, Naved Durnni, struck her repeatedly in the face, fracturing bones, and was later charged with assault as a hate crime.⁹⁴ The same man had several hate crime charges filed against him for anti-Muslim actions committed in June and July of 2021, including pursuing, robbing, striking, and yelling anti-muslim rhetoric at several victims.⁹⁵ In October 2023, a six-year-old Palestinian-American boy was fatally stabbed 26 times because of his murderer’s hatred of Muslims and Palestinians. This attack was classified as an anti-Muslim hate crime, spurred by fears related to the onset of the Israel-Hamas war. In February 2025, his murderer was sentenced to 53 years in prison for this crime.⁹⁶

Witness:

Maha Elgenaidi
Founder and Executive Director
Islamic Network Group (ING)
3031 Tisch Way #950
San Jose, CA 95128

⁹² Maha Elgenaidi, "Safeguarding Religious Freedom: Addressing the Challenges Facing Muslim Americans Today," *Islamic Networks Group*, last modified May 28, 2025,

<https://ing.org/safeguarding-religious-freedom-addressing-the-challenges-facing-muslim-americans-today/>

⁹³ KTVU Staff, "Berkeley Business Defaced with Anti-Muslim Graffiti," *KTVU FOX 2*, March 3, 2025,

<https://www.ktvu.com/news/berkeley-business-defaced-anti-muslim-graffiti>.

⁹⁴ Queens District Attorney Melinda Katz, “*Queens Grand Jury Indicts Man for Random Attacks on Muslims; Defendant Charged with Robbery and Assault as a Hate Crime*,” Office of the District Attorney, Queens County, October 22, 2021,

<https://queensda.org/queens-grand-jury-indicts-man-for-random-attacks-on-muslims-defendant-charged-with-robbery-and-assault-as-a-hate-crime/>.

⁹⁵ Queens County District Attorney’s Office, “Jamaica Man Charged with Assault as a Hate Crime for Violent Attack of Muslim Subway Rider,” press release, June 21, 2025,

<https://queensda.org/jamaica-man-charged-with-assault-as-a-hate-crime-for-violent-attack-of-muslim-subway-rider/>.

⁹⁶ "Jury Finds Landlord Guilty of Murder, Hate Crime in 2023 Attack on Palestinian American Boy," *WDBJ7*, February 28, 2025,

<https://www.wdbj7.com/2025/02/28/jury-finds-landlord-guilty-murder-hate-crime-2023-attack-palestinian-american-boy/>.



d) Sikhs and Gurdwaras

Harman Singh of the Sikh Coalition provided us with this summary of hate crimes experienced among the Sikh community:

Sikhs have experienced targeted violence in the United States for generations, from the Bellingham Riots⁹⁷ in the early 1900s through a new wave of post-9/11 hate crimes.⁹⁸ One of the deadliest attacks on an American house of worship in history occurred on August 5, 2012, when a white supremacist gunman's deadly assault on a gurdwara⁹⁹ (Sikh house of worship) in Oak Creek, Wisconsin, ultimately led to the deaths of seven worshippers. As a result of that attack, the Sikh community led a successful advocacy campaign to ensure that the Federal Bureau of Investigation (FBI) began tracking anti-Sikh hate crimes and bias incidents. Since 2014, when that data was first publicly released, Sikhs have consistently remained among the most frequently targeted religious groups for hate crimes and bias incidents, including assaults, robberies, and instances of vandalism where bias was a motivating factor. While some instances of anti-Sikh violence have been linked to mistaken identity, it is important to note that there are plenty of documented cases where Sikhs have been specifically targeted due to their faith or other aspects of their intersectional identity.

Witness:

Harman Singh
Executive Director
Sikh Coalition
[REDACTED]@sikhcoalition.org

e) Hindus and Temples

Bias crimes against religious groups have also targeted Hindus and their temples. On March 8, 2025, the largest Hindu temple outside of India, BAPS Shri Swaminarayan Mandir in

⁹⁷ "The 1907 Bellingham Riots," Seattle Civil Rights and Labor History Project, University of Washington, accessed June 10, 2025, https://depts.washington.edu/civilr/bham_intro.htm.

⁹⁸ Sahel Sra, "Misconceptions and Misidentification of Sikhs Post-9/11," *Human Rights Magazine*, November 25, 2024, <https://www.americanbar.org/groups/crsj/resources/human-rights/2024-november/misconceptions-misidentification-sikhs/>.

⁹⁹ "Remember Oak Creek," *Remember Oak Creek*, accessed June 10, 2025, <https://rememberoakcreek.org/>.

California, was vandalized with anti-Hindu and anti-India graffiti targeting India's Prime Minister.¹⁰⁰ The incident is part of a pattern of the desecration of sacred Hindu sites across the U.S. since 2023 in places such as New York, Sacramento, Newark, and Hayward. Some suggest the Khalistan movement, a Sikh separatist effort, is responsible.¹⁰¹

Witness:¹⁰²

Mehul Patel¹⁰³

BAPS Temple Volunteer and Activist



@parentrevolution.org

@gmail.com

H. Employment Discrimination

1. Summary

Title VII of the 1964 Civil Rights Act “forbids [religious] discrimination when it comes to any aspect of employment, including hiring, firing, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment.” The law also requires “an employer or other covered entity to reasonably accommodate an employee's religious beliefs or practices,” which applies to dress and grooming, scheduling, and other workplace policies.¹⁰⁴ As illustrated by the 2023 case of *Groff v. DeJoy*,¹⁰⁵ in which the postal service refused to accommodate an evangelical Christian employee’s request to observe the Sabbath,¹⁰⁶ employers continue to violate the rights of their religious employees. For instance, on June 4, 2025, the U.S. Equal Employment Opportunity Commission filed a lawsuit against a construction company for denying an Apostolic Christian employee's religiously motivated request to wear a close-fitting skirt over her pants, a request that complied with safety regulations. The employee was fired when she would not remove the skirt.¹⁰⁷ Similarly, a Muslim man attended prayer meetings on Fridays during his lunch break and informed his supervisor when he would return late but was

¹⁰⁰ “Largest Hindu Temple Outside India in the Modern Era Opens in New Jersey,” *AP News*, October 7, 2023, apnews.com/article/new-jersey-largest-hindu-temple-d75d6dae88a6a24af9d6bc614a09baba.

¹⁰¹ “Southern California Hindu Temple Desecrated with Anti-India and Anti-Hindu Graffiti Calls for Peace,” *AP News*, March 17, 2025, apnews.com/article/us-hindu-temple-attacks-hate-crime-california-36e29bdbc74816b02352afa0057c066.

¹⁰² Ibid.

¹⁰³ Mehul Patel, LinkedIn, <https://www.linkedin.com/in/mpat1130/>.

¹⁰⁴ U.S. Equal Employment Opportunity Commission, “Religious Discrimination,” accessed June 10, 2025, <https://www.eeoc.gov/religious-discrimination>.

¹⁰⁵ *Groff v. DeJoy*, 600 U.S. 447 (2023).

¹⁰⁶ Brief for the Sikh Coalition, Muslim Advocates, the Islam and Religious Freedom Action Team of the Religious Freedom Institute, SUR Legal Collaborative, and Legal Aid at Work as Amici Curiae Supporting Petitioner, *Groff v. DeJoy*, No. 22-174 (U.S. 2023).

¹⁰⁷ *EEOC v. CEMEX Construction Materials Florida, LLC*, No. 8:25-cv-1454 (M.D. Fla. filed Jun. 4, 2025).

harshly reprimanded for tardiness and eventually fired. On March 6, 2025, the court upheld his claims against his employer of religious discrimination and failure to accommodate.¹⁰⁸

Harman Singh of the Sikh Coalition underscores the employment discrimination faced by Sikhs, asserting that extending policy protection to this community would also provide protections to other religious groups:

No one should have to choose between their job and their religious beliefs. Sikhs, unfortunately, often face unique challenges with regard to workplace discrimination—often due to employers’ failure to understand their obligations in the eyes of the law.

Equality of opportunity is a bedrock American value, reflected in federal and state-level laws that protect employees’ religious rights. Whether in the public or private sectors, however, Sikh employees often encounter discrimination in their workplaces...Sikhs [and other minority religious groups] can encounter discriminatory treatment rooted in bias against their perceived or actual religion, race, or national origin. Employers also often fail to understand their obligation to accommodate Sikhs’ articles of faith in the least-restrictive means possible; this can range from uniform policies that wrongfully prohibit turbans, claims that unshorn hair contradict safety standards or are incompatible with personal protective equipment (PPE), or misplaced fears that kirpans violate anti-weapons policies.

Advocacy for Sikhs’ rights to practice their faith while employed often overlap with other groups who encounter similar issues. The same policy that ensures a Sikh man’s right to his turban or a Sikh woman’s right to her kirpan could extend the same protection for a Muslim woman’s hijab or a Jewish man’s yarmulke. Moreover, a wide range of religious employees require assurances of their rights as employees pertaining to daily prayer, diet, and days off for religious observances.

Stopping employment discrimination is one of the most challenging areas to tackle with proactive policies, given that legal cases often begin with an employer in violation of established laws already on the books. However, the Sikh Coalition won’t stop fighting to pursue new policies or reforms that can alleviate persistent burdens on Sikh employees, including with a specific focus in modernizing

¹⁰⁸ *Chowdhury v. Department of Housing Preservation and Development, NYC et al*, No. 1:2024cv00182 (S.D.N.Y. 2025).

uniform and grooming standards as well as making PPE more inclusive for individuals in and beyond the medical and first responders fields.

2. Case Study: *Brown v. Alaska Airlines*

Brown v. Alaska Airlines, a case currently pending in the U.S. Court of Appeals for the Ninth Circuit, is another example illustrating employment discrimination against religious individuals. Alaska Airlines posted on its internal company website its support for the Equality Act, a Congressional bill that would have prohibited companies from discriminating on the basis of “sexual orientation” and “gender identity.” The company promised that it welcomed questions and invited people to express their different perspectives on its website. Two flight attendants commented about the proposed legislation’s risk to religious freedom and about the danger of opening up women’s restrooms in a way that could be exploited by predators. Alaska Airlines called the comments discriminatory and fired both flight attendants.

The flight attendants sued the company in federal court under Title VII of the 1964 Civil Rights Act. Discovery revealed hostility by Alaska Airlines management toward the former employees. The district court ruled for the airline, finding that it was protecting other employees from hearing offensive ideas. The court also found that the flight attendants’ comments were not protected by Title VII because they were not “religious,” in that not all Christians shared their views and that they merely reflected general ethical principles. The flight attendants are now appealing to the U.S. Court of Appeals for the Ninth Circuit.¹⁰⁹

The district court’s narrow view that religious beliefs are not protected if they are not shared by all members of a religious community, if they are shared by other religions, or if they concern universal human precepts departs from well-established law. Title VII’s protection is not limited to beliefs that are shared by all members of a religious community. Likewise, sincerely held beliefs that parallel the beliefs of other religions or are claimed to be universal also enjoy protection under Title VII. The district court’s narrow interpretation of Title VII, especially if it is widely adopted, would have serious negative ramifications for people of all faiths.

Witness:

Jeffrey C. Mateer
Attorney for Plaintiffs
First Liberty Institute
2001 West Plano Parkway

¹⁰⁹ Brief of American Hindu Coalition, Jewish Coalition for Religious Liberty, and Islam and Religious Freedom Action Team of the Religious Freedom Institute as Amici Curae Supporting Plaintiffs-Appellants, *Brown v. Alaska Airlines, Inc.*, No. 24-3789 (9th. Cir., Oct. 16, 2024).

Suite 1600
Plano, Texas 75075
(972) 941-4444

I. Housing Discrimination in Local Land Use Laws and Practices

1. Summary

Federal laws such as the Fair Housing Act (FHA) protect religious individuals and institutions from housing discrimination based on their beliefs and practices.¹¹⁰ Municipalities may violate the FHA by, among other things, “[p]rohibiting or restricting the development of housing based on the belief that the residents will be members of a particular protected class” such as religion.¹¹¹ Despite this legal protection, numerous instances demonstrate officials failing to uphold this standard in recent years, especially among Jewish communities. For example, in the ongoing case *Lost Lake Holdings, LLC v. Town of Forestburgh*,¹¹² an Orthodox Hassidic developer is suing the city of Forestburgh, NY for religious discrimination in the form of permit denials, illegal property searches, inflated property assessments, and increasing local fees due to fear that their proposed housing development will attract Orthodox Jews. Likewise, this year in Jackson Township, New Jersey, a top code enforcement official was caught coordinating with an anti-Orthodox activist group and filing complaints that mirrored discriminatory rhetoric targeting Jewish residents. This incident follows a broader pattern of bias in the township, which has already faced lawsuits and federal oversight for zoning and code enforcement actions aimed at discouraging Orthodox Jewish settlement.¹¹³ In Hendricks County, Indiana, the Muslim community faced similar discrimination when county officials twice denied zoning approval for Al Hussnain Inc.—an Islamic seminary, school, and residential housing project. In September 2024, the Department of Justice reached an agreement with Hendricks County, determining the denials violated RLUIPA and FHA by discriminating on the basis of religion.^{114,115} Another New Jersey city, Linden, has likewise applied discriminatory regulations to their zoning procedures, as elaborated on below.

¹¹⁰ *Federal Religious Land Use Protections - Department of Justice*, www.justice.gov/crt/page/file/1070736/dl?inline.

¹¹¹ Joint Statement of The Department of Housing and Urban Development and the Department of Justice State and Local Land Use Laws and Practices and the Application of the Fair Housing Act (Nov. 10, 2016), <https://www.justice.gov/crt/page/file/909956/dl?inline>

¹¹² *Lost Lake Holdings, LLC v. Town of Forestburgh*, No. 7:22-cv-10656 (S.D.N.Y. filed Dec. 16, 2022).

¹¹³ “Top Jackson, New Jersey, Code Enforcement Official Caught Pushing Bias Against Orthodox Jews,” *The Yeshiva World*, March 17, 2025, <https://www.theyeshivaworld.com/news/general/2377018/top-jackson-new-jersey-code-enforcement-official-caught-pushing-bias-against-orthodox-jews.html>.

¹¹⁴ *United States v. Hendricks County, Indiana*, No. 1:24-cv-01620-SEB-MKK (S.D. Ind. 2024).

¹¹⁵ U.S. Department of Justice, “Justice Department Secures Agreement with Indiana County Following Allegations the County Illegally Denied Zoning Approval for Islamic Religious Use,” press release, September 18, 2024, <https://www.justice.gov/archives/opa/pr/justice-department-secures-agreement-indiana-county-following-allegations-county-illegally>.

2. Case Study: Linden, NJ Discriminatory Zoning Ordinances

Linden has demonstrated bias and discrimination towards Jews in their design to “prevent Orthodox Jews from moving there.” Evidence of discrimination include their mayor outwardly expressing his desire to “keep our community from being taken over by guys with big hats and curls” and the creation of zoning changes to keep Jews from worshiping within their city such as increasing “the minimum lot size for houses of worship from 25,000 to 90,000 square feet—an almost unachievable benchmark within the city limits.” Appallingly, members of the Orthodox Jewish community were reportedly denied entry to a Linden City Council meeting on April 18, 2025, potentially violating New Jersey’s Open Public Meetings Act, which ensures public access to government meetings.¹¹⁶

Witness:

Rabbi Shlomo Schorr
Director of Legislative Affairs
Agudath Israel of America’s New Jersey Office
[REDACTED]@agudah.org

¹¹⁶ Judith Dinowitz, “Agudath Israel Slams Linden Discriminatory Zoning Ordinances as Antisemitic; Calls for Investigation,” *Agudath Israel of America*, April 28, 2025, [agudah.org/agudath-israel-slams-linden-discriminatory-zoning-ordinances-as-antisemitic-calls-for-investigation](https://www.agudah.org/agudath-israel-slams-linden-discriminatory-zoning-ordinances-as-antisemitic-calls-for-investigation).

III. Recommendations

We advise the commission to make the following recommendations to the President:

A. Autonomy of Religious Institutions

Recommendation: Protect and Affirm the Tax-Exempt Status of Religious Institutions

- a) Affirm and protect the institutional autonomy and tax-exempt status of religious institutions with different religious and spiritual beliefs and missions.
- b) Promote agency guidance throughout the faith-based offices across the executive branch that reaffirms 501(c)(3) protections as consistent with First Amendment guarantees.
- c) Through the White House Faith Office, convene and consult with diverse religious institutions and nonprofits to better understand the theological, legal, and programmatic nuances at stake.

Recommendation: Initiate Enforcement Action Against New York City and New York State

- a) Respond to the January 15, 2025, Title VI complaint submitted to the Department of Education's Office of Civil Rights on behalf of several yeshivas, by investigating New York City and New York State for religious discrimination related to those governments' efforts to infringe on the yeshivas' institutional religious autonomy, and taking appropriate action to enforce the institutions' statutory and constitutional rights.

B. Discrimination Against Religious Institutions in State Programs

Recommendation: Encourage States' Universal Pre-K Programs to Utilize Indirect Funding Models

- a) The Departments of Education and Health and Human Services should issue joint guidance encouraging states to utilize indirect funding mechanisms—such as scholarships, certificates, or vouchers—in universal childcare and Pre-K programs to promote equal treatment of faith-based organizations and ensure that parental choice drives selection of providers, including providers that share their religious and moral values.
- b) The White House Faith Office, in coordination with the Domestic Policy Council, should recommend this model as a best practice, aligning with the principles of Charitable Choice and recent Supreme Court precedent.
- c) The Department of Health and Human Services should update or clarify regulations under Head Start or Child Care and Development Block Grant (CCDBG) to emphasize

indirect funding as the preferred model where state discretion exists and reaffirm the right of faith-based providers to retain their religious character and staffing practices.

C. Parental Rights

Recommendation: Create a Parental Rights and Institutional Religious Freedom Taskforce

- a) Create a taskforce staffed by the Departments of Justice, Health and Human Services, and Education to consider what federal action (including proposed legislation) can counteract the strong tendency of states to construct universal pre-K systems that exclude faith-based participation and faith-filled curricula, even while those states regularly receive federal child care dollars (Child Care and Development Block Grant Act funds), which are required to be spent in a way that strongly accommodates faith-based providers and families desiring faith-based child care.
- b) Empower the taskforce to modify Head Start and Early Head Start programs to become faith-accommodating to better serve religiously pluralistic communities.

