

Religious Freedom in State Prisons:
An Exploratory LLM-Categorized Quantitative Analysis of RLUIPA Case Outcomes

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I. Abstract

For many individuals, religion is not only a cornerstone of their identity, but is also a source of humanity and community. The government has defended this right for all, asserting that religious liberty “must not be forfeited at the prison gate.”¹ This study examines this statement, using cases brought under the Religious Land Use and Institutionalized Persons Act (RLUIPA), which provides the strongest legal protection of religious liberty in state prisons. Given the politicized nature of religion and incarceration, this research explores potential associations between a state’s political alignment and RLUIPA outcomes, in the process creating one of the largest existing empirical RLUIPA case datasets. The data reinforced existing literature, finding that ninety-six percent of resolved cases were dismissed, mostly due to failure to state a claim or to prove a substantial burden, documenting a notable presence of procedural screening dismissals. However the data also highlighted an unexpected decrease in cases following 2016, which may indicate a developing pattern. Further analyses showed a trend between states voting for Republican presidents and the likelihood an RLUIPA complaint would be granted, developing after the Supreme Court *Holt v. Hobbs* decision (2015). Although this pattern was not statistically significant ($p=0.052$), it may point towards potentially underexplored political influences on outcomes. Further, this paper describes the systemic challenges to conducting thorough research in carceral populations due to filtered and inaccessible data.

II. Background

In the last several years, teaching Creative Writing in a regional detention center, I became quite familiar with its participants. Throughout the course, students shared personal religious experiences, particularly as they related to and shaped their experiences while being incarcerated. Some weeks later, I received an email that completely banned all physical contact,

¹ U.S. Commission on Civil Rights. “Enforcing Religious Freedoms in Prison: 2017–2023.”

specifically noting the impact of this policy on religious programming. This project began by asking how to evaluate the protections of the religious freedoms of incarcerated individuals.

The first freedom in the First Amendment, that of religion, promises just governance, and the protection of religious exercise.² Yet the judicial system has often found its interests may conflict with religious beliefs, enforcing laws at the cost of impeding religious practices.³ The Religious Freedom Restoration Act (RFRA) was passed in 1993 to protect these freedoms, requiring that the government prove religious burdens under “strict scrutiny”: that a policy burdening religious practice was the least restrictive means of protecting an essential interest. Yet this act was eventually ruled unconstitutional to the degree that it imposed Congressional power over state rights.⁴ Seven years later, RLUIPA was enacted; it resembled the RFRA, but was restricted to populations uniquely at risk of governmental obstruction, including individuals incarcerated in state prisons. This paper focuses on only those cases.

Individuals bringing a claim under RLUIPA must prove (a) that they hold a sincere religious belief, and (b) that they were forced to choose between following their religious beliefs and following prison policy. Similar to the RFRA, upon proving a substantial burden, the responsibility falls upon the state to prove the policy to be under strict scrutiny, as defined above. However, past RLUIPA lawsuits have set contradicting precedents; for example deferring to prison officials or weighing the necessity of a religious practice instead of adhering to rules of strict scrutiny.⁵ Decisions have become less systematic and more dependent on individual judges and on circuit precedent.⁶

² Freedom Forum, “Freedom of Religion”

³ Salkin, “The Genesis of RLUIPA and Federalism: Evaluating the Creation of a Federal Statutory Right and Its Impact on Local Government”

⁴ Salkin, “The Genesis of RLUIPA and Federalism: Evaluating the Creation of a Federal Statutory Right and Its Impact on Local Government”

⁵ Reaves, “Enforcing Religious Freedom in Prisons Briefing.” 46–47.

⁶ Bollman, “Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward ‘Strict in Theory, Strict in Fact’.”

