

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. However the data also highlighted an unexpected decrease in cases following 2016. This may reflect changing policies, or a changing attitude towards RLUIPA as a method of relief. Further analyses showed strong trends between states voting for Republican presidents and the likelihood an RLUIPA complaint would be granted, specifically after the Supreme Court *Holt v. Hobbs* decision (2015). Although these associations were not statistically significant ($p=0.052$), they may point towards potentially underexplored political influences on outcomes.

II. Background

The first freedom in the First Amendment, that of religion, promises just governance, and 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

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

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”

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

Typically, RLUIPA cases challenge grooming, dietary, service and ceremony, or material restrictions. Additionally, the majority of such complaints are registered by non-Christians. 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

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’.”

adequately demonstrated that this policy was the least restrictive means of meeting the compelling security interest.⁷ Studies analyzing the impact of *Holt v. Hobbs* found it an inflection point, which clarified RLUIPA standards and increased granting of complaints.⁸

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.⁹ 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 collecting data.¹⁰ As a result, many post-*Holt* RLUIPA studies exist in law journals and utilize refined legal databases like Westlaw for smaller samples parsed by hand, 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 issues¹¹, and are influenced by electoral dynamics and outcomes¹². This project explores whether RLUIPA case outcomes may also be influenced by partisan politics. While federal court judges affiliate with a

⁷ Oyez. “*Holt v. Hobbs*.”

⁸ Bollman, “Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward ‘Strict in Theory, Strict in Fact’.”

⁹ U.S. Commission on Civil Rights. “Enforcing Religious Freedoms in Prison: 2017–2023.”

¹⁰ 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.”

¹¹ Goidel, Kirby, Brian Smentkowski, and Craig Freeman. “Perceptions of Threat to Religious Liberty.”

¹² Jacobs, David, and Ronald E. Helms. “Toward a Political Model of Incarceration: A Time-Series Examination of Multiple Explanations for Prison Admission Rates.”

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.¹³

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, assigned judge, 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.

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 model¹⁴ 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, first, fifty cases were read, and categorized by hand. Then, these fifty cases were fed through the model; the outcome was compared and the reasoning read to refine the prompting further. For example, many entry

¹³ MIT Election Data and Science Lab, "U.S. President 1976–2024"

¹⁴ Anthropic. "Claude 4.5 Haiku"

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 equated to 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 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 only cases prior to 2023 were excluded as incomplete due to potentially ongoing litigation. All 2000-2023 cases labeled as “UNSURE” are also excluded from 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 (4,661), statistical analyses are limited to cases terminated before 2023 (4,260). After removing “UNSURE” cases, the dataset comprises 3,189 cases between the years of 2000 and 2023.

B. Temporal Analyses

Annual filings increased over twenty-fold, from 11 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),¹⁵ whereas Alaska and Wyoming had relatively none (Figure 3).

C. Outcome Analyses

Of the 2,346 resolved cases, 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”, or the failure to comply with legal procedures. The rarest outcome was a dismissal on sincerity grounds (0.6%) (Figure 4).

There appears to be a strong trend 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 trend was only present 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).

¹⁵ Mueller, “Prisoners in 2023 – Statistical Tables.” 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 and increased religious freedoms, though must 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%). This is consistent with post-*Holt* studies reporting that 94.4% of filed cases were dismissed¹⁶, almost three-quarters of which because they failed to prove a substantial burden.¹⁷ These categorical dismissals are often a result of first-stage screening procedures¹⁸ introduced under the 1996 Prison Litigation Reform Act (PLRA), which aimed to streamline court procedures and to reduce the number of cases.¹⁹ This high dismissal rate may also be tied to the high rates of cases filed “pro se” (without a lawyer), due to cost concerns (89.7% of cases between 2017 and 2023)²⁰.

¹⁶ U.S. Commission on Civil Rights. “Enforcing Religious Freedoms in Prison: 2017–2023.”

¹⁷ Bollman, “Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward ‘Strict in Theory, Strict in Fact’.”

¹⁸ American Civil Liberties Union, “Know Your Rights: The Prison Litigation Reform Act (PLRA)”

¹⁹ Cornell Law School, “28 U.S. Code § 1915A - Screening.”

