NO. 20-1237

UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

TAJUDDIN ASHAHEED,

Plaintiff – Appellant,

v.

THOMAS E. CURRINGTON, *in his individual and official capacities,*

Defendant – Appellee.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

BRIEF OF *AMICUS CURIAE* MUSLIM ADVOCATES IN SUPPORT OF PLAINTIFF-APPELLANT AND FOR REVERSAL OF THE DISTRICT COURT

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CORPORATE DISCLOSURE STATEMENT

Muslim Advocates is a 501(c)(3) non-profit entity with no parent company.

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IDENTITY AND INTERESTS OF *AMICI CURIAE*

Amicus curiae **Muslim Advocates**, a national legal advocacy and educational organization formed in 2005, works on the frontlines of civil rights to guarantee freedom and justice for Americans of all faiths. The issues at stake in this case relate directly to Muslim Advocates' work fighting religious discrimination against vulnerable communities and in prisons.

RULE 29(a)(4)(E) STATEMENT

No party's counsel authored this brief in whole or in part. No party or party's counsel contributed money that was intended to fund preparing or submitting this brief. No person—other than the *amici curiae*, their members, or their counsel—contributed money that was intended to fund preparing or submitting the brief.

INTRODUCTION AND SUMMARY OF ARGUMENT

Plaintiff Mr. Ashaheed, an observant Muslim, has a right to maintain his religious practice of growing a beard even during his incarceration in the Colorado Department of Corrections ("CDOC"). This is a right protected not only the U.S. Constitution through the Free Exercise Clause and the Equal Protection Clause, it is a right that is recognized by CDOC's own policies permitting prisoners who maintain beards for religious reasons to maintain them in prison (the "Beard Policy"). Yet when Plaintiff's right to maintain a beard was violated by Defendant Mr. Currington and he sought justice by filing this lawsuit, the district court below threw out his case based on a reading of qualified immunity that is contrary to precedent and offensive to this country's strong traditions of religious liberty.

The religious freedoms guaranteed by the Constitution are specially aimed at protecting the practices of religious minorities. Religious minorities face more discrimination and are more vulnerable to such discrimination when it appears. Because their lives are so fully controlled by prison officials, prisoners are at the highest risk of suffering from this kind of discrimination. Accordingly, the religious protections of the Constitution require courts to exert the most careful scrutiny over claims of religious discrimination by prisoners.

Plaintiff's case here falls squarely within this long history of vulnerable religious minorities subjected to discrimination in prison. Statistics show that

Muslims are especially likely to experience religious discrimination, particularly while incarcerated. The fact that Defendant violated a policy that was especially crafted to counteract this widespread discrimination and protect religious minorities like Plaintiff adds strong corroboration to Plaintiff's allegations of religious animus.

The district court's holding that Defendant was entitled to qualified immunity disregards both this context of anti-Muslim animus and the framework of federal law that was crafted to protect adherents like Plaintiff. Qualified immunity does not protect those government officials who are on notice, based on the facts of the case, that their conduct violates the law. Plaintiff's allegations in this case make clear that any reasonable officer would be aware that the forcible shaving of Plaintiff's religious beard in violation of prison policy would violate his religious rights. By dismissing this case at the motion to dismiss stage, the district court failed to draw factual inferences in favor of Plaintiff and neglected to give Plaintiff the opportunity to develop his case through discovery. And by imposing—in violation of Supreme Court and circuit precedent—a requirement that Plaintiff identify binding precedent with precisely the same facts as his, the district court crafted a rule that disadvantages religious minorities, whose less common beliefs will have fewer opportunities to generate precedent compared to mainstream religions. Because this rule is offensive and contrary to both the substance and purpose of this country's religious freedom law, the district court must be reversed and Plaintiff's claims reinstated.