Typically, RLUIPA cases challenge grooming, dietary, service and ceremony, or material restrictions. Additionally, the majority of such complaints are registered by pro se plaintiffs without a lawyer, and non-Christians⁷. The RLUIPA case most frequently cited is *Holt v. Hobbs* (2015), where Gregory Holt, a practicing Salafi Muslim, argued that preventing facial hair unrelated to dermatological problems was a significant burden on his religious practice. The district court rescinded relief upon evidence that Holt could practice his religion in other ways, and that the grooming policy was relevant to maintaining security. Upon appeal, the Supreme Court unanimously ruled that preventing a one-half inch beard substantially burdened Holt's beliefs, and that the prison officials had not adequately demonstrated that this policy was the least restrictive means of meeting the compelling security interest.⁸ Studies analyzing the impact of *Holt v. Hobbs* found it to be an inflection point that clarified RLUIPA standards and increased the percentage of granted cases.⁹

III. Research Question

Evaluating religious liberty within incarcerated populations is challenging. Primary data collection is highly restricted, and research regulations are complex. Institutional data is obscure, limited, and rarely validated by a neutral party.¹⁰ As a result of these obstacles, this project focuses on court cases brought under RLUIPA as a formal, standardized, and documented proxy for religious freedoms in prisons.

While official "PACER" dockets may be accessed using fee waivers, these exceptions are requested on a court-by-court basis and are prohibited in conjunction with Application Programming Interface (API) software communications, constraining the potential for affordably

⁷ U.S. Commission on Civil Rights, "Enforcing Religious Freedom in Prison, 2008"

⁸ Oyez. "Holt v. Hobbs."

⁹ Bollman, "Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward 'Strict in Theory, Strict in Fact'."

¹⁰ U.S. Commission on Civil Rights. "Enforcing Religious Freedoms in Prison: 2017–2023."

collecting data.¹¹ As a result, most post-*Holt* RLUIPA studies exist in law journals, and utilize refined legal databases like Westlaw for smaller hand-parsed samples, often omitting low-level early dismissal cases. The present study aims to fill this gap by using CourtListener’s large-scale, crowdsourced RECAP API tool to bulk-scrape and aggregate all closed RLUIPA dockets.

Religious liberty, as well as incarceration rates have become politicized issues¹², and are influenced by electoral dynamics and outcomes¹³. This project explored whether RLUIPA case outcomes may also be influenced by partisan politics. While federal court judges affiliate with a political party, case decision recommendations are generally made by non-partisan magistrate judges. Therefore, MIT Election Data of a state’s presidential vote (Democratic or Republican) closest to the docket’s terminated date was used as one measure of state political affiliation.¹⁴

The research question may be summarized as follows: what can be learned about religious liberty in state prisons by analyzing patterns in RLUIPA case filings and outcomes, as well as any association with partisanship at the state-level?

IV. Methods

After identifying CourtListener’s RECAP dockets as the data source, R (Version 4.6.1) was used to interface with the RECAP API. To synthesize the data sample, a search query for the word “RLUIPA” pulled relevant dockets into a spreadsheet, along with other basic case information: name, docket number, date of filing and termination, suit nature, and state. To eliminate cases brought under the land use clause, only dockets whose “suit nature” included the word “prison”, “habeas”, or “civil detainee” were retained. Then, appellate dockets were removed so that the same case would not be counted twice.

¹¹ Administrative Office of the U.S. Courts, "Instructions for the Application for Multi-Court Exemption from the Judicial Conference's Electronic Public Access (EPA) Fees: For Individual Researchers Associated with Educational Institutions."

¹² Goidel, Kirby, Brian Smentkowski, and Craig Freeman. "Perceptions of Threat to Religious Liberty."

¹³ Jacobs, David, and Ronald E. Helms. "Toward a Political Model of Incarceration: A Time-Series Examination of Multiple Explanations for Prison Admission Rates."

¹⁴ MIT Election Data and Science Lab, "U.S. President 1976–2024"

R was directed to pull a shortened entry description summary. If this did not exist, the next pull was for a short judge-written opinion. For cases that had neither, the model was then directed to search for the most recent “Report and Recommendation”, a detailed complaint analysis typically adopted by judges in the final decision. Finally, if CourtListener housed none of these, the model was scripted to pull the most recent available documents in chronological order.

