No. 24-154

In the Supreme Court of the United States

CATHOLIC CHARITIES BUREAU, INC., ET AL., *Petitioners*,
v.
WISCONSIN LABOR & INDUSTRY REVIEW COMMISSION, ET AL.

On Petition for Writ of Certiorari to the Supreme Court of Wisconsin

BRIEF FOR *AMICI CURIAE* THE LUTHERAN CHURCH—MISSOURI SYNOD, THE NATIONAL ASSOCIATION OF EVANGELICALS, THE ETHICS AND RELIGIOUS LIBERTY COMMISSION, THE MINNESOTA-WISCONSIN BAPTIST CONVENTION, AND THE ISLAM AND RELIGIOUS FREEDOM ACTION TEAM SUPPORTING PETITIONERS AND REVERSAL

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INTRODUCTION AND INTERESTS OF *AMICI CURIAE*[1]

As World War II raged, placing patriotism at a premium, this Court rejected a state requirement that public school children stand and recite the Pledge of Allegiance. The Court observed: "If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in *** religion[.]" *West Virginia State Bd. of Educ.* v. *Barnette*, 319 U.S. 624, 642 (1943). Yet that is what the decision below did, though by more subtle means.

It did so through an implausible interpretation of a Wisconsin law exempting from the state unemployment insurance program any "organization operated primarily for religious purposes," if that organization is "operated, supervised, controlled, or principally supported by a church or convention or association of churches." Wis. Stat. § 108.02(15)(h)2. The Wisconsin Supreme Court determined that the Catholic Charities Bureau (and its sub-entities) are not "operated primarily for religious purposes." Rather, the court found that these religious organizations engage in "activities [that] are primarily charitable and secular." App.30a. That's because these activities are also performed by secular entities and the Bureau also serves poor and needy non-Catholics without attempting to convert them to the faith.

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[1] This brief was not authored in whole or part by counsel for any party and no person or entity other than *amici* or its counsel has made a monetary contribution toward the brief's preparation or submission. Counsel for all parties received timely notice.

App.26a, 29a-30a. Yet Catholicism does not allow the faithful to only provide food and clothing to members of the faith or to proselytize nonmembers when serving them. Pet.Br.10-11.

The Wisconsin Supreme Court also relied on its determination that the motives and activities of the Catholic Charities Bureau and its sub-entities are separate from those of the Roman Catholic Church since they are structured as separate corporations. App.18a. But the Catholic Charities Bureau was created by the Diocese of Superior to be its social ministry arm and to carry out its Catholic religious mandate to serve the poor and disadvantaged, and it is under continual control by the Diocese. Pet.Br.8-11.

By imposing the court's view of what it means to be religious, based on organizational polity and the who and how of charitable service, the Labor Commission and the state supreme court are prescribing a single form of religious orthodoxy in the context of the state unemployment law. That violates the U.S. Constitution's Establishment and Free Exercise Clauses, which together form the constitutional basis for the church autonomy doctrine. See *Our Lady of Guadalupe Sch.* v. *Morrissey-Berru*, 591 U.S. 732, 747 (2020).

This threat to the First Amendment is of great concern to *amici*. Like Petitioners, these religious faiths face government encroachment on their autonomy to decide their own religious questions.

Amici agree with the Catholic Charities Bureau that the decision below deepens a split among state supreme courts. Pet.Br.15-23. *Amici* write further to

explain the constitutional and practical dangers of the decision below. Those dangers provide ample additional reason for this Court to grant review and reverse.

SUMMARY

As the petition fully explains, state courts around the country are confused on the key issues present in this case. Specifically, here, state actors violated the First Amendment in two ways.

First, in construing a state statute the Wisconsin Supreme Court adopted a legal test that turned on deciding a religious question—whether Catholic Charities had engaged in activity for primarily religious reasons and was sufficiently religious to obtain a statutory exemption. Second, the Wisconsin Supreme Court violated the First Amendment by discriminating among religious polities—but the Constitution protects religious organizations' freedom to structure themselves as they see fit. Both these issues reach far beyond Wisconsin.

Allowing the Wisconsin Supreme Court's decision to stand, and to act as persuasive authority for other states, will undermine religious organizations' ability to govern their internal affairs. Accordingly, a ruling from this court correcting these serious constitutional errors and harms is needed to protect religious organizations throughout the nation.

