# The Initial Report by the Task Force to Eradicate Anti-Christian Bias

Pursuant to Executive Order 14202 Dated June 6, 2025

# Eradicating Anti-Christian Bias within the Federal Government

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#### **EXECUTIVE SUMMARY**

"Christianity, which has rendered all men equal before God, will not be loath to see all citizens equal before the law." So wrote Alexis de Tocqueville in the Nineteenth Century, reflecting on the profound role of Christianity in shaping America's democracy. History has only deepened his insight. From the birth of our Republic to the great struggles for civil rights, Christianity has not only inspired individuals but transformed the nation. Nowhere was this clearer than in the leadership of Rev. Martin Luther King, Jr., who preached that faith compels good citizenship and justice, saying "[i]f one is truly devoted to the religion of Jesus, [that person] will seek to rid the earth of social evils. The gospel is social as well as personal."

Yet, in recent years, this legacy has been undermined. The political, social, and humanitarian contributions of Christians have been devalued, their beliefs marginalized, and their communities unlawfully targeted by their own government. A review of federal departments and agencies revealed a consistent and systematic pattern of discrimination against Christians during the Biden Administration. Where there should have been "equal justice under law" there was unequal treatment – policies and practices that singled out Christian people, Christian houses of worship, and Christian convictions for disfavored treatment.

During his 2024 presidential campaign, President Trump promised the American people that this injustice would end. On February 6, 2025, keeping that promise, President Trump issued Executive Order (EO) 14,202, *Eradicating Anti-Christian Bias*.<sup>3</sup> The E.O. created the "Task Force to Eradicate Anti-Christian Bias" chaired by the Attorney General, with a clear mandate: to "ensure

<sup>&</sup>lt;sup>1</sup> Alexis de Tocqueville, *Democracy in America*, trans. Harvey C. Mansfield and Delba Winthrop 279–280, 519 (Chicago: University of Chicago Press, 2002),

<sup>&</sup>lt;sup>2</sup> Martin Luther King, Jr., Stride Toward Freedom 117 (San Francisco: Harper & Row, 1986).

<sup>&</sup>lt;sup>3</sup> Exec. Order No. 14,202, 90 Fed. Reg. 9365 (Feb. 6, 2025).

that any unlawful and improper conduct, policies, or practices that target Christians are identified, terminated, and rectified." Among its directives, the E.O. requires the Task Force to Eradicate Anti-Christian Bias (Task Force) to deliver an initial assessment of the harm caused when religious liberty is denied. This report fulfills that charge, providing an initial overview of the damage that can be done when religious liberty is not protected and preserved for all Americans.

This is not the end of the inquiry. It is only the beginning. The Task Force will continue to investigate the full scope of anti-Christian bias that pervaded the federal government during the Biden Administration, and it will deliver a detailed report with findings and recommendations by February 2026. A final report will follow at the conclusion of its work.

The Task Force makes this commitment: the federal government will never again be permitted to turn its power against people of faith. Under President Trump and Attorney General Bondi's leadership, in partnership with all members of this Task Force, the rule of law will be enforced with vigor, and every religion will be treated with equality in both policy and action. The days of anti-Christian bias in the federal government are over. Faith is not a liability in America – it is a liberty.

#### EXAMPLES OF ANTI-CHRISTIAN BIAS ACROSS THE FEDERAL GOVERNMENT

A preliminary review of federal agencies and departments revealed numerous instances of anti-Christian bias during the Biden Administration. Below are examples of manifestations of this bias.

# Denial of Generally Available Aid and Benefits

 The Department of State (DOS) provided limited humanitarian relief to Christians relative to other populations and offered muted responses to attacks on Christians compared to other groups.

# Disfavored Treatment and Viewpoint Discrimination

- The Department of Labor (DOL) dismantled its Office of Faith Based Initiatives and replaced it with a Diversity, Equity and Inclusion Office.
- The Department of Housing and Urban Development (HUD) discriminated against Christian perspectives in its marketing, treating social media posts celebrating Christian holidays, such as Palm Sunday, Good Friday, and Easter, differently than posts celebrating other religious or interest group holidays, including Pride Month, Ramadan, and Diwali by taking down the Christian posts and leaving up the rest.
- The Department of State discovered evidence that preferential employment practices were afforded adherents of non-Christian religions, while Christian employees were disfavored. It was particularly concerning that employees were less likely to be permitted leave for observation of certain Christian holidays as opposed to non-Christian ones.
- The DOS imposed radical LGBTQ gender ideology on foreign governments and State employees, including the forced usage of preferred pronouns and rainbow flags, violating the sincerely held religious beliefs of many Christians and other Americans of faith.

• The Equal Employment Opportunity Commission (EEOC) violated the religious liberty of many stakeholders by interpreting a pro-life law—the Pregnant Workers Fairness Act—to cover abortion and redefined harassing conduct in the workplace to include both denying biological men access to women's restrooms and other sex-segregated facilities and using "a name or pronoun inconsistent with" an individual's "gender identity."

#### Harassment

 The Department of State harassed families that chose to homeschool their children, often for religious reasons, in the form of targeted Inspector General investigations, IRS referrals, and threats of criminal charges and disciplinary action, with officials likening homeschooling to child abuse.

### Weaponized Prosecutions

The Department of Justice (DOJ) arrested and convicted approximately two dozen individuals
under the Freedom of Access to Clinic Entrances (FACE) Act for praying and demonstrating
outside abortion facilities. Yet, the same DOJ refused to apply the FACE Act to protect places
of worship and crisis pregnancy centers.

### Violations of Religious Liberty in Healthcare

• The Department of Defense (DOD), EEOC, and DOL all deprioritized, mishandled, or denied requests for religious exemptions to the Biden Administration's COVID-19 vaccine mandate.

### INITIAL TASK FORCE MEETING

The Task Force held its initial meeting on April 22, 2025, hosted by Attorney General Pam Bondi at the Robert F. Kennedy Main Justice Building. Fourteen of the eighteen members of the Task Force established by EO 14,202 were present.<sup>4</sup>

#### WITNESS TESTIMONY

Prior to this meeting, Task Force members conducted initial reviews of their respective agencies to identify any unlawful anti-Christian policies, practices, or agency conduct during the prior Administration.

At the meeting, Task Force members reported these initial findings from their agencies.

Members also heard from witnesses about their experiences with anti-Christian bias.

These first-hand accounts began with a video highlighting the story of Mr. Paul Vaughn, who was arrested at gunpoint at his family home and in front of his wife and children for praying and singing outside of an abortion facility. Mr. Vaughn was tried and convicted by the Biden-Garland DOJ under the Freedom of Access to Clinic Entrances Act, on an unprecedented and untested theory. President Trump later pardoned Mr. Vaughn along with nearly two dozen other victims of the Biden-Garland DOJ's weaponization of the FACE Act against peaceful, pro-life demonstrators.

Treasury Secretary Michael Faulkender; Deputy Attorney General Todd Blanche; Principal Associate Deputy Attorney General Emil Bove; Stanley Woodward, Nominee to be Associate Attorney General; Assistant Attorney General for Civil Rights Harmeet Dhillon; Andrew Hughes, Chief of Staff (Dep. Sec. Nom.) at the Department of Housing and Urban Development; Deputy Director of the Office of Management and Budget Dan Bishop; Pastor Paula White-

Cain, Senior Advisor, White House Faith Office; and Jennifer Korn, Faith Director, White House Faith Office.