Then, the selected text was fed into Anthropic’s API model¹⁵ and designated one of fourteen categories with a two to three sentence summary describing the reasoning behind the categorization. In order to create these categorizations, fifty cases were read, and categorized by hand. Then, these fifty cases were fed through the model. The outcome was then compared and the reasoning evaluated to refine the prompting further. For example, many entry descriptions stated “defendant’s summary judgment granted”. It had to be clarified in the prompt that “granted” did not relate to the plaintiff’s claim, and this statement should be marked as a denial. Many of the judges used standardized language and structure, making categorization more straightforward. Another refinement was that some cases had religious freedom complaints brought under the First Amendment and RLUIPA cited, but were not RLUIPA claims. In order to limit the LLM’s likelihood of making categorization errors or guessing, the prompt clearly noted that if the outcome was not readily and clearly available, or if the model had any doubts that the case was legitimately brought under RLUIPA, the outcome should be marked as “UNSURE”. The final definition of the categories can be summarized as follows:

- *“Exhaustion”: the claim was dismissed because the plaintiff failed to exhaust all available administrative remedies before filing;*
- *“Immunity”: Qualified immunity: the claim was dismissed because of shielding from liability for actions taken in their official capacity; Sovereign immunity: the*

¹⁵ Anthropic. “Claude 4.5 Haiku”

claim was dismissed because shielding prevents RLUIPA claims from seeking monetary damages;

- *“Mootness”: the claim was dismissed as irrelevant (eg: facility transferral, release, or the changed policy);*
- *“Failure to state claim”: the claim was dismissed because it did not allege sufficient facts to state a claim; No substantial burden: the claim was dismissed because the policy in question did not significantly burden the plaintiff’s religious exercise;*
- *“Sincerity”: the claim was dismissed because the court found the plaintiff’s religious belief not sincerely held;*
- *“Compelling interest”: Compelling interest: the claim was dismissed because the government had a sufficiently compelling interest justifying the burden; Least restrictive means: the claim was dismissed because the policy was the least restrictive means of achieving its interest;*
- *“Actionable”: the case was dismissed because of something the plaintiff failed to do procedurally (ex: failure to pay fees, update address information, file correctly, respond to a court order, prosecute);*
- *“Dismissal”: the RLUIPA claim was dismissed or denied, but the text does not clearly state which specific outcome applies, or is a mix;*
- *“Granted”: the plaintiff obtained relief on the RLUIPA claim (granting of a defendant’s summary judgement should be considered a dismissal);*
- *“Advance”: the RLUIPA claim survived a motion to dismiss, summary judgment, or similar challenge and is proceeding, rather than being decided; Partial advance: some but not all of the RLUIPA claim advanced;*
- *“UNSURE”: use this if you cannot determine the outcome from this text, OR cannot confidently determine this is a RLUIPA/religious exercise claim at all. Do not guess at all.*

The complete data and R code may be found in the appendix.

To validate these methods, fifty cases with a determined outcome were randomly selected from the dataset using a random number generator and categorized by hand. Of these fifty cases, 90% (45/50) were correctly demarcated as a grant or as a dismissal. One was incorrectly marked as a grant instead of an advance, one was marked as a partial advance although the RLUIPA case was denied, and three mentioned RLUIPA but were not an RLUIPA claim; these cases were

deleted from the dataset. Four cases (8%) were correctly marked as dismissals, though oversimplified a complex or mixed dismissal into one outcome.

The average case in this sample took 2.28 years, so cases resolved after 2023 were excluded as incomplete due to potentially ongoing litigation. All 2000-2023 cases labeled as “UNSURE” are also excluded from temporal analyses. In outcome analyses, unresolved “advance” and “partial advance” cases will be excluded (Figure 1).

R was used to create the following temporal graphs and tables. State’s presidential vote (Democratic or Republican) was sourced from the MIT Election Dataset, and the vote closest to the docket’s terminated date was used for political affiliation analyses.