²⁰ U.S. Commission on Civil Rights, “Enforcing Religious Freedom in Prison, 2008”

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.²¹ While the association was not statistically significant ($p=0.076$), the likelihood of a favorable outcome increased if the state voted for a Republican in the most recent presidential election ($OR=1.5$). Pre-*Holt* data showed no association ($p=0.860$, $OR=1.1$), yet the trend strengthened post-*Holt*: Republican-voting states were 1.8 times as likely to grant a case as Democrat-voting states. ($p=0.052$). Existing post-*Holt* studies also observed an increase in both granted accommodations and “hard looks” at policy reasons.²² The change in the odds ratio from 1.1 to 1.8 may suggest that post-*Holt*, federal courts in Republican states adopted strict textualism and “hard looks” more readily than federal courts in Democratic states. These associations were not statistically significant at conventional levels, 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

²¹ Gaubatz, “RLUIPA at Four: Evaluating the Success and Constitutionality of RLUIPA’s Prisoner Provisions.” (2005)

²² Bollman, “Deference and Prisoner Accommodations Post-*Holt*: Moving RLUIPA Toward ‘Strict in Theory, Strict in Fact’.”

evaluates religious freedoms through a legal framework; this method lacks personal narrative and cannot claim to fully capture individual experiences.

VII. Conclusion

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 may be related to changing policies, and should be further explored as an indicator of RLUIPA relevance, or religious freedoms. 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. This may indicate that procedural screening under the PLRA holds an underexplored influence over 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 uniformly enforce the standards of scrutiny across partisan lines. The limitations to this dataset highlight the significant restrictions to prison and court records access hindering meaningful and thorough carceral research. Continued RLUIPA research should work to isolate factors contributing to high dismissal rates, as well as explore other potential political or demographic factors influencing outcome. Further research should also assume larger issues, such as transparency within carceral spaces and the adequacy of legal protective frameworks.

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

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Author's Note:

What does religious liberty look like for incarcerated individuals?

I followed this question into a labyrinth of dead ends. Yet somehow, over several months, it was iteratively refined into this project. After extensive research and data collection, I am proud to have finished this paper; however in this author's note, I want to return to its origin story.

This past year, teaching in a detention center, I became quite familiar with the participants of our weekly Creative Writing course. It was a challenging year, with numerous lockdowns due to health and security concerns for months on end. Volunteer programs were canceled, and participants described the time as isolating and demeaning. We encouraged participants to write, and unprompted, many shared stories about religion, and how it shaped this challenging period of their life.

One wrote, "God comes to those who are brokenhearted and crushed in spirit... Wishin you could rewind time/But keep your chin up young soldier God is with you/Just a part of his miraculous plan to uplift you/To be the greatest version of yourself/In a place like this you couldn't do it with no one but God's help."

This interaction gave me a newfound belief of the important role of religion, and prompted questions about how that role adapts within carceral spaces.

Some weeks later, as I was developing my research, I received an email from the Volunteer Coordinator. It read, "We want to inform everyone of an important policy change that is effective immediately during all volunteer services and interactions with inmates...there is to be absolutely no physical contact at any time. This includes handshakes, hugs, handholding during prayer, pats on the back, or any other form of touching. We understand that some of these practices have been meaningful parts of ministry and fellowship, but it is very important that we fully comply with these updated guidelines moving forward."

Information about this policy change was only incidental to my role as a volunteer, yet it struck me as consequential for religious life. I began to reconsider how incarceration could constrain religious practice, and how that could degrade humanity and quality of life. Thus, this project was born.

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

Category	Counts	Percentage
Exhaustion	235	5.8%
Immunity	58	1.43%
Failure to State A Claim	428	10.6%
Mootness	265	6.54%
No Substantial Burden	466	11.5%
Sincerity	12	0.3%
Compelling Interest	26	0.64%
Actionable	168	4.15%
Dismissal	582	14.4%
Advance	435	10.7%
Partial Advance	288	7.11%
Granted	78	1.93%
UNSURE	1,008	24.9%
Total	4,049	100%

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

	Resolved Cases (2000-2023)	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 (2000-2014)	Granted Cases (2000-2014)	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 (2015-2023)	Granted Cases (2015-2023)	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)