<sup>&</sup>lt;sup>4</sup> In attendance were the following members: Secretary of State Marco Rubio, Secretary of Defense Pete Hegseth, Secretary of Labor Lori Chavez, Secretary of Health and Human Services Robert F. Kennedy, Jr., Secretary of Education Linda McMahon, Secretary of Veterans Affairs Doug Collins, Secretary of Homeland Security Kristi Noem, Administrator of the Small Business Administration Kelly Loeffler, FBI Director Kash Patel, Director of the Domestic Policy Council Vince Haley, Acting Director of the Federal Emergency Management Agency Cameron Hamilton, and Acting Chair of the Equal Employment Opportunity Commission Andrea Lucas. Also in attendance were Deputy

Following the story of Mr. Vaughn, the Task Force received testimony from Michael Farris, a First Amendment litigator and founding President of Patrick Henry College. Mr. Farris spoke on behalf of Senior Pastor Gary Hamrick to discuss how Cornerstone Chapel was investigated and charged by the Internal Revenue Service (IRS) for so-called Johnson Amendment violations. Mr. Farris, an elder at the church, previously led the conservative Christian legal advocacy group Alliance Defending Freedom and served as counsel on the Cornerstone Chapel case.

The Task Force also heard from Dr. Scott Hicks, Provost and Chief Academic Officer at Liberty University. Dr. Hicks described how Liberty University and Grand Canyon University were singled out by the Biden Administration for disproportionate fines under the Clery Act, likely due to the schools' Christian worldview.

Finally, the Task Force heard from witness Phil Mendes, a U.S. Navy Seal, who detailed how the DOD unreasonably denied his request for a religious exemption from the COVID-19 vaccine and ultimately released him from service for his religious beliefs on this issue.

#### CONCLUSION AND FOLLOW UP ACTIONS

Attorney General Bondi asked member agencies to follow up on the Task Force meeting by submitting reports which:

- 1. Describe any additional findings of Anti-Christian bias within the agency;
- 2. Identify any remedial actions already taken to combat such bias; and
- 3. Outline future areas of action.

The Task Force will use this information to make recommendations to address anti-Christian bias in furtherance of the Executive Order. The next meeting of the Anti-Christian Bias Task Force is expected to take place later this year.

# **DETAILED AGENCY REPORTS**

This initial report includes assessments from the agencies led by Task Force members. Future reports may also include assessments from additional departments and agencies, as described in Executive Order 14,202, Sec. 3(i). Department and agency reports are listed in alphabetical order, with related agencies listed under the applicable department.

#### **DEPARTMENT OF DEFENSE**

# Findings of Anti-Christian Bias

- Religious Liberty in Healthcare Religious Exemptions to the COVID-19 Vaccine. The Fifth Circuit prevented the Biden Administration from taking action against a group of Navy Seals, representing various Christian backgrounds, who were denied religious exemptions to the COVID-19 vaccine. These Seals had 350+ collective years of service, 100+ combat deployments, and received blanket denials for religious accommodation. Many of these Seals faced consequences, including ineligibility for advancement, reduced advancement opportunities, and loss of travel opportunities.
- Cancellation of Pastoral Care for Service Members and Veterans. During Holy Week in 2023, Walter Reed National Military Medical Center issued a "cease and desist" letter to a community of Franciscan Catholic priests that had been providing pastoral care to service members and veterans for nearly two decades. After canceling its contract with these priests, the Center awarded the contract to a secular for-profit entity, leaving inadequate pastoral care for Catholics during Holy Week.

#### Actions Taken

The DOD Office for Civil Rights and Equal Opportunity tasked all DOD Components with identifying complaints filed with Military Equal Opportunity (MEO) or civilian Equal Employment Opportunity (EEO) professionals on the basis of religion in 2023 and 2024. Of the approximately 4,000 formal MEO complaints and 7,500 formal EEO complaints received annually on the basis of any protected class DOD components flagged 112 potential complaints (some of which were informal) involving anti-Christian bias, almost half of which included denial of

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<sup>&</sup>lt;sup>5</sup> U.S. Navy SEALs 1-26 v. Biden, No. 22-10077 (5th Cir. 2022).

religious accommodations. Of those, a small fraction led to administrative actions, Final Agency Action or monetary settlement. Several are still pending. The nature of these complaints involved mandatory COVID-19 testing or vaccination; hostile work environment for Christian beliefs; hostile work environment for Christian beliefs; alleged negative personnel actions due to Christian affiliation; and retaliation for filing a complaint of religious discrimination.

#### **Future Actions**

DOD acknowledges that this information is incomplete, and the agency would need to do a prevalence survey in order to determine the full extent of anti-Christian bias under its jurisdiction. The DOD is committed to continuing efforts to eradicate anti-Christian bias and ensure equal treatment for all service members.

#### **DEPARTMENT OF EDUCATION**

# Findings of Anti-Christian Bias

- Weaponization of Policies Targeting Christian Higher Education. The Biden Administration weaponized the Department of Education (ED) and attempted to impose record-breaking fines on some of the nation's largest Christian universities, including Liberty University (\$14 million) and Grand Canyon University (\$37.7 million).
- Targeting of School Boards. The Biden Administration's "book ban coordinator" role within ED, investigated school boards for removing age-inappropriate materials from school libraries, typically in response to religious objections by parents.

#### **Future Actions**

- End the Weaponization of Policies Targeting Christian Higher Education. The Trump Administration's Office of Federal Student Aid carefully evaluated pending cases and rescinded excessive and unjustifiable fines targeting Christian institutions. ED will no longer disproportionately target Christian colleges and universities and will affirm the rights of Christian colleges and universities to act in accordance with their faith-based identity.
- Monitor Freedom of Religion Infringement in K-12 Public Schools. The rights of religious freedom extend to parents and educators in K-12 public schools, and these include religious objections to gender ideology on the basis of Christian faith. The cases of *Vitsaxaki v. Skaneateles Central School District* (NY) and *Damiano v. Grants Pass School District* 7 (OR) serve as prime examples of individual religious liberty violations by public school systems and administrators.
  - On January 24, 2025, ED's Office for Civil Rights disbanded the Biden Administration's "book ban coordinator" role within OCR, which had been

investigating school boards for removing age-inappropriate materials from school libraries. Furthermore, OCR dismissed complaints and rescinded guidance pertaining to so-called "book bans," affirming the conscience rights of parents to remove explicit and obscene materials from school districts.

- On January 31, 2025, ED announced it would enforce the Trump Administration's 2020 Title IX regulation, ending the use of the federal government to push radical transgender ideologies into American classrooms.<sup>6</sup>
- The Trump Administration's ED rescinded the Biden Administration's June 2021 guidance on supporting transgender students. This guidance advised affirming the identity of students by requiring students and staff to use preferred pronouns instead of language reflecting biological realities, a clear violation of free speech and free exercise of religion rights.
- Safeguard Rights of K-12 Christian Schools. In partnership with stakeholders in Christian school administration and considering the significant structural change and eventual closure of ED, ED is assessing how to ensure federal protections for Christian educators such as statutory language in block grants to the states and equitable services provisions.
- Protect the Right to Pray in Public Schools Reissuance of Prayer Guidance. The Center for Faith has been working alongside ED's Office of General Counsel to reissue ED's Prayer Guidance. Pending approval from DOJ, this guidance will be released imminently.