V. Results

A. Creating the dataset

While the spreadsheet includes all cases terminated to date (4,660), statistical analyses are limited to cases terminated in or before 2023 (4,256). After removing “UNSURE” cases, the dataset comprises 3,189 cases between the years of 2000 and 2023 (Figure 1).

B. Temporal Analyses

Annual filings increased over twenty-fold, from approximately 10 cases in 2000 to 240 cases in 2016. Following this peak, the number of filed cases decreased, declining to just over 100 cases filed in 2023 (Figure 2).

RLUIPA filing rates also varied significantly by state. Certain states, namely New Hampshire and Nevada, had relatively high rates of about 100 to 150 RLUIPA claims filed per 10,000 individuals incarcerated in state prisons (2023),¹⁶ whereas Alaska and Wyoming had relatively none (Figure 3).

C. Outcome Analyses

¹⁶ Mueller, “Prisoners in 2023 – Statistical Tables.” Table 4

Of the 2,442 resolved cases (excluding “UNSURE”, “advance”, and “partial advance”), 96.6% of cases were dismissed. The most common outcome was dismissal for a failure to assert a substantial burden (19.5%) or for a failure to state a claim (18.9%). A significant portion of cases (7.3%) were dismissed as “actionable” (a failure to comply with legal procedures). The rarest outcome was a dismissal on the grounds of sincerity (0.6%) (Figure 4).

There appears to be a pattern between the likelihood of a granted outcome and states’ political affiliation. An exact Fisher test was conducted, finding that the odds of a “grant” were 1.5 times as likely in a state voting Republican than Democratic ($p = 0.076$) (Table 2). Further, when stratified by pre-*Holt* and post-*Holt*, the pattern presented post-*Holt*; the odds of a “grant” in Republican states compared to Democrat states rose from 1.1 pre-*Holt* ($p=0.8604$, Table 3), to 1.8 post-*Holt* ($p=0.0519$, Table 4).

VI. Discussion

This study explores the distribution of 3,189 RLUIPA case outcomes and filings by incarcerated individuals between 2000 and 2023, as well as potential associations between granted outcomes and state-level political affiliations.

The timeline of RLUIPA case filings is unexpected given existing literature. The number of cases increases steadily each year, peaking in 2016 and then decreasing similarly quickly (Figure 2). This provides important context to many post-*Holt* RLUIPA studies. For example, the U.S. Commissioner's 2025 Report on RLUIPA reports, “There were many more cases with RLUIPA claims from 2017-2023 (1,741 [850 settled cases]) compared to 2001-2006 (250).” However, this broadened study indicates that since 2016, the number of filed cases has been decreasing markedly. This shift may be indicative of changing policies or increased religious freedoms, though should be validated with further research.

RLUIPA resolved cases were most frequently dismissed (96.6%), particularly due to a failure to state a claim (18.9%) or to prove a substantial burden (19.5%) (Figure 4). This is consistent with post-*Holt* studies reporting that 94.4% of filed cases were dismissed¹⁷, almost three-quarters of which because they failed to prove a substantial burden.¹⁸ While these categories are sweeping, they include dismissals resulting from first-stage screening procedures¹⁹ under the 1996 Prison Litigation Reform Act (PLRA).²⁰ One example of such a dismissal may be illustrated in *Caldwell v. Hoffman* (2022). Algernon Caldwell Jr. asserts that on four of the mornings during Ramadan, his meal either did not arrive or was not delivered before dawn, burdening his ability to fast as a practicing Muslim. While the deprivation of Ramadan meals may constitute a substantial burden, Caldwell did not assert that his morning meals were withheld when he reported them missing. Therefore, even though the meals were delivered late, Caldwell “failed to show that the defendants [or any one policy] intended to prevent the plaintiff from practicing his religion...the most reasonable inference is that the officers forgot to bring his morning meal.” Therefore, the court found that Caldwell failed to state an actionable claim under RLUIPA, and the case was dismissed pursuant to PLRA standards.²¹ These standard dismissals cases may occur well before a judge applies strict scrutiny to an action or prison policy. This is worth exploring in further research to evaluate the weight of PLRA in RLUIPA case outcomes.