ADDITIONAL REASONS FOR GRANTING THE PETITION

I. The Wisconsin Supreme Court Fashioned a Test Requiring Government Actors to Decide Religious Questions, Which Violates Church Autonomy.

The First Amendment's church autonomy doctrine prohibits state resolution of religious questions or disputes, as well as testing the validity, meaning, or importance of an organization's religious beliefs and practices. See *Thomas* v. *Review Bd.*, 450 U.S. 707, 715-716 (1981) (holding inter alia that courts are not arbiters of scriptural interpretation); *Espinosa* v. *Rusk*, 634 F.2d 477, 480 (10th Cir. 1980) (charitable solicitation regulation requiring civil authorities to distinguish between spiritual or temporal motives of donors violated church autonomy under the First and Fourteenth Amendments), *aff'd,* 456 U.S. 951 (1982) (granting and affirming); *Maryland & Va. Churches of God* v. *Church at Sharpsburg*, 396 U.S. 367, 368 (1970) (per curiam) (courts cannot adjudicate doctrinal disputes); *Presbyterian Church* v. *Mary Elizabeth Blue Hull Mem'l Church*, 393 U.S. 440, 449-451 (1969) (refusing to follow a legal rule that discourages changes in doctrine); *Watson* v. *Jones*, 80 U.S. 679, 725-733 (1871) (rejecting implied-trust rule because of its departure-from-religious-doctrine inquiry). Yet that, unfortunately, is exactly what the Wisconsin Supreme Court's test will require state actors to do.

What the Wisconsin Supreme Court should have done is fashion a test for determining whether an entity is eligible for a state benefit that does not take

sides in a religious dispute or resolve a religious question. In generating such a test, the best option is for the test to be neutral as to religion. However, if "being religious" is the criterion for receiving a government benefit—in this case, an exemption—then the state is required to accept what the religious person or organization says is religious for them, subject only to an inquiry into sincerity. See *United States* v. *Ballard*, 322 U.S. 78 (1944) (holding that the truthfulness of a religious belief has no relevance to a judicial determination so long as that belief is sincere).

Unfortunately, the Wisconsin Supreme Court's test requires state actors, be they the Labor Commission or courts, to determine whether a certain activity was religious in nature and purpose for a particular faith. But this the Constitution forbids. *Espinosa*, 634 F.2d at 480. In other words, any test to determine whether an entity is eligible for a state benefit must be neutral as to religion—the test cannot take sides in a religious dispute or resolve a religious question. If Catholics say something is religious for them, unless there are concrete reasons to doubt their sincerity, the state must accept that as true.

An example of this principle is *Colorado Christian University* v. *Weaver*, 534 F.3d 1245 (10th Cir. 2010). There, in an opinion written by Judge Michael McConnell, the court dealt with a state scholarship program that excluded students who attended a "pervasively sectarian" school. *Id.* at 1250. The court determined that this exclusion violated the First Amendment because it required a state commission to sit as judges as to what was "pervasively sectarian" and what was not: a religious question. *Id.* at 1261-

1263. In other words, the constitutional defect with "pervasively sectarian" as a legal test is that a government actor must decide as to each school which is "somewhat" religious, and so acceptable, and which was "too" religious, and so excluded. As this Court has observed, "[i]t is well established[] *** that courts should refrain from trolling through a person's or institution's religious beliefs." *Mitchell* v. *Helms*, 530 U.S. 793, 828 (2000).

Thus, Wisconsin has two choices—it can jettison a statute (or its "test" construing that statute) and test that makes a degree of religiousness a requirement for a state benefit, or it can keep such a requirement and accept what religious entities assert is to them religious. Wisconsin did neither. It has a requirement akin to the problematic "pervasively sectarian" test: that to qualify for the exemption, an entity must be operated primarily for religious purposes. See *Carson* v. *Makin,* 596 U.S. 767 (2022) (holding that a law that denies state benefits because the "sectarian" character of a school is unconstitutional). And state actors made that determination here without any deference to what Catholic Charities deemed religious.

To add injury to injury, the Wisconsin Supreme Court's test also requires a religious purpose, without deferring to an entity's own conception as to what is religious.

