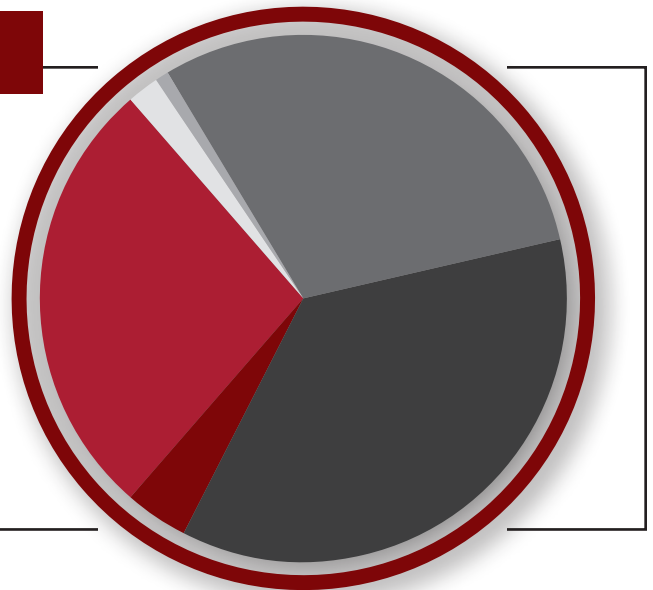
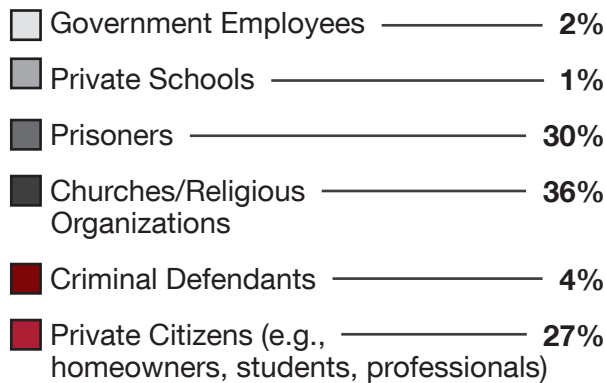


# STATE RELIGIOUS FREEDOM RESTORATION ACTS

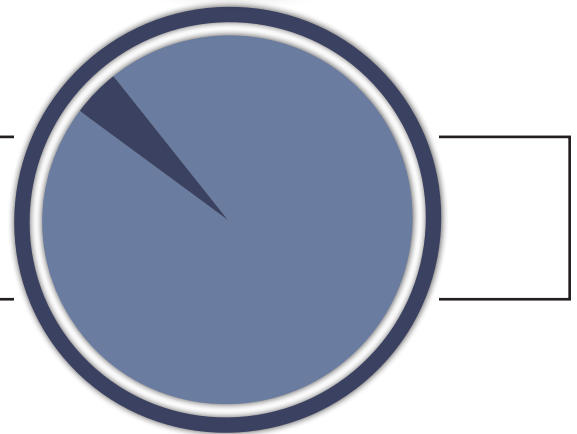
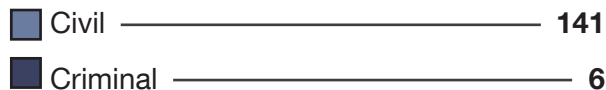


## The Breakdown of State Cases Involving State RFRAs

### Who is using the state RFRAs against the Government?



### State RFRA Litigation: Civil Cases vs. Criminal Cases



Since Connecticut enacted the first state Religious Freedom Restoration Act in 1993, research shows that there have been approximately 147 reported instances where litigants have filed claims, raised defenses, or relied upon their state RFRAs in litigated cases. AL (9 cases), AR (0 cases), AZ (10 cases), CT (17 cases), FL (28 cases), ID (6 cases), IL (23 cases), IN (0 cases), KS (0 cases), KY (0 cases), LA (0 cases), MO (1 case), MS (0 cases), NM (3 cases), OK (7 cases), PA (13 cases), RI (0 cases), SC (3 cases), TN (4 cases), TX (19 cases), VA (3 cases). These cases have arisen over the past two decades in many of the twenty-one states that have a state RFRA. The pie charts herein reflect these cases.