Recommendation: Investigate Osseo Area School District

- a) Direct the Department of Education or Department of Justice to launch a Title VI investigation into the Osseo (Minnesota) Area School District, with particular scrutiny on the district's practice of offering misleading or superficial opt-out options with the aim of frustrating parents' exercise of their fundamental rights.

Recommendation: Investigate Montgomery County Public Schools

- a) Direct the Department of Education or Department of Justice to launch a Title VI investigation into the practice and policy of Montgomery County (Maryland) Public Schools to refuse to permit parents of students to opt their children out of health class instruction aimed at changing their views on sex and gender, and to refuse to permit those students whose parents removed them from such instruction to graduate.

D. Free Exercise in Public Schools

Recommendation: Strengthen the Enforcement of Anti-Discrimination Laws in Schools (K-12 and Higher Education)

- a) Direct the Department of Education to issue updated guidance to public school districts reminding them that students have the right to pray, wear religious attire, or express religious views in class assignments.

- b) Mandate policies for religious accommodation (e.g., allowing students to make up exams or assignments missed for religious holidays like Eid or Yom Kippur).
- c) Clarify that protections under Title VI of the 1964 Civil Rights Act extends to religious status when it intersects with race, ethnicity, or national origin (e.g., protecting Muslim, Sikh, and Jewish students from harassment and discrimination).

E. Religious Land Use

Recommendation: Protect Sacred Apache Lands in Oak Flats, Arizona

- a) This threatened violation of Apache religious liberty has unfortunately proven not to be redressable in the judicial system. This creates an opportunity for the Executive Branch to step in to protect this worship space. We advise the commission to recommend that the administration direct federal agencies to take no further action to transfer the land to Resolution Copper on the ground that doing so would violate the Religious Freedom Restoration Act and render any agency action in furtherance of the transfer *ultra vires*.¹¹⁷

F. Free Exercise of Institutionalized Persons

Recommendation: Protect the Religious Rights of Individuals in Custody

- a) In collaboration with community stakeholders, host trainings and regularly publish and disseminate updated rules and guidance for staff at the Federal Bureau of Prisons, state departments of corrections, and individual correctional facilities underscoring the obligation to respect religious and civil rights religion-based harassment in the workplace and provide reasonable accommodations for religiously observant incarcerated persons across confinement settings.

Recommendation: Strengthen Anti-Discrimination Laws in Public Institutions such as Hospitals, Government Offices, Prisons, etc.

- a) Update public accommodation laws to ensure that religious dietary needs (e.g., halal, kosher) are met in government-funded institutions such as prisons, hospitals, and shelters.
- b) Require chaplaincy services in correctional facilities and hospitals to accommodate a range of faiths.
- c) Ensure training for public employees (e.g., police, social workers) on engaging with diverse religious communities respectfully and lawfully.

¹¹⁷ See, e.g., Attorney General's Memorandum on Religious Liberty, 82 FR 49668 (October 26, 2017)(noting that "RFRA prohibits the federal government from substantially burdening a person's exercise of religion," and that "RFRA applies to all actions by federal administrative agencies...").

G. Hate Crimes Against Individuals and Institutions

Recommendation: Prevent, Address, and Track Hate Crimes

- a) Mandate that local and state law enforcement provide accurate and verifiable hate crime reports to the FBI to combat the prolific problem of the under-reporting of hate crime data.
- b) Implement provisions of laws like the COVID-19 Hate Crimes Act, the Jabara-Heyer NO HATE Act, and the Non-Profit Security Grant Improvement Act of 2022 to ensure that the resources provided under these laws are accessible, including making these materials available in various languages so more communities can find and effectively utilize them.
- c) Protect the Community Relations Service and allow this critical component of the Department of Justice to carry out its congressional mandate to keep the peace in communities, mediate conflict, and de-escalate tensions.

H. Employment Discrimination

Recommendation: Combat Employment Discrimination

- a) Host trainings in collaboration with community stakeholders and regularly publish and disseminate updated rules and guidance on employers' obligations to address religion-based harassment in the workplace and provide reasonable accommodations for religiously observant employees in a wide range of employment contexts.
- b) Proceed with the federal project titled "Fit Testing of Respirators on Those Wearing Beard Bands," announced in 2024, and initiate other such research projects to gain further insight into PPE for workers with religiously-mandated facial hair.
- c) Ensure that the nation's largest employer, the Department of Defense, is dedicated to adopting policies across all military branches that permit military personnel of faiths that require beards, long hair, or headwear, to comply with uniform and grooming requirements, as the Army and Air Force have already done in their policies.

Recommendation: Expand the Civil Rights Divisions of Federal Agencies in Religious Liberty

- a) Increase staffing and funding specifically for cases involving religious discrimination or profiling, including at airports, schools, workplaces, and law enforcement agencies.
- b) Mandate regular public reporting on how religious discrimination complaints are handled, broken down by religion, setting (e.g., workplace, school, government), and resolution.

I. Housing Discrimination in Local Land Use Laws and Practices

Recommendation: Guidance and Funding to Mitigate Fair Housing Violations by Municipalities

- a) Direct the DOJ and HUD to issue guidance to municipalities encompassing or adjoining minority religious communities to inform them of their obligations under the FHA, Title VI, and RLUIPA.
- b) Maintain and strengthen HUD's Fair Housing Initiatives Program (FHIP) as a bulwark against housing discrimination on the basis of religion, ethnicity, national origin, etc. by local and state governments and private parties. Policy concerns with FHIP can be mitigated by conditioning FHIP grants on combating disparate treatment (as with, e.g., the housing discrimination against Orthodox Jewish communities in New Jersey) rather than disparate impact.

Recommendation: Investigate New Jersey Municipalities That Are Intentionally Discriminating Against Orthodox Jews

- a) Direct DOJ's Housing and Civil Enforcement Section to investigate the city of Linden, New Jersey, and, if appropriate, take legal action against it to enforce the Fair Housing Act's (FHA) prohibition against disparate treatment of Orthodox Jews in its housing laws and practices.

Appendix

Violence Against Catholic Institutions

The statistics that follow are taken from a list of incidents, compiled by the U.S. Conference of Catholic Bishops (USCCB),¹¹⁸ of vandalism, arson, or other destruction at Catholic sites that have been publicly reported in news media. Other reports record a much higher number of attacks.^{119,120}

Timeframe	# of Attacks	Attacks Per Month
2020 (May - December)	56	7
2021	74	6.2
2022	102	8.5
2023	64	5.3
2024	56	4.7
2025 (January - June 21)	19	3.2
TOTAL	371	6.0

January - June 21, 2025 (19 attacks)

June 2025

1. **June 21:** Man used crowbar to damage doors and smash a statue of the Holy Family (Holy Family Church, Fresh Meadows, NY)¹²¹
2. **June 15:** Man rushed altar and broke statues of the Blessed Virgin Mary and the Sacred Heart of Jesus during Mass (Corpus Christi Church, Mineola, NY)¹²²

¹¹⁸ United States Conference of Catholic Bishops, *Backgrounder: Attacks on Catholic Churches in the U.S.*, Committee on Religious Liberty, https://www.usccb.org/committees/religious-liberty/Backgrounder-Attacks-on-Catholic-Churches-in-US#tab--_020.

¹¹⁹ See, e.g., Arielle Del Turco, *Hostility Against Churches Is on the Rise in the United States*, Family Research Council, February 20, 2024, <https://www.frc.org/issueanalysis/hostility-against-churches-is-on-the-rise-in-the-united-states#gsc.tab=0>.

¹²⁰ USCCB's figures are slightly higher than the chart that follows, presumably because there are a few incidents recorded in their list that involve more than one discreet attack and thus are counted as more than one in their aggregate figure. The USCCB's list excludes incidents where circumstances suggest a motive other than hostility toward the Church.

¹²¹ Alexandra Moyer, "Vandal Charged With Hate Crime After Defacing Queens' Parish Statue," *The Tablet*, June 24, 2025, <https://thetablet.org/vandal-charged-after-defacing-holy-family-statue/>.

¹²² "Long Island Man Charged with Damaging Statues Worth \$10K During Church Service," *ABC7*, June 16, 2025, <https://abc7ny.com/post/nassau-county-man-charged-damaging-2-statues-worth-10k-during-church-service/16765002/>.

3. **June 11:** Fire set at front doors of church (Sacred Heart Catholic Church, Portland, OR)¹²³
4. **June 7:** Heads of two statues broken, stolen (St. Martha Catholic Church, Porter, TX)¹²⁴

May 2025

5. **May 14:** Man threw rocks at church, damaging statue and breaking stained glass window (St. Patrick Church, Canonsburg, PA)¹²⁵
6. **May 6:** Explosive device detonated on altar (St. Teresa of Calcutta Parish, Mahanoy City, PA)¹²⁶
7. **May 5:** Man attempted to set fire to Cross outside of church (St. Bernard Catholic Church, Crawfordsville, IN)¹²⁷
8. **May 4:** Man threw rock through window, assaulted priest (St. Christopher Catholic Church, Marysville, MI)¹²⁸

April 2025

9. **April 22:** Man urinated in holy water font (St. Patrick Church, York, PA)¹²⁹
10. **April 8:** Rock used to knock off head of statue (St. Theresa Catholic Church, South Lake Tahoe, CA)¹³⁰
11. **April 6:** Man threatened priest, slapped small statue out of parishioner's hand breaking it (Immaculate Conception Catholic Church, Queens, NY)¹³¹

¹²³ Luisa Anderson and Libby Dowsett, "Suspect Turns Themselves In After Southeast Portland Church Fire," *KGW*, June 11, 2025, <https://www.kgw.com/article/news/local/portland-sacred-heart-church-fire-suspect-custody/283-3ea8db42-4aa8-40ca-826d-084355fbfe33>.

¹²⁴ Briahn Hawkins, "Unknown Suspect Vandalizes Porter Church Statues, Officials Say," *FOX 26 Houston*, June 11, 2025, <https://www.fox26houston.com/news/porter-texas-church-vandalized-statues-st-martha-june-2025>.

¹²⁵ Erika Stanish, "Man Accused of Causing \$5,000 Worth of Damage to Washington County Church," *CBS Pittsburgh*, May 16, 2025, <https://www.cbsnews.com/pittsburgh/news/man-vandalizes-washington-county-church/>.

¹²⁶ "An act of darkest evil" - explosive device detonated on Penn. parish chapel altar," *The Pillar Catholic*, May 8, 2025, <https://www.pillaratholic.com/p/an-act-of-darkest-evil-explosive>.

¹²⁷ Hayley Jarman, "Darlington Man Facing Arson Charges," *Journal Review*, May 7, 2025, <https://www.journalreview.com/stories/darlington-man-facing-arson-charges.340154>.

¹²⁸ Jonathan Hogan, "Man Charged With Hate Crime After Marysville St. Christopher Catholic Church Vandalism, Priest Attack," *The Times Herald*, updated May 21, 2025, <https://www.thetimesherald.com/story/news/crime/2025/05/21/man-charged-with-hate-crime-after-marysville-st-christopher-catholic-church-vandalism-priest-attack/83744711007/>.

¹²⁹ Dale Chamberlain, "PA Man Accused of Desecrating Local Church's Holy Water With Urine," *PennLive*, April 29, 2025, <https://www.pennlive.com/news/2025/04/man-desecrated-holy-water-with-urine-at-central-pa-catholic-church-police.html>.

¹³⁰ "Police Investigate Vandalism at South Lake Tahoe Church," *KOLO 8 News Now*, April 15, 2025, <https://www.kolotv.com/2025/04/15/police-investigate-vandalism-south-lake-tahoe-church/>.

¹³¹ Bill Parry, "Suspect Smashes Religious Statue, Spits into Holy Water at Astoria Church: NYPD," *Astoria Post*, April 9, 2025, <https://astoriapost.com/suspect-smashes-religious-statue-astoria-church>.

12. **April 3:** Priest shot and killed outside rectory (Sts. Peter and Paul Catholic Church, Seneca, KS)¹³²
13. **April 1:** Man spit in baptismal font (Immaculate Conception Catholic Church, Queens, NY)¹³³

March 2025

14. **March 22:** Statue of Blessed Virgin Mary holding Christ child broken, damaged with tar (St. Theresa's Church, Briarcliff Manor, NY)¹³⁴
15. **March 21:** Man accused of defacing baptismal pool, threatened parishioners after argument with priest (St. Louis Catholic Church, Memphis, TN)¹³⁵
16. **March 15:** State of St. Patrick pulverized, candles, candlesticks and cover for baptismal font damaged, Satanic message scrawled on wall (St. Patrick Catholic Church, Wichita, KS)¹³⁶
17. **March 5:** Stained glass windows damaged and items burned on Ash Wednesday (Our Mother of Good Counsel Catholic Community, Los Angeles, CA)¹³⁷

February 2025

18. **February 21:** Property defaced at multiple churches (including St. John the Baptist, Baldwin Park, CA)¹³⁸
19. **February 12:** Human feces placed in baptismal font (Church of the Holy Rosary, Edgewater, NJ)¹³⁹

¹³² Daniel Payne, "Gunman Shot Kansas Catholic Priest 'Intentionally and With Premeditation,' Prosecutor Says," *National Catholic Register (EWTN News)*, April 8, 2025,

<https://www.ncregister.com/cna/gunman-shot-kansas-catholic-priest-intentionally-and-with-premeditation>.

¹³³ Bill Parry, "Police Arrest Astoria Repeat Offender for Multiple Hate Crimes at Same Church: NYPD," *Astoria Post*, April 10, 2025,

<https://astoriapost.com/police-arrest-astoria-repeat-offender-for-multiple-hate-crimes-at-same-church>.

¹³⁴ Melanie Palmer, "Statue Outside Briarcliff Manor Church Reportedly Vandalized, Police Investigating," *News 12 New York*, March 25, 2025,

<https://westchester.news12.com/statue-outside-briarcliff-manor-church-reportedly-vandalized-police>.

¹³⁵ Stepheny Price, "Man Arrested After Allegedly Threatening to 'Butcher' Memphis Churchgoers with Machete: Police," *Fox News*, March 23, 2025,

<https://www.foxnews.com/us/man-arrested-after-allegedly-threatening-butcher-memphis-churchgoers-machete-police>.

¹³⁶ Gina Christian, "Wichita Catholic Church Vandalized in What Bishops' Call 'Hate Crime'," *OSV News*, March 18, 2025, <https://www.osvnews.com/wichita-catholic-church-vandalized-in-what-bishops-call-hate-crime/>.

¹³⁷ Will Conybeare, "Los Angeles Church Vandalized on Ash Wednesday," *KTLA 5*, March 10, 2025,

<https://ktla.com/news/local-news/los-angeles-church-vandalized-on-ash-wednesday/>.

¹³⁸ Aaron Castrejon, "Suspect Slapped with Felony Vandalism Charges in Destruction at Baldwin Park Church," *SGVCityWatch*, March 5, 2025,

<https://www.sgvcitywatch.com/baldwin-park/suspect-slapped-with-felony-vandalism-charges-in-destruction-at-baldwin-park-church>.

¹³⁹ "Vandal Put Human Feces in Baptismal Font at N.J. Church, Officials Say," *NJ*, February 20, 2025,

<https://www.nj.com/bergen/2025/02/vandal-put-human-feces-in-baptismal-font-at-nj-church-officials-say.html>.

2024 (56 attacks)

December 2024

- 20. **December 13:** Statue of Virgin Mary vandalized and head missing (St. Peter Catholic Church, Pittsburgh, PA)¹⁴⁰
- 21. **December 3:** Statue destroyed outside church (Holy Cross Church, Harrison, NJ)¹⁴¹

November 2024

- 22. **November 28:** Church vandalized, fire extinguisher sprayed, hole made in stained glass, statues from 1800s damaged (St. Mary of the Immaculate Conception Church, Michigan City, IN)¹⁴²
- 23. **November 20:** Gold rose from 9/11 memorial stolen (Church of St. Francis of Assisi, New York, NY)¹⁴³

October 2024

- 24. **October 23:** Signs vandalized at church (St. Robert Bellarmine Church, Blue Springs, MO)¹⁴⁴
- 25. **October 23:** Fire intentionally set in building, smoke damage throughout church (St. Mary's Catholic Church, Franklin, MA)¹⁴⁵
- 26. **October 21:** Statues of Blessed Virgin Mary and St. Therese of Lisieux broken (St. Therese of Lisieux Church, Brooklyn, NY)¹⁴⁶

¹⁴⁰ Patrick Damp, "Catholic Diocese of Pittsburgh Asking for Public's Help in Identifying North Side Vandal," *CBS Pittsburgh*, December 15, 2024,

<https://www.cbsnews.com/pittsburgh/news/catholic-diocese-st-peter-church-vandal/>.

¹⁴¹ Anthony G. Attrino, "N.J. Cops Search for Man Who Destroyed Statue at Catholic Church," *NJ*, December 6, 2024, <https://www.nj.com/hudson/2024/12/nj-cops-search-for-man-who-destroyed-statue-at-catholic-church.html>

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¹⁴⁶ Janice Yu, "Search for Suspect Who Kissed, Vandalized Statue at Church in East Flatbush," *ABC7 New York*, October 23, 2024,

27. **October 18:** Fire intentionally set in church resulting in significant damage (St. Anthony of Padua Catholic Church, Casa Grande, AZ)¹⁴⁷
28. **October 16:** Fire set at altar spread throughout church, which was in a temporary location after original church was set on fire (Incarnation Catholic Church, Orlando, FL)¹⁴⁸
29. **October 10:** Statue of St. John the Baptist smashed with a hammer (St. John the Baptist Maronite Catholic Church, New Castle, PA)¹⁴⁹
30. **October 6:** Hateful graffiti written on wall, statue of St. Frances Cabrini vandalized (St. Frances Cabrini Shrine, Manhattan, NY)¹⁵⁰

September 2024

31. **September 30:** Rock thrown through stained glass window of St. Patrick (Roman Catholic Church of the Transfiguration, New York, NY)¹⁵¹
32. **September 28:** Statue of St. Francis de Sales spray-painted (St. Francis de Sales Church, Sherman Oaks, CA)¹⁵²
33. **September 24:** Statue of Blessed Virgin Mary smashed with rock (Presentation of the Blessed Virgin Mary Church, Queens, NY)¹⁵³
34. **September 21:** Pro-life banner spray-painted (Holy Trinity Roman Catholic Church, Westfield, NJ)¹⁵⁴

<https://abc7ny.com/post/search-suspect-vandalized-statue-st-therese-lisieux-church-east-flatbush-brooklyn/15459032/>.