Thus, for state actors to have to characterize certain activities as religious or nonreligious is one violation of the First Amendment. And to have state actors determine whether the *motive* of a religious entities is religious is a second violation of the First

Amendment. See *Espinosa*, 634 F.2d at 480 (invalidating an ordinance requiring civil authorities to assess if motives for charitable donations were "spiritual"); Carl H. Esbeck, *An Extended Essay on Church Autonomy*, 22 Fed. Soc'y Rev. 244, 254 (2021) ("Church autonomy doctrine has long entailed the rule that the judiciary must avoid issues that cause it to probe into the religious meaning of religious words, practices, or events[.]").

In sum, the Wisconsin Supreme Court's test for benefits involves state actors making religious determinations, contrary to the First Amendment's protection of church autonomy.

II. The Wisconsin Supreme Court Violated the Principle that the First Amendment Protects Religious Organizations' Freedom to Select Their Polity.

The Wisconsin Supreme Court also ignored another fundamental requirement of the First Amendment—the principle that the Amendment's protections do not ebb and flow based on the organizational form of a religious polity.[2] Numerous

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[2] See, *e.g.*, *Crowder* v. *Southern Baptist Convention*, 828 F.2d 718, 726-727 n.20 (11th Cir. 1987) (applying the First Amendment's church autonomy doctrine and rejecting the "argument that [because] the [Southern Baptist Convention] has a congregational, rather than a hierarchical, form of church governance," the doctrine does not apply). See also *Burgess* v. *Rock Creek Baptist Church*, 734 F. Supp. 30, 35 n.2 (D.D.C. 1990) ("[T]he Court can discern no justification for refusing to apply the First Amendment analysis and reasoning of Supreme Court and lower federal court case law involving hierarchical churches to this case" where the defendant "is a congregational church.").

forms of religious polity exist, and a government's recognizing some but not others amounts to religious discrimination in violation of the First Amendment.

A. There Exist Numerous Forms of Religious Polity.

Nearly as varied as doctrine among religious organizations are the organizational forms they take. For instance, some employ a more congregational structure, such as most Jewish, Muslim, Buddhist, Hindu, and Sikh congregations. Others form a more hierarchical structure, such as the Roman Catholic Church and The Church of Jesus Christ of Latter-day Saints. Of course, many religious organizations (*e.g.*, Presbyterians) are not purely one or the other, existing on a continuum. Furthermore, within these organizational forms, religious organizations employ a plethora of sub-entities or orders to conduct their religious missions, as the Diocese of Superior did here.

But, according to the Wisconsin Supreme Court, a polity that allows such delegation of religious functions means that the religious organization forfeits its statutory exemptions and constitutional rights: If the Pope himself gives a meal to a homeless person, that is religious under the court's reasoning, but if the *Catholic* Charities Bureau does so under the Pope's command, that is not. Likewise, if a Catholic organization serves Catholics, that is religious, but if it serves non-Catholics, that is not. And if one entity simultaneously performs *two* religious activities—serving the poor not of one's faith while proselytizing them—that is religious. But if it does only one of those

faith-mandated activities at a time, that is not religious.

Such distinctions make little constitutional sense, for they discriminate among religious faiths. And they do not make religious sense for millions of Americans of varied faiths.

B. To Recognize One Organizational Form or Structure for Practicing Religion as Worthy of Constitutional Protection Over Others Violates the First Amendment.

A decision—like that of the Labor Commission and Wisconsin Supreme Court in this case—recognizing some organizational forms or frameworks for practicing religion over others violates the Establishment Clause, the Free Exercise Clause, and the church autonomy doctrine that this Court has held to be grounded in both Clauses.

Establishment. As the Court put it a little over 40 years ago, "[t]he clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another." *Larson* v. *Valente*, 456 U.S. 228, 244 (1982). The Court faced such a scenario in *Larson* with a statute regulating charitable solicitations that made "explicit and deliberate distinctions between different religious organizations." *Id*. at 246 n.23 (White, J., dissenting). Specifically, the Minnesota statute at issue there only required religious organizations to register and report when they solicited more than fifty percent of their funds from nonmembers of the faith. *Id*. at 230. And the Court found such a distinction

"discriminates against such organizations in violation of the Establishment Clause." *Ibid.*

That unconstitutional statute is sibling to the situation here. The Labor Commission and the Wisconsin courts violated the Establishment Clause by preferring religious denominations that carry out their religious missions directly rather than through orders or other sub-entities that the denomination creates and controls. And these state actors violated the clause by preferring religious polities that choose to serve only members of their faith rather than the broader community or that also seek to convert nonmembers they serve. But those are choices of church *policy*—effected by choice of *polity*—that religious organizations are free to make according to the dictates of their theology, without fault or favor from the state.