Ultimately, this project aimed to explore potential relationships between case outcome and political affiliation, particularly given that the “strictness of scrutiny” followed judicial discretion more than any one reigning principle.²² While the association was not statistically significant ($p=0.076$), the likelihood of a favorable outcome increased if the state voted for a

¹⁷ U.S. Commission on Civil Rights. “Enforcing Religious Freedoms in Prison: 2017–2023.”

¹⁸ Bollman, “Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward ‘Strict in Theory, Strict in Fact’.”

¹⁹ American Civil Liberties Union, “Know Your Rights: The Prison Litigation Reform Act (PLRA)”

²⁰ Cornell Law School, “28 U.S. Code § 1915A - Screening.”

²¹ *Caldwell v. Hoffman*, No. 1:22-cv-00366, Docket No. 10

²² Gaubatz, “RLUIPA at Four: Evaluating the Success and Constitutionality of RLUIPA’s Prisoner Provisions.” (2005)

Republican in the most recent presidential election (OR=1.5) (Table 2). Pre-*Holt* data showed no association ($p=0.860$, OR=1.1, Table 3), yet the trend strengthened post-*Holt*: Republican-voting states were 1.8 times as likely to grant a case as Democrat-voting states ($p=0.052$, Table 4). Existing post-*Holt* studies also observed an increase in both granted accommodations and “hard looks” at policy reasons.²³ The change in the odds ratio from 1.1 to 1.8 may suggest that post-*Holt*, federal courts in Republican states have adopted strict textualism and “hard looks” more readily than federal courts in Democratic states. These associations were not statistically significant at conventional levels ($p=0.05$), and these evaluations should not be treated as conclusive.

This project’s brevity and limited resources introduce several notable limitations. The first is access to case data. As mentioned, CourtListener was selected as the most accessible and comprehensive resource for dockets. However, it is possible that certain filed cases exist outside of the scope of this database, and were excluded from the study. Another limitation results from the use of artificial intelligence. Although the prompting required relatively simple comprehension, it is possible that the LLM failed to read certain cases properly, miscategorizing them. As a precaution, prompting emphasized the acceptability of an “UNSURE” designation, possibly also contributing to the sizable percentage of unresolved cases. A third limitation exists in the analyses of resolved outcomes. “Advance” and “partial advance” cases omitted for consistency may have been more likely to resolve in a granted outcome. Finally, this study evaluates religious freedoms through a legal framework; this method lacks personal narrative and cannot claim to fully capture individual experiences.

VII. Conclusion

²³ Bollman, "Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward 'Strict in Theory, Strict in Fact'."

While existing research used small samples to evaluate the legal ramifications of *Holt v. Hobbs* (2015), this project fills a key gap by including large scale data as early as 2000. Case filings increased over twenty-fold between 2000 and 2016, yet halved in the following seven years. This decrease should be further explored as a potential indicator of changes to RLUIPA's relevance, or to religious liberties. The vast majority of these cases were denied, often for a failure to state a claim or for a failure to prove a substantial burden. Procedural screening under the PLRA should be analyzed and considered as a potential influence in case outcomes. While not statistically significant at conventional levels ($p < 0.05$), this project also found that a trend developed post-*Holt* between states voting Republican in presidential elections and the likelihood of a "granted" outcome. This suggests that *Holt* did not clarify the standards of scrutiny uniformly across partisan lines. Continued studies are necessary to better isolate factors contributing to high dismissal rates, as well as to explore other potential political or demographic factors influencing outcome.

The limitations to this dataset also demonstrate the institutional barriers hindering carceral research. This project aims to circumvent these challenges by focusing on complaints retained in the legal system, but also studies the systemic constraints to data access, and research in prisons. Future research should work to understand and improve institutional transparency and accessibility while accommodating security constraints and subject protections.