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¹⁵² Vivian Chow, "Sherman Oaks Church Repeatedly Vandalized in Possible Hate Crime," *KTLA*, October 2, 2024, <https://ktla.com/news/local-news/sherman-oaks-church-repeatedly-vandalized-in-possible-hate-crime/>.

¹⁵³ Diocese of Brooklyn, "Blessed Mother Statue Attacked Outside Queens Catholic Church," press release, September 25, 2024, <https://dioceseofbrooklyn.org/press-releases/blessed-mother-statue-attacked-outside-queens-catholic-church/>.

¹⁵⁴ Jackie Lieberman Westfield, "Westfield Police Investigating Graffiti on Banner at Catholic Church," *TAPinto Westfield*, September 21, 2024, <https://www.tapinto.net/towns/westfield/sections/police-and-fire/articles/westfield-police-investigating-graffiti-on-banner-at-catholic-church>.

35. **September 20:** Statue of St. Francis de Sales spray-painted (St. Francis de Sales Church, Sherman Oaks, CA)¹⁵⁵
36. **September 17:** Statue of angel knocked off pedestal (Cathedral Basilica of St. Louis, St. Louis, MO)¹⁵⁶

August 2024

37. **August 30:** Processional Crucifix damaged, statue of Blessed Virgin Mary knocked down (Dahlgren Chapel at Georgetown University, Washington, DC)¹⁵⁷
38. **August 23:** Catholic pro-life pregnancy center vandalized with red paint, doors damaged by cement (Aid for Women, Chicago, IL)¹⁵⁸
39. **August 16:** Window at front of rectory set on fire (St. Francis de Sales Church, Sherman Oaks, CA)¹⁵⁹
40. **August 11:** Statue of Blessed Virgin Mary toppled and beheaded, prayer garden damaged (St. Anthony Catholic Church, Kansas City, MO)¹⁶⁰
41. **August 9:** Multiple areas of church set on fire (St. Rose Catholic Church, Sacramento, CA)¹⁶¹
42. **August 7:** Base of statue of St. Francis de Sales set on fire (St. Francis de Sales Church, Sherman Oaks, CA)¹⁶²

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July 2024

43. **July 29:** Playground equipment and shed vandalized (St. Alphonsus Liguori Catholic Church, Greenwell Springs, LA)¹⁶³
44. **July 29:** Fountain damaged (St. Thomas More Catholic Church, Sarasota, FL)¹⁶⁴
45. **July 6:** Three instances of vandalism over three-week period, including statue of Mary toppled and broken and racial slur written on door (St. Leo Church, Hartford, AR)¹⁶⁵
46. **July 4:** Windows broken (St. Theresa Church, Orleans Village, VT)¹⁶⁶

June 2024

47. **June 30:** Man smashed head of a statue of the child Jesus with shoe (Holy Family Catholic Church, Fresh Meadows, NY)¹⁶⁷
48. **June 26:** Statue of Blessed Virgin Mary vandalized (St. John's Catholic Church, Stillwater, OK)¹⁶⁸
49. **June 13:** Man set fire to rectory (Christ the Divine Parish, Monroeville, PA)¹⁶⁹
50. **June 11:** Statues of St. Teresa of Calcutta and Pope St. John XXIII smashed, glass front doors shattered (St. Dominic Church, Bensonhurst, NY)¹⁷⁰
51. **June 9:** American flag and keyboard set on fire inside church building (St. Jerome Catholic Church, Maplewood, MN)¹⁷¹
52. **June 6:** Statue of Blessed Virgin Mary toppled and broken (St. Monica Catholic Church, Coos Bay, OR)¹⁷²

¹⁶³ Destiny Beasley, "3 Teenagers Vandalized Church in Central, One Arrested," *WBRZ*, July 31, 2024, <https://www.wbrz.com/news/3-teenagers-vandalized-church-in-central-one-arrested/>.

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¹⁷² Julio Mora Rodriguez, "Vandalism at Local Roman Catholic Church in Coos Bay," *KEZI*, June 12, 2024, https://www.kezi.com/news/vandalism-at-local-roman-catholic-church-in-coos-bay/article_97bca4b6-291d-11ef-a4fb-4b3b733b2749.html.

May 2024

- 53. **May 31:** Statues of the Sacred Heart of Jesus and St. Padre Pio vandalized (Mater Dolorosa Catholic Church, New Orleans, LA)¹⁷³
- 54. **May 15:** Group of teenagers spray painted graffiti on exterior of church (St. Francis of Assisi Parish, Spokane, WA)¹⁷⁴
- 55. **May 11:** Teenager with gun disrupted First Communion service (St. Mary Magdalen Church, Abbeville, LA)¹⁷⁵

April 2024

- 56. **April 28:** Pro-abortion graffiti spray painted on doors (St. Patrick Catholic Church, Portland, OR)¹⁷⁶
- 57. **April 19:** Statues of Blessed Virgin Mary and Holy Family topped and broken (St. Joseph Catholic Church, Muskogee, OK)¹⁷⁷
- 58. **April 14:** Man broke window and entered church building (Christ the King Catholic Church, Glen Burnie, MD)¹⁷⁸
- 59. **April 9:** Fire extinguishers dispersed, cross on altar turned upside down, holy oil poured over floors, religious artifacts damaged (St. Teresa of Avila Catholic Church, Louisville, KY)¹⁷⁹

March 2024

- 60. **March 31:** Communion wafers strewn throughout parking lot while congregants attended Mass (St. Peter's Roman Catholic Church, Harper's Ferry, WV)¹⁸⁰

¹⁷³ "Jesus Statue at a New Orleans Church Vandalized," *WWLTV*, June 11, 2024, <https://www.wwltv.com/article/news/crime/new-orleans-jesus-statue-vandalized-mater-dolorosa/289-3c0dd22e-cc71-41e2-8677-9ebc1245fc83>.

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¹⁸⁰ Tyler Arnold, "Communion Wafers Found Discarded in Parking Lot of West Virginia Church After Easter Mass," *Catholic News Agency*, April 5, 2024,

61. **March 31:** Rock thrown at sacristy window (St. Francis of Assisi Catholic Church, San Antonio, TX)¹⁸¹
62. **March 28:** Man set fire to interior of church (Our Lady of the Lake Catholic Church, Verona, NJ)¹⁸²
63. **March 26:** Rock thrown at sacristy window (St. Francis of Assisi Catholic Church, San Antonio, TX)¹⁸³
64. **March 26:** Statue of Blessed Virgin Mary holding the Christ Child knocked down, broken (St. Mary's Immaculate Conception Roman Catholic Church, Altoona, PA)¹⁸⁴
65. **March 13:** Man broke into and vandalized church (Immaculate Heart of Mary Catholic Church, Santa Ana, CA)¹⁸⁵
66. **March 12:** Rock thrown through front window (St. Francis of Assisi Catholic Church, San Antonio, TX)¹⁸⁶
67. **March 3:** Intruders entered rectory and damaged office (St. Mary Byzantine Catholic Church, New York, NY)¹⁸⁷

February 2024

68. **February 28:** Man broke into monastery, smashed windows and religious objects (The Grotto Monastery, Portland, OR)¹⁸⁸

<https://www.catholicnewsagency.com/news/257296/communion-wafers-found-discarded-in-parking-lot-of-west-virginia-church-after-easter-mass>.

¹⁸¹ Zack Briggs, "San Antonio Catholic Church Hit by Vandals Easter Sunday, Marking Third Incident Within a Month," *KENS 5*, April 1, 2024,

<https://www.kens5.com/article/news/local/san-antonio-catholic-church-hit-by-vandals-easter-sunday-marking-third-incident-within-a-month/273-cddf850e-fcfe-4fb4-8755-3464a9d3b810>.

¹⁸² Toni Yates, "Man in Custody After Church in Verona, New Jersey Set on Fire," *ABC7 New York*, April 5, 2024, <https://abc7ny.com/church-fire-man-in-custody-after-our-lady-of-the-lake-roman-catholic-verona-set-on-fire/14616841/>.

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<https://www.kens5.com/article/news/local/san-antonio-catholic-church-hit-by-vandals-easter-sunday-marking-third-incident-within-a-month/273-cddf850e-fcfe-4fb4-8755-3464a9d3b810>.

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<https://wjactv.com/news/local/shattering-a-sacred-symbol-st-marys-church-statue-vandalized-in-blair-county>.

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<https://mynews1a.com/crime/2024/03/15/man-charged-with-vandalizing-santa-ana-church/>.

¹⁸⁶ Zack Briggs, "San Antonio Catholic Church Hit by Vandals Easter Sunday, Marking Third Incident Within a Month," *KENS 5*, April 1, 2024,

<https://www.kens5.com/article/news/local/san-antonio-catholic-church-hit-by-vandals-easter-sunday-marking-third-incident-within-a-month/273-cddf850e-fcfe-4fb4-8755-3464a9d3b810>.

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<https://www.catholicnewsagency.com/news/257001/uptick-in-attacks-on-catholic-parishes-reveals-hostility-to-faith-religious-liberty>.

¹⁸⁸ Gina Christian, "Priest Narrowly Escapes Attack Damaging Historic Oregon Catholic Shrine," *The Catholic Spirit*, March 4, 2024,

69. **February 19:** Statue of Jesus knocked to the ground (Immaculate Conception Church, New York, NY)¹⁸⁹
70. **February 19:** Stained glass windows broken (National Shrine of St. John Neumann, Philadelphia, PA)¹⁹⁰
71. **February 15:** Statue of Blessed Virgin Mary vandalized with a hammer (Basilica of the National Shrine of the Immaculate Conception, Washington, DC)¹⁹¹
72. **February 9:** Traffic cone thrown through stained glass window (St. Rita Catholic Church, Long Island City, NY)¹⁹²

January 2024

73. **January 27:** Group broke into church, broke stained glass and damaged crucifix (St. Columba Roman Catholic Church, Brooklyn, NY)¹⁹³
74. **January 8:** Statue of Blessed Virgin Mary spraypainted gold (Our Lady of Mt. Carmel Catholic Church, Louisville, KY)¹⁹⁴
75. **January 7:** Nativity scene vandalized, statues broken (Our Lady of Lourdes Catholic Church, Overbrook, PA)¹⁹⁵

2023 (64 attacks)

December 2023

76. **December 11:** Statue of Blessed Virgin Mary spraypainted gold (Our Lady of Mt. Carmel Catholic Church, Louisville, KY)¹⁹⁶

<https://thecatholicspirit.com/news/nation-and-world/priest-narrowly-escapes-attack-damaging-historic-oregon-catholic-shrine/>.

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<https://thetablet.org/vandalism-hits-manhattan-church-where-a-violent-slasher-struck-weeks-earlier/>.

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November 2023

77. **November 29:** Statue of St. Joseph toppled and broken in half, steps damaged (St. Mary of the Immaculate Conception Church, Indianapolis, IN)¹⁹⁷
78. **November 22:** Stained glass window broken, church ransacked (Our Lady of Guadalupe Mission, Irwindale, CA)¹⁹⁸
79. **November 11:** Crude images spraypainted on exterior of church (St. Andrew Catholic Church, Eagle River, AK)¹⁹⁹
80. **November 5:** Paint splattered on front doors and signs (Cathedral of the Annunciation, Stockton, CA)²⁰⁰
81. **November 1:** Stained glass front doors smashed, satanic graffiti (Holy Family Catholic Church, Eastmoreland, OR)²⁰¹
82. **November 1:** Statues of Sacred Heart of Jesus and St. Francis of Assisi broken (Sacred Heart Roman Catholic Church, Staten Island, NY)²⁰²

October 2023

83. **October 31:** Over a dozen incidents, including pro-life signs stolen, church and school front doors vandalized, signs spraypainted, ahead of vote on abortion-related proposition (Archdiocese of Cincinnati)²⁰³
84. **October 30:** Statue of Blessed Virgin Mary broken (St. Andrew Avellino Church, Flushing, NY)²⁰⁴

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<https://www.wishtv.com/news/crime-watch-8/shattered-statue-leads-indianapolis-church-to-call-for-prayers-and-police/>.

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<https://www.latimes.com/california/story/2023-11-27/our-lady-of-guadalupe-catholic-mission-is-vandalized-ransacked-in-irwindale>.

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<https://www.silive.com/crime-safety/2023/11/religious-statues-vandalized-on-staten-island-nypd-is-investigating.html>.

²⁰³ Tyler Arnold, "Pro-Abortion Vandals Target Ohio Catholic Churches, Schools Before Issue 1 Vote," *Catholic News Agency*, November 1, 2023, <https://www.catholicnewsagency.com/news/255889/pro-abortion-vandals-target-ohio-catholic-churches-schools-before-issue-1-vote>.

²⁰⁴ "A Statue Outside Queens Church Vandalized; Third Attack on a Church in a Week," *The Tablet*, October 31, 2023, <https://thetablet.org/a-statue-outside-queens-church-vandalized-third-attack-on-a-church-in-a-week/>.

85. **October 24:** Large, historic Crucifix damaged by man hanging and swinging from it (Cathedral of the Holy Cross, Boston, MA)²⁰⁵
86. **October 16:** Cross stolen from main altar (St. Patrick Roman Catholic Parish, Bisbee, AZ)²⁰⁶
87. **October 10:** Damage to two statues outside of church (Sacred Heart Catholic Church, Broussard, LA)²⁰⁷
88. **October 6:** Fire set to altar cloth, tabernacle cloth, and lectionary by two 12-year-olds (St. John the Evangelist Church, East Bridgewater, MA)²⁰⁸
89. **October 2:** Pipe organ, marble walls, and plate glass windows damaged (St. Thomas Aquinas Church, Madawaska, ME)²⁰⁹
90. **October 2:** Pro-life sign defaced (St. Paul Catholic Church, St. Louis, MO)²¹⁰
91. **October 1:** Crosses for pro-life display pulled up from lawn (Mary Queen of Heaven Catholic Church, Elmhurst, IN)²¹¹

September 2023

92. **September 16:** Graffiti multiple times over three-week period (Prince of Peace Parish, Lewiston, ME)²¹²
93. **September 16:** Statues stolen and damaged (Holy Family Church, Lewiston, ME)²¹³

²⁰⁵ Isabel Keane, "Vandal Snaps Arms off Jesus Statue Outside Historic Boston Cathedral," *New York Post*, October 26, 2023, <https://nypost.com/2023/10/26/news/michael-patzelt-allegedly-vandalizes-boston-jesus-statue/>.

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²¹⁰ Jonah McKeown, "Pro-Life Display Vandalized at St. Louis County Parish," *Catholic News Agency*, October 3, 2023, <https://www.catholicnewsagency.com/news/255566/pro-life-display-vandalized-at-st-louis-county-parish>.

²¹¹ David Giuliani, "Elmhurst Church's Pro-Life Display Vandalized: Cops," *Patch*, October 2, 2023, <https://patch.com/illinois/elmhurst/elmhurst-churchs-pro-life-display-vandalized-cops>.

²¹² Brad Rogers, "Three Catholic Churches in Lewiston Vandalized in Last 3 Weeks," *WGME*, September 18, 2023, <https://wgme.com/news/local/three-catholic-churches-lewiston-vandalized-last-weeks-hate-crime-statues-parish-virgin-mary-lamb>.

²¹³ Christopher Bouchard, "Man Arrested, Woman Summoned in Recent Church Vandalism, Thefts in Lewiston," *Portland Press Herald*, September 22, 2023, <https://www.pressherald.com/2023/09/22/man-arrested-woman-summonsed-in-recent-church-vandalism-thefts-in-lewiston/>.

94. **September 13:** Statue of Jesus beheaded (Holy Savior Catholic School, Lockport, LA)²¹⁴
95. **September 10:** Statue of the Blessed Virgin Mary stolen (Cathedral of St. Mary, Fargo, ND)²¹⁵
96. **September 7:** Crucifix stolen from gravesite of Charelene Richard, Servant of God (St. Edward Catholic Church, Church Point, LA)²¹⁶
97. **September 2:** Classrooms trashed, desks broken, computer screens smashed, and windows shattered (Our Lady of Perpetual Help School, Santa Clarita, CA)²¹⁷

August 2023

98. **August 31:** Fire started in dumpster on church property, moved to roof and sanctuary causing significant damage (St. Joseph Catholic Church, Salem, OR)²¹⁸
99. **August 23:** Sacred items, including a Crucifix, desecrated and non-sacred items damaged inside church (Holy Family Catholic Church, Grand Blanc, MI)²¹⁹
100. **August 12:** Man used snow shovel to break statues, vases, candles, and other items, attempted to set carpet on fire (Immaculate Conception Church, Willoughby, OH)²²⁰
101. **August 7:** Window broken (Basilica of Ss. Peter and Paul, Lewiston, ME)²²¹

²¹⁴ "Jesus Statue Beheaded at Louisiana Catholic School; Vandalism Suspect Sought," FOX 8, September 14, 2023, <https://www.fox8live.com/2023/09/14/jesus-statue-beheaded-louisiana-catholic-school-vandalism-suspect-sought/>.

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²²⁰ Julia Bingel and Jim Nelson, "\$50K Bond Set for Man Accused of Vandalizing Willoughby Church," *Cleveland 19 News*, August 14, 2023, <https://www.cleveland19.com/2023/08/14/50k-bond-set-man-accused-vandalizing-willoughby-church/>.

²²¹ Mark LaFlamme, "Man Arrested, Woman Summoned in Recent Church Vandalism, Thefts in Lewiston," *Portland Press Herald*, September 22, 2023, <https://www.pressherald.com/2023/09/22/man-arrested-woman-summonsed-in-recent-church-vandalism-thefts-in-lewiston/>.