ARGUMENT

I. Federal Law Is Designed to Protect Religious Minorities.

The freedom to practice one's religion is central to the laws of the United States. "[T]he promise of the free exercise of religion [is] enshrined in our Constitution; that guarantee lies at the heart of our pluralistic society." *Bostock v. Clayton Cty.*, 140 S. Ct. 1731, 1754 (2020). The freedom to practice one's religion is among "the cherished rights of mind and spirit" protected by the Constitution. *Malloy v. Hogan*, 378 U.S. 1, 5 (1964). As Justice Murphy noted, "nothing enjoys a higher estate in our society than the right given by the First and Fourteenth Amendments freely to practice and proclaim one's religious convictions." *Martin v. City of Struthers*, 319 U.S. 141, 149 (1943) (Murphy, J., concurring). By including protection for the free exercise of religion in the First Amendment to the Constitution, "the people of this nation have ordained in the light of history, that, in spite of the probability of excesses and abuses, these liberties are, in the long view, essential to enlightened opinion and right conduct on the part of the citizens of a democracy." *Cantwell v. Connecticut*, 310 U.S. 296, 310 (1940).

While the First Amendment was drafted to protect all expressions of religious belief, "[t]he free exercise clause . . . . was specially concerned with the plight of minority religions." *Zelman v. Simmons-Harris*, 536 U.S. 639, 679 n.4 (2002) (Thomas, J., concurring) (quoting Akhil Reed Amar, *The Bill of Rights as a*

Constitution, 100 Yale L.J. 1131, 1159 (1991)). The framers of the Bill of Rights were themselves victims of religious discrimination, and accordingly "it was 'historical instances of religious persecution and intolerance that gave concern to those who drafted the Free Exercise Clause.'" *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 532–33 (1993) (quoting *Bowen v. Roy*, 476 U.S. 693, 703 (1986)). As Justice Gorsuch has written, "[p]opular religious views are easy enough to defend. It is in protecting unpopular religious beliefs that we prove this country's commitment to serving as a refuge for religious freedom." *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719, 1737 (2018) (Gorsuch, J., concurring).

Religious minorities in prison are not only likely to suffer this same discrimination, they are even more powerless to fight against it. The Supreme Court has referred to prisons as among those state-run institutions "in which the government exerts a degree of control unparalleled in civilian society and severely disabling to private religious exercise." *Cutter v. Wilkinson*, 544 U.S. 709, 720–21 (2005). Fortunately, federal law reaches even into prisons; "prisoners do not shed all constitutional rights at the prison gate," *Sandin v. Conner*, 515 U.S. 472, 485 (1995), and the protection of the Free Exercise Clause, "including its directive that no law shall prohibit the free exercise of religion, extends to the prison environment." *Morrison v. Garraghty*, 239 F.3d 648, 656 (4th Cir. 2001) (citing *O'Lone v. Estate*

of Shabazz, 482 U.S. 342, 348 (1987)). The strong protections of the First Amendment ensure that prison officials may not "demand from inmates the same obeisance in the religious sphere that more rightfully they may require in other aspects of prison life." *Barnett v. Rodgers*, 410 F.2d 995, 1002 (D.C. Cir. 1969).

Nor is the Free Exercise Clause the only source of constitutional protection against religious discrimination. Among other constitutional provisions, the Equal Protection Clause "prohibits selective enforcement based on an unjustifiable standard such as . . . religion." *United States v. Batchelder*, 442 U.S. 114, 125 n.9 (1979). The Equal Protection Clause is intended "to secure every person within the State's jurisdiction against intentional and arbitrary discrimination, whether occasioned by express terms of a statute or by its improper execution through duly constituted agents," *Vill. of Willowbrook v. Olech*, 528 U.S. 562, 564 (2000) (per curiam) (internal quotation marks omitted). As with the Free Exercise Clause, the right to equal protection of the laws extends to prisons; the Equal Protection Clause protects prisoners "from arbitrary state action even within the expected conditions of confinement." *Sandin v. Conner*, 515 U.S. 472, 487 n.11 (1995).