This point is confirmed by our nation's history and tradition: To allow Wisconsin to play favorites among denominations is the very stuff of which church establishments are made. See Michael W. McConnell, *Establishment and Disestablishment at the Founding, Part I: Establishment of Religion,* 44 Wm. & Mary L. Rev. 2105, 2135-2136, 2160-2167, 2176-2178 (2003) (noting that established churches in England and in the American colonies during the founding era required certain religious tenets on all faiths, coerced conformity of practice and belief, and limited certain public benefits and opportunities to those in approved churches).

Free Exercise. Closely related to the Establishment Clause violation is a violation of the

Free Exercise Clause. As the Court also said in *Larson,* the "constitutional prohibition of denominational preferences is inextricably connected with the continuing vitality of the Free Exercise Clause." *Larson*, 456 U.S. at 245. As explained in Federalist No. 51, "Madison's vision—freedom for all religion being guaranteed by free competition between religions—naturally assumed that every denomination would be equally at liberty to exercise *** its beliefs." *Ibid*. Yet "such equality would be impossible in an atmosphere of official denominational preference." *Ibid*.

For the state actors in this case to officially prefer denominations that are organized a certain way, serve only their own people, or serve them in a certain way (while proselytizing), discriminates against those who do not conform. Wisconsin is telling the Catholic Church, and all religious organizations in the state, that they must exercise their distinct faiths in government-approved ways to qualify for the unemployment law exemption. This pressures the Church to conform its faith to the law.

While Wisconsin may argue that the statute is neutral and generally applicable, facial neutrality is not enough. *Church of Lukumi Babalu Aye, Inc*. v. *City of Hialeah*, 508 U.S. 520, 534 (1993). The Labor Commission and the state courts have discriminated against the Catholic Charities Bureau based on religion and created a system of individualized exemptions by importing a standardless conception of what counts as a valid religious purpose. These state actors have also shown a lack of neutrality towards religion. Thus, strict scrutiny must be satisfied. See

Fulton v. *City of Philadelphia*, 593 U.S. 522, 533 (2021).

In sum, "the exclusion of [the Catholic Charities Bureau] from a public benefit for which it is otherwise qualified, solely because [of its organizational structure and breadth and style of service], is odious to our Constitution ***, and cannot stand." *Trinity Lutheran Church of Columbia, Inc.* v. *Comer*, 582 U.S. 449, 467 (2017).

Church Autonomy. The decisions at issue here also violate the church autonomy doctrine recognized by this Court. As the Court put it in a recent case, "[t]he First Amendment protects the right of religious institutions to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine." *Our Lady of Guadalupe*, 591 U.S. at 736 (citation and quotation marks omitted). That protection provides "a spirit of freedom for religious organizations, an independence from secular control or manipulation[.]" *Hosanna-Tabor Evangelical Lutheran Church & Sch.* v. *EEOC*, 565 U.S. 171, 186 (2012) (citing *Kedroff* v. *Saint Nicholas Cathedral of Russian Orthodox Church in N. Am.*, 344 U.S. 94, 116 (1952)).

As noted, this constitutional protection flows from both the Free Exercise and Establishment Clauses. See *Our Lady of Guadalupe*, 591 U.S. at 746. Both clauses are implicated because "[s]tate interference in that sphere [of ecclesiastical decision-making] would obviously violate the free exercise of religion, and any attempt by government to dictate or even to influence

such matters would constitute one of the central attributes of an establishment of religion." *Ibid*.

Here, allowing the Labor Commission, aided by the statutory construction of the Wisconsin courts, to penalize the Catholic Church because of the organizational form it chooses to carry out its religious missions, as well as how and to whom that religious mission can be conducted, violates the church autonomy doctrine. See *Corporation of Presiding Bishop of Church of Jesus Christ of Latter-day Saints* v. *Amos*, 483 U.S. 327, 341-342 (1987) (Brennan, J., concurring) ("[R]eligious organizations have an interest in autonomy in ordering their internal affairs, so that they may be free to *** run their own institutions." (citation and quotation marks omitted)). In short, the Labor Commission and the state courts committed the "error of *** intrusion into a religious thicket," trampling the church autonomy "power (of religious bodies) to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine." *Serbian Eastern Orthodox Diocese* v. *Milivojevich,* 426 U.S. 696, 719, 721-722 (1976) (citation and quotation marks omitted).