July 2023

102. **July 29:** Stained glass windows broken (Notre Dame Church, Ogdensburg, NY)²²²
103. **July 17:** Holy oil poured out, crosses turned upside down, satanic imagery written on items inside church (Most Holy Trinity Roman Catholic Church, El Paso, TX)²²³
104. **July 15:** Man broke into church through window, chased staff out of building, damaged Crucifix (Shrine of Elizabeth Ann Seton at Our Lady of the Rosary Church, New York, NY)²²⁴
105. **July 8:** Statue of the Blessed Virgin Mary spray-painted (Resurrection Church, Brooklyn, NY)²²⁵

June 2023

106. **June 28:** Attempted break-in, damage to historic structure including Rose Window (Mission San José, San Antonio, TX)²²⁶
107. **June 28:** Cross sawn down (Santiago Retreat Center, Silverado, CA)²²⁷
108. **June 16:** Satanic messages spray-painted on exterior of school (Annunciation Catholic School, Denver, CO)²²⁸
109. **June 10:** Woman spray-painted messages on church walls, damaged altar (St. Timothy Catholic Church, Miami, FL)²²⁹

²²² Matt Curatolo, "Ogdensburg Church's Famed Horwood Stained Glass Vandalized," *NNY360*, August 3, 2023, https://www.nny360.com/ogdensburg-church-s-famed-horwood-stained-glass-vandalized/article_f3e54842-953a-5f74-a303-7d44c05f304b.html.

²²³ Daniel Payne, "Police Arrest Man Accused of Vandalizing El Paso Catholic Church," *National Catholic Register*, July 28, 2023, <https://www.ncregister.com/cna/police-arrest-man-accused-of-vandalizing-el-paso-catholic-church>.

²²⁴ "Lower Manhattan Church Vandalized in Latest Series of Attacks," *The Tablet*, July 17, 2023, <https://thetablet.org/lower-manhattan-church-vandalized-in-latest-series-of-attacks/>.

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²²⁸ Joe Bukuras, "Two More Anti-Catholic Attacks: Church in El Paso and School in Denver," *Catholic News Agency*, July 19, 2023, <https://www.catholicnewsagency.com/news/254844/two-more-anti-catholic-attacks-church-in-el-paso-and-school-in-denver-vandalized>.

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110. **June 5:** Man smashed photographs in rectory, spread paint thinner in rectory basement, smashed head with monstrance, and threw consecrated hosts from the Tabernacle on the ground (St. Joseph Roman Catholic Church, Queens, NY)²³⁰

May 2023

111. **May 23:** Woman set fire to outdoor chapel (Shrine of Our Lady of Guadalupe, Des Plaines, IL)²³¹
112. **May 14:** Multiple statues of the Blessed Virgin Mary broken, knocked down (Immaculate Conception Catholic Church, Goose Creek, SC)²³²
113. **May 2:** Furniture toppled, inscriptions defaced (Chapel of St. Ignatius at Seattle University, Seattle, WA)²³³
114. **May 2:** Brick thrown through glass door (Catholic Charities Brooklyn and Queens, Brooklyn Heights, NY)²³⁴

April 2023

115. **April 16:** Interior of church vandalized (Immaculate Heart of Mary Church, Churubusco, NY)²³⁵
116. **April 10:** Exterior graffitied with satanic symbols (St. Clare of Assisi Catholic Church, Johnstown, PA)²³⁶

²³⁰ Steven Vago and Larry Celona, "Crazed Vandal Wrecks Pope Francis Photo, Dresses Up in Priest Robes at NYC Church: Report," *New York Post*, June 7, 2023, <https://nypost.com/2023/06/07/crazed-vandal-wrecks-pope-francis-photo-dresses-up-in-priest-robos-at-nyc-church-report/>.

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²³³ "Seattle University Chapel Vandalized; 'Hate' Among Graffiti Found on Furniture, Books," *KOMO News*, May 3, 2023, <https://komonews.com/news/local/seattle-university-chapel-vandalized-crime-furniture-capitol-hill-books-inscriptions-catholic-jesuit-religious-st-ignatius-church-jewish-temple-flyers-edmonds-kirkland-campus-ministry-police-investigation-fbi-congregants-cars-hate>.

²³⁴ "Police Looking for Vandals Who Targeted Catholic Charities Office," *The Tablet*, May 10, 2023, <https://thetablet.org/police-looking-for-vandals-who-targeted-catholic-charities-office/>.

²³⁵ Robin Caudell, "Immaculate Heart of Mary Church in Churubusco Vandalized," *Press-Republican*, May 11, 2023, https://www.pressrepublican.com/news/immaculate-heart-of-mary-church-in-churubusco-vandalized/article_bb10322e-f012-11ed-8426-27669200ed33.html.

²³⁶ Rian Bossler, "Police Investigating Pentagrams, Message Spray Painted on Johnstown Church," *WTMJ*, April 13, 2023,

117. **April 8:** Statues of Holy Family vandalized (St. Patrick Seminary, Menlo Park, CA)²³⁷
118. **April 1:** Statue of Our Lady of Guadalupe smashed (Corpus Christi Catholic Church, Corona, CA)²³⁸
119. **April 1:** Altar overturned and broken, statue and other objects broken (St. Paulinus Catholic Church, Syracuse, NE)²³⁹

March 2023

120. **March 20-April 24:** Over the course of three nights man toppled statues and defiled altar (St. Edward the Confessor Catholic Church, Metairie, LA)²⁴⁰
121. **March 23:** Statue of angel destroyed (Holy Family Parish, Fresh Meadows, NY)²⁴¹
122. **March 11:** Vandalism to Crucifix and interior of church, smashed windows (Our Lady of Lourdes Catholic Church, Gales Ferry, CT)²⁴²

February 2023

123. **February (date not given):** Unspecified vandalism (St. Joseph Catholic Church, Manistee, MI)²⁴³

<https://www.wtaj.com/news/local-news/police-investigating-pentagrams-message-spray-painted-on-johnstown-church/>.

²³⁷ "Menlo Park Man Accused of Vandalizing Mary, Joseph Statues at St. Patrick's Seminary Easter Weekend," *CBS News*, April 11, 2023, <https://www.cbsnews.com/sanfrancisco/news/menlo-park-man-accused-vandalizing-mary-joseph-statues-st-patricks-seminary-easter-weekend/>.

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²³⁹ Dan Swanson, "Suspect Charged for Church Vandalism," *News Channel Nebraska - River Country*, April 11, 2023, <https://rivercountry.newschannelnebraska.com/story/48699328/suspect-charged-for-church-vandalism>.

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January 2023

124. **January 26:** Pro-life signs defaced (St. Stephen Catholic Church, Riverview, FL)²⁴⁴
125. **January 25:** Statues of the Blessed Virgin Mary and Baby Jesus vandalized (Good Shepherd Church, Fall River, MA)²⁴⁵
126. **January 23:** Woman overturned potted plant, smashed statue of Jesus Christ (St. Mary's Cathedral, Fargo, ND)²⁴⁶
127. **January 20:** Front doors vandalized (St. Boniface Catholic Church, Cincinnati, OH)²⁴⁷
128. **January 20:** Baby Jesus stolen, statues damaged (San Pablo Catholic Church, Marathon, FL)²⁴⁸
129. **January 18:** Pro-life memorial defaced (St. Rosalia Church, Greenfield, PA)²⁴⁹
130. **January 17:** Glass door shattered, image of Our Lady of Guadalupe slashed, statues and other religious items stolen, walls graffitied (Mary Queen of Peace, Billings, MT)²⁵⁰
131. **January 16:** Statues for outdoor nativity set smashed, stolen (St. Patrick Co-Cathedral, Billings, MT)²⁵¹
132. **January 13:** Man threw brick through window of front door, attempted to set flagpole on fire (St. Agnes Catholic Church, Blackwood, NJ)²⁵²

²⁴⁴ D'Ann Lawrence White, "FL Supreme Court Will Hear Lawsuit On 15-week Abortion Ban; Church Hit by Vandals," *Bloomington-Riverview Patch*, January 29, 2023,

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<https://www.ncregister.com/cna/woman-arrested-at-fargo-cathedral-for-smashing-christ-in-death-statue>.

²⁴⁷ James Pilcher, "Two Cincinnati Churches Hit by Vandalism, Break-Ins Over Last Week," *LOCAL 12*, January 27, 2023,

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<https://cbs12.com/news/local/baby-jesus-stolen-san-pablo-catholic-church-marathon-florida-nativity-scene-florida-keys>.

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²⁵¹ Kelsey Merison, "Montana Church's Nativity Scene Vandalized: 'The Wise Men Were All Decapitated'," *KRTV*, January 26, 2023,

<https://www.krtv.com/news/montana-and-regional-news/montana-churchs-nativity-scene-vandalized-the-wise-men-were-all-decapitated>.

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133. **January 13:** Man attempted to throw rock through window (St. Teresa Church, Runnemede, NJ)²⁵³
134. **January 13:** Cross set on fire on church lawn (St. Patrick's Church, Woodbury, NJ)²⁵⁴
135. **January 10:** Glass windows of front door shattered by thrown object (St. Mary Catholic Church, Escondido, CA)²⁵⁵
136. **January 9:** Bottle thrown at statue of Our Lady of Guadalupe (St. Mary Catholic Church, Escondido, CA)²⁵⁶
137. **January 8:** Statue of Blessed Virgin Mary smashed (All Saints Catholic Church, Ft. Worth, TX)²⁵⁷
138. **January 5:** Altar smashed with sledgehammer, reliquaries stolen (Subiaco Abbey, Subiaco, AR)²⁵⁸
139. **January 5:** Nativity scene vandalized (St. Nicholas of Tolentine Church, Jamaica, NY)²⁵⁹

2022 (102 attacks)

December 2022

140. **December 30:** Brick thrown through window, woman entered church and threatened priest (Blessed Sacrament Catholic Church, Grand Island, NE)²⁶⁰
141. **December 25:** Flower vases kicked over, crucifix vandalized (St. Mary Catholic Church, Escondido, CA)²⁶¹

²⁵³ Ibid.

²⁵⁴ Ibid.

²⁵⁵ Joe Bukuras, "California Church Vandalized Three Times Since Christmas; Suspect Apprehended," *Catholic News Agency*, January 12, 2023, <https://www.catholicnewsagency.com/news/253339/california-church-vandalized-three-times-since-christmas-suspect-apprehended>.

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142. **December 25:** Satanic symbolism etched into wooden doors of cathedral (Cathedral of St. Peter, Scranton, PA)²⁶²
143. **December 17:** Statues from Nativity scene stolen (St. Michael Catholic Church, Tybee Island, GA)²⁶³
144. **December 11:** Three statues vandalized (St. Joseph's Catholic Church, Downingtown, PA)²⁶⁴
145. **December 3:** Threatening note left on door (St. John Paul II Newman Center, Omaha, NE)²⁶⁵

November 2022

146. **November 26:** Stained glass windows broken, grounds damaged by vehicle (St. Bernard Catholic Church, Weston, WV)²⁶⁶
147. **November 23:** Phallic symbols spray-painted on church exterior (St. Andrew Catholic Church, Eagle River, AK)²⁶⁷
148. **November 20:** Graffiti spray-painted on outdoor Divine Mercy shrine (St. Peter Catholic Parish, Kenosha, WI)²⁶⁸

October 2022

149. **October 31:** Cemetery vandalized with satanic graffiti (Calvary Cemetery, Rochester, MI)²⁶⁹

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150. **October 30:** Satanic symbols spray-painted on church (St. Pius X Catholic Church, Mountlake Terrace, WA)²⁷⁰
151. **October 28:** Wrench thrown through the door of Archbishop's residence (Archdiocese of New York, New York, NY)²⁷¹
152. **October 25:** Interior of church vandalized, including damage to tabernacle and baptismal font; obscenities written on altar and Eucharist desecrated (Our Lady of Lourdes Catholic Church, Colusa, CA)²⁷²
153. **October 23:** Many items, including Tabernacle, stolen from church (Our Lady of the Prairie, Reva, SD)²⁷³
154. **October 23:** Front door of church vandalized (St. Stephen Catholic Church, El Paso, TX)²⁷⁴
155. **October 17:** Fire started inside church, causing damage to stained glass and stations of the cross (St. Patrick's Parish, Watsonville, CA)²⁷⁵
156. **October 9:** Church vandalized with pro-abortion messages (Church of the Resurrection, Lansing, MI)²⁷⁶
157. **October 5:** Man attacked desk attendant with a sword, threw incendiary device at building (Holy Family Cathedral, Tulsa, OK)²⁷⁷
158. **October 3:** Statue of Blessed Virgin Mary smashed, sign run over by car (Mary's Nativity-St. Ann Parish, Flushing, NY)²⁷⁸

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September 2022

- 159. **September 25:** Exterior of Catholic pro-life medical clinic graffitied with satanic messages and imagery (Bella Health + Wellness, Englewood, CO)²⁷⁹
- 160. **September 24:** Political messages and satanic symbols spray-painted on exterior (St. Mary's Catholic Church, Arcata, CA)²⁸⁰
- 161. **September 18:** Office graffitied (St. Thomas Aquinas Pastoral Center, Palo Alto, CA)²⁸¹
- 162. **September 17:** Extensive damage to interior of church, including broken statues and urine on floor (Our Lady of the Angels, Sauk Centre, MN)²⁸²

August 2022

- 163. **August 30:** Statue of Our Lady of Fatima stolen (St. Andrew the Apostle Catholic Church, Gibbsboro, NJ)²⁸³
- 164. **August 19:** Statues and outdoor event tent and shed vandalized (St. Mary Catholic Church, Glens Falls, NY)²⁸⁴
- 165. **August 17:** Glass window and door broken (Sts. Mary and John Catholic Parish, Evansville, IN)²⁸⁵
- 166. **August 15:** Statue of St. Anthony decapitated and damaged, benches and windowsill smashed, office ransacked and candles destroyed (St. Anthony Catholic School, Washington, DC)²⁸⁶

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167. **August 11:** Statue of St. Anthony decapitated and damaged, benches and windowsill smashed, office ransacked and candles destroyed (St. Anthony Catholic School, Washington, DC)²⁸⁷
168. **August 8:** Front doors and windows hit by bullets from drive-by shootings (Assumption of the Blessed Virgin Mary Catholic Church, Denver, CO)²⁸⁸
169. **August 6:** Front doors and windows hit by bullets from drive-by shootings (Assumption of the Blessed Virgin Mary Catholic Church, Denver, CO)²⁸⁹
170. **August 2:** San Clemente statue decapitated, satanic altar found behind church (San Clemente Mission Parish, Bakersfield, CA)²⁹⁰
171. **August 2:** Stained glass windows smashed by rocks (St. Joseph Catholic Church, Bakersfield, CA)²⁹¹

July 2022

172. **July 23:** Statue of Blessed Virgin Mary smashed, statues of St. Joseph and baby Jesus decapitated (Kingsburg Holy Family Catholic Church, Kingsburg, CA)²⁹²
173. **July 22:** Statues knocked over and smashed (Holy Rosary Catholic Church, Houma, LA)²⁹³
174. **July 21:** Graffiti on exterior of building (St. George Catholic Church, Framingham, MA)²⁹⁴
175. **July 20:** Pro-life sign defaced (St. Boniface Catholic Church, Springfield, GA)²⁹⁵

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176. **July 14:** Windows shattered, statue of the Blessed Virgin Mary toppled (St. Thomas Aquinas Parish School, East Lansing, MI)²⁹⁶
177. **July 14:** Multiple windows broken with rocks (Lansing Catholic High School, Lansing, MI)²⁹⁷
178. **July 12:** Pro-life signs defaced (Didde Catholic Campus Center, Emporia, KS)²⁹⁸
179. **July 9:** Posted signs with threatening messages, caused damage to statues (St. Patrick Church, Kennett Square, PA)²⁹⁹
180. **July 9:** Multiple fires set inside church building, statues pulled down, Stations of the Cross torn from walls, books torn (St. Jane Frances de Chantal Church, Bethesda, MD)³⁰⁰
181. **July 9:** Church building vandalized with pro-abortion messages, statue of Blessed Virgin Mary defaced (Church of the Ascension, Overland Park, KS)³⁰¹
182. **July 9:** Satanic and pro-abortion graffiti spraypainted on building (Parish of St. John Neumann, Lower Township, NJ)³⁰²
183. **July 8:** Pro-life sign vandalized (Blessed Sacrament Church, Ontario, OR)³⁰³
184. **July 8:** Statue of Mary knocked down, broken (St. Thomas the Apostle Catholic Church, Long Beach, MS)³⁰⁴
185. **July 7:** Man made threats, lit books on fire in chapel (St. Joseph Catholic Church, Upland, CA)³⁰⁵

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186. **July 5:** Windows broken and sprinkler system damaged repeatedly over 2-month period (St. Mary's Catholic Church, Oakdale, CA)³⁰⁶
187. **July 4:** Pro-abortion message spray-painted on building (St. Bernard Catholic Church, Madison, WI)³⁰⁷
188. **July 3:** Pro-abortion, anti-Christian messages spray-painted on building (Holy Family Catholic Church, Hillsborough, NC)³⁰⁸
189. **July 1:** Pro-life sign defaced (St. Mary Catholic Church, Vinton, IA)³⁰⁹
190. **July 1:** Sidewalk spray-painted outside church building (St. Charles Catholic Church, Chippewa Falls, WI)³¹⁰
191. **July 1:** Sidewalk spray-painted outside church building (Holy Ghost Parish, Chippewa Falls, WI)³¹¹
192. **July 1:** Sidewalk spray-painted outside church building (Notre Dame Catholic Church, Chippewa Falls, WI)³¹²
193. **July 1:** Sidewalk spray-painted outside church building (St. Peter's Catholic Church, Tilden, WI)³¹³

June 2022

194. **June 30:** Fire suspected as arson caused estimated 1 million dollars in damages to school (St. Anthony of Padua School, Lorain, OH)³¹⁴
195. **June 28:** Man spray-painted anti-religious messages on building, damaged doors with rocks, and threatened people at the church building (St. Louise Catholic Church, Bellevue, WA)³¹⁵

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196. **June 27:** Pro-abortion, threatening messages spraypainted on front doors (Church of the Ascension, New York, NY)³¹⁶
197. **June 27:** Red paint splattered on statue (St. George Catholic Church, Framingham, MA)³¹⁷
198. **June 25:** Pro-life sign vandalized (St. Teresa of Avila Catholic Church, Hutchinson, KS)³¹⁸
199. **June 25:** Memorial to aborted children vandalized (St. Therese Little Flower Catholic Church, South Bend, IN)³¹⁹
200. **June 25:** Pro-abortion messages spray-painted on walls, stained glass windows broken (St. Anthony Parish, Renton, WA)³²⁰
201. **June 25:** Two statues of angels stolen, statue of the Blessed Virgin Mary toppled (St. Anthony's Catholic Church, Harlingen, TX)³²¹
202. **June 25:** Sign vandalized with pro-abortion messages (All Saints Parish, Portland, OR)³²²
203. **June 25:** Historic church burned to ground in suspected arson attack (St. Colman Catholic Church, Shady Spring, WV)³²³
204. **June 25:** Pro-abortion messages spray-painted on church building; mulch set on fire (St. John Neumann Catholic Community Church, Reston, VA)³²⁴

³¹⁶ Carol Tannenhauser, "'If Abortion Isn't Safe, Neither Are You,' Says Graffiti on West 107th Street Church," *West Side Rag*, June 27, 2022, <https://www.westsiderag.com/2022/06/27/graffiti-on-west-107th-street-church-says-if-abortion-isnt-safe-neither-are-you>.