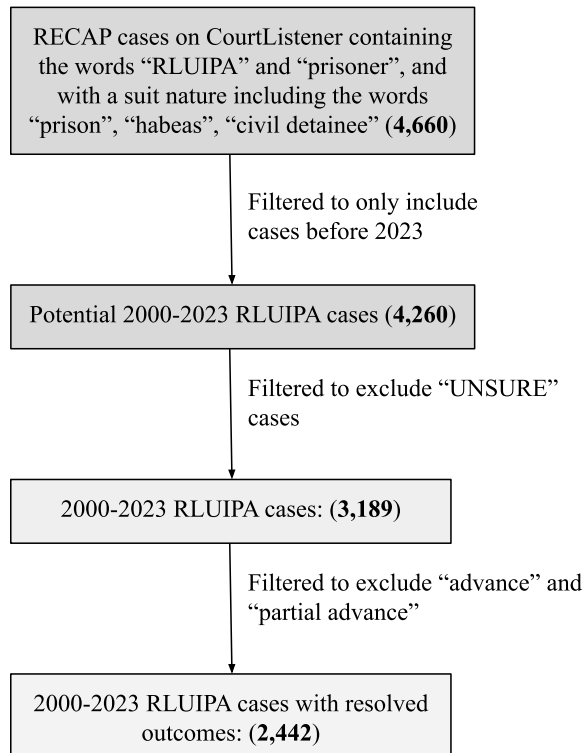
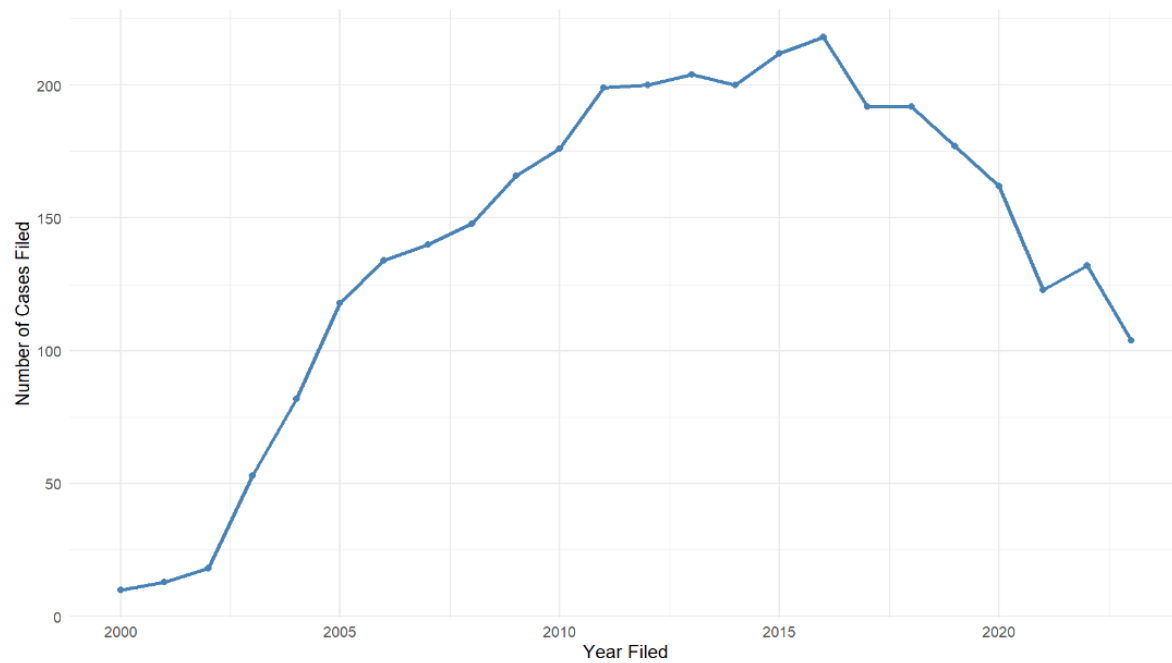
Figure 1. Flow Diagram of Stepwise RLUIPA Dataset Exclusions**Figure 2. RLUIPA Cases Filed by Year (2000-2023)**

Figure 3. RLUIPA Claim Density (2000-2023) Relative to 2023 State Prison Population by State²³

