The Amicus Brief, Alberto R. Gonzales, Attorney General, ET AL v. O Centro Espirita Beneficiente Uniao Do Vegetal, ET AL, was joined by Clifton Kirkpatrick, as Stated Clerk of the General Assembly of the Presbyterian Church (U.S.A.). The brief was filed in the United States Supreme Court on September 9, 2005.

No. 04-1084

IN THE

Supreme Court of the United States

ALBERTO R. GONZALES, ATTORNEY GENERAL, ET AL.

Petitioners,

v.

O CENTRO ESPIRITA BENEFICIENTE UNIAO DO VEGETAL (USA), ET AL.,

*Respondents***.**

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT

BRIEF *AMICUS CURIAE* OF THE COALITION FOR THE FREE EXERCISE OF RELIGION

ANTHONY R. PICARELLO, JR.
Counsel of Record
DEREK L. GAUBATZ
THE BECKET FUND FOR RELIGIOUS LIBERTY
1350 Connecticut Ave., NW
Suite 605
Washington, DC 20036
Phone: (202) 955-0095

September 9, 2005

Counsel for Amicus Curiae

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INTEREST OF THE *AMICUS*

The Coalition for the Free Exercise of Religion is a coalition of over 50 religious and civil liberties organizations. (Coalition members are listed in Appendix A.) These organizations represent almost every major faith group in America, spanning the full spectrum of religious diversity—Buddhists, Christians, Hindus, Jews, Muslims, Native Americans, and Sikhs. The Coalition includes liberals and conservatives (religious and nonreligious), and groups with world views as disparate as People for the American Way and Liberty Counsel. Though the Coalition includes members who often find themselves on opposite sides of Establishment Clause and federalism issues, they speak with one voice in the conviction that accommodating religious exercise by removing government-imposed substantial burdens on religious exercise is an essential element of a democratic society. The Coalition's members supported the enactment of the Religious Freedom Restoration Act ("RFRA") to achieve this purpose, and now join together to defend its constitutionality. The Coalition takes no position on the merits of the application of RFRA to the facts of this case. This brief addresses only the question of whether RFRA, on its face, is a constitutionally legitimate exercise of Congressional authority.[1]

[1] All parties have consented to the filing of this brief. A letter of consent from **[*Petitioner(s) or Respondent(s)*]** is on file with the Court. Letters of consent from all other parties have been filed simultaneously with this brief. No counsel for any party authored this brief in whole or in part. No person or entity other than *amicus* and their members made any monetary contributions to the preparation or submission of this brief.

SUMMARY OF ARGUMENT

ARGUMENT

I. This Court Need Not Reach the Constitutionality of RFRA as Applied to the Federal Government.

A. The Constitutionality of RFRA Is Beyond the Scope of the Question on Which Certiorari Was Granted, Was Not Generated by the Parties Below, and Has Not Been Briefed or Otherwise Generated by the Parties Presently.

This Court generally avoids deciding questions that lie beyond the scope of the question presented on *certiorari, see, e.g.,* **[*CITE*]**; that were not decided first in the court below, *see, e.g., Cutter* v. *Wilkinson,* 125 S. Ct. 2113 (2005) (declining to address constitutional challenges not addressed below, noting that "we are a court of review, not of first view"); or that have not been briefed by the parties, *see, e.g.,* **[*CITE*]**.

Here, all of these factors militating against review of the constitutionality of RFRA as applied to the federal government are present. Aware of this, the Tort Committees urge three exceptional circumstances warranting review in this case. *See* Tort Cmtes. Br. 4-6.

Although present *amici* are receptive to this Court's reaching and deciding this question, they believe that the better course is for the Court to follow its general practices and not address the question, mainly because the three asserted reasons for exceptional treatment are flawed.

First, although the constitutionality of RFRA as applied to the federal government could dispose of this case, that fact should not suffice alone to justify review of the question. *See* Tort Cmtes. Br. 4-5. This argument proposes an exception that would swallow the rule. If the mere

possibility of a constitutional challenge to a law – no matter how half-baked or widely rejected the challenge may be – were sufficient to justify this Court's addressing the challenge without presentation on *certiorari*, decision by the court below, or briefing by the parties, then review would be justified in every such case, unless and until this Court has addressed all conceivable constitutional challenges to the law.