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205. **June 25:** Statue memorializing children who died of abortion defaced (Holy Name of Mary Catholic Church, New Orleans, LA)³²⁵
206. **June 25:** Exterior of church defaced with pro-abortion graffiti (St. Patrick Catholic Church, Philadelphia, PA)³²⁶
207. **June 24:** Exterior of church defaced with pro-abortion and other political slogans (Guardian Angel Roman Catholic Church, Brooklyn, NY)³²⁷
208. **June 23:** Religious statues and garden pots smashed (St. Margaret's Roman Catholic Church, Buffalo, NY)³²⁸

May 2022

209. **May 29:** Tabernacle stolen, Holy Eucharist thrown on floor, statues of angels on the altar decapitated and destroyed (St. Augustine Catholic Church, Brooklyn, NY)³²⁹
210. **May 28:** Threats and pro-abortion messages spray-painted on building (South Broward Pregnancy Help Center, Miami, FL)³³⁰
211. **May 22:** Pro-abortion messages spray-painted on church building (St. Michael's Catholic Church, Olympia, WA)³³¹
212. **May 19:** Pro-abortion messages spray-painted on front doors of church building (Notre Dame de Lourdes, Swarthmore, PA)³³²
213. **May 17:** Statues of Lúcia dos Santos and Jacinta Marto, two of the children who witnessed the apparitions of Our Lady of Fatima, smashed and decapitated (Our Lady of Sorrows Catholic Church, New York, NY)³³³

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214. **May 17:** Statue vandalized (St. David the King, West Windsor, NJ)³³⁴
215. **May 11:** Pro-life sign vandalized (Church of the Ascension, Overland Park, KS)³³⁵
216. **May 9:** Pro-abortion messages painted on front doors (Holy Rosary Catholic Church, Houston, TX)³³⁶
217. **May 9:** Building vandalized with pro-abortion messages, attempted desecration of Eucharist (St. Elizabeth Ann Seton Catholic Church, Katy, TX)³³⁷
218. **May 9:** Theft of Tabernacle containing Body and Blood of Jesus Christ (St. Bartholomew the Apostle Catholic Church, Katy, TX)³³⁸
219. **May 8:** Offices set on fire using incendiary devices (Oregon Right to Life, Keizer, OR)³³⁹
220. **May 8:** Pro-abortion messages spray-painted on door and sign (Loreto House, Denton, TX)³⁴⁰
221. **May 7:** Pro-abortion messages spray-painted on front doors, glass panels broken (St. John Paul XXIII Catholic Church, Fort Collins, CO)³⁴¹
222. **May 4:** Phallic symbols spray-painted on exterior of church (St. Andrew Catholic Church, Eagle River, AK)³⁴²
223. **May 4:** Pro-abortion messages spray-painted on front doors (Sacred Heart of Mary Catholic Church, Boulder, CO)³⁴³

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April 2022

224. **April 16:** Man poured gasoline on door and sidewalk leading to church (St. Elizabeth Catholic Church, Boone, NC)³⁴⁴
225. **April 8:** Thirty windows and front door broken by rocks (Cristo Rey Catholic Church, Austin, TX)³⁴⁵
226. **April 1:** Sanctuary vandalized, crucifix and stained glass window damaged (St. Anthony's Catholic Church, North Beach, MD)³⁴⁶

March 2022

227. **March 25:** Tabernacle stolen (St. John the Evangelist, Hydes, MD)³⁴⁷
228. **March 25:** Statue of Our Lady of Fatima stolen (St. Jude Catholic Church, Ceres, CA)³⁴⁸
229. **March 22:** Statue of St. John Neumann vandalized (Cathedral Basilica of Sts. Peter and Paul, Philadelphia, PA)³⁴⁹
230. **March 19:** Statue of Jesus with children smashed (St. Mel's Catholic Church, Woodland Hills, CA)³⁵⁰
231. **March 12:** Front doors vandalized (St. Anthony Catholic Church, Wellington, KS)³⁵¹
232. **March 8:** Interior and exterior of church vandalized, statue damaged (St. Mary's Catholic Church, Royal Oak, MI)³⁵²

³⁴⁴ "Suspect Arrested, Charged after Allegedly Pouring Gasoline on Door, Sidewalk of St. Elizabeth Catholic Church," *Watauga Democrat*, April 19, 2022, https://www.wataugademocrat.com/blowingrocket/news/suspect-arrested-charged-after-allegedly-pouring-gasoline-on-door-sidewalk-of-st-elizabeth-catholic-church/article_70e02ba0-19ce-5eff-897c-d05530de46f8.html.

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³⁵¹ "Wellington police identify suspects in 'Hail Satan' church vandalism," *KWCH 12*, March 14, 2022, <https://www.kwch.com/2022/03/14/hail-satan-police-investigate-wellington-church-vandalism/>.

³⁵² Priya Mann, "Royal Oak Church Community Gathers in Prayer after Man Damages Building, Beloved Statue," *ClickOnDetroit*, March 13, 2022, <https://www.clickondetroit.com/news/local/2022/03/14/royal-oak-church-community-gathers-in-prayer-after-man-damages-building-beloved-statue/>.

233. **March 1:** Statue of the Holy Family defaced with blasphemous words and imagery (Holy Family Catholic Church, Jacksonville, FL)³⁵³

February 2022

234. **February 28:** Tombstones at Ukrainian Catholic cemetery defaced (St. Michael the Archangel Ukrainian Catholic Church, Baltimore, MD)³⁵⁴
235. **February 23:** Statue of the Holy Family stolen from parking lot (St. Margaret Mary Catholic Church, San Antonio, TX)³⁵⁵
236. **February 18:** Headstones in cemetery knocked down (St. Stephen Cemetery, Framingham, MA)³⁵⁶
237. **February 17:** Two statues of angels knocked down (Sacred Heart Catholic Church, Milledgeville, GA)³⁵⁷
238. **February 14:** Stained glass windows smashed (St. Therese of the Infant Jesus Catholic Church's Shrine of the Little Flower, Albuquerque, NM)³⁵⁸

January 2022

239. **January 27:** Interior of church vandalized (Greenwood Catholic Church, Greenwood, MS)³⁵⁹
240. **January 26:** Statues of Our Lady of Fatima and children who witnessed apparitions decapitated (Church of the Nativity, Burke, VA)³⁶⁰

³⁵³ Samantha Mathers, "Three arrested for graphic messages at Jacksonville Catholic Church," *Action News Jax*, March 8, 2022, <https://www.actionnewsjax.com/news/local/hail-satan-catholic-church-says-statues-holy-family-defaced/52YTXIAKVNHLZAXRDSRF5X6E2U/>.

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³⁶⁰ Zoey Maraist, "Marian Grotto Vandalized at Nativity Church," *The Catholic Herald*, January 27, 2022, https://www.catholicherald.com/News/Local_News/Marian_grotto_vandalized_at_Nativity_church/.

241. **January 14:** Tabernacle vandalized, money stolen (St. Alphonsus Catholic Church, Fresno, CA)³⁶¹

2021 (74 attacks)

December 2021

242. **December 29:** Christmas decorations damaged and stolen (Mary Mother of God Catholic Church, Hillsborough, NJ)³⁶²
243. **December 26:** Statues of the Holy Family stolen from Nativity scene (Holy Cross Catholic Church, Woodland Park, NJ)³⁶³
244. **December 23:** Christmas decorations damaged and stolen (Mary Mother of God Catholic Church, Hillsborough, NJ)³⁶⁴
245. **December 13:** Arsonist set fire to church and adjacent parsonage (Immaculate Conception Catholic Church, Portland, IN)³⁶⁵
246. **December 12:** Christmas decorations damaged and stolen (Mary Mother of God Catholic Church, Hillsborough, NJ)³⁶⁶
247. **December 7:** Statue of Our Lady of Fatima vandalized (Basilica of the National Shrine of the Immaculate Conception, Washington, DC)³⁶⁷

³⁶¹ Peter Lopez, "100-Year-Old Tabernacle Vandalized, Suspect on the Loose, in Fresno," *FOX26News*, January 21, 2022, <https://kmpfh.com/news/local/100-year-old-tabernacle-vandalized-suspect-on-the-loose-in-fresno>.

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November 2021

- 248. **November 28:** Fire at Catholic Charities, causing destruction of roof and one fifth of the building (Catholic Charities, Knoxville, TN)³⁶⁸
- 249. **November 25-29:** Windows smashed and statues toppled (St. Peter's Catholic Church, DeLand, FL)³⁶⁹
- 250. **November 9:** Graffiti painted on exterior walls (St. Nicholas Ukrainian Catholic Cathedral, Chicago, IL)³⁷⁰
- 251. **November 5:** Graffiti spray-painted on exterior of Catholic mission (Mission San Jose, Fremont, CA)³⁷¹
- 252. **November 1:** Statue of St. Anthony of Padua decapitated (St. Anthony of Padua Catholic Church, Fargo, ND)³⁷²

October 2021

- 253. **October 30:** Satanic symbols spray-painted on church³⁷³
- 254. **October 24:** Fire set to parish office (St. Charles Borromeo, Tacoma, WA)³⁷⁴
- 255. **October 22:** Swastika painted on a pillar in church parking lot (Annunciation Catholic Church, Washington, DC)³⁷⁵
- 256. **October 21:** Headstones knocked down (St. Stephen Cemetery, Framingham, MA)³⁷⁶

³⁶⁸ "Knoxville Fire Breaks Out at Catholic Charities Building," *WBIR 10 News*, November 28, 2021, <https://www.wbir.com/article/news/crime/knoxville-fire-breaks-out-at-catholic-charities-building-knoxville/51-c1f8bbfb-fbfb-4680-851f-a75fb632875c>.

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³⁷⁶ Norman Miller, "Framingham Police Investigate Vandalism of Headstones at St. Stephen Cemetery," *MetroWest Daily News*, October 28, 2021,

257. **October 21:** Hateful messages spray-painted on exterior wall of church (American Martyrs Catholic Church, Manhattan Beach, CA)³⁷⁷
258. **October 11:** Graffiti painted on exterior wall of residence (Arrupe Jesuit Residence, Seattle University, Seattle, WA)³⁷⁸
259. **October 11:** Paint splattered over the exterior of the church (Los Angeles, CA, St. Peter Italian Catholic Church)³⁷⁹
260. **October 10:** Windows broken and exterior vandalized with spray paint (St. Edward Church, Seattle, WA)³⁸⁰
261. **October 10:** Hateful messages and other graffiti found spray painted on exterior wall and door (Denver, CO, Cathedral Basilica of the Immaculate Conception)³⁸¹

September 2021

262. **September 29 and August 29:** Statues of Jesus vandalized (Miami Shores, FL, St. Martha Catholic Church)³⁸²
263. **September 29:** Windows broken and exterior spray painted with pro-abortion messages (Sacred Heart of Mary Catholic Church, Boulder, CO)³⁸³
264. **September 23:** Stained glass windows smashed (St. Peter Armenian Apostolic Church, Van Nuys, CA)³⁸⁴
265. **September 9:** Statues of St. Patrick, Our Lady of Fatima, and Our Lady of Grace broken (St. Patrick Church, North Little Rock, AR)³⁸⁵
266. **September 5:** Graffiti found on church's door, sign, and garden sign³⁸⁶

<https://www.metrowestdailynews.com/story/news/2021/10/28/gravestones-knocked-over-st-stephens-cemetery-framingham/8581585002/>.

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<https://mynews1a.com/crime/2021/10/21/police-investigate-vandalism-at-manhattan-beach-church/>.

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³⁸¹ Patrick Perez, "Cathedral Basilica of the Immaculate Conception in Downtown Denver Vandalized," *Denver7 (TheDenverChannel.com)*, October 10, 2021, <https://www.thedenverchannel.com/news/local-news/cathedral-basilica-of-the-immaculate-conception-in-downtown-denver-vandalized>.

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³⁸³ Deborah Takahara, "Boulder County Church Vandalized," *FOX31 Denver*, September 29, 2021, <https://kdvr.com/news/local/boulder-county-church-vandalized/>.

³⁸⁴ "Vandal Smashes Stained Glass Windows at Armenian Church," *KKTV*, September 25, 2021, <https://www.kktv.com/2021/09/25/vandal-smashes-stained-glass-windows-armenian-church/>.

³⁸⁵ "Vandalism at St. Patrick Church," *Arkansas Catholic*, September 9, 2021, <https://www.arkansas-catholic.org/news/brief/7087/Vandalism-at-St-Patrick-Church>.

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267. **September 2:** Exterior of church and parish hall vandalized with white paint (St. Rose of Lima Catholic Church, Jay, ME)³⁸⁷

August 2021

268. **August 17:** Statue of the St. Bernadette knocked down (St. Michael's Church, Flushing, NY)³⁸⁸
269. August 12: Statue destroyed (Church of St. Joseph, Spring Valley, NY)³⁸⁹
270. **August 9:** Statue of the Blessed Virgin Mary vandalized (Immaculate Conception of the Blessed Mary, Bronx, NY)³⁹⁰
271. **August 6:** Doors vandalized with black paint (St. Benedict Catholic Church, Seattle, WA)³⁹¹

July 2021

272. **July 17:** Woman seen on camera smashing statues of the Blessed Virgin Mary and St. Thérèse of Lisieux (Our Lady of Mercy Catholic Church, Forest Hills, NY)³⁹²
273. **July 11:** Doors vandalized with obscene political slogans (Holy Redeemer Catholic Church, Portland, OR)³⁹³
274. **July 8:** Fire set in bell tower (St. Mary's Catholic Church, Los Angeles, CA)³⁹⁴

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<https://www.pressherald.com/2021/09/02/several-businesses-and-a-church-in-jay-and-livermore-falls-vandalized/>.

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<https://www.catholicherald.com/article/national/fires-graffiti-red-paint-are-among-ways-portland-churches-vandalized/>.

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<https://mynews1a.com/crime/2021/07/08/l-a-catholic-archdiocese-assessing-damage-from-boyle-heights-church-fire-2/>.

275. **July 7:** Statue of Jesus covered in red paint (Basilica of St. Lawrence, Asheville, NC)³⁹⁵
276. **July 4:** Man seen on camera using red paint to vandalize church buildings and statues (St. Patrick's Catholic Church, Merced, CA)³⁹⁶
277. **July 2:** Front doors of church vandalized with red paint (St. James Cathedral, Seattle, WA)³⁹⁷
278. **July 1:** Front doors, steps, and columns vandalized with red paint (St. Francis of Assisi Roman Catholic Parish, Portland, OR)³⁹⁸
279. **July 1:** Statue of Blessed Virgin Mary holding baby Jesus vandalized and stolen (Holy Rosary Church, Jersey City, NJ)³⁹⁹

June 2021

280. **June 30:** Graffiti painted on exterior of church (Holy Ghost Catholic Church, Denver, CO)⁴⁰⁰
281. **June 26:** Fires lit and graffiti found on church grounds (St. Patrick Catholic Church, Portland, OR)⁴⁰¹
282. **June 26:** Stained glass window broken (St. Andrew Catholic Church, Portland, OR)⁴⁰²
283. **June 19:** Fire started at front door of church (St. Veronica's Catholic Church, Philadelphia, PA)⁴⁰³

³⁹⁵ Simone Jasper, "Statue of Jesus Covered in Red Paint at Catholic Basilica in North Carolina," *The Charlotte Observer*, July 7, 2021, <https://www.charlotteobserver.com/news/state/north-carolina/article252623093.html>.

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284. **June 8:** Graffiti spray-painted on exterior of church (Immaculate Conception Church, Queens, NY)⁴⁰⁴
285. **June 4:** Man caught on camera vandalizing doors and stained glass (St. Charles Borromeo Catholic Church, Port Charlotte, FL)⁴⁰⁵

May 2021

286. **May 31:** Stained glass and doors defaced (St. Charles Borromeo Catholic Church, Port Charlotte, FL)⁴⁰⁶
287. **May 27:** Audio equipment stolen and multiple fire extinguishers deployed inside the church (Our Lady of the Assumption Catholic Church, Leavenworth, WA)⁴⁰⁷
288. **May 17:** Statue of baby Jesus decapitated (Diocese of Brooklyn, Brooklyn, NY)⁴⁰⁸
289. **May 15:** Statues of Our Lady of Carmel and the Sacred Heart of Jesus vandalized (Our Lady of Mount Carmel-St. Benedicta-St. Mary of the Assumption Parish, Staten Island, NY)⁴⁰⁹
290. **May 14:** Large crucifix toppled and smashed, American flag burned (St. Athanasius Catholic Church, Brooklyn, NY)⁴¹⁰
291. **May 8-9:** Statue of Jesus Christ vandalized (St. Thomas More Catholic Church, Narragansett, RI)⁴¹¹
292. **May 8:** Rocks thrown through stained glass windows (Our Lady of Grace, Everett, MA)⁴¹²
293. **May 6:** Stained glass windows broken and statue of San Juan Diego vandalized (Sacred Heart Catholic Church, Riverside, CA)⁴¹³

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294. **May 5:** Statue of Polish priest vandalized (McCarren Park, Brooklyn, NY)⁴¹⁴
295. **May 4:** *Update on fire at Mission San Gabriel Arcángel in the Archdiocese of Los Angeles* - "Man Charged with Arson in San Gabriel Mission Fire"⁴¹⁵
296. **May 2-3:** Statue of Jesus Christ decapitated (St. Charles Borromeo Catholic Church, Waltham, MA)⁴¹⁶

April 2021

297. **April 26:** Man smashed face of Our Lady of Guadalupe with a sledgehammer (St. Elisabeth Catholic Church, Van Nuys, CA)⁴¹⁷
298. **April 17 or 18:** Statues of the Blessed Virgin Mary, St. Mary Magdalene, and St. John, spray painted (Holy Rosary Catholic Church, Woodland, CA)⁴¹⁸
299. **April 17 or 18:** Statue of the Blessed Virgin Mary spray painted (St. John Vianney, Rancho Cordova, CA)⁴¹⁹
300. **April 16 or 17:** Face of statue of Jesus vandalized (St. Mary's Cathedral, Fargo, ND)⁴²⁰
301. **April 15:** Statues of three female saints vandalized (Holy Rosary Church, Woodland, CA)⁴²¹

March 2021

302. **March 24:** Gunshots fired at abbey of Benedictines of Mary, Queen of the Apostles (Abbey of Our Lady of Ephesus, Gower, MO)⁴²²
303. **March 22:** Fire at St. Charles Catholic School is being investigated as possible arson (St. Charles Catholic Church, Spokane, WA)⁴²³

⁴¹⁴ Andrew J. Campa, Richard Winton, and James Queally. "Man Charged with Setting Devastating San Gabriel Mission Fire." Los Angeles Times, May 4, 2021.