This framework of federal law places an obligation on courts to apply the law in such a way that it safeguards the liberty of religious minorities. By throwing out Plaintiff's case based on a flawed application of the qualified immunity doctrine, the district court failed to live up to this important duty.

II. Religious Animus Is Widespread in Prison.

A holding in favor of Plaintiff in this case is critical to protecting religious freedom in part because the anti-Muslim animus that he alleges is common throughout the prison system. Defendant argued below that Plaintiff's Complaint failed to plead the animus necessary to state a claim of religious discrimination, arguing that Defendant that Plaintiff's Complaint lacks allegations of discriminatory intent and that Defendant's actions are equally certain to be motivated by "compliance with the policy" or possibly "mistake." Since the Beard Policy did not require the forcible shaving of Plaintiff (or anyone else with a religiously maintained beard), such a motivation is not available to Defendant in this case. And, as the prevalence of anti-Muslim animus in the prison system makes clear, "mistake" is a highly unlikely defense—and certainly not one that is proper to assert at the motion-to-dismiss stage.

Religious animus in the prison system is, regrettably, a very common occurrence. In 2000, during hearings on the passage of the Religious Land Use and Institutionalized Persons Act ("RLUIPA"),[1] Congress was presented with the widespread problem of prisoners being denied the opportunity to practice their faith without a sufficient justification. Some of these "inadequately formulated prison regulations and policies grounded on mere speculation, exaggerated fears, or post

[1] Pub. L. 106-274, 114 Stat. 803 (2000), *codified at* 42 U.S.C. § 2000cc et seq.

hoc rationalizations"[2] included Michigan prisons prohibiting Chanukah candles,[3] Oklahoma prisons restricting the Catholic use of sacramental wine for celebration of Mass,[4] and prison policies banning jewelry that prevented prisoners from wearing a cross or Star of David.[5] These examples are, unfortunately, as timely as ever—a great number of such cases remain on the docket of every federal judge in the nation.

While prisoners of all faiths experience discrimination, the available evdience shows that anti-Muslim discrimination is among the most widespread. In federal prisons, Muslims are significantly over-represented as grievers and litigants. *See Enforcing Religious Freedom in Prison*, U.S. Comm'n on Civil Rights Table 3.8, at 70; Table 4.1, at 82 (Sept. 2008) (noting that Muslims filed 42% of administrative remedy requests for accommodation from 1997-2008 and that Muslims litigated 29% of RLUIPA cases from 2001-2006). In 2008, Muslims constituted only 9.3% of federal prisoners, but brought the highest percentage of religious discrimination

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[2] 146 Cong. Rec. S7774-01, S7775 (statement of Sens. Hatch & Kennedy) (quoting S. Rep. No. 103-111, at 10 (1993)).

[3] *Cutter*, 544 U.S. at 717 n.5 (citing *Hearing on Protecting Religious Freedom After Boerne v. Flores before the Subcommittee on the Constitution of the House Committee on the Judiciary*, 105th Cong., 2d Sess., Pt. 3, p. 41 (1998) (statement of Isaac M. Jaroslawicz, Director of Legal Affairs for the Aleph Institute).

[4] See *id.*, Pt. 2, at 58-59 (prepared statement of Donald W. Brooks, Reverend, Diocese of Tulsa, Oklahoma)).

[5] *Hearing before the Subcomm. on the Const. of the H. Comm. on the Judiciary*, 105th Congress, 1st Session 86 (July 14, 1997) (testimony of Prof. Douglas Laycock).

grievances, accounting for 26.3% of all grievances filed. *See id.*at Table 2.1 & 26. The Department of Justice also consistently reports a disproportionately high number of discriminatory incidents against Muslims in particular. *See* U.S. Dep't of Justice, *Update on the Justice Department's Enforcement of the Religious Land Use and Institutionalized Persons Act: 2010-2016*, at 4 (2016).