Second, notwithstanding the Tort Committees' assertion to the contrary (p.5), the issue of RFRA's constitutionality is *not* especially difficult to get before a court. Indeed, the Tort Committees themselves are free to raise the issue in their own bankruptcy cases – and perhaps ultimately petition for *certiorari* – as did the creditors in *In re Young,* 141 F.3d 854 (8th Cir.), *cert. denied,* 525 U.S. 811 (1998).[2] And as the brief of the Tort Committees itself illustrates, the question has been decided many times, including in contexts other than bankruptcy. Tort Cmtes. Br. 3 & n.2 (listing cases).

But even if the question were difficult to generate, this Court has never treated that difficulty as a basis for considering a question not properly presented. More specifically, the Tort Committees claim that the constitutionality of RFRA as applied to the federal government is a question "'capable of repetition, yet of evading review,'" Tort Cmtes. Br. 5. It is not, but even if it were, that would only provide a defense against the claim that the question is moot, not a reason for this Court to take up a question that is not presented on *certiorari,* addressed below, or briefed by the parties.

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2 As this court's consideration of a petition for *certiorari* in *In re Young* reflects, the present case is *not* "the first opportunity for this Court to consider the Religious Freedom Restoration Act ('RFRA') since it was declared unconstitutional in *City of Boerne* v. *Flores,* 521 U.S. 507 (1997)." Tort Cmtes. Br. 3.

Third, although *amici* agree that the constitutionality of RFRA is an issue great importance (p.6), that counsels in favor of restraint rather than haste. This Court has repeatedly recognized that "judg[ing] the constitutionality of an Act of Congress" is "'the gravest and most delicate duty that this Court is called upon to perform.'" *Rostker* v. *Goldberg,* 453 U.S. 57, 64 (1981) (quoting *Blodgett* v. *Holden,* 275 U.S. 142, 148, (1927) (Holmes, J.)). Rushing to judgment on this issue, without the benefit of a decision below or the briefing of the parties, might reflect less deference than is due to a "coequal branch of government whose Members take the same oath [the Justices] do to uphold the Constitution of the United States." *Rostker,* 453 U.S. at 64.

B. There Is No Circuit Split to Resolve, as Courts of Appeals Have Uniformly Upheld the Act as Applied to the Federal Government.

The constitutionality of RFRA as applied to the federal government is especially unfit for this Court's review, because there is no disagreement among the Courts of Appeals on that question. *Cf.* S. Ct. Rule 10(a).

As the Tort Committees recognize (p.3), every Court of Appeals to decide the question since *Flores* has found RFRA constitutional as applied to the federal government. *O'Bryan* v. *Bureau of Prisons,* 349 F.3d 399, 401 (7th Cir. 2003) (Easterbrook, J.); *Guam* v. *Guerrero,* 290 F.3d 1210, 1221 (9th Cir. 2002) (O'Scannlain, J.); *Kikumura* v. *Hurley,* 242 F.3d 950, 959 (10th Cir. 2001); *Christians* v. *Crystal Evangelical Free Church (In re Young),* 141 F.3d 854, 860 (8th Cir.), *cert. denied,* 525 U.S. 811 (1998). The D.C. Circuit has also upheld the application of RFRA to federal law since *Flores*. *Henderson* v. *Kennedy,* 265 F.3d 1072, 1073 (D.C. Cir. 2001). *See also E.E.O.C.* v. *Catholic Univ. of America,* 83 F.3d 455, 470 (D.C. Cir. 1996) (rejecting, prior to *Flores,* lack of enumerated powers, Separation of

Powers, and Establishment Clause challenges to application of RFRA to federal law).

Notably, the Tort Committees omit that, prior to *Flores,* the Courts of Appeals have rejected unanimously the very challenges to RFRA urged here.[3] To be sure, any Enforcement Clause analysis in these decisions has been abrogated or directly overruled by this Court's decision in *Flores.* But their decisions on other constitutional challenges to RFRA remain good law in those Circuits. More to the point, the unanimity of the Courts of Appeals on these challenges, even before *Flores,* underscores the marginal character of the challenges, and the lack of any need for this Court to address them.