<sup>&</sup>lt;sup>6</sup> U.S. Department of Education to Enforce 2020 Title IX Rule Protecting Women, U.S. Dep't of Ed. (Jan. 31, 2025), https://www.ed.gov/about/news/press-release/us-department-of-education-enforce-2020-title-ix-rule-protecting-women.

• Identify and End Anti-Christian Bias in ED Grants and Programs. ED is developing artificial intelligence systems to review grants and programs that have historically focused on teaching students to identify "misinformation," as these may harbor anti-Christian bias.

# **EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

# Findings of Anti-Christian Bias

- Issuing Radical Regulations and Formal Policy Guidance. The Biden Administration issued radical regulations and formal policy guidance that trampled religious beliefs, such as the EEOC's expansive regulations interpreting the Pregnant Workers Fairness Act to cover abortion; and the EEOC's Enforcement Guidance on Harassment in the Workplace, which adopted radical gender ideology at the expense of women's rights and both religious employers' and employees' rights.
- Inaction toward Violations of Employees' Rights. Remaining silent in the face of overt violations of federal employees' Title VII religious accommodation rights during the federal government COVID-19 vaccine mandate.
- Mishandling of Requests for Religious Accommodations. Deprioritizing and otherwise
  mishandling thousands of religious accommodation charges against private employers arising
  from private sector COVID-19 vaccine mandates.

#### Future Actions

- **Pregnant Workers Fairness Act of 2022 (PWFA).** Once quorum is re-established at the EEOC, Acting Chair Andrea Lucas intends for the EEOC to reconsider revisions to portions of the Final Rule that are unsupported by law.
- Enforcement Guidance on Harassment in the Workplace. In its formal policy guidance on harassment, the EEOC took the position that for both private companies and federal employers harassing conduct under Title VII includes "denial of access to a bathroom or other sex-segregated facility consistent with [an] individual's gender identity." Relatedly, the EEOC declared that harassing conduct included "repeated and intentional use of a name or pronoun

inconsistent with [an] individual's known gender identity." The EEOC's guidance effectively eliminated single-sex workplace facilities and impinged on employees' and employers' rights to freedom of speech and religion. Acting Chair Lucas has announced her intent to take immediate steps to rescind or revise the conflicting portions of the harassment guidance as soon as the agency has a quorum.

**COVID-19 Vaccination Mandates:** Since January 2021, the EEOC estimates it has received over 15,500 charges of discrimination related to COVID-19 – either as an illness or resulting vaccine mandates. Of those 15,500 charges, an estimated 9,800 alleged only a Title VII violation, primarily for violations of religious accommodation rights to refuse the COVID-19 vaccine. However, out of the thousands of charges alleging a Title VII violation, the Biden EEOC only found cause for 397 charges since 2021. Of the 397 COVID-19 related Title VII violations, the EEOC sued private employers only four times for their failure to accommodate an employee's religious beliefs in their COVID-19 vaccine mandates—none of which were major, large-scale lawsuits involving dozens or hundreds of employees. Under Acting Chair Lucas' leadership, the remaining COVID-19 vaccine mandate charges alleging a failure to accommodate religious beliefs are no longer being treated as second-class, disfavored charges. She has directed the field to conduct a class search in accordance with standard investigatory procedures where charges implicate a potential systemic or class violation. While much of the Biden EEOC's damage is irremediable in this space, for any still-open EEOC charges arising out of COVID-19 vaccine mandates, the EEOC is now ensuring the charging parties receive a thorough investigation and, where appropriate, robust equitable and non-equitable relief.

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES

### Findings of Anti-Christian Bias

- Centers for Medicare & Medicaid Services (CMS) Persecuted Catholic Hospital. In early 2023, CMS notified St. Francis Health System in Oklahoma that the system was in violation of CMS's patient safety policy and threatened to terminate the health system's Medicare, Medicaid, and even their Children's Health Insurance Program funding, regarding a purported violation concerning a lit sanctuary candle in the chapel of its main facility. This had been the hospital's practice for decades with approval by local government and fire marshals, and St. Francis informed CMS of these facts in their initial appeal letter to the agency. Despite the valid religious reason for having a lit flame, CMS saw the completely enclosed candle, positioned 6-feet off the ground, as an inexcusable safety concern. CMS claimed an unsupervised, open flame within 15-feet of oxygen delivery equipment, and 1-foot for cannulas, was too dangerous, without exception. St. Francis stood firmly against this determination, objecting on First Amendment grounds. CMS ultimately assented, granting the exemption they had previously refused. St. Francis posted signage and erected a rope barrier to prevent any patient with oxygen equipment from getting close enough to the enclosed candle to create a danger.8
- Biden Administration Allowed Hospital to Violate Employee Conscience Rights. In 2019,
   under the first Trump Administration, the HHS Office for Civil Rights (OCR) found that
   University of Vermont Medical Center (UVMC) violated the "Church Amendments"—federal

<sup>&</sup>lt;sup>7</sup> CMS Response to St. Francis Health System, BECKET (Apr. 20, 2023), https://becketnewsite.s3.amazonaws.com/20230502211111/CMS-Response-St.-Francis-Health-System-4-20-23.pdf.

<sup>&</sup>lt;sup>8</sup> Letter to Scott Cooper, BECKET (May 5, 2023), https://becketnewsite.s3.amazonaws.com/20230505162554/Letter-to-Scott-Cooper-CMS.pdf.

conscience laws—by forcing staff to participate in abortions against their consciences. It later came to light that others at this hospital were also coerced to violate their consciences, and that management carried disdain for individuals expressing religious and even moral objections to abortion procedures. One of the first actions taken by the Biden Administration was to drop a DOJ lawsuit filed to hold UVMCC accountable for its unlawful religious liberty violations. Biden's HHS also overturned their 2019 notice of violation to UVMCC.

Opportunities. The Biden HHS release guidance titled, "HHS Notice and Guidance on Gender Affirming Care, Civil Rights, and Patient Privacy," a document equating the denial of mutilating surgeries to an unconstitutional violation of civil rights protections. This was an attack on the Christian belief and biological reality that biological sex is not interchangeable. In response to litigation against this guidance and child mutilation surgeries, former HHS Secretary Xavier Becerra made HHS's stance clear: support for mutilation surgeries would not stop. HHS even distributed an informational memo from the Administration for Children and Families (ACF) to state child welfare agencies, directing them to use their resources to "to advance safety and support for LGBTQI+ youth," including mutilating surgeries. Though directed at Texas by name, Becerra's threat to weaponize the federal apparatus was aimed directly at Christian beliefs. In 2024, HHS issued a rule titled, "Designated Placement Requirements Under Titles IV-E and IV-B for LGBTQI+ Children," which conditioned federal

<sup>&</sup>lt;sup>9</sup> HHS Notice and Guidance on Gender Affirming Care, Civil Rights, and Patient Privacy, U.S. DEP'T OF HEALTH AND HUMAN SERV. (Mar. 2, 2022), https://www.hhs.gov/sites/default/files/hhs-ocr-notice-and-guidance-gender-affirming-care.pdf, accessible through <u>Website Archive</u>.

<sup>&</sup>lt;sup>10</sup> Statement by HHS Secretary Xavier Becerra Reaffirming HHS Support and Protection for LGBTQI+ Children and Youth, U.S. DEP'T OF HEALTH AND HUMAN SERV. (Mar. 2, 2022), https://www.hhs.gov/about/news/2022/03/02/statement-hhs-secretary-xavier-becerra-reaffirming-hhs-support-and-protection-for-lgbtqi-children-and-youth.html, accessible through Website Archive.

funding for foster care programs on foster care providers affirming the child's self-professed LGBTQ identity. <sup>11</sup> This rule was an affront to all common-sense Americans, but most especially, it targeted faith-based foster parents and organizations who believe in biological truth and seek to provide a loving home for foster youth.