Plaintiff's allegations that Defendant violated a prison policy in order to force him to shave his beard are an offensive continuation of this tradition of anti-Muslim bigotry. Plaintiff clearly alleged that Defendant was aware that the Beard Policy offered an exemption for prisoners who wore beards for religious reasons, was aware that Plaintiff had a religious reason for keeping his beard, that Defendant made a false claim about the Beard Policy, and that Defendant forced Plaintiff to shave his beard under threat of discipline. While violating a prison's policy does not by itself establish a constitutional violation, such violations of policy are "instructive on whether defendants acted in good faith and whether they are entitled to qualified immunity." *Harper v. Blagg*, No. 2:13-CV-19796, 2015 WL 6509131, at *9 (S.D.W. Va. Oct. 28, 2015) (holding plaintiff stated a claim for excessive force against defendants who failed to follow use-of-force policy and denying qualified immunity to defendants). In cases like this, where the defendant's mental state is an element of the claim, this Court has held that a government official violating a policy with a clear rationale can properly consider that the official desired to defy that rationale.

In *Hostetler v. Green*, then-Judge Gorsuch wrote an opinion affirming a district court decision holding that a prison guard was deliberately indifferent to the plaintiff's sexual assault when the guard failed to enforce a policy designed to protect prisoners from sexual assault. 323 F. App'x 653, 657–58 (10th Cir. 2009) (unpublished). Judge Gorsuch wrote that "knowledge of a policy *and [defendant's] awareness of its rationale* . . . support an inference about [defendant's] subjective knowledge" of the constitutional violation. *Id*. (emphasis in original) (affirming denial of qualified immunity based on plaintiff's having properly alleged improper motive). Here, the rationale for the religious exemption in the Beard Policy is obvious: there is no reason to refrain from shaving the beards of religious practitioners other than to preserve religious liberty. Yet Defendant proceeded to violate that policy anyway.

At the motion to dismiss stage, courts are required to draw "all reasonable factual inferences" in favor of the plaintiff. *Wilson v. Montano*, 715 F.3d 847, 852 (10th Cir. 2013) (citing *Brown v. Montoya*, 662 F.3d 1152, 1162 (10th Cir. 2011)). Given such a rule, Plaintiff has alleged more than enough to prove that Defendant's actions fell within the widespread practice of intentional discrimination against Muslim prisoners.

III. The District Court Erred In Granting Qualified Immunity to Defendant.

The district court's granting of qualified immunity to Defendant Currington was an offensive abdication of its responsibility to protect religious freedom. As

noted above, federal law has long been a source of critical protections for the religious practices of religious minorities. In order to have effective rights, however, the law must also have effective remedies. The Supreme Court has noted that "[i]n situations of abuse, an action for damages against the responsible individual can be an important means of vindicating constitutional guarantees." *Butz v. Economou*, 438 U.S. 478, 506 (1978). Damages deter violations of rights by making officials internalize the costs of their illegal activity rather than forcing their victims to bear it. *See* John C. Jeffries, Jr., *In Praise of the Eleventh Amendment and Section 1983*, 84 Va. L. Rev. 47, 72 (1998). Section 1983 of Title 42 of the U.S. Code, which provides a cause of action for claims under the Constitution, was created to make the courts "guardians of the people's federal rights," *Haywood v. Drown*, 556 U.S. 729, 735 (2009) (citation omitted), including the right to be free from religious discrimination.