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⁴²¹ Eric Rucker, "Saint Statues at Woodland Church Vandalized," *FOX40*, April 15, 2021, <https://fox40.com/news/local-news/saint-statues-at-woodland-church-vandalized/>.

⁴²² "Missouri Nuns Targeted in Multiple Acts of Violence," *Pillar Catholic*, March 24, 2021, <https://www.pillarcatholic.com/p/missouri-nuns-targeted-in-multiple>.

⁴²³ Emma Epperly, "Fire at St. Charles Elementary School Causes Significant Damage, Investigated as Possible Arson," *Spokesman-Review*, March 18, 2021, <https://www.spokesman.com/stories/2021/mar/18/fire-at-st-charles-elementary-school-causes-signif/>.

304. **March 12:** Unknown substance inserted into locks, statue of the Blessed Virgin Mary knocked down (St. Teresa of Calcutta Church, St. John Paul II Academy, and St. Monica-St. Augustine Catholic Church, Boston, MA)⁴²⁴
305. **March 2:** Vandals damaged statues of the Blessed Virgin Mary and St. Thomas the Apostle (St. Thomas the Apostle Catholic Church, Ft. Worth, TX)⁴²⁵

February 2021

306. **February 27:** Several statues vandalized (Basilica of Our Lady of Mt. Carmel, Youngstown, OH)⁴²⁶
307. **February 25:** Chapel doors and statue of the Blessed Virgin Mary vandalized (St. Mary of the Knobs Catholic Church, Floyds Knobs, IN)⁴²⁷
308. **February 20:** Gunshots fired at abbey of Benedictines of Mary, Queen of the Apostles (Abbey of Our Lady of Ephesus, Gower, MO)⁴²⁸
309. **February 19:** Doors damaged (Mission San Juan Capistrano, San Juan Capistrano, CA)⁴²⁹
310. **February 17:** Gunshots fired at abbey of Benedictines of Mary, Queen of the Apostles (Abbey of Our Lady of Ephesus, Gower, MO)⁴³⁰
311. **February 16:** Statue and flower pots around altar damaged (St. Anthony of Padua Catholic Church, Denver, CO)⁴³¹
312. **February 10:** Three angel statues toppled and broken (St. Pius X, El Paso, TX)⁴³²

⁴²⁴ Rick Sobey, "Two Boston Churches Vandalized Again: 'It's Unsettling,'" *Boston Herald*, March 14, 2021, <https://www.bostonherald.com/2021/03/14/two-boston-churches-vandalized-again-its-unsettling/>.

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⁴³⁰ "Missouri Nuns Targeted in Multiple Acts of Violence," *Pillar Catholic*, February 17 and 20, 2021, <https://www.pillarcatholic.com/p/missouri-nuns-targeted-in-multiple>.

⁴³¹ Aimee Lewis, "Video Shows Vandal Smashing Objects Inside Southwest Denver Church," *KDVR*, February 16, 2021, <https://kdvr.com/news/video-shows-vandal-smashing-objects-inside-southwest-denver-church/>.

⁴³² "Vandalism Outside El Paso Catholic Church Damages Three Angel Statues," *Catholic News Agency*, February 10, 2021, <https://www.catholicnewsagency.com/news/vandalism-outside-el-paso-catholic-church-damages-three-angel-statues-15588>.

January 2021

- 313. **January 29:** Statue of Our Lady of Guadalupe shot six times (Queen of Peace Catholic Church, Houston, TX)⁴³³
- 314. **January 19:** Graffiti and arson at Cathedral (Rosary Cathedral, Toledo, OH)⁴³⁴
- 315. **January 1:** Cathedral tagged with anti-police graffiti (St. Patrick's Cathedral, New York, NY)⁴³⁵

May - December 2020 (56 attacks)

December 2020

- 316. **December 28:** Stained glass windows vandalized (Cathedral of St. Mary of the Assumption, Fall River, MA)⁴³⁶
- 317. **December 25:** Nativity scene vandalized on Christmas morning (St. John the Evangelist Catholic Church, Indianapolis, IN)⁴³⁷
- 318. **December 11:** Front entrance to site graffitied (Mission San Juan Capistrano, San Juan Capistrano, CA)⁴³⁸
- 319. **December 6:** Church buildings and bathroom spray-painted (St. Louis Catholic Church, Houma, LA)⁴³⁹

November 2020

- 320. **November 28:** Windows broken (St. Joseph Catholic Church, Derry, PA)⁴⁴⁰

⁴³³ Erica Simon, "Virgin Mary Statue Shot Six Times at Queen of Peace Catholic Church in Houston," *ABC13 Houston*, January 29, 2021,

<https://abc13.com/virgin-mary-statue-vandalized-church-vandalism-queen-of-peace-catholic/10127442/>.

⁴³⁴ "Officials Investigating Arson Case at Rosary Cathedral," *13ABC Toledo*, January 18, 2021,

<https://www.13abc.com/2021/01/18/officials-investigating-arson-case-at-rosary-cathedral/>.

⁴³⁵ "NYPD: Vandals Tagged St. Patrick's Cathedral During New Year's Protest," *NBC New York*, January 1, 2021,

<https://www.nbcnewyork.com/news/local/nypd-vandals-tagged-st-patricks-cathedral-during-new-years-protest/2807917/>.

⁴³⁶ Jo. C. Goodle, "Vandal Damages Windows at St. Mary's Cathedral, and Police Are Looking for Person of Interest," *The Herald News*, December 28, 2020,

<https://www.heraldnews.com/story/news/crime/2020/12/28/vandal-damages-windows-st-marys-cathedral-and-police-looking-person-interest/4065801001/>.

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<https://fox59.com/news/downtown-church-nativity-scene-vandalized-on-christmas-day/>.

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<https://www.foxla.com/news/vandals-strike-244-year-old-church-in-orange-county>.

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<https://www.houmatoday.com/story/news/2020/12/09/catholic-church-vandalized-bayou-blue/6507201002/>.

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<https://wsvn.com/news/local/broward/man-destroys-3-statues-from-sunrise-catholic-church-shoves-2-down-sewer-drain/>.

321. **November 23:** Statue of Jesus smashed with rock, two other statues decapitated and pushed into sewer drain, garden set on fire with accelerant (St. Bernard Catholic Church, Sunrise, FL)⁴⁴¹
322. **November 15:** Apparent arson attack (Sacred Heart Catholic Church, Brewster, WA)⁴⁴²
323. **November 10:** Portrait of St. Pope John Paul II defaced (St. Gabriel Elementary School, Milford, CT)⁴⁴³
324. **November 9:** Statue of Mary graffitied, "God is dead" spray-painted on church exterior (St. Mary's Catholic Church, Chicago, IL)⁴⁴⁴
325. **November 8:** Head of Jesus stolen from crucifix (Mother Cabrini Catholic Church, Shamokin, PA)⁴⁴⁵
326. **November 3:** Unspecified vandalism (St. Joseph Catholic Church, Derry, PA)⁴⁴⁶

October 2020

327. **October 31:** Unspecified vandalism (St. Joseph Catholic Church, Derry, PA)⁴⁴⁷
328. **October 25:** Altar vandalized (St. Martin of Tours Catholic Church, Louisville, KY)⁴⁴⁸
329. **October 22:** Statue of Mary toppled (St. Peter and Paul Catholic Church, Scranton, PA)⁴⁴⁹

⁴⁴¹ Ibid.

⁴⁴² Jonah McKeown, "Two Churches in Washington State Burn in Apparent Arson Attacks," *Catholic News Agency*, November 18, 2020,

<https://www.catholicnewsagency.com/news/46637/two-churches-in-washington-state-burn-in-apparent-arson-attacks>

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<https://abc7chicago.com/saint-marys-catholic-church-south-side-vandalized-vandals/7786481/>.

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<https://www.courier-journal.com/story/news/local/2020/10/27/man-broke-into-louisville-catholic-church-vandalized-altar/3749162001/>.

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330. **October 21:** Statues of the Blessed Virgin Mary and Jesus Christ found toppled; gardens surrounding the statues were also damaged. (St. Germaine Catholic Church, Prescott Valley, AZ)⁴⁵⁰
331. **October 20:** Statue of the Blessed Virgin Mary found vandalized; left hand was cut off, and there was a crack along her head. (Resurrection Roman Catholic Church, Brooklyn, NY)⁴⁵¹
332. **October 19:** Pro-life display vandalized. The display consists of 150 small white crosses and a banner, which were knocked down. (Immaculate Heart of Mary Catholic Church, Magnolia, AR)⁴⁵²
333. **October 12:** Statue of Junipero Serra defaced and pulled down (Mission San Rafael Arcángel, San Rafael, CA)⁴⁵³

September 2020

334. **September 29:** Statues of Joseph, Mary, and infant Jesus decapitated, heads carried away (St. Joseph Cupertino Catholic Church, Fall River, MA)⁴⁵⁴
335. **September 29:** Rocks, cinderblocks thrown through windows of Catholic church, decapitated heads of holy family statues found on site (Cathedral of St. Mary of the Assumption, Fall River, MA)⁴⁵⁵
336. **September 26:** Exterior of church graffitied with swastikas, political messages, and satanic imagery (St. Peter's Chaldean Catholic Cathedral, El Cajon, CA)⁴⁵⁶
337. **September 26:** Exterior of church graffitied with swastikas, political messages, and satanic imagery (Our Mother of Perpetual Help Catholic Church, El Cajon, CA)⁴⁵⁷

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⁴⁵⁷ Ibid.

338. **September 24:** Man with baseball bat damages crucifix, doors at Catholic seminary (Assumption Seminary, San Antonio, TX)⁴⁵⁸
339. **September 23:** Man breaks church windows, sets pews on fire (Incarnation Catholic Church, Town 'n' Country, FL)⁴⁵⁹
340. **September 15:** Statue of Jesus topped, beheaded (St. Patrick Cathedral, El Paso, TX)⁴⁶⁰
341. **September 13-14:** Statue of St. Therese toppled, beheaded; parish office burglarized (St. Therese of the Child Jesus Catholic Church, Midvale, UT)⁴⁶¹
342. **September 11:** Statue of Our Lady of Guadalupe toppled (Shrine Church of Our Lady of Solace, Brooklyn, NY)⁴⁶²
343. **September 9:** Statues damaged and beheaded, windows broken (Immaculate Heart of Mary Church, Tioga, LA)⁴⁶³

August 2020

344. **August 25:** Anti-religious graffiti spray-painted on Catholic Church site during protests over police shooting of Jacob Blake (St. James Church, Kenosha, WI)⁴⁶⁴
345. **August 24 (approximately):** Attempted beheading of statue of Mary (Our Lady Help of Christians Church, Allentown, PA)⁴⁶⁵

⁴⁵⁸ Kevin J. Jones, "Vandal Takes Baseball Bat to Catholic Seminary in Texas, but None Harmed," *Catholic News Agency*, September 25, 2020.
<https://www.catholicnewsagency.com/news/vandal-takes-baseball-bat-to-catholic-seminary-in-texas-but-none-harmed-63146>.

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<https://www.catholicnewsagency.com/news/pastor-urges-prayer-forgiveness-after-florida-man-tries-to-burn-down-incarnation-catholic-church-71890>.

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<https://kvia.com/news/crime/2020/09/15/jesus-statue-decapitated-in-brazen-vandalism-attack-at-el-pasos-st-patricks-cathedral/>.

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<https://www.abcactionnews.com/news/national/catholic-church-parish-in-utah-vandalized-burglarized-on-back-to-back-nights>.

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<https://www.thetowntalk.com/story/news/2020/09/10/tioga-louisiana-crime-catholic-church-vandalism-destruction/3458492001/>.

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<https://www.catholicnewsagency.com/news/kenosha-catholics-praying-for-peace-after-third-night-of-violence-37993>.

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346. **August 17:** Statue of Mary beheaded, swastika spray-painted on Ten Commandments (Holy Family Parish, Citrus Heights, CA)⁴⁶⁶
347. **August 9:** Statue of St. Jude beheaded (Our Lady of Guadalupe Shrine, Denver, CO)⁴⁶⁷
348. **August 8:** Deconsecrated church destroyed in suspected arson (Sacred Heart Catholic Church, Wounded Knee, SD)⁴⁶⁸
349. **August 3:** Fires set at church entrance (Sacred Heart Church, Weymouth, MA)⁴⁶⁹

July 2020

350. **July 18-19:** Abortion monument toppled (Our Lady of the Assumption Catholic Church, Bloomingburg, NY)⁴⁷⁰
351. **July 15:** Satanic and anarchist symbols painted on the front door of the church (St. Joseph's Catholic Church, New Haven, CT)⁴⁷¹
 - Statement, Archdiocese of Hartford: ("This follows an apparent trend of desecrating Catholic spaces throughout the nation, as evidenced by incidents in Chattanooga, Queens, Boston, Sacramento, and Ocala.")⁴⁷²
352. **July 14-15:** Outdoor statue of Jesus knocked over and beheaded (Good Shepherd Catholic Church, Miami, FL)⁴⁷³
 - Statement, Archdiocese of Miami: "Archbishop Thomas Wenski is requesting that police investigate this incident as a hate crime."⁴⁷⁴

<https://www.mcall.com/news/local/mc-nws-allentown-virign-mary-statue-vandalized-20200903-tq62vv3peffvi5fpa6klaj7fu-story.html>.

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<https://kdvr.com/news/vandals-behead-st-jude-statue-outside-historic-denver-church/>.

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https://www.facebook.com/story.php?story_fbid=3244843232238777&id=424801330909662.

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<https://www.catholicnewsagency.com/news/catholic-church-statues-continue-to-be-attacked-in-florida-and-colorado-38551>.

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353. **July 14:** Statue of St. Mary painted red (St. Mary's Cathedral, Colorado Springs, CO)⁴⁷⁵
354. **July 13:** Statue of St. Mary beheaded (St. Stephen Catholic Church, Chattanooga, TN)⁴⁷⁶
355. **July 11:** Statues of children, Blessed Virgin Mary, and Jesus damaged (Sacred Heart Church Center, Punta Gorda, FL)⁴⁷⁷
356. **July 11-12:** Outdoor statue of St. Mary burned (St. Peter's Parish, Dorchester, MA)⁴⁷⁸
 - Statement, Archdiocese of Boston⁴⁷⁹
357. **July 11:** Man crashed minivan through church door, poured gasoline on the foyer and lit it on fire. People were inside the church, preparing for Mass. (Queen of Peace Catholic Church, Ocala, FL)⁴⁸⁰
358. **July 11:** Fire at 249-year-old church destroyed the roof, pews, and more (Mission San Gabriel Arcángel, San Gabriel, CA)⁴⁸¹
 - Letter, Archbishop of Los Angeles, Jose Gomez⁴⁸²
359. **July 10:** Outdoor statue of St. Mary spray painted with word "IDOL" (Cathedral Prep School and Seminary, Elmhurst, NY)⁴⁸³
 - Press release, Diocese of Brooklyn⁴⁸⁴
360. **July 5-6:** Crucifix at roadside shrine smashed (St. Bernadette Catholic Church, Rockford, IL)⁴⁸⁵

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<https://www.catholicnewsagency.com/news/catholic-church-statues-continue-to-be-attacked-in-florida-and-colorado-38551>.

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⁴⁷⁸ "Statues of Mary Vandalized in Weekend of Church Attacks," *Catholic News Agency*, July 12, 2020, <https://www.catholicnewsagency.com/news/statues-of-mary-vandalized-in-weekend-of-church-attacks-24779>.

⁴⁷⁹ "July 13, 2020 Statement Regarding Vandalism of Virgin Mary Statue at St. Peter's Parish, Dorchester," *Boston Catholic*, July 13, 2020, <https://www.bostoncatholic.org/news/july-13-2020-statement-regarding-vandalism-virgin-mary-statue-st-peters-parish-dorchester>.

⁴⁸⁰ "Arrest Made in Ocala, Florida Catholic Church Burning," *Catholic News Agency*, July 1, 2020, <https://www.catholicnewsagency.com/news/arrest-made-in-ocala-florida-catholic-church-burning-21535>.

⁴⁸¹ Pablo Kay, "After a Devastating Fire, Mission San Gabriel Community Vows to Rebuild," *Angelus News*, July 13, 2020, <https://angelusnews.com/local/la-catholics/after-a-devastating-fire-mission-san-gabriel-community-vows-to-rebuild>.

⁴⁸² José H. Gomez, "Letter from Archbishop Gomez Regarding the Mission San Gabriel Fire," *University Catholic Center at UCLA*, July 11, 2020, <https://uccla.org/news/letter-from-archbishop-gomez-regarding-the-mission-san-gabriel-fire>.