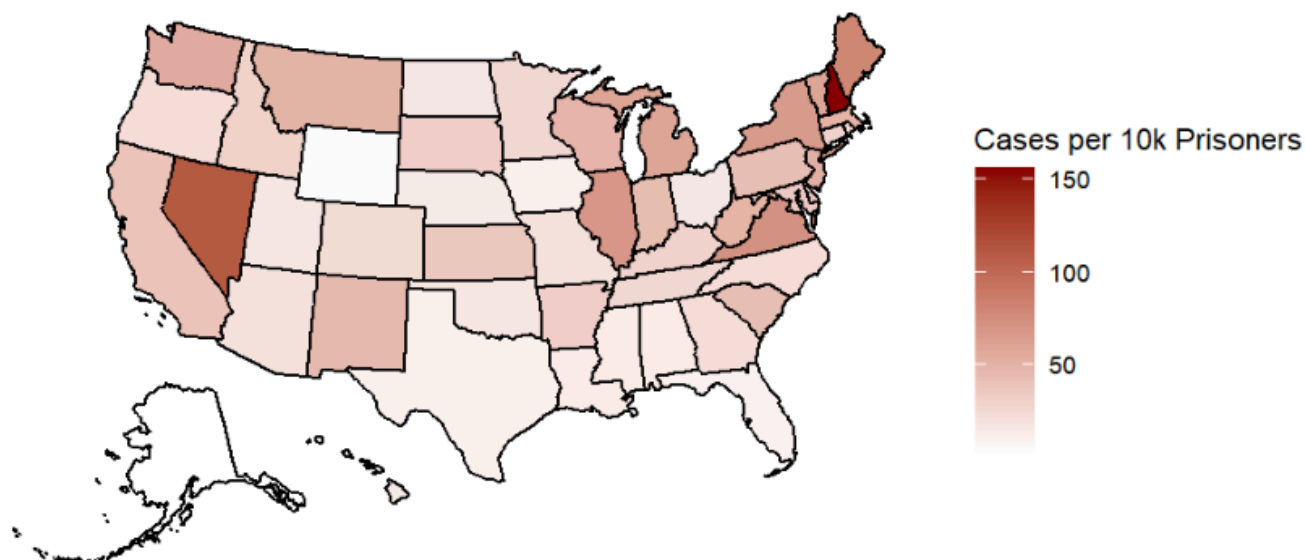
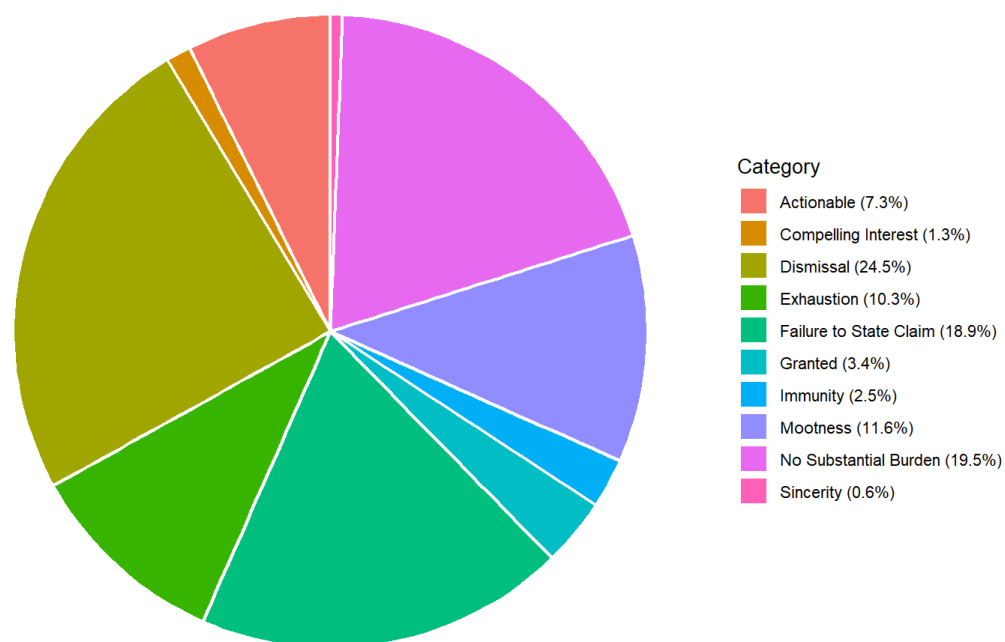


Figure 4. Categorical Distribution of Resolved RLUIPA Case Outcomes (2000-2023, excluding “UNSURE”)



²³ Mueller, Derek. “Prisoners in 2023 – Statistical Tables.” Table 4

Appendix

R Script For Docket Pull and Categorization

Dataset Refined Spreadsheet

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