That unconstitutional intrusion is no less harmful when it comes in the form of withholding an otherwise available exemption as compared to the direct coercion of faith. See *Espinoza v. Mont. Dep't of Revenue*, 591 U.S. 464, 475 (2020). The Constitution forbids either form of incursion—and the resulting encroachment into matters for internal governance of a religious organization. *Hosanna-Tabor Evangelical Lutheran Church & Sch.*, 565 U.S. at 188.

III. Allowing the Decision Below to Stand Would Undermine All Religious Organizations' Ability to Carry Out Their Religious Missions and Live Their Faith.

Sadly, resolving religious questions was not the only constitutional violation at issue here. The Wisconsin Supreme Court faulted the Catholic Charities Bureau for not being sufficiently religious because its activities serve the poor of *all* faiths without seeking to convert them and because it hires Catholics and non-Catholics to perform some activities. This puts the religious missions of many faiths in jeopardy. Most faiths believe that their religion requires them to do things for religious reasons that may not seem overtly religious. And few limit religious charity to those of their own faith. Likewise, many faiths avoid mixing charity with proselytizing.

Yet the Wisconsin Supreme Court adopted a cramped notion of being religious—one not found in many of Wisconsin's religions. Christianity is one example: The New Testament, defines "[p]ure" and "undefiled" "religion" to include "visit[ing] the fatherless and widows in their affliction." *James* 1:27 (KJV). Yes, secular social workers can also visit orphans and widows and assist them in their needs, but for Christians, this is the very essence of religion and is done out of religious faith.

Judaism too has long required almsgiving and charitable behavior toward the less fortunate,

promising blessings to those who do.[3] As has Islam—its fourth pillar is giving alms to the poor.[4] In fact, nearly all of the world's major religions, most of which are found in Wisconsin, have similar beliefs.[5] These faiths do not require the faithful to help only their own, but rather require the faithful to treat all as their brothers or sisters, regardless of belief. And how much better is the world because religions generally do *not* believe the less fortunate are unworthy of help if they believe differently than the helper.

The Wisconsin Supreme Court also found that the Catholic Charities Bureau's activity did not have a religious purpose because the Bureau did not require its employees or board members to be of the Catholic faith. App.29a. In a related context, however, this Court rejected a co-religionist requirement for a religious schoolteacher to be considered a minister under the First Amendment's ministerial exception—"insisting on this as a necessary condition would

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[3] See, *e.g., Isaiah* 1:17 (NIV) ("Learn to do right; seek justice. Defend the oppressed. Take up the cause of the fatherless; plead the case of the widow.").

[4] See *Quran* 2:274 ("Those who give, out of their own possessions, by night and by day, in private and in public will have their reward with their Lord."); *id*. 3:92 ("You will never attain righteousness until you spend in charity from that what you love.").

[5] For example, in Sikhism and Hinduism, *Seva* or *Sewa* refers to "selfless service" and this involves "reaching out to serve and uplift all of humanity as an expression or devotion to the Creator." *Seva*, SikhiWiki.org (last visited Sept. 12, 2024). In Buddhism, *Dāna* involves giving, such as food, clothing, medicine, and money, and can lead to one of the "perfections." See generally *Dana: The Practice of Giving* (ed. Bhikkhu Bodhi, 1995).

create a host of problems." *Our Lady of Guadalupe*, 591 U.S. at 791. That's because "determining whether a person is a 'co-religionist' will not always be easy," and "[d]eciding such questions would risk judicial entanglement in religious issues." *Ibid*. So too here: How exactly would the Labor Commission or a court determine whether the Catholic Church is serving someone who is *sufficiently* Catholic, or is *sufficiently* proselytizing to non-Catholics? That would require theological determinations wholly beyond the competence of a judge or bureaucrat, which is why the First Amendment places such territory off-limits for state actors.