California Permitted to Violate Federal Law and Conscience Rights. The Obama Administration permitted California to force churches to fund abortion in their health plans, closing complaints submitted to OCR in 2014 relating to unlawful discrimination by the state, and issuing a closure letter in 2016. The California Department of Managed Health Care (DMHC) had informed seven insurers that their exclusion or limitation of abortion coverage violated state law, and they would need to alter their plans and provide documentation to the state of such change. These providers serviced several religious groups and businesses. The first Trump Administration reopened the investigation, finding California had violated the Weldon Amendment, a provision prohibiting the allocation of federal funds to Federal or State agencies or programs who discriminate against a healthcare entity on the basis they do not provide, cover, pay for, or refer for abortions. 12 OCR issued a notice of violation to California in January 2020, which was then withdrawn by the Biden Administration. 13 The Biden Administration reasoned that employers and plan sponsors were not covered by Weldon's definition of a healthcare entity, and thus these churches, religious orders, and companies could not object under Weldon. Further justification, as cited in the initial 2016 Closure Letter, was

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<sup>&</sup>lt;sup>11</sup> 45 C.F.R. § 1355 (2024).

<sup>&</sup>lt;sup>12</sup> HHS Issues notice of Violation to California for its Abortion Coverage Mandate, U.S. DEP'T OF HEALTH AND HUMAN SERV. (Jan. 24, 2020), https://www.hhs.gov/about/news/2020/01/24/hhs-issues-notice-of-violation-to-california-for-its-abortion-coverage-mandate.html, accessible through Website Archive.

<sup>&</sup>lt;sup>13</sup> State of California Letter, U.S. DEP'T OF HEALTH AND HUMAN SERV. (Aug. 13, 2021), https://www.hhs.gov/conscience/conscience-protections/ca-letter/index.html.

that one provider had applied for and received some level of exemption for some of the plans they provided.

#### DEPARTMENT OF HOMELAND SECURITY

# Findings of Anti-Christian Bias

- Christian Perspectives Omitted from CBP Directive. CBP provided Directive No. 3320-001 regarding Religious Accommodations for Members of the Public and/or Detainees During CBP-Conducted Services, Programs, and Activities." This directive outlines examples of accommodations that are made for religious purposes but does not deliberately call out accommodations for members of the Christian faith; however, it does so for Sikhism, Islam, Rastafari, and sects of Judaism, as well as Native American communities.
- specific anti-Christian Free Exercise. U.S. Citizenship and Immigration Services reported no specific anti-Christian bias in their policies or regulations but noted the impact of the Biden Administration and Department-directed COVID-19 vaccination policies were generally hostile in nature to religious liberty. These policies were in effect from September 9, 2021, until January 21, 2022, when Executive Order 14043, *Requiring Coronavirus Disease 2019 Vaccination for Federal Employees*, was enjoined by the courts. While these vaccination policies were in effect, U.S. Citizenship and Immigration Services issued 37 letters of reprimand around December 17, 2021, due to employees' non-compliance with the Executive Order. Following the imposition of the nationwide injunction, on January 24, 2022, guidance was issued that the federal government would take no action to implement and enforce COVID-19 vaccination requirements. Ultimately, the letters of reprimand were removed from personnel files, and no final disciplinary actions were executed.
- Ongoing Evaluations for Anti-Christian Bias. Additionally, U.S. Citizenship and Immigration Services continues to evaluate the Refugee Admissions Program to ensure that the United Nations High Commissioner for Refugees, or any other government entity that is

referring cases to U.S. Citizenship and Immigration Services for consideration of refugee status, is not purposefully and willfully engaging in categorical anti-Christian practices. U.S. Citizenship and Immigration Services continues to assess religious-based referrals through the U.S. Refugee Admissions Program to U.S. Citizenship and Immigration Services during the Biden Administration, and if any evidence of bias is substantiated it will be reported to the Task Force after consultation with the Department of State.

FEMA Skips Over Trump Voters' Homes. Finally, the Federal Emergency Management Agency provided the following example of anti-Christian bias: shortly before the 2024 election, Hurricanes Helene and Milton ravaged the Southeastern United States resulting in approximately 250 deaths. Between 70% to 81% of the people from the impacted States of Florida, North Carolina, South Carolina, Georgia, Tennessee, and Virginia are Christian. The religiously affiliated from these States are a strong voting bloc for President Donald J. Trump. Against this backdrop, a FEMA supervisor was fired for instructing staff helping survivors to skip over homes with signs supporting President Trump's campaign. It was also reported around this time that a government system read: "Trump sign no entry per leadership." These accounts did not go unnoticed. Section 1 of Executive Order 14180, Council to Assess the Federal Emergency Management Agency, echoes the reported concerns that a FEMA official directed staff to avoid homes of hurricane victims supporting President Trump's campaign last fall. The episode above was not a one-off. In fact, it was publicly espoused doctrine at FEMA during the time of the hurricanes. The 2020 – 2026 FEMA Strategic Plan's first goal was to instill "equity" in response. Put another way, the goal was to discriminate or select who is assisted during relief efforts. To promote this goal, the Strategic Plan included performance measures on "[p]ercent of staff who see DEI valued in their work and the decision-making

processes" and "[p]ercent of FEMA's programs that require implementing partners to advance equity in their programs."

#### Future Actions

Acknowledging that the thorough review of policies and programs conducted by DHS Components and offices demonstrated a commitment to sharing DHS programs and operations with all faith groups, DHS can and should continue to share DHS resources with and conduct intentional outreach to the Christian community.

- DHS should issue new guidance to all Components, reminding them that they are statutorily, and by executive order, prohibited from exhibiting biases against Christians in all policies and programs.
- Additionally, within the next 120 days, DHS should devote additional resources and actions to examining the issue of anti-Christian bias. This can include, once the DHS Secretary's Faith-Based Security Advisory Council is reconstituted, inviting the Council to provide advice on enhancing coordination with the faith-based community and findings and recommendations from an outside perspective on how DHS can address anti-Christian bias. This can also include strengthening, enhancing, and ensuring the DHS Center for Faith, engaging in direct consultation with the Office of the Secretary, works in close coordination with the White House Faith Office to foster partnerships to enhance engagement with Christian communities. Finally, DHS can assess potential impacts of DHS policies and operations to Christian faith-based organizations. The Office of Partnership and Engagement should continue to lead engagement with Christian pastors and community leaders to establish, sustain, and enhance consistent information-sharing capabilities with the Christian community.

These actions and reports will allow DHS to inform policies and procedures to ensure no instances of anti-Christian bias exist in its policies, operations, and external engagements.

#### DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

# Findings of Anti-Christian Bias

- Adverse Employment Action Due to Religious Beliefs. A HUD employee was allegedly denied a promotion multiple times and was discriminated against because of the employee's Christian faith, including complaints about a Bible and cross in the employee's cubicle. The employee's supervisor advised others to "beware of [name]," referencing the employee because of the employee's religious beliefs. The matter was ultimately settled after "a challenging 17-month fight" through the EEOC process.
- Targeted Removal of Holiday Posts. During the 2023 Easter season, a Public Affairs Officer was instructed to take down posts on an official HUD office X account relating to Palm Sunday, Good Friday, and Easter because they potentially violated the Establishment Clause and other federal regulations. However, similar posts in celebration of Pride Month, Ramadan, and Diwali, among others, received no scrutiny.