⁴⁸³ "Statues of Mary Vandalized in Weekend of Church Attacks," *Catholic News Agency*, July 13, 2020, <https://www.catholicnewsagency.com/news/statues-of-mary-vandalized-in-weekend-of-church-attacks-24779>.

⁴⁸⁴ "Statue of Blessed Mother Vandalized at Cathedral Prep," press release, Diocese of Brooklyn, <https://dioceseofbrooklyn.org/news/statue-of-blessed-mother-vandalized-at-cathedral-prep>.

⁴⁸⁵ *The Observer*, Rockford Diocese, <https://observer.rockforddiocese.org/article?id=1808>.

361. **July 4:** Exterior vandalized with red paint and political messages (Mission San Jose, Fremont, CA)⁴⁸⁶
362. **July 3:** Outdoor statue of St. Mary beheaded and hands severed (St. Ann Catholic Parish, Gary, IN)⁴⁸⁷

June 2020

363. **June 22:** At a Catholic college's on-campus cemetery for deceased priests who taught at the school, a man defaced gravestones by painting swastikas and anti-Catholic language, burned some American flags that were next to the graves, and assaulted a college security guard (Providence College, Providence, RI)⁴⁸⁸
- Statement by Providence College President, Rev. Brian J. Shanley, OP, and President-elect, Rev. Kenneth R. Sicard, OP⁴⁸⁹

May 2020

364. **May 30-31:** Church exterior damaged over multiple nights, including smashed gates, graffiti with messages such as "God is dead" and "There is no God," and windows shattered by rocks (Cathedral Basilica of the Immaculate Conception, Denver, CO)⁴⁹⁰
365. **May 30:** Church exterior graffitied (St. Patrick's Cathedral, New York, NY)⁴⁹¹
366. **May 30:** Church exterior graffitied with "prosecute killer cops," "ACAB" [All Cops Are Bastards], "Kill all cops," and "Make America pay for its crimes against Black lives" (Our Lady of Mt. Lebanon-St. Peter Cathedral, Los Angeles, CA)⁴⁹²
367. **May 29:** Thrown rocks shattered rectory windows (Cathedral of the Assumption, Louisville, KY)⁴⁹³

⁴⁸⁶ "Fremont Police Investigating Graffiti Vandalism on the Mission San Jose as Hate Crime," *KTVU Fox 2*, July 4, 2020,

<https://www.ktvu.com/news/fremont-police-investigating-graffiti-vandalism-on-the-mission-san-jose-as-hate-crime>.

⁴⁸⁷ Christine Rousselle, "Weekend Sees More Attacks on Catholic Church Statues across US," *Catholic News Agency*, July 20, 2020,

<https://www.catholicnewsagency.com/news/weekend-sees-more-attacks-on-catholic-church-statues-across-us-26486>

⁴⁸⁸ "Cross and Graves Vandalized with Swastika at Catholic University Cemetery," *Catholic News Agency*, June 23, 2020,

<https://www.catholicnewsagency.com/news/cross-and-graves-vandalized-with-swastika-at-catholic-university-cemetery-78172>.

⁴⁸⁹ Brian J. Shanley and Kenneth R. Sicard, "Statement on Vandalism at Dominican Cemetery," *Providence College News*, June 23, 2020, <https://news.providence.edu/statement-on-vandalism-at-dominican-cemetery>.

⁴⁹⁰ Christine Rousselle, "Cathedrals in 6 States Damaged by Violent Protests," *Catholic News Agency*, June 1, 2020, <https://www.catholicnewsagency.com/news/cathedrals-in-6-states-damaged-by-violent-protests-91111>.

⁴⁹¹ Khristina Narizhanaya and Dean Balsamini, "St. Patrick's Cathedral Desecrated with Protest Graffiti," *New York Post*, May 30, 2020, <https://nypost.com/2020/05/30/st-patricks-cathedral-desecrated-with-protest-graffiti/>.

⁴⁹² "A Lebanese Cathedral in Los Angeles Was Vandalized during U.S. Protests," *The 961*, June 2, 2020, <https://www.the961.com/lebanese-church-los-angeles-vandalized>.

⁴⁹³ Marnie McAllister, "Louisville Cathedral Damaged as Protests over Floyd Death Turn Violent," *America Magazine*, June 1, 2020,

368. **May 29:** Exterior damaged, including thrown rocks shattering windows (St. Jude Chapel, Dallas, TX)⁴⁹⁴
369. **May 28:** Minor property damage (St. Olaf Catholic Church, Minneapolis, MN)⁴⁹⁵
370. **May 28:** Someone broke into the church and poured flammable liquid under the pews, lighting a fire that damaged pews and the floor (Basilica of St. Mary, Minneapolis, MN)⁴⁹⁶
371. **May 6:** Pulpit, altar, and statue damaged (St. Anthony's Catholic Church, Casper, WY)⁴⁹⁷

<https://www.americamagazine.org/politics-society/2020/06/01/louisville-cathedral-damaged-protests-over-floyd-death-turn-violent>.

⁴⁹⁴ "Dallas Businesses Hit in Violent Protests over Racial Injustice," *The Dallas Morning News*, May 30, 2020, <https://www.dallasnews.com/news/2020/05/30/dallas-businesses-hit-in-violent-protests-over-racial-injustice>.

⁴⁹⁵ Josh Penrod and C.J. Sinner, "A Deeper Look at Areas Most Damaged by Rioting, Looting in Minneapolis, St. Paul," *Star Tribune*, July 13, 2020, <https://www.startribune.com/a-deeper-look-at-areas-most-damaged-by-rioting-looting-in-minneapolis-st-paul/569930671/>.

⁴⁹⁶ John Bauer, "Message from Fr. John Bauer: Justice, Reconciliation and Peace," *The Basilica of Saint Mary*, June 2020, https://www.mary.org/blog/202006/message-fr-john-bauer-justice-reconciliation-and-peace#_XxscoJ5KgdU.

⁴⁹⁷ Trevor T. Trujillo, "Suspect Arrested in \$25,000 Casper Church Vandalism," *Oil City News*, May 8, 2020, <https://oilcitynews.com/crime/2020/05/08/suspect-arrested-in-25000-casper-church-vandalism/>.

Testimony as a substitute teacher in Denver Public Schools

One of the students I worked with was a kindergartner who had recently transitioned. Before class began, the lead teacher pulled me aside and instructed me to use the child's chosen pronouns and to exercise caution, since he had been "acting up" in class.

I'll be honest — I didn't know what to expect. But to my surprise, my time with him was nothing but pleasant. He never disrespected me. When I made a mistake and misgendered him, he simply, calmly corrected me. There was no anger, no rebellion — just a young child who wanted to be seen, acknowledged, and treated with dignity.

One moment I will never forget was overhearing him explain his transition to other children. As he spoke, I noticed the other kids looking at me with eyes full of confusion and overwhelm, as if silently asking me to explain what they could not understand. In that moment, I stayed silent. I didn't have the words or courage. What if I lost my income due to this moment?

I also remember one afternoon on the playground when he stood apart from the other kids. He wasn't being teased. He wasn't causing trouble. He was simply quiet, watching the others play, alone. And what struck me most was his hesitation — he didn't seem to know where he fit. Should he sit with the girls? Should he chase the boys? Should he join in at all? In that uncertainty, I saw not defiance, but fragility. It was as if his whole little world was carrying too much weight for someone his age.

These experiences taught me something important: the challenges children face in school are never just about pronouns or labels. So often, they come from deeper wounds — neglect, instability, or trauma in the home. I also worked with another boy in the same class who threw books and water bottles, not because he was "bad," but because he discovered it was the only way to get his mother to leave work and come spend time with him. His parents were going through a divorce, and he was at school care from 6:00 a.m. to 6:00 p.m. every day.

At this same school, I also observed that students do not pledge allegiance to the flag, nor do they pray. That silence struck me just as much as the other issues — it revealed how far some schools have moved away from grounding children in values of faith and country.

So I ask this Commission: what are we to do when school staff instruct us to abide by pronoun policies that go against our conscience? How do we say "no" while still showing respect and compassion for the child? What recourse do we have when we are pressured in this way?

And beyond that — how do we restore love of country in our schools? One concrete step could be a program that investigates which schools are no longer playing the national anthem. From there, we could support parents in petitioning to reinstate it, reminding administrators that our children deserve to hear it daily. I'll tell you this: students in China and Russia hear their anthem every day. Why shouldn't American children have the same grounding in their national identity?

Finally, I urge parents and community members to get involved. The most eye-opening step you can take is to volunteer or apply as a substitute teacher. The process is scarily easy — many districts use third-party companies that are desperate for substitutes. You can get paid about

\$100 a day, and it does not require extensive security checks. But what it does give you is direct access to witness what is really happening in our schools.

Our children need us to step into their classrooms, to see them, to advocate for them, and to restore dignity, faith, and stability to their education.

Testimony of Patricia P [REDACTED]

Submitted to the Religious Liberty Commission

For the September 8th Hearing in Washington, D.C.

Dear Honorable Members of the Commission,

Thank you for the opportunity to share my testimony as a mother and a member of a Catholic family deeply impacted by the loss of religious exemption protections.

In 2019, my son [REDACTED] was attending a full-time special education school to support his speech delay. He is classified as having a speech impairment, and due to that delay, he also struggled with emotional regulation. [REDACTED] didn't begin speaking until he was 3 years old. We began advocating for help when he was just 2, but because he was bright and met other developmental milestones, we were told he didn't qualify. It wasn't until he turned 3 and underwent speech-focused evaluations that it became undeniably clear — he could not speak.

I fought for him to be accepted into that special education school because by that September — at just 4.5 years old — he was supposed to begin kindergarten. [REDACTED] worked diligently for over a year and a half. Then one day, he could no longer attend. Why? Because of our religious faith. His religious exemption was taken away — and with it, the essential services that helped him thrive.

That summer, I worked tirelessly to find him private support, incurring out-of-pocket costs to ensure he was ready for kindergarten, hoping and praying that the religious exemption law would be reversed. [REDACTED] was enrolled in public school. That September, he proudly went in for his first day — and two weeks later, he was removed. Again, not because of academics, but because of our religious beliefs.

Now 10 years old and entering the 6th grade, [REDACTED] has never had the opportunity to attend school or participate in school activities — not because we failed to meet educational standards, but because our family chose to follow our Catholic faith and conscience.

For the past six years, our family has lived in exclusion and isolation. As a single full-time working mother in New York, the cost of living while raising and homeschooling my son has been unbearable. We live paycheck to paycheck to provide for his care, homeschool curriculum, and any social opportunities I can find for him. I don't have a single day off — on my scheduled days off from work, I homeschool. On workdays, I teach before I clock in. I never have time for myself because every moment is spent ensuring that [REDACTED] academic and emotional needs are met.

I also work as an operations manager for a large company, overseeing more than 250 employees across multiple departments. The intense demands of this position — on top of raising and homeschooling my son without school access — have taken a serious toll on my health. I've developed an autoimmune condition that flares with extreme stress. In January, I had to take a three-month leave of absence to focus on my health and [REDACTED] well-being. This is not sustainable.

[REDACTED] has missed out on key milestones that most children enjoy — kindergarten graduation, moving-up ceremonies, and now the transition to middle school. The only time he experienced a joyful rite of passage was when he received the sacraments of Reconciliation and First Holy Communion. That day gave him a sense of pride, dignity, and inclusion — something school was supposed to offer, but never could.

As most parents of children with IEPs know, homeschooling under these circumstances has been far from easy — but we did it. We chose faith over fear. We adapted. And we refused to let the world devour us.

For the past 10 years, my mother — who is now nearing 80 — has selflessly helped raise [REDACTED]. She devotes over 42 hours each week driving him to services and providing vital support. Her dedication has made it possible for me to work and hold our life together. But I now live with a deep and growing fear: what will happen when she is no longer here? What will become of us? My son will not only lose his beloved grandmother — we will lose the only lifeline that's allowed us to survive this burden. That fear keeps me up at night.

This has not been a normal childhood for my son. He's missed out on friendships, field trips, group learning, and so much more — all because of our sincere religious convictions.

We live by the teachings of the Catholic Church, which call us to live in truth, protect the sanctity of life and family, and honor God above all. As it says in Romans 5:3–5:

“We rejoice in our sufferings, knowing that suffering produces endurance, and endurance produces character, and character produces hope. And hope does not put us to shame, because God's love has been poured into our hearts.”

That verse reflects the very heart of why I'm testifying. I'm here not only for my son — but for all the families who have been silenced, pushed aside, or punished for holding fast to their faith.

I respectfully urge the Commission to act with courage and compassion — to restore religious liberty in education and ensure that no parent is ever again forced to choose between their child's future and their conscience.

I would be honored to testify in person on September 8th in Washington, D.C. Please advise on next steps to confirm my participation.

With deep gratitude and unwavering faith,



Patricia P [REDACTED]

Catholic Mother & Advocate for Religious Liberty

[REDACTED]

[REDACTED]@gmail.com

([REDACTED]) [REDACTED] [REDACTED]



GRACE Act and Religious Liberty in Education Funding

Background

- On August 29, 2025, Congressman Greg Steube (FL-17) introduced the GRACE Act (Guaranteeing Religious Accommodation in Childhood Education Act).
- The bill prohibits federal education funding to schools and agencies that deny students religious exemptions from vaccination requirements for classroom attendance, athletics, and other activities.
- This legislation addresses the urgent crisis in states such as New York, California, Connecticut, and Maine, where children are barred from schools because their families uphold religious convictions regarding vaccination.

Why This Matters for the September 29th Hearing

The Religious Liberty Commission's upcoming hearing on religious liberty in education funding provides a critical platform to address one of the most severe violations of religious liberty in education today:

- The exclusion of children from schools based on their families' faith.
- A direct infringement of the First Amendment's Free Exercise Clause, undermining the constitutional rights of families.
- A real-world crisis impacting countless families across multiple states, who face educational exclusion, legal penalties, or economic hardship.

Key Points on the GRACE Act

- **Restores fairness:** Ensures equitable treatment by requiring religious exemptions where medical exemptions are permitted.
- **Protects families of faith:** Guarantees that no child is denied education for honoring their beliefs.
- **Broad precedent:** Forty-six states already balance public health and religious liberty by allowing exemption, demonstrating a workable model.
- **Constitutional grounding:** Conditions federal education funds in a narrowly tailored manner, designed to withstand judicial scrutiny.

Why Urgent Action by the Religious Liberty Commission Is Critical

- Families in affected states are suffering immediate harm -- denied education, facing legal penalties, or forced into economic hardship due to their faith.
- The GRACE Act directly addresses this crisis by tackling the exclusion of students from schools due to their families' religious objections to vaccination, ensuring equitable access to education while reinforcing constitutional protections.
- Including the GRACE Act in the September 29th discussion would highlight a legislative solution that safeguards faith-based exemptions, amplifying the hearing's impact on protecting religious liberty in education funding.

James F Shepherd


Dear President Trump,

I mailed you a picture back in February with a request for a signature. Did that get thrown out?

The theme would have fit with your Easter message.

“I agree that until we MAKE AMERICA GODLY AGAIN, we cannot MAKE AMERICA GREAT AGAIN.”

Pleas at least respond, even if it is nothing you would sign.

I applaud much of what you are doing. As a 71 year old partially disabled veteran, I am proud of my country and would still give up my life for it today. However I have watched the country's moral degradation starting in the late 60s. In fact, I participated in it during my youth.

As a country/nation, we lost our love of God and strayed from the way. Returning us to a Godly country again should be priority one for all people in our government. Once we get back to what our Christian founders envisioned, we can return to greatness as a country.

Could you be the catalyst for a great revival and a great awakening?

I would be honored if you and possibly Vice President Vance would sign and return the enclosed picture.

If you'd like to make it a talking point/campaign ideal, that would be great.

Have a blessed day,

Jim Shepherd

The First Congregational Church
AND THE FIRST ECCLESIASTICAL SOCIETY OF WOODBURY
214 Main Street South
Woodbury, Connecticut 06798
(203) 263-2846

THE REV. JACOB W. DELL, PASTOR

VIA EMAIL: RLC@usdoj.gov

CC: Allyson Ho ([REDACTED].com), Josh Blackman ([REDACTED]@gmail.com), Elyse Young ([REDACTED]@gmail.com)

August 5, 2025

Religious Liberty Commission
U.S. Department of Justice
Office of the Associate Attorney General
950 Pennsylvania Avenue, NW, Room 5706
Washington, DC 20530

Subject: Urgent Appeal for RLC to Docket Religious Exemption Hearings in 2025

Dear Director Mary Margaret Bush and Members of the Religious Liberty Commission:

As the pastor of the First Congregational Church of Woodbury, Connecticut, I write with urgency regarding the denial of religious exemptions to childhood vaccination requirements in New York, California, Connecticut, and Maine. These policies violate the First Amendment rights of families in my congregation and beyond. In my own church, two families, including those of my parishioners Elizabeth [REDACTED] and Thea [REDACTED] have been forced out of the public school system due to their Christian convictions against the vaccine schedule, rooted in 1 Corinthians 6:19-20 and 2 Corinthians 7:1.

For Elizabeth [REDACTED] and her husband, the 2021 removal of the religious exemption left them no choice but to homeschool their three school-aged children, scaling back their freelance business and incurring added expenses for curriculum and enrichment—all while knowing dozens of other families face similar hardships. Thea [REDACTED] a homeschooling mom and U.S. Air Force veteran, chose this path after Connecticut's abusive COVID policies closed schools and stripped away religious exemptions. While her son [REDACTED] thrives in homeschooling, free from mandated vaccines and secular ideologies, she emphasizes that many families lack the resources to choose homeschooling, leaving their children without access to equal educational opportunities.

These families face impossible choices: compromise their faith, bear the heavy burden of homeschooling, or relocate, all of which harm their children's education and well-being. Your 2025 schedule lists September and October hearings on religious liberty in education. Since

children in these states are barred from public, private, and faith-based schools over their families' religious objections, will these hearings address this injustice? I can't imagine a greater threat to religious liberty in education than policies that exclude children from school entirely. With the school year approaching and significant public comments already submitted, this issue demands immediate attention.

I understand a dedicated hearing on vaccine-related matters is planned but does not appear on the 2025 schedule. Has it been delayed to 2026? If so, this is unacceptable given the ongoing harm to families. I respectfully urge the Commission to docket at least one representative from coalitions supporting these families to testify at the September and October education hearings. I also request that the dedicated vaccine hearing be docketed in 2025 to provide timely relief.