To carry out its religious mission of caring for the less fortunate of any faith, or none at all, the Diocese created an entity—the Catholic Charities Bureau. The Diocese could have created a Catholic Missionary Bureau to facilitate proselytizing, or a Catholic Printing Bureau to publish Catholic religious materials. That the Diocese created a separate arm that it controls to assist in fulfilling a specific religious mission does not make the activities of that arm any less religious. That would make no more sense than arguing that, because the Department of Justice exercises only a portion of the President's executive power, it cannot be considered as exercising "executive" functions at all. So too here: Whether the Diocese undertakes these religious activities itself or creates and supervises another entity to do so does not change the nature and purpose of the activity.

Moreover, by punishing the Catholic Church for choosing this organizational form to carry out this specific charitable religious mission, the Labor

Commission and the Wisconsin courts threaten the ability of *all* religious organizations in Wisconsin to fulfill the mandates of their faith in the way they see as most beneficial. After all, specialization is common in our society. Why shouldn't religious organizations be able to practice their faith without penalty from the state through the organizational structure they see as best suited to the religious task at hand? The state certainly does so, as the existence of the state actors in this case—the Labor Commission and courts—attest.

If the Wisconsin Supreme Court's decision is affirmed, religious organizations in Wisconsin will have to eschew creating, delegating to, and supervising subject-specific entities to carry out their religious missions, and instead try to do everything themselves as a diocese or similar ecclesiastical body. That will undermine their ability to fulfill all the mandates of their faith to the best of their ability, forcing upon them what they see as second- or third-best organizational structures. Religious organizations would also be forced, under the Wisconsin courts' reasoning, to minister only to those who share their faith or to those they seek to proselytize. Such a stingy notion of religion does no one any good—not the faithful whose religion requires that they serve based on need rather than creed, and not the needy who are looking for a hand up without the strings of conversion attached.

CONCLUSION

In rejecting the Bureau's application for an exemption, the Labor Commission and the Wisconsin courts have violated the established constitutional

rule that "no official, high or petty, can prescribe what shall be orthodox in *** religion." *Barnette*, 319 U.S. at 642. For that and the other reasons explained above and in the petition, *amici* respectfully submit that the petition should be granted, and the decision of the Wisconsin Supreme Court reversed.

Respectfully submitted,

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STATEMENTS OF INTERESTS OF *AMICI CURIAE*

The Lutheran Church—Missouri Synod ("LCMS") is a Missouri nonprofit corporation headquartered in St. Louis, Missouri. It has more than 6,000 member congregations with nearly 2 million baptized members. The denomination has numerous Synod-wide related entities, two seminaries, six colleges and universities, the largest Protestant parochial school system in America, and hundreds of recognized service organizations operating all manner of charitable nonprofit corporations throughout the country. The LCMS steadfastly adheres to orthodox Lutheran theology and practice, and fully supports and promotes religious liberty and all First Amendment protections, including the right of religious organizations to control the make-up of their workforces in achieving their missions and promoting their beliefs.

The National Association of Evangelicals is the largest network of evangelical churches, denominations, colleges, and independent ministries in the United States—serving forty member denominations as well as numerous evangelical associations, missions, social-service charities, colleges, seminaries, and independent churches.

The Ethics and Religious Liberty Commission ("ERLC") is the moral concerns and public policy entity of the Southern Baptist Convention ("SBC"), the nation's largest Protestant denomination, with approximately 13 million members in more than 45,000 churches and congregations. The ERLC is charged by the SBC with

addressing public policy affecting such issues as religious liberty, marriage and family, the sanctity of human life, and ethics. Religious freedom is an indispensable, bedrock value for Southern Baptists. The Constitution's guarantee of freedom from governmental interference in matters of faith is a crucial protection upon which SBC members and adherents of other faith traditions depend as they follow the dictates of their conscience in the practice of their faith.

The **Minnesota-Wisconsin Baptist Convention** is a state convention entity in partnership with the SBC. It has over 150 affiliated churches in those states, and it shares the values of the Ethics and Religious Liberty Commission and other Southern Baptists.

The Religious Freedom Institute's **Islam and Religious Freedom Action Team** ("IRF") amplifies Muslim voices on religious freedom, seeks a deeper understanding of the support for religious freedom inside the teachings of Islam, and protects the religious freedom of Muslims. IRF engages in research, education, and advocacy on core issues like freedom of religion, and the freedom to live out one's faith, including in the workplace and at school. IRF explores and supports religious freedom by translating resources by Muslims about religious freedom, fostering inclusion of Muslims in religious freedom work both in places where Muslims are a majority and where they are a minority, and partnering with the Institute's other teams in advocacy.