#### Actions Taken

- Protections for Faith-Based Shelters. In response to issues raised by faith-based providers regarding biological men attempting to enter shelters intended only for women, Secretary Scott Turner issued an order directing HUD to halt any pending or future enforcement actions related to HUD's 2016 rule entitled, "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs." Secretary Turner's action will ensure housing programs, shelters and other HUD-funded providers offer services to Americans based on their sex at birth: male or female.
- Workplace Questionnaire. HUD released a workforce questionnaire on May 5, 2025, exploring anti-Christian bias or other religious bias experienced by employees and contractors.

After completion of the survey, HUD will share the results with the Task Force. HUD is also planning a survey of grantees relating to anti-Christian or other anti-religious bias

#### Future Actions

HUD's main recommendations for the future focus on the Nine Agency Rule (Faith-Based Rule). The Faith-Based Rule was a joint effort by nine federal agencies, ensuring equal access and treatment for faith-based organizations in federally funded programs. <sup>14</sup> Each agency distributed or amended the Faith-Based Rule consistent with the other relevant agencies, and the rules were promulgated together in one Federal Register publication. This rule was problematic because it: (1) added unnecessary notice and referral requirements biased against faith-based organizations and alternative provider language; (2) removed Trump Faith-Based Rule language clarifying that faith-based organizations retain their autonomy and religious character and other clarifying language beneficial to faith-based organizations; and (3) changed the definition of "indirect Federal financial assistance" in the Trump Faith-Based Rule to the detriment of faith-based organizations.

- HUD recommends that the Anti-Christian Bias Task Force work with the nine agencies to amend the Biden rule. The Faith-Based Rule prohibits organizations that receive direct federal financial assistance from engaging in explicitly religious activities as part of the social services funded with that financial assistance and requires that religious activities be separated in time or location from the federally funded services (Religious Restriction).
- HUD suggests that the Task Force explore whether the Religious Restriction should be repealed.

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<sup>&</sup>lt;sup>14</sup> 89 Fed. Reg. 15671 (Mar. 4, 2024).

#### DEPARTMENT OF JUSTICE

# Findings of Anti-Christian Bias

A review of the Biden-Garland DOJ actions demonstrates a lack of concerted effort to address and prosecute violations of the law where anti-Christian bias was demonstrated by the perpetrators. Instead, during that time, the DOJ pursued novel theories of prosecution against those speaking or demonstrating based upon their Christian faith.

#### Actions Taken

Since January 20, 2025, the DOJ has begun addressing anti-Christian bias in two ways: (1) the DOJ has begun a process of evaluating and addressing examples of anti-Christian bias within the DOJ and its component agencies; (2) the DOJ has aggressively pursued examples of anti-Christian bias exhibited by state and local governments by using the DOJ's unique investigatory and litigation authority. The Trump Administration's DOJ is now using criminal and civil enforcement mechanisms to investigate and remedy anti-Christian bias and to protect the religious liberty of Christians across the nation. Below is a list of exemplars of the latter categories:

• Ending Weaponization of the FACE Act. In January 2025, contemporaneously with President Trump's pardons of many peaceful, pro-life protesters against whom the FACE Act had been weaponized by the prior administration, new DOJ leadership directed the Civil Rights Division to dismiss with prejudice multiple civil lawsuits against peaceful, pro-life protesters, including some of the same protesters whom the Civil Rights Division had been criminally prosecuting under the prior administration. DOJ leadership also implemented a new charging policy allowing future abortion-related FACE Act prosecutions and civil actions "only in extraordinary circumstances, or in cases presenting significant aggravating factors, such as death, serious bodily harm, or serious property damage" to ensure that peaceful, pro-life

protesters would not face years in prison for peacefully acting in accordance with their religious beliefs. As the Executive Order describes, on January 23, 2025, President Trump pardoned approximately two dozen individuals whom the Biden-Garland DOJ had convicted for praying and demonstrating outside abortion facilities.

- **Protecting Houses of Worship.** In February 2025, the Civil Rights Division filed a statement of interest supporting the plaintiff in *Pollack v. Codepink Women for Peace*. This case involved access to a synagogue, and it was the first time that DOJ applied the FACE Act to a place of worship despite frequently applying it to alleged obstructions of abortion clinics. Breaking from the prior administration's refusal to apply the FACE Act to protect places of worship, the current DOJ made clear that the plain language of the FACE Act prohibits the kind of physical obstructions of places of religious worship alleged in this case, where the physical obstructions are reasonably foreseeable, even if temporary or partial.
- Protecting Pregnancy Resource Centers. The Civil Rights Division has now tasked its Special Litigation Section to identify potential FACE Act violations related to obstruction of crisis pregnancy centers. Such centers are frequently supported by churches and Christian organizations as an alternative to abortion. The prior administration failed to enforce the FACE Act's civil protection of crisis pregnancy centers. The prior administration only applied FACE Act's civil remedies to promote access to abortion clinics.
- Combatting Religious Discrimination in Legislation. On May 5, 2025, the DOJ announced a civil rights investigation into a new Washington state law (Wa. Sen. Bill 5375) that would force Catholic priests to report information disclosed during the sacrament of confession. The law has been denounced by local Catholic leaders as an infringement on Catholic religious freedom. The law appears on its face to violate the First Amendment. Washington State's new

law adds "members of the clergy" to a list of other professionals who are required to report information received in a confessional setting relating to child abuse or neglect to law enforcement or other state authorities, with no exception for the absolute seal of confidentiality that applies to Catholic priests. The DOJ filed suit challenging this law on June 23, 2025.

- Enforcing the Religious Land Use and Institutionalized Persons Act to Protect Houses of Worship. On May 20, 2025, the DOJ filed a suit in Idaho, Case No. 3:25-cv-00262-REP alleging that the City of Troy, Idaho violated RLUIPA when it denied a conditional use permit (CUP) application sought by Christ Church, a small evangelical church, while granting similar use permits to nonreligious institutions. Other examples of DOJ enforcing RLUIPA are listed below.
  - o Hope Rising Community Church v. Borough of Clarion: On March 3, 2025, DOJ filed a statement of interest in a private lawsuit alleging that the Borough violated RLUIPA by enacting and enforcing zoning provisions that treat religious uses less favorably than similar secular assemblies. The statement of interest explains that the Church has properly alleged an equal terms claim under the Act and that the Church, which cannot develop its proposed religious facility, has suffered a concrete injury.
  - Anchor Stone Christian Church v. City of Santa Ana: On March 13, 2025, DOJ filed a statement of interest in a lawsuit alleging that the city violated RLUIPA by enacting and enforcing zoning provisions that treat religious uses less favorably than secular places of assembly. On April 17, 2025, the court issued an opinion ruling in favor of the plaintiff, granting a preliminary injunction on the church's RLUIPA substantial burden and equal terms claims, and adopting several of the arguments from the United States' statement of interest.