Because these remedies are so important in safeguarding constitutional rights, it is critical that any defense to them is construed narrowly in order not to defeat meritorious claims. Recognizing this, the U.S. Supreme Court has repeatedly stated that the standard for qualified immunity does not require that "the very action in question has previously been held unlawful,"; rather, "the unlawfulness must be apparent" "in light of pre-existing law." *Hope v. Pelzer*, 536 U.S. 730, 739 (2002). The relevant case law need not be "directly on point," *District of Columbia v. Wesby*,

138 S. Ct. 577, 590 (2018), or even "fundamentally similar." *Hope* at 741. "[O]fficials can . . . be on notice that their conduct violates established law even in novel factual circumstances." *Id.*

It has long been clearly established that a prison official cannot burden a prisoner's rights without some justification. As the district court noted, making reference to a case specifically identified by Plaintiff in the district court, "*Tennyson* stands for the broad notion that prison guards may not take action against an individual prisoner which violates that prisoner's right to the free exercise of his or her religious beliefs."[6] Nor is *Tennyson* the only case establishing this principle; the Supreme Court has repeatedly held for decades that any prison restriction on religious practice must be rationally related to a legitimate government interest. *See, e.g.*, *Turner v. Safley*, 482 U.S. 78, 89-91 (1987). While such a principle of religious freedom may not be sufficient for every case involving allegations of religious freedom, where the *facts* of the case make clear that such a principle is implicated, courts have not hesitated to deny qualified immunity to defendants. *See, e.g.*, *Salahuddin v. Goord*, 467 F.3d 263, 275–76 (2d Cir. 2006) ("Qualified immunity is not appropriate at this stage because it was clearly established at the time of the

[6] Referencing *Tennyson v. Carpenter*, 558 F. App'x 813 (10th Cir. 2014) (unpublished).

alleged violations that prison officials may not substantially burden inmates' right to religious exercise without some justification.").

The district court's narrow framing of the right at issue in this case is directly contrary to this directive. The district court characterized the "particular conduct at issue" as "requiring a Muslim inmate to shave his beard during the intake process" and held that no authority had clearly established that the Free Exercise Clause protected against this conduct. Yet because the forcible shaving served no purpose—and because the religious nature of Plaintiff's beard growth was clear—Plaintiff's case falls squarely within the bounds of those where a reasonable government official would have understood that he was acting in violation of Plaintiff's constitutional rights.

The district court's dismissal of Plaintiff's case is especially offensive because the district court cut off fact discovery, which could have revealed important additional evidence of the unreasonableness of Defendant's mistake. Where a defendant asserts qualified immunity at the motion to dismiss stage, a plaintiff is "entitled to all reasonable inferences from the facts alleged, not only those that support [plaintiff's] claim, but also those that defeat the immunity defense." *McKenna v. Wright*, 386 F.3d 432, 436 (2d Cir. 2004). As the Second Circuit has noted in the employment context, "direct evidence of discriminatory intent is rare[,] and such intent often must be inferred from circumstantial evidence found in

affidavits and depositions." *Schiano v. Quality Payroll Sys., Inc.*, 445 F.3d 597, 603 (2d Cir. 2006) (quotations omitted). Because "the details of the alleged deprivations are more fully developed" on a motion for summary judgment, qualified immunity is "often best decided" at that later stage of litigation. *Walker v. Schult,* 717 F.3d 119, 130 (2d Cir. 2013). Not only is Defendant's understanding of the policy relevant to the question of whether he was entitled to qualified immunity, "the reasonableness of an officer's actions must be assessed in light of the officer's training." *Maresca v. Bernalillo Cty.*, 804 F.3d 1301, 1311 (10th Cir. 2015) (quoting *Weigel v. Broad,* 544 F.3d 1143, 1155 (10th Cir. 2008)). Yet evidence of Defendant's training is not yet available to Plaintiff. By cutting off this and other avenues of discovery, the district court harmed Plaintiff's ability to develop his case.