II. If This Court Were to Reach Any Constitutional Challenges to RFRA, It Should Reject Them All.

A. RFRA Respects the Separation of Powers.

The Tort Committees raise various arguments under the rubric of "separation of powers": (1) RFRA "is a frank usurpation of this Court's critical role in interpreting the meaning of the Constitution" (p.7); (2) RFRA "is in fact a constitutional amendment in violation of Article V" (p.9); (3) RFRA "violates the separation of powers because it imposes

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3 *Mockaitis* v. *Harcleroad,* 104 F.3d 1522, 1530 (9th Cir.) (rejecting, *inter alia,* Establishment Clause challenge to RFRA), *overruled on other grounds*, 521 U.S. 507 (1997); *Sasnett* v. *Sullivan,* 91 F.3d 1018, 1022 (7th Cir. 1996) (adopting Fifth Circuit's rejection of Establishment Clause and Separation of Powers challenges to RFRA in *Flores*), *vacated on other grounds*, 521 U.S. 1114 (1997); *E.E.O.C.* v. *Catholic Univ. of America,* 83 F.3d 455, 470 (D.C. Cir. 1996) (rejecting, *inter alia,* lack of enumerated powers, Separation of Powers, and Establishment Clause challenges to RFRA); *Flores* v. *City of Boerne*, 73 F.3d 1352, 1364 (5th Cir. 1996) (rejecting, *inter alia,* Establishment Clause and Separation of Powers challenges), *rev'd on other grounds*, 521 U.S. 507 (1997).

strict scrutiny on … laws that are presumptively constitutional" (pp.10-11). In accordance with the unanimous views of the federal Courts of Appeals applying the precedents of this Court, these theories should be rejected.

First, Congress does not "usurp[]" the judicial power (p.7) simply by passing laws that provide stronger individual rights than this Court interprets the constitution to provide. Congress does so routinely, including in the area of religious exercise. *See, e.g., Goldman* v. *Weinberger,* **[*CITE*]**; *Lyng,* **[*CITE*]**. Indeed, this Court in *Smith* specifically invited such legislation. *Smith,* 494 U.S. at 890 (**[*quote re legislation*]**).

Of course, Congress may not implement its disagreement with this Court by passing laws that restrict individual rights guaranteed by the Constitution. *See, e.g., Dickerson* v. *United States,* 530 U.S. 428, 437-38 (2000) (striking down federal statute authorizing admission of evidence obtained in violation of constitutional protections set forth in *Miranda* v. *Arizona,* 384 U.S. 436 (1966)).

Nor may Congress express such disagreement by passing laws that exceed its enumerated powers. *See, e.g., Flores,* 521 U.S. at 529-36 (discussing "whether RFRA can be considered enforcement legislation under § 5 of the Fourteenth Amendment," and concluding that it cannot).

But operating pursuant to its enumerated powers, and within the limits of those powers and of the Bill of Rights, Congress is free to express and implement its own interpretation of the Constitution through legislation, even when it may differ from the interpretations of this Court. *Flores,* 521 U.S. at 535 ("When Congress acts within its sphere of power and responsibilities, it has not just the right

but the duty to make its own informed judgment on the meaning and force of the Constitution.”).

Indeed, it is a time-honored tradition for this Court and Congress to disagree, even on the meaning of the Constitution; the separation of powers is served, not violated, by leaving latitude for that disagreement.

Second, RFRA does not amend, nor even purport to amend, the Constitution by a process less rigorous than Article V’s. *See* Tort Cmtes. Br. 10. Although it is true that RFRA passed by large margins that suggested viability as a constitutional amendment,[4] RFRA may be repealed at any time by a simple congressional majority and is subject to judicial review for consistency with the Constitution, just like any other federal statute. To be sure, RFRA implements stronger protections for religious exercise than the First Amendment, but for the reasons stated above, that fact alone does not violate the separation of powers.