- O Summit Church-Homestead Heights Baptist Church, Inc. v. Chatham County, N.C. Board of Commissioners: On April 18, 2025, DOJ filed a statement of interest addressing the availability of injunctive relief in lawsuit alleging that the county violated RLUIPA when it denied an application to rezone parcels of land to build a church.
- o *Grace New England v. Town of Weare, NH*: On April 29, 2025, we filed a statement of interest addressing ripeness for federal court adjudication. In this lawsuit, the church alleges that the Town violated RLUIPA when it required a church to take procedural steps to use property for religious purposes that the town did not require for secular uses and which were prohibited by state law for religious land use.
- Addressing Anti-Christian Bias in Employment: On May 2, 2025, the DOJ announced that a federal judge approved a consent decree that settles its lawsuit against the Advanced Science and Technology Education Charter Schools (ASTEC) in Oklahoma City, Oklahoma. The lawsuit alleges ASTEC discriminated against Marcus Rethwill, a former teacher at the school, on the basis of religion, in violation of Title VII of the Civil Rights Act of 1964, when it terminated him after denying his request for a religious exemption from ASTEC's vaccine mandate for employees.
- Prosecution of Anti-Christian Hate Crimes. In March 2025, the DOJ charged a man in Mississippi with hate crimes for vandalizing and setting fire to a Christian church, and the Division secured a guilty verdict in a case of an attempted shooting at a church in Virginia.<sup>15</sup>

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<sup>&</sup>lt;sup>15</sup> Mississippi Man Indicted for Federal Civil Rights and Arson Charges for Setting Fire to Mormon Church, U.S. DEP'T OF JUSTICE (Mar. 19, 2025), https://www.justice.gov/opa/pr/mississippi-man-indicted-federal-civil-rights-and-arson-charges-setting-fire-mormon-church; *Virginia Man Convicted of Hate Crime for Attempted Church Shooting*, U.S. DEP'T OF JUSTICE (Mar. 6, 2025), https://www.justice.gov/opa/pr/virginia-man-convicted-hate-crime-attempted-church-shooting.

In April 2025, the DOJ secured the conviction of a person who was targeting Christian churches in three states, planting fake bombs in two churches.<sup>16</sup> The jury's verdict in that case included a special finding that the defendant targeted the church because of the religion of the people who worshipped there, making the offense a hate crime.

- ADA for Worship: On the civil side, the DOJ has begun to actively enforce the Americans
  with Disabilities Act (ADA) through its Disability Rights Section (DRS) to ensure that
  people with disabilities have access to Christian worship services and materials. DRS
  matters include:
  - o Five matters (three public, two confidential preliminary reviews) involving Christian services and reading materials in correctional settings. This includes church services as well as Bibles, Christian books, and other materials for inmates in correctional institutions to provide effective communication or physical access to individuals with disabilities.
  - Twelve matters involving ADA enforcement in which complainants with disabilities seek to leave institutions and return to their communities where they can attend church with their families and friends. DRS enforces the ADA's integration mandate as interpreted by the Supreme Court's ruling in *Olmstead v. L. C.*, 527 U.S. 581 (1999). Children and adults with disabilities who may otherwise have to live in an institution can instead live in their local communities.

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<sup>&</sup>lt;sup>16</sup> Arizona Man Convicted of Crimes Arising Out of Plot Targeting Christian Churches, U.S. DEP'T OF JUSTICE (Apr. 4, 2025), https://www.justice.gov/usao-edca/pr/arizona-man-convicted-crimes-arising-out-plot-targeting-christian-churches.

- Three ADA matters involving paratransit or public transportation barriers and two
  matters involving public sidewalk access. These matters help ensure individuals with
  disabilities can travel to church services and community groups.
- Protecting the Right to Worship: The DOJ has also filed and is litigating several lawsuits to
  vindicate the rights of Christian groups to engage in religious worship, in addition to the
  example mentioned above:
  - o *United States v. City of Brunswick, GA* (S.D. Ga.): The DOJ is currently litigating a case against the City of Brunswick, Georgia, which alleges that the city violated RLUIPA through its efforts to interfere with and permanently close The Well, a faith-based resource center affiliated with the United Methodist Church for those experiencing homelessness. DOJ filed a response to defendant's motion to dismiss on April 3, 2025, and will be attending a hearing on the motion on June 5, 2025.
  - States filed a complaint and consent order to resolve its RLUIPA claims against defendants. The complaint alleges that the township and the Sugar Grove Area Sewage Authority (SUGASA) violated RLUIPA by enacting and enforcing two ordinances against Old Order Amish residents: one mandating that certain households connect to the Township's and SUGASA's municipal sewage system, which requires the use of an electric grinder pump, and one banning privies on property intended for permanent residence.

#### **Future Actions**

In the coming months, the DOJ will implement E.O. 14,202 through the following actions:

- Enforcement and Engagement Proposals: The DOJ has the authority to review and litigate matters under a number of civil-rights and criminal statutes, and it will continue to use these statutes to pursue cases that address anti-Christian bias in order to protect Christians from unlawful bias. Alongside its enforcement responsibilities, the DOJ plans to work with Task Force members to solicit information and ideas from a broad range of interested individuals and groups. To ensure that the Task Force's work is informed by a broad spectrum of ideas and experiences, this effort will include Americans affected by anti-Christian conduct, faith-based organizations, and State, local, and Tribal governments.
- Policy and Legislative Proposals: The DOJ intends to develop recommendations on additional legislative and policy changes responsive to the Executive Order, after a process of identifying the deficiencies in existing laws and enforcement and regulatory practices that have contributed to anti-Christian discriminatory conduct by governments and private parties. The DOJ will work with the relevant agency heads to recommend appropriate actions that agencies may take to remedy failures to fully enforce the law against anti-Christian discriminatory conduct.
- Internal Action and Policy Reversals: The DOJ will continue to review internal policies that have allowed bias against Christians to affect the application of facially neutral policies. Examples of past bias will be corrected. Relatedly, internal communications and memoranda which have been biased against expression of Christian faith, holidays, greetings, or events will be corrected and reissued.
- Tracking Executive Order Implementation: The DOJ will continue to serve as the administrative entity that ensures that the various agencies that comprise the Task Force are

tracking and following through on the deliverable elements of the Executive Order to ensure that the goals of the Task Force are being met.

#### FEDERAL BUREAU OF INVESTIGATION

# Findings of Anti-Christian Bias

- The Executive Order notes that in January 2023, a Federal Bureau of Investigation (FBI) memorandum asserted that "radical-traditionalist" Catholics were domestic-terrorism threats and suggested infiltrating Catholic churches as "threat mitigation."
- Members of Congress expressed concerns that this memorandum, issued by FBI's Richmond Field Office, more broadly targeted Catholics who attend traditional Latin mass or hold prolife or other conservative views as potential domestic terrorists, including by placing undercover agents or confidential human sources (CHS) in churches or interviewing clergy and other church employees. The FBI retracted the memo in February 2023.

#### Actions Taken

In April 2023, the FBI's Inspection Division completed a review of the investigation and processes that led up to Domain Perspective and recommended several corrective actions. In addition, Congress directed the DOJ Inspector General to provide a report on the Domain Perspective, which the IG submitted in April 2024.

#### Future Actions

In addition to the corrective actions directed by the Inspection Division's Strategic Review, the FBI will continue to assess whether additional steps are necessary to address any violative policies, practices, or conduct identified pursuant to the Executive Order.

- The FBI has tasked the Office of Professional Responsibility to investigate and identify whether employees engaged in conduct reflecting anti-Christian bias.
- The FBI will also engage with the Training Division to identify whether any additional educational resources are needed to address anti-Christian bias. The FBI's Directorate of

Intelligence is conducting a review of whether the FBI has deployed confidential human sources in circumstances that would violate the Executive Order. The FBI's Internal Policy Office has not yet identified any existing or current policies responsive to E.O. 14,202.