VIII. Acknowledgements

I would like to thank Dr. Alphonso Saville for guiding this study with invaluable support and expertise. Additionally, I am grateful to the Laidlaw Scholars Foundation, Georgetown University's Laidlaw Scholars Programme, and Colleen Dougherty for encouraging, supporting, facilitating, and funding this research project.

Table 1. Distribution of RLUIPA Case Outcomes From 2000 to 2023 (Including “UNSURE”)

Category	Counts	Percentage
Exhaustion	252	5.92%
Immunity	62	1.46%
Failure to State A Claim	462	10.8%
Mootness	283	6.64%
No Substantial Burden	476	11.2%
Sincerity	15	0.35%
Compelling Interest	31	0.73%
Actionable	179	4.20%
Dismissal	598	14.0%
Advance	451	10.6%
Partial Advance	296	6.95%
Granted	84	1.97%
UNSURE	1,071	25.1%
Total	4,260	100%

Table 2. Resolved RLUIPA Cases from 2000 to 2023 Based On State Partisanship

	Resolved Cases (2000-2023) (Excluding UNSURE, advance, and partial advance)	“Granted” Cases (2000-2023)	Total
Democratic	1,186	34	1,220
Republican	1,160	50	1,210
Total	2,346	84	2,430

P-value = 0.076, Odds ratio = 1.50, 95% CI = (0.95 - 2.42)

Table 3. Resolved RLUIPA Cases from 2000 to 2014 (Pre-Holt) Based On Recent State Partisanship

	Resolved Cases (2000-2023) (Excluding UNSURE, advance, and partial advance)	“Granted” Cases (2000-2023)	Total
Democratic	723	25	746
Republican	346	13	359
Total	1,069	38	1,107

P-value = 0.86, Odds ratio = 1.09, 95% CI = (0.50 - 2.24)

Table 4. Resolved RLUIPA Cases from 2015 to 2023 (Post-Holt) Based On Recent State Partisanship

	Resolved Cases (2000-2023) (Excluding UNSURE, advance, and partial advance)	“Granted” Cases (2000-2023)	Total
Democratic	689	18	707
Republican	591	28	619
Total	1,280	46	1,326

P-value = 0.052, Odds ratio = 1.81, 95% CI = (0.96 - 3.52)