Third and finally, the fact that RFRA applies strict scrutiny to other federal laws is similarly irrelevant to the separation of powers. Notwithstanding the Tort Committees’ exaggerations to the contrary, RFRA does not “direct[] the courts to treat all legislative acts as though they are probably illegal.” Tort Cmtes. Br. 11. Federal laws will continue to enjoy the same, strong presumption of constitutionality in the vast majority of cases (*i.e.,* all cases not involving the imposition of “substantial burdens” on religious exercise by federal law). After twelve years in force, RFRA has yet to generate the radical shift in power from the legislature to the judiciary that the Tort Committees fear (or believe already

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4 In an attempt to diminish the great breadth of political support for RFRA, the Tort Committees inaccurately state that RFRA “was passed pursuant to the ‘unanimous consent’ procedure in both Houses of Congress.” Tort Cmtes. Br. 10. In fact, there was a roll call vote in the Senate, which passed RFRA by a margin of 97-3. **[*CITE*]**

exists). In any event, this Court has never held (or even hinted) that a federal law would violate the separation of powers simply because it applied strict scrutiny to other federal laws (however frequently or rarely).

In sum, Tort Committees' Separation of Powers arguments are so weak that the Court should not even bother to take them up. But if this Court were to address them, it should reject them resoundingly.

B. RFRA Does Not Exceed Congress's Enumerated Powers.

The Tort Committees argue that RFRA is not enacted pursuant to any enumerated power of Congress (except perhaps the Commerce Clause), and cannot be justified as an exercise of Congress' power under the Necessary and Proper Clause of Article I.

Lower courts have consistently rejected arguments like these, and always for the same reason:

> When [Congress] passes a law within one of its Article I powers (such as, for example, the Bankruptcy Code), Congress can decide, then or later, to restrict the reach of the law. In other words, the power to amend a particular federal law in a way that protects religious freedom rests on whatever Article I power authorized the enactment of the law originally. To continue with the bankruptcy example, Congress would certainly act within its Article I powers if it amended the fraudulent conveyance provision of the Bankruptcy Code to exclude tithes to churches from the category of pre-petition transfers that can be overturned by trustees.

Thomas Berg, *The Constitutional Future of Religious Freedom Legislation,* 20 U. ARK. LITTLE ROCK L.J. 715, 731 (1998). *See, e.g., Guerrero,* 290 F.3d at 1220-21 ("Congress derives its ability to protect the free exercise of religion from its plenary authority found in Article I of the Constitution; it can carve out a religious exemption from otherwise neutral, generally applicable laws based on its power to enact the underlying statute in the first place."); *In re Young,* 141 F.3d at 860-61 (concluding that RFRA, as applied to federal bankruptcy law, is an exercise of the bankruptcy power effectively amending bankruptcy laws).

In short, the greater includes the lesser. If Congress has the enumerated power to regulate narcotics in commerce (as in this case), Congress also has the power to regulate them incrementally less in order to minimize federal government interference with religious exercise.

The Tort Committees spend seven pages erecting and knocking down straw men on this point. Their lengthy analysis of RFRA as an exercise exclusively of the Commerce Clause (pp.14-18) is misguided. Instead, the appropriate question is whether RFRA is a legitimate means under the Necessary and Proper Clause for Congress to exercise whatever enumerated power Congress exercised previously in passing the federal statute that RFRA would curtail.

Here, there can be no doubt that application of the Controlled Substances Act to the *hoasca* tea at issue here is a legitimate exercise Congress' enumerated power under the Commerce Clause. *See Gonzales* v. *Raich,* 125 S. Ct. 2195 (2005). And pursuant to the Necessary and Proper Clause, Congress may subsequently limit the reach of that exercise of its authority by virtually any means it would prefer. This Court long ago emphasized the breadth of Congress' discretion in this regard:

> Let the end be legitimate, let it be within the scope of the constitution, and all means which are appropriate, which are plainly adapted to that end, which are not prohibited, but consist with the letter and spirit of the constitution, are constitutional.

M'Culloch v. *Maryland,* 17 U.S. (4 Wheat.) 316, 421 (1819). RFRA falls easily within this plenary power.

The Tort Committees also argues that RFRA cannot be an exercise of the Necessary and Proper Clause alone, apart from another enumerated power. *See* Tort Cmtes. Br. 18-20. *See also id.* 8-9. But RFRA is not a free-standing exercise of the Necessary and Proper Clause. Instead, it is the means chosen by Congress – wholesale rather than retail – to exercise once again *all* of the enumerated powers it had exercised previously through prior legislation, in order to serve the legitimate end of minimizing federal interference with religious exercise.