• As part of Director Patel's commitment to transparency and accountability, the FBI is engaged in rolling document productions to Congress to address their various investigations of the drafting, review, and approval of the Domain Perspective and allegations of anti-Christian bias.

### DEPARTMENT OF LABOR

## Findings of Anti-Christian Bias

• Replaced Faith-Based Office with DEI Office: The Biden Administration replaced the Office of Faith Based Initiatives with a Diversity, Equity and Inclusion (DEI) Office at the Labor Department. This decision ended one of the few ways for small to mid-sized religious groups to receive micro-grants for low-cost, high-impact job training, prisoner re-entry, and disability focused job programs. Under the Trump Administration, DOL continues to review employee e-mail traffic related to possible instances of anti-Christian bias, including those related to DEI initiatives.

Below, DOL has provided a few examples of claims of anti-Christian bias in the private sector regulated by DOL. These cases are currently being litigated in the federal courts:

- Flight Attendants Fired for Christian Beliefs: In 2021, Alaska Airlines fired two flight attendants after they questioned the wisdom of the company's choice to support the Equality Act. Responding to a company Intranet post celebrating their corporate decision to support the Equality Act and asking for comments, the flight attendants independently questioned the wisdom of the decision based upon their Christian religious convictions. That action alone caused the employees to be fired, resulting in the *Brown et al v. Alaska Airlines Inc et al.* lawsuit. The plaintiffs are currently appealing their case to the 9th Circuit Court of Appeals.
- Christian Company Sued for Christian Beliefs: Turbocam is a private New Hampshire company founded and owned by a Christian family that chose to exclude coverage for gender dysphoria in its company health insurance policy due to the owners' religious convictions. The company's website declares the family's faith in its mission statement which includes, "to honor God, create wealth for its employees and support Christian service to God and to

people." Despite offering a bonus to those who choose to opt out of the health plan, the company was sued by an employee, Lillian Bernier (*see Bernier v. Turbocam*) for "denial of insurance coverage" over the gender dysphoria exclusion. It is pending in the United States District Court for the District of New Hampshire before Chief Judge Landy B. McCafferty and U.S. Magistrate Judge Andrea K Johnstone. The case designation is: 1:23-cv-523-LM-AJ.

- Iowan Fired for Wearing Religious T-shirts: In June 2023, Eaton Corporation's Davenport, Iowa office fired Cosby "Corey" Cunningham for wearing Christian gear in response to the company raising a pride flag in front of its main building and encouraging employees to wear clothing celebrating "Pride Month." After Cunningham started wearing Christian t-shirts with direct quotations from the Bible, such as "God opposes the proud, but gives grace to the humble. James 4:6," management pressured Cunningham to discontinue wearing the Bible-themed shirts, and he was fired on August 23, 2023. Subsequently, the company reached a settlement with Cunningham.
- Realtor Targeted for Christian Beliefs. Wilson Fauber is a Virginia real estate agent and an ordained minister. In 2023, when he ran for the city council in Staunton, Virginia, his political opponents found that he had posted his support for a Biblical stance on marriage (i.e., that it was between one man and one woman). A complaint was then filed with the National Association of Realtors' (NAR) Board of Ethics based on the NAR's rule disallowing "hate speech against the LGBTQ community," which includes against "sexual orientation" and "gender identity." The charge was upheld by the Realtor Appeals Panel, forcing Mr. Fauber to begin a lawsuit against REALTOR to prevent the loss of his REALTOR membership and access to its Multiple Listing Service (MLS), the loss of which would make it very difficult to maintain his real estate business.

- Adverse Employment Action Due to Christian Beliefs: After teaching at Arlington Public Schools (APS) for 14 years, TeRay Bingham was abruptly placed on administrative leave with a recommendation that he be terminated likely because his Christian faith conflicted with the APS's radical LGBTQ+ agenda. APS is one of five public schools under formal investigation by ED due to its "transgender" policies. In the previous year, when teachers wore rainbow LGBTQ+ pride-themed t-shirts, Bingham was sent home for wearing a rainbow that had a Biblical theme. When he was asked to treat a biological female student as a biological man and call her by a male name without the knowledge of her parents, he refused and filed a complaint against APS for religious discrimination. As his attorney explained, "[a]t the beginning of the current 2024-25 school year, without any warning or explanation, Mr. Bingham's administration moved him into an entirely different department, which was commonly called the 'lesbian department,' presumably knowing it would lead to more direct conflict for him. [...] Just weeks later, after sending a survey to his colleagues about whether they were being similarly treated, he was placed on administrative leave with a recommendation that he be fired."17
- **Denial of COVID-19 Religious Accommodations:** During the 2021 COVID-19 pandemic, the University of Virginia (UVA) implemented a policy requiring all its employees to receive a vaccine for COVID-19. In determining whether to grant religious accommodation requests to the vaccine mandate, UVA established a list of religious faiths it believed were opposed to vaccination before COVID-19 and then automatically exempted members of those religions. All employees who did not profess membership in a favored faith were automatically denied

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<sup>&</sup>lt;sup>17</sup> Victory: Teacher's Job Saved After Facing Religious Persecution, FOUNDING FREEDOMS LAW CENTER (Mar. 13, 2025), https://www.foundingfreedomslaw.org/news/arlington-teacher-job-saved#:~:text=When%20veteran%20Arlington%20County%20teacher,he%20is%20keeping%20his%20job.

exemptions by UVA Health and summarily fired. A Complaint was filed by six former employees on behalf of several hundred former employees who were systematically refused accommodations. It is in the Western District of Virginia's PACER e-filing system, under case file no. 3:22cv75.

# Actions Taken and Future Actions

The DOL is currently reviewing policies and investigating other incidents and will report its findings and progress in the Task Force's next report.

### SMALL BUSINESS ADMINISTRATION

## Findings of Anti-Christian Bias

**Denial of Generally Available Benefits:** Under the Biden administration, the Small Business Administration (SBA) banned religious organizations from receiving Economic Injury Disaster Loans, which are designed to provide working capital to entities suffering substantial harm from a declared disaster. To date, nearly 170 religious organizations—including Christian churches—have been denied loans by the SBA on the grounds of their religious affiliation.

### Actions Taken

The SBA is taking immediate action to eliminate this regulation which enabled this discrimination and ensure every eligible religious organization has access to our disaster loan programs. The Agency is ending the era of anti-Christian discrimination that excluded and punished religious Americans in their time of greatest need.

#### Future Actions

Removal of 13 CFR § 123.301 is part of the Agency's deregulation agenda, and initial steps are underway. 13 CFR § 123.301(g) makes businesses "principally engaged in teaching, instructing, counseling, or indoctrinating religion or religious beliefs, whether in a religious or secular setting" ineligible for the SBA's Economic Injury Disaster Loan program. In both *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 582 U.S. 449, 137 S. Ct. 2012, 198 L. Ed. 2d 551 (2017), and *Espinoza v. Montana Department of Revenue*, 591 U.S. 464, 140 S. Ct. 2246, 207 L. Ed. 2d 679 (2020), the Court held that the government may not deny a public benefit to an entity solely because of its religious status, character, or identity. Despite these rulings, the Biden Administration failed to rescind 13 CFR § 123.301(g).