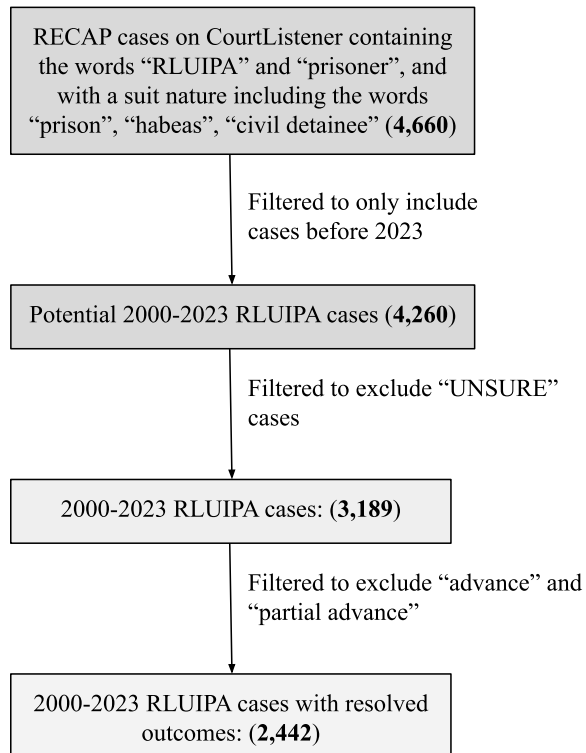
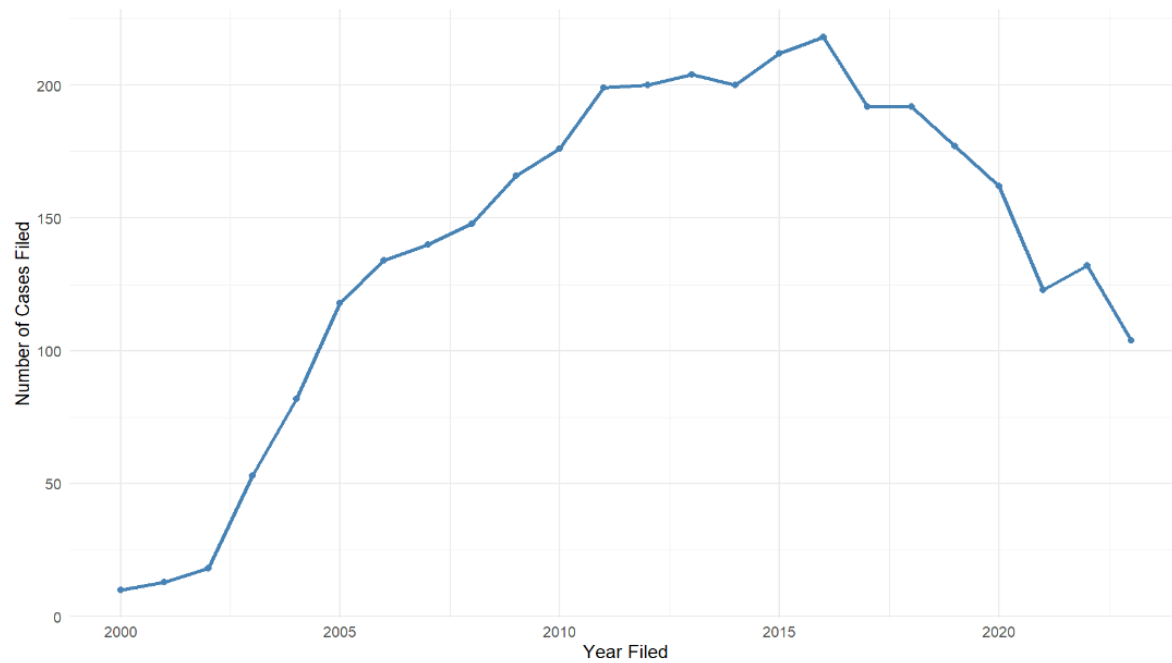
Figure 1. Flow Diagram of Stepwise RLUIPA Dataset Exclusions**Figure 2. RLUIPA Cases Filed by Year (2000-2023)**

Figure 3. RLUIPA Claim Density (2000-2023) Relative to 2023 State Prison Population by State²⁴