Thank you for your commitment to protecting religious liberty. I look forward to your response clarifying the timeline and opportunities to address this critical matter.

Sincerely,

The Rev. Jacob W. Dell



Violation Warning

Denial of Rights Under Color of Law Violation of Liberties

Violation Warning--18 U.S.C. 241; 18 U.S.C. 242; 18 U.S.C. 245

Corpus Delecti and Mailing Location:
Sheik Heka Husia El
Address: Care of Post Office
Box 1632 Fort Lauderdale
FL (33302) Broward County
Cell: 786-416-4623
Email: Sheikhekael@gmail.com

Name of Public Servant Recipient and
Address: Sheriff Walter A. McNeil
Leon County Sheriff Office
Address: 2825 Municipal Way
Tallahassee FL 32304, Leon County
Phone: 850-606-3300
Website: mcneilw@leoncountyfl.gov

Statement Of Fact (May have attachment):

Please describe the incident you experienced. Please include date(s), the incident(s) occurred, and your name and contact information. A letter of Fire and Sword was addressed to Sheriff Walter McNeil containing proof of National credentials and statement of appointment of office. An Official Registration Form of a Member of the MSTofA Temple 8, Bro. Tariq Ra Bey Ex Rel [TYRONE O'NEIL ADDERLEY], was sent informing him that this member was being unlawfully held in custody and was to be released into the custody of his government in conjunction with Executive Order 13798. No correspondence nor action has been taking to date and the afore mentioned member is still being unlawfully detained by the state.

I certify that the foregoing information stated here is true and correct to the best of my ability and entered in honour. Autograph: Sheik Heka Husia El Date: 06/26/2025

Lawful / Legal Notice and Warning

Federal Law provides that it is a crime to violate the Rights of the people under the Color-Of-Law. You can be held personally liable for violating the Personal Liberties of the People, and for committing 'Fraud'.

Attempting to cause a person to do something by telling that person that such action is required by law, when it is not required by law, is not only Fraud, it is a felony and is Treason. Law being the American Constitution, pursuant to Article VI, as well the USC Codes, which are in harmony with the American Constitution of 1791:

Title 18, Part 1, Chapter 13 §241, §242, and §245 of United States Codes of Law:

18 USC §241: If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, commonwealth, Possession, or district in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or Laws of the United States, or because of his having so exercised the same; or.

If two or more persons go in disguise on the highway, or on the premises of another, with the intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured -

They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section, or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.

18 USC §242: Whoever, under 'color' of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or Laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, that are prescribed for the citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section, or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years or for life, or both, or may be sentenced to death.

18 USC §245: provides that Whoever, whether or not acting under color of law, intimidates or interferes with any person from participating in or enjoying (the estate, identified as) any benefit, service, privilege, program, facility or activity, provided or administered by (a person / agent / Officer / Public Servant, operating through an agency, corporation, or association of) the United States; [or] applying for or enjoying employment or any prerequisite thereof, by any agency of the united states; shall be fined under this title, or imprisoned not more than one year, or both.

WARNING: You are in violation of Federal Law. Persisting with violating my Liberties with unconstitutional demands will lead to your personal liability, as well as the company, agency and/ or association, you are operating through.

You are advised to cease and desist your untoward actions and demands, which are in violation of the People's Personal Liberties. You are also advised to seek personal lawful counsel if you do not understand the law, so that you may **govern yourself accordingly**.

Notice of Service:

I, Sheik Heka Husia El, certify that I personally delivered this Notice to above named Recipient and address on June 26, 2025 at 3:00 p.m. (a.m.)

I, _____, certify this Notice has been delivered to the above named recipient via Certified mail Delivery #: _____ on _____.

SEND TO: Eric Holder, United States Attorney General, United States Justice Department
950 Pennsylvania Avenue NW, Washington, D.C. 20530 • email: askdoj@udoj.gov • Fax: 202 307-6777



Moorish Science Temple of America

PROPHET NOBLE DREW ALL FOUNDER 1913.

Home Office:

gmail.com

HATE CRIMES COMPLAINT

Fill out the form online and click submit at the end of the form to send by email or print and mail to the address above. Include copies (no originals please) of any supporting documents.

YOUR INFORMATION:

Name: Mr. ☐ Mrs. ☐ Ms. ☐ (check one)

Heka Husia El, Grand Sheik

Address:

care of Post Office Box 1632

City: Fort Lauderdale State: FL Zip Code: [33302] County: Broward

Your Telephone Number:

Daytime: Ext:

Evening Ext:

Cell:

Your Email Address: gmail.com

PERSON OR ENTITY YOU ARE COMPLAINING ABOUT:

Name:

Sheriff Walter A. McNeil

Type of Facility (Examples include: restaurant, hotel, doctor's office):

Leon County Sheriff Office

Contact Person (Examples include: supervisor, manager):

Address:

2825 Municipal Wy

City: Tallahassee State: FL Zip Code: 32304 County: Leon

Telephone: Ext.:

Website: mcneilw@leoncountyfl.gov

Preferred phone number(s) for communications with our office regarding your complaint:

☐ Daytime Phone ☐ Evening Phone ☒ Cell Phone

Please describe the incident you experienced. Please include date(s), the incident(s) occurred, and your name and contact information.

A letter of Fire and Sword was addressed to Sheriff Walter McNeil containing proof of National credentials and statement of appointment of office. An Official Registration Form of a Member of the MSTofA Temple 8, Bro. Tariq Ra Bey Ex Rel [TYRONE O'NEIL ADDERLEY], was sent informing him that this member was being unlawfully held in custody and was to be released into the custody of his government in conjunction with Executive Order 13798. No correspondence nor action has been taking to date and the afore mentioned member is still being unlawfully detained by the state.

The incident you experienced is based on one or more of the following [check appropriate box(es)]:

- | | | | |
|--|---|---|---|
| ☐ Race | ☐ Color | ☐ Creed | ☒ Religion |
| ☐ Ancestry | ☐ Gender | ☐ Sexual Orientation | ☒ National Origin |
| ☐ Physical or Mental Disability | ☐ Other (Please specify) _____ | | |

Do you have witnesses who have information about the incident you are reporting? If so, state their names, addresses and phone numbers and the pertinent information they can provide.

Name: Sheik Salaam El, Assistant Grand Sheik

Address: c/o Post Office Box 1632

Phone Number: [REDACTED]

Information the witness will provide: Bro Salaam was the original drafter and mailer of the correspondence on beh
of myself, and the Organization with regards to Bro. Tariq Ra Bey Ex Rel [TYRONE O'NEIL ADDERLEY].

Name: Sheik Nizza P. El, Legal Advisor

Address: [REDACTED]@gmail.com

Phone Number: [REDACTED]

Information the witness will provide: Bro. Nizza can witness that the Moor is a registered member of the MSTofA
Temple 8 who has been held unlawfully for the over two (2) years in direct violation and blatant disregard
Executive Order 13798.

Have other members of your community experienced similar incidents? If so, please explain.

If any of those individuals are willing to be contacted, please list their names and contact information.

Name: [REDACTED]

Telephone Number: [REDACTED]

Email Address: [REDACTED]

Do you have any documents or other evidence to support this complaint? Yes ☒ No ☐
If so, please attach copies.

PLEASE DO NOT SEND ORIGINALS.

Have you reported this incident to any attorney or another government agency, including any federal, state, or local law enforcement agency? Yes ☐ No ☒

If your answer is yes, please provide the following information:

Name of the agency: _____

Address: _____

Phone Number: _____

When was the incident reported? _____

What was the outcome/Is any court action pending? _____

READ THE FOLLOWING BEFORE SIGNING BELOW:

To report a crime or if you fear for your safety, contact local law enforcement and call 911 in an emergency. This form is not a substitute for filing a police report with a federal, state or local law enforcement agency.

The Illinois Attorney General cannot obtain financial compensation or file a criminal case on your behalf. The Illinois Attorney only has the authority to seek injunctive or other equitable relief and civil penalties on behalf of the People of the State, and may do so only after consulting with the local State's Attorney.

In filing this complaint, I understand that the Attorney General is not my private attorney, but represents the public to enforce laws designed to protect the public from patterns and practices of hate crimes. I agree that the Attorney General's Office may use its discretion to determine whether an investigation is warranted, and I have no objection to the contents of this complaint being shared with the person or entity that I am complaining about. I understand that, if I have any questions concerning my legal rights or responsibilities, I should contact a private attorney. I also understand that, under most circumstances, my complaint, and any documents submitted with my complaint, *may* be considered a public record and *may be* available to a member of the public upon request, subject to the exemptions provided under the Freedom of Information Act, 5 ILCS 140/7 and 5 ILCS 140/7.5.

I certify that I have read this complaint, and that the information that I have provided is true and accurate to the best of my knowledge.

Signature: Sheik Heka Husia El Date: June 26, 2025

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Moorish Science Temple Of America

PROPHET NOBLE DREW ALI, FOUNDER 1913.

Home Office:

@gmail.com

Sheriff Walter A. McNeil
2825 Municipal Wy
Tallahassee, FL 32304

Grand Sheik Heka Husia El
[REDACTED]
Broward County, Florida [33302]

Letter of fire and sword

Greetings of Peace,

I have the honor to inform you of the arrival of Sheik Heka Husia El, Grand Sheik and Grand Governor of the Moorish Science Temple of America and the Moorish Divine and National Movement respectively. Please see the attached official credentials as per the Florida Secretary of State's executive office apostilled July 24, 2024.

We would like to inform you of the fact that you have unlawfully in your custody a Moorish American, Bro. Tariq Ra Bey, being held as the ExRel [TYRONE O'NEIL ADDERLEY, JR.], who is a registered member of Temple 8 in Broward County, Florida and with the Home Office of the Moorish Science Temple of America, respectively. I would like to request, therefore, that he be released to custody of the Grand Sheik Heka Husia El, as per Home Office of the Moorish Science Temple of America.

Thanks for your attention to this matter and we look forward to your correspondence and co-operation in conjunction with Exec. Order No.13798 ss 4, 82 Fed. Red. 21675 (May 4 2017).

Sincerely,

Sheik Salaam El, M.A.N. Assistant Grand Sheik & Chairman of MST of A Temple 8
for: **Sheik Heka Husia El**, Grand Sheik of National MST of A Temple 8

[REDACTED]
Broward County, Florida republic [33311]

cc: Susan Davies, Principal Deputy Assistant Attorney General
Office of Legal Policy
950 Pennsylvania Avenue NW
Washington, DC 20530-0001



WE THE PATRIOTS USA, INC.
5210 Cleveland Boulevard
Bldg. 140, Ste. 222
Caldwell, ID 83607
info@wethepatriotsusa.org
www.wethepatriotsusa.org

June 13, 2025

Religious Liberty Commission
c/o White House Faith Office
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Commission Members:

We are sending you this letter on behalf of our members, especially those in California, New York, Connecticut, and Maine. It is with both profound joy, and profound trepidation, that we write to you today. As a staunch defender of the First Amendment, we are of course elated that President Trump has ordered the formation of this body to investigate and report on, among other things, “current threats to domestic religious liberty,” including “the First Amendment rights of pastors, religious leaders, houses of worship, faith-based institutions, and religious speakers”; “conscience protections in the health care field and concerning vaccine mandates;” and “parents’ authority to direct the care, upbringing, and education of their children, including the right to choose a religious education.” Indeed, we have brought litigation concerning all of these issues, including a federal lawsuit currently ongoing in defense of Milford Christian Church in Connecticut, whose daycare and preschool was threatened with closure by the state, simply because the church allows parents to opt out of vaccinations due to their religious objections. We also recently filed a federal lawsuit against the Ventura, California Unified School District, and other state and local officials, after a high school student was expelled from school for asserting a religious exemption to required school vaccinations, and his parents later charged with truancy.

In California, New York, Connecticut, and Maine, families are denied the option to decline one or more vaccinations required for school attendance, even if they have a sincere religious objection to those vaccinations. Even in states where education is recognized

as a fundamental right under the state constitution (as it is in California¹ and Connecticut², for instance), these states have been permitted to provide education to those who do not have religious beliefs opposed to vaccinations, while denying education to those who do. This is a very clear violation of the First Amendment's guarantee of the right to the free exercise of religion, as well as other protections enshrined in our Constitution.

Some have urged you to recommend federal action against these states in the form of executive orders, litigation brought by the Attorney General, and other actions. Others have urged the federal government to refrain from taking any action at all, in favor of the states retaining power over public health. **Our position is clear: we do not believe that any government – local, state, or federal – should have authority over individual health decisions.** Even assuming that the state has the authority to mandate vaccinations under its police power, as held by the U.S. Supreme Court in *Jacobson v. Massachusetts*, 197 U.S. 11 (1905), this power cannot be exercised without exception. And this power can never be exercised in such a manner as to blatantly violate the First Amendment by refusing to allow individuals to refuse to be vaccinated based on their sincere religious objections, even in the face of a public health emergency. The *Jacobson* court did not hold otherwise. More recently, the U.S. Supreme Court has ruled that “...even in a pandemic, the Constitution cannot be put away and forgotten.”³

Nevertheless, we do not believe that an Executive Order issued by President Trump would be the best course of action to restore religious liberty in these four states where it has been lost. If upheld, it would set a dangerous precedent that allows the President to punish states that do not comply with its dictates regarding vaccinations, religious liberty, and more. A future President may withhold funding from states, for instance, that do not mandate covid shots for school or work. If this President can withhold funding for not allowing people to opt out of vaccination mandates, what is to stop a future President from withholding funding from states that refuse to mandate vaccinations?

Beyond this, a “victory” for such an Executive Order could adversely affect ongoing legal efforts to restore the religious exemption to school vaccinations in those states. Presently there is litigation ongoing in multiple states that could soon result in the Supreme Court considering the issue of religious exemptions as a violation of the First Amendment, litigation that has been unfolding for years. The aforementioned lawsuits brought by our

¹See *Butt v. California*, 4 Cal. 4th 668, 680-81; 685 (1992): “In view of the importance of education to society and to the individual child, the opportunity to receive the schooling furnished by the state must be made available to all on an equal basis. ... the California Constitution makes public education uniquely a fundamental concern of the State and prohibits maintenance and operation of the common public school system in a way which denies basic educational equality to the students of particular districts. The State itself bears the ultimate authority and responsibility to ensure that its district-based system of common schools provides basic equality of educational opportunity.”

² See *Sheff v. O'Neill*, 238 Conn. 1 (1996): “Our Connecticut constitution, by contrast, contains a fundamental right to education and a corresponding affirmative state obligation to implement and maintain that right.”

³ *Roman Catholic Diocese of Brooklyn v. Cuomo*, Order on Application for Injunctive Relief (November 25, 2020).

organization are just two examples, but there are more. A Supreme Court ruling in favor of the plaintiffs in any of these cases *would* have lasting effect, and would create precedent that would prevent a future administration – or any state – from issuing a vaccination mandate without exemptions. But if the Supreme Court ruled tomorrow that the President has the power to withhold funding from states that do not allow exemptions, prompting those four states to change their laws so that exemptions are now permitted, the aforementioned lawsuits would be dismissed as moot. When a future President withdraws that Executive Order, the states are very likely to once again repeal the religious exemption, and all of this litigation would have to begin anew, further delaying a permanent victory.

But leaving it to the states is equally troublesome. What we learned during the covid pandemic was that states cannot be trusted to protect individual freedoms. In New York, Governor Cuomo closed local businesses statewide and even churches. Governor Newsom did the same thing in California. But these horrific infringements on individual liberties were not restricted to places like New York and California. In Dallas, Texas in 2020, salon owner (and now state representative) Shelley Luther was arrested for refusing to close her salon. And at a park in Meridian, Idaho the same year, Sara Walton Brady was arrested and charged with trespassing simply for using a playground with her children, that had been closed as part of the covid restrictions. These are just two of many examples of egregious local and state government overreach even in allegedly “free” states.

And freedom should not be dependent on one’s zip code, in any event. The U.S. Constitution should be applied and enforced equally in Connecticut and Texas, in California and Idaho. Sadly, not everyone has the option of fleeing from one of these four states – that collectively represent 20 percent of the nation’s population – to one of the 46 states that permit religious exemptions to vaccination. Single parents who share custody with a former partner who objects to such a move are one such example.

That is why the solution must come from the Judicial Branch, not in the form of an order from the Executive Branch, or even a law passed by Congress. We already have a law that protects the free exercise of religion, and that is the Supreme law of the land – the U.S. Constitution. Since the U.S. Supreme Court is the body ultimately tasked with interpreting the constitutionality of laws, it must be left to the Court to decide this issue and provide relief. Ultimately, we believe that the ongoing private litigation is poised to bring this issue before the Court in relatively short order, negating the need for any federal involvement. However, if the Commission determines that federal action is necessary to address the religious persecution in these states with regard to school vaccination mandates, we ask that it be restricted to a recommendation for legal action by the U.S. Attorney General, seeking declaratory and injunctive relief. To be clear, our request is very narrow. We ask not that the Attorney General seek any expansion of federal power, or any ruling which allows the President to withhold funding or otherwise punish states that do not allow religious exemptions from vaccination. The question presented in the lawsuit must be limited to whether a state’s denial of religious exemptions for required school vaccinations violates the U.S. Constitution, especially the First and Fourteenth

Amendments. We believe that this is the safest and surest path to restoring religious liberty in these states.

Sincerely,

Brian D. Festa, Esq.

Vice-President & Co-Founder, We The Patriots USA

Dawn Jolly

President, We The Patriots USA

Joined by:

Mathew D. Staver, Esq.

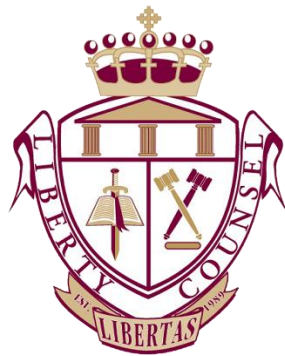
Founder and Chairman
Liberty Counsel

Katherine I. Hartley, Esq.

Pacific Justice Institute

Warner Mendenhall, Esq.

Co-Founder
Freedom Counsel



**PACIFIC JUSTICE
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