C. RFRA Is Consistent with the Establishment Clause.

Notwithstanding this Court's recent decision in *Cutter* v. *Wilkinson,* 125 S. Ct. 2113 (2005), the Tort Committees claim that RFRA violates the Establishment Clause. *Cutter* rejected an Establishment Clause challenge to Section 3 of the Religious Land Use and Institutionalized Persons Act of 2000 ("RLUIPA"), which implements the *very same* substantial burden / strict scrutiny standard as RFRA.[5]

Notably, as in *Cutter,* the Establishment Clause challenge asserted here is a facial one. Its principal complaint is with the breadth of the statute, not with its

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5 **[*Draft note contra n.4 on p.12 re divergent standards and burden shifting.*]**

application to the particular facts of this case. Indeed, the Tort Committees' Establishment Clause argument consists mainly of a series of assertions to the effect that RFRA is extremely broad in scope, and much broader than RLUIPA Section 3. *See* Br. 20-22, 26-29.[6]

Some of these assertions are simple exaggerations. Br. 21 (RLUIPA Section 3 "pales in comparison to the scope of RFRA"); *id.* at 26 ("RFRA's scope is breathtaking"). Some are meaningless epithets. *Id.* at 22, 27 (RFRA is "a blind handout"). Some are patently false. *Id.* at 20 ("RFRA has no boundaries").

Hyperbole aside, the bare fact is that RFRA covers federal law of all types but does not reach state or local law at all. RLUIPA Section 3, on the other hand, covers all state and municipal governments that affect interstate commerce or receive federal funds in the course of running their prisons.

Even if this difference in scope were as colossal as the Tort Committees would have it – and it is not – the difference is irrelevant under the Establishment Clause. Although the Court in *Cutter* recognized that the scope of RLUIPA Section 3 is limited to state and local prisons, the decision did not hinge on that fact. Instead, *Cutter* upheld the law "because it alleviates exceptional government-created burdens on private religious exercise," while allowing courts to "take adequate account of the burdens a requested accommodation may impose on nonbeneficiaries," and to assure "that the Act's prescriptions are and will be

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6 The Establishment Clause section of Tort Committees' brief contains other arguments as well, but their connection to the Establishment Clause is unclear. There is a 2-page block quote (p.23-24) from *Boerne,* a decision that did not reach the Establishment Clause question, and a third page (p.25) listing references to *Smith* (some hostile) in RFRA's legislative history.

administered neutrally among different faiths." *Cutter,* 125 S. Ct. at 2121 (citations omitted).

RFRA and RLUIPA Section 3 are exactly alike with respect to these criteria, and any law that satisfies them – whether broader or narrower in scope than RLUIPA Section 3 – would satisfy the requirements of the Establishment Clause.

Indeed, the breadth of an accommodation is an asset rather than a liability under the Establishment Clause. This Court has been consistently more suspicious of accommodations that might benefit only one or a few religious groups. *See, e.g., Kiryas Joel* v. *Grumet,* 512 U.S. 687 (1994). *See also Larson* v. *Valente,* 456 U.S. 228, 244 (1982) ("The clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another.") Accordingly, any suggestion that the breadth of an accommodation *increases* Establishment Clause risks has it exactly backwards and should be rejected out of hand.

The Tort Committees' argument based on breadth has an additional flaw that they recognize but fail to address adequately. If legislative accommodations violate the Establishment Clause simply because they cover a broad range of policy areas within a given jurisdiction, approximately a dozen state RFRAs would be invalidated wholesale. *See* Br. 29 n.6. And although the Tort Committees do not acknowledge it, state constitutions that are interpreted to apply a similarly vigorous standard would suffer the same fate.[7]

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7 *See, e.g., Humphrey* v. *Lane*, 728 N.E.2d 1039 (Ohio 2000); *In re Browning*, 476 S.E.2d 465 (N.C. 1996); *State* v. *Miller*, 549 N.W.2d 235 (Wis. 1996); *Attorney Gen.* v. *Desilets*, 636 N.E.2d 233 (Mass. 1994); *Swanner* v. *Anchorage Equal Rights Comm'n*, 874 P.2d 274

The Tort Committees admit that their Establishment Clause theory would jeopardize some state RFRAs, but claim it would only affect those without exceptions. *See* Tort Cmtes. Br. 29 n.6. This is a distinction without a difference. There is simply no reason why a state RFRA (or state constitution) that covers every area of law within the state would violate the Establishment Clause, while another that carves out only a single area would not. Even if the breadth of an accommodation were an Establishment Clause problem – and it is not – it strains credulity to suggest that the incremental difference between comprehensive coverage and a single exception to coverage is a difference of constitutional magnitude under the Establishment Clause. Notably, the Tort Committees fail to cite a single case in support of this meaningless distinction.