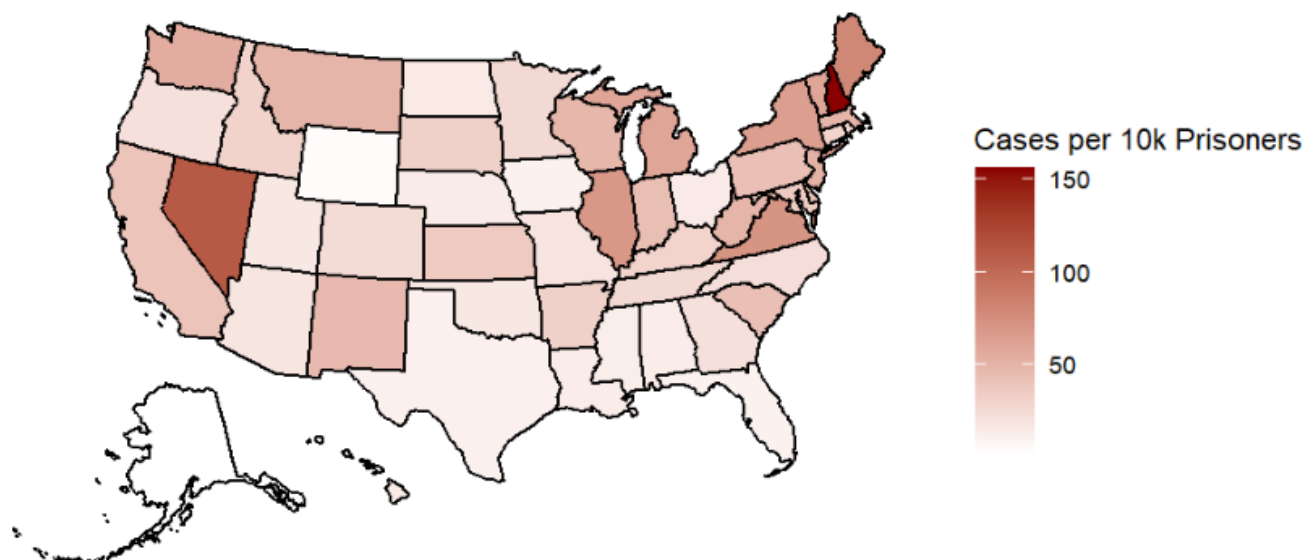
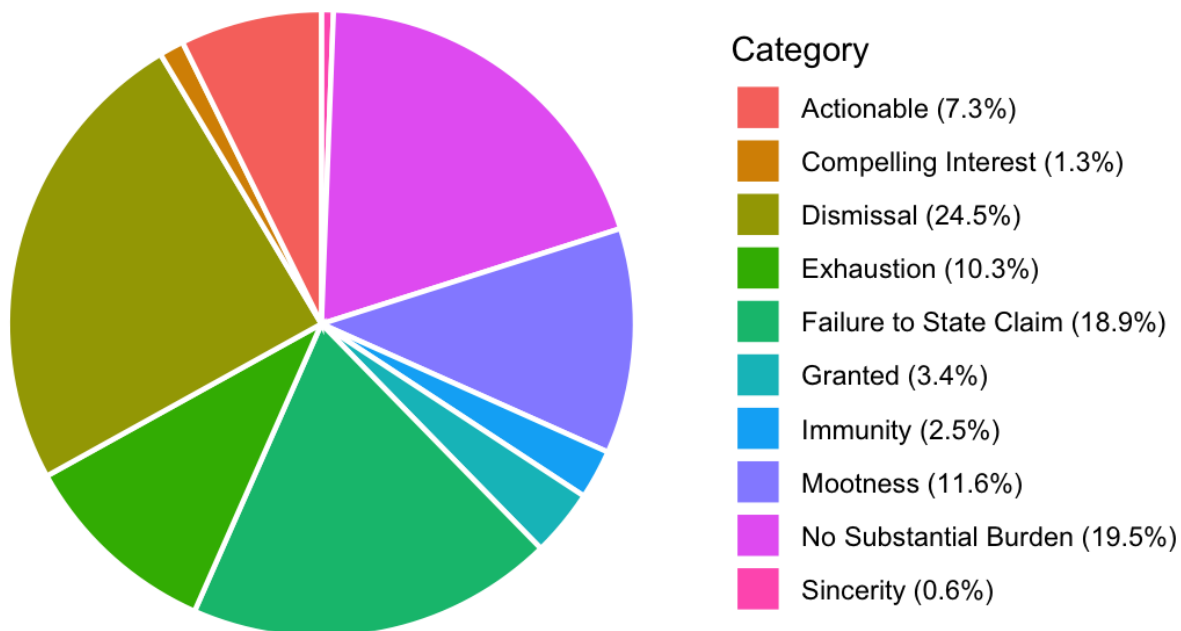


Figure 4. Categorical Distribution of Resolved RLUIPA Case Outcomes (2000-2023, excluding “UNSURE”)



²⁴ Mueller, Derek. “Prisoners in 2023 – Statistical Tables.” Table 4

Appendix

R Script For Docket Pull and Categorization

Dataset Refined Spreadsheet

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