A rule like the district court's—that qualified immunity is available unless the exact factual circumstances of the case at bar must have been previously held to be a constitutional violation by a court—is not only contrary to precedent, it would discriminate against minority religions. Adherents to minority religions are by definition less numerous than those of mainstream religions. Accordingly, they would be presented with fewer opportunities to litigate the content of their beliefs and obtain the kind of decisions that are necessary to escape qualified immunity under the district court's rule. As noted above, the Free Exercise Clause was affirmatively intended to protect "members of minority religions against quiet

erosion by majoritarian social institutions that dismiss minority beliefs and practices as unimportant, because unfamiliar." *Goldman v. Weinberger*, 475 U.S. 503, 524 (1986) (Stevens, J., concurring). By adopting a version of qualified immunity that effectively rewards the frequency with which a religious practice is litigated, the district court denied the protections of the Free Exercise Clause to these same beliefs and practices that are one of the central concerns of the Constitution. Such a rule is error, and this Court must act to correct it by restoring a version of qualified immunity that is "more than a scavenger hunt for prior cases with precisely the same facts." *Perea v. Baca*, 817 F.3d 1198, 1204 (10th Cir. 2016).

CONCLUSION

For the foregoing reasons, this Court should reverse the decisions of the district court and reinstate Mr. Ashaheed's claims against Mr. Currington.

Dated: October 30, 2020

Respectfully submitted,

/s/ Matthew W. Callahan

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CERTIFICATE OF COMPLIANCE WITH TYPE REQUIREMENTS

1. This document complies with the type-volume limitation of Fed. R. App. P. 32(a)(7)(B) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this brief contains 3,428 words.

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Date: October 30, 2020 /s/ Matthew W. Callahan

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CERTIFICATE OF COMPLIANCE WITH PRIVACY REDACTION, DIGITAL SUBMISSION, AND VIRUS SCAN

I hereby certify that (1) there is no information required to be redacted pursuant to Fed. R. App. P. 25(a)(5) and Tenth Circuit Rule 25.5; (2) any paper copies delivered to the Clerk of Court are exact copies of the PDF version filed via CM/ECF; and (3) the digital submissions have been scanned for viruses with the latest version of Sophos Endpoint for Mac and no viruses were detected.

/s/ Matthew W. Callahan
Matthew W. Callahan

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of October 2020, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Tenth Circuit by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Matthew W. Callahan

MUSLIM ADVOCATES

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Ashaheed v. Currington

David M Shapiro <david.shapiro@law.northwestern.edu> Fri, Oct 30, 2020 at 11:10 AM
To: Matthew Callahan <matthew@muslimadvocates.org>
Cc: David Lane <dlane@kln-law.com>, Andrew McNulty <amcnulty@kln-law.com>

Plaintiff consents to the filing of Muslim Advocates' amicus brief.

David Shapiro

David M. Shapiro

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RE: [Ashaheed v. Currington] Seeking consent to file amicus brief

Joshua Luna <Joshua.Luna@coag.gov> Fri, Oct 30, 2020 at 11:17 AM
To: Matthew Callahan <matthew@muslimadvocates.org>

Hi Mr. Callahan,

No problem. We consent to you filing an amicus brief.

Thanks,
Josh

From: Matthew Callahan <matthew@muslimadvocates.org>
Sent: Friday, October 30, 2020 9:16 AM
To: Joshua Luna <Joshua.Luna@coag.gov>
Subject: Re: [Ashaheed v. Currington] Seeking consent to file amicus brief

Mr. Luna, thank you for your call this morning. I'm told that the Tenth Circuit requires written proof of the parties' consent; could you confirm via email that your client consents to the filing of Muslim Advocates' brief?

Many thanks,

Matthew W. Callahan

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On Thu, Oct 29, 2020 at 10:23 AM Matthew Callahan <matthew@muslimadvocates.org> wrote:

> Mr. Luna,
>
> Pleased to meet you. My name is Matthew Callahan and I am an attorney at a non-profit called Muslim Advocates. Tomorrow, we intend to file an amicus brief in support of plaintiff-appellant in *Ashaheed v. Currington*, Tenth Circuit Case No. 20-1237. Please advise if we have your client's consent to do so.

If you have any questions or concerns, please feel free to give me a call at (202) 897-1892.

Best,

Matthew W. Callahan

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