CONCLUSION

For the foregoing reasons, this Court should either decline to reach any constitutional challenges to RFRA, or reject any such challenges it would reach.

Respectfully submitted,

ANTHONY R. PICARELLO, JR.
Counsel of Record
DEREK L. GAUBATZ

(Alaska 1994); *Rourke* v. *N.Y. State Dep't of Corr. Servs*., 603 N.Y.S.2d 647 (N.Y. Sup. Ct. 1993), *aff'd*, 615 N.Y.S.2d 470 (N.Y. App. Div. 1994); *Rupert* v. *City of Portland*, 605 A.2d 63 (Me. 1992); *St. John's Lutheran Church* v. *State Comp. Ins. Fund*, 830 P.2d 1271 (Mont. 1992); *First Covenant Church of Seattle* v. *City of Seattle*, 840 P.2d 174 (Wash. 1992); *State* v. *Evans*, 796 P.2d 178 (Kan.1990); *State* v. *Hershberger*, 462 N.W.2d 393 (Minn. 1990). *See also Arizona* v. *Evans,* 514 U.S. 1, 8 (1995) ("[S]tate courts are absolutely free to interpret state constitutional provisions to accord greater protection to individual rights than do similar provisions of the United States Constitution").

THE BECKET FUND FOR
RELIGIOUS LIBERTY
1350 Connecticut Avenue, NW
Suite 605
Washington, DC 20036-1735
Phone: (202) 955-0095

September 9, 2005

Counsel for Amicus Curiae

APPENDIX A

The Coalition for the Free Exercise of Religion includes the following organizations:

Agudath Israel of America
Aleph
American Center for Law and Justice
American Ethical Union
Americans for Religious Liberty
American Jewish Committee
Anti-Defamation League
Association of Christian Schools International
Association on American Indian Affairs
Baptist Joint Committee
Becket Fund for Religious Liberty
B'nai B'rith International
Central Conference of American Rabbis
Christian Legal Society
Clifton Kirkpatrick, Stated Clerk of the Presbyterian Church (USA)
Council on Religious Freedom
Council on Spiritual Practices
Ethics & Religious Liberty Council of the Southern Baptist Convention
Friends Committee on National Legislation
General Council on Finance and Administration of The United Methodist Church
Hadassah, the Women's Zionist Organization of America
Hindu American Foundation
Institute on Religion & Public Policy
International Church of the Foursquare Gospel
International Commission on Freedom of Conscience
Jewish Council for Public Affairs
Jewish Prisoner Services International

Jewish Reconstructionist Federation
Liberty Counsel
Liberty Legal Institute
Mennonite Central Committee U.S., Washington Office
Minaret of Freedom Institute
National Council of the Churches of Christ in the USA
National Ministries, American Baptist Churches, USA
North American Religious Liberty Association
Northwest Religious Liberty Association
People for the American Way
Peyote Way Church of God
Philadelphia Ethical Society
Prison Fellowship
Queens Federation of Churches
Rabbinical Council of America
Seventh-day Adventist Church (General Conference
World Headquarters)
Shambhala International
Shaykh Mohamed Hisham Kabbani, Chairman of the
Islamic Supreme Council of America
Sikh American Legal Defense and Education Fund
Soka Gakkai International—USA
The Church of Jesus Christ of Latter-day Saints
The First Church of Christ, Scientist, in Boston, Massachusetts
The Interfaith Alliance Foundation
The United House of Prayer For All People of the Church on the
Rock of the Apostolic Faith
Union for Reform Judaism
Union of Orthodox Jewish Congregations of America
Unitarian Universalist Association
United Sikhs
United States Conference of Catholic Bishops
United Synagogue of Conservative Judaism