### **DEPARTMENT OF STATE**

## Findings of Anti-Christian Bias

- Challenges to Religious Liberty in Healthcare: Religious Exemptions to COVID-19 Vaccinations: During the last Administration, the Department of State stigmatized employees for religious objections to the COVID-19 vaccine mandate, casting blame for disease on the unvaccinated. The Department of State empowered employees to publicly shame and demean their colleagues with religious objections, even calling them "plague rats" and "murderers." In one instance, an ambassador directly accused an unvaccinated subordinate of "wanting to kill" the ambassador's mother. The process used for determining religious exemptions involved an invasive questionnaire demanding highly personal information, reportedly far exceeding the legal requirements. Those who received religious accommodations were further shamed and humiliated as they were required to test for COVID weekly in view of others; disclose their accommodations to colleagues; and wear masks essentially marking them with a scarlet letter. Under the Trump Administration, employees are not only free to reject COVID vaccinations but are also free to exercise their right not to violate their religious conscience and seek religious accommodations through a process that anticipates approval as is consistent with the law without fear of retaliation.
- Harassment Because of Religious Beliefs: The Department of State vilified Christian homeschool-parents who were federal employees with targeted investigations and degrading repercussions—likening their commonsense parental choice to child abuse. The Department of State targeted Christian homeschool-parents who were federal employees with Inspector General investigations, IRS referrals, and threats of criminal charges and disciplinary action. Secretary Rubio's team is reviewing homeschool policies for overseas families and eliminating

any discriminatory practices. President Trump is restoring parental rights, including the right to homeschool without undue scrutiny.

- **Viewpoint Discrimination:** The Department of State's foreign policy disfavored Christians, imposing ideologically driven LGBT policies and programming on foreign governments.
- **Disfavored Treatment:** The Department of State also offered only muted responses to brutal attacks on, and the repression of, Christians overseas. The Department of State also limited limiting humanitarian relief to Christians. President Trump's foreign policy disallows any such discriminatory animus for Christians. Under President Trump, Secretary Rubio will work to ensure that anti-Christian violence, and the repression of Christians overseas, is addressed appropriately via foreign policy and swift diplomacy.
- Notile Work Environment and Adverse Employment Actions: The Department of State's overseas leave policies discriminatorily disfavored Christian State Department employees, instilling a culture of bias in which Catholics and other Christians reported being mocked for their religious beliefs by their colleagues. In some cases, State Department employees were given leave for Muslim holidays, even as operations continued on Passover, Good Friday, and Easter Sunday and Monday. Within this culture of bias, Department employees reported being mocked for their Catholic and other Christian beliefs, including about attending Christmas Eve midnight mass. Under Secretary Rubio, the Department has revised its religious holiday and leave policies and will update the workforce imminently to ensure all employees are treated equally.

## Actions Taken

The Department of State submitted an analysis of 133 responses to a voluntary survey of its employees and contractors between April 11 and April 25, 2025. The survey asked for examples

of anti-Christian and anti-religion bias and/or recommendations to combat any such bias that occurred during the Biden Administration, from 2021-2024.

The Department of State received 133 reports, totaling approximately 150 unique allegations. Controlling for responsiveness, specificity, and relevance, 94 reports involved allegations of religious bias (83 of which were specific to Christianity) and provided supporting evidence/details. Those 94 submissions fell into the following categories:

- Religious expression, speech, and participation in groups;
- Vaccine mandates and related policy and process;
- Religious holidays and related policy;
- LGBT/DEI policies that violated religious conscience;
- Religious accommodations including prayer rooms;
- Anti-religious hostile work environment;
- School options for diplomats' children, including homeschooling; and
- Bias affecting foreign policy.

The survey portal remains open, and additional reports will be analyzed for future submissions to the Task Force.

While the allegations require further vetting and investigation, the Department of State has made some findings based on its initial review. The responses showed clear evidence of both generalized and individual anti-Christian bias at the State Department under the Biden Administration. Additionally, the results demonstrate that, on a broad level, there is indicia of a culture unfriendly to religion generally and to Christianity in particular. One notable and quantifiable datapoint was a 59% increase in formal discrimination (EEO) complaints filed on the basis of religion during the Biden Administration as compared to the first Trump Administration.

#### Future Actions

In light of these findings, the Department of State commits to doing the following:

- Civil Rights Trainings: Train supervisors on their duties to facilitate religious exemptions under federal civil rights laws.
- Religious Accommodations Where Practicable:
  - O Consider allowing use of administrative leave at posts where Sunday is a normal workday (S/OCR identified 15 such posts across 3 regional bureaus) and where Easter is not a local holiday, but Muslim holidays are (S/OCR identified 13 such posts).
  - Identify an office to oversee the reasonable accommodation policy that can hear appeals of improper denials.
- Equitable Leave Policies: Review and, as appropriate, update Department-wide policies for religious holiday leave.
- Review of Policies for Bias: Solicit input from all policy offices where religious bias may have affected policies or recommendations (e.g., the Office of International Religious Freedom) and develop remedial policy measures.
- Preserve Religious Liberty in Education: Assess the Office of Overseas Schools for policies
  and programs that may disparately impact families who choose a religious school or
  homeschooling.

The Department of State also recommends interagency cooperation on these issues, including the following actions:

• Equitable Leave Policies: Implement government-wide policies pertaining to religious leave (e.g., grant two "floating holidays" for religious observance).

- Civil Rights Trainings and Guidance: Update guidance on religious exercise, including expression, and accommodation in the federal workplace.
- Religious Liberty in Education: Ask the DOJ to clarify and distribute a legal opinion on the legality of selecting religious schools when federal agencies decide to provide benefits to government employees abroad to choose overseas schools.

### **DEPARTMENT OF THE TREASURY**

## Findings of Anti-Christian Bias

- Debanking of Christian Groups. Many pro-Christian groups have been debanked by financial institutions in recent years under the previous Administration.
- Investigatory Targeting of Christian Groups. The IRS under the Biden Administration scrutinized several Christian-based organizations and their applications for nonprofit, taxexempt status.

### Actions Taken

To remedy these incidents of bias, within the first 100-days of the Trump Vance administration, Treasury's OCC instructed examiners to discontinue the use of "reputational risk" to evaluate the financial institutions it oversees. This "reputational risk" was often misused to guise anti-Christian bias. Discontinuing this practice is a significant step to reducing discretion of regulators that could result in discrimination against faith-based groups. Secretary Bessent is also leading an effort to end the weaponization of the IRS, modernize its infrastructure, and ensure customer service is brought back to all Americans.

#### Future Actions

Treasury is committed to locating and expelling policies and action which discriminate against Christians, and indeed, all people of faith.

### DEPARTMENT OF VETERANS AFFAIRS

## Findings of Anti-Christian Bias

Secretary Doug Collins established the Veterans Affairs (VA) Anti-Christian Bias Task Force, and VA employees were notified and instructed on how to report any observed anti-Christian bias. To date, the VA has received approximately 1,500 responses and has reviewed about 500 responses alleging anti-Christian bias. Commonly reported themes include denying religious accommodations for vaccines and provision of abortion services; mandating trainings inconsistent with Christian views; concealing Christian imagery; and Chaplain program and protections for Chaplains.

### Actions Taken

Weeks after being sworn in, Secretary Collins responded to reports of a chaplain in Coatesville, PA, who was reprimanded after preaching a sermon. Additionally, the chaplain's supervisor proposed policy changes requiring chaplains to submit sermons for pre-approval to ensure the content was not "divisive." Secretary Collins has taken swift action to ensure that no such policies will be considered and is working diligently to identify and root out anti-Christian bias throughout the VA.

## **CONCLUSION**

In the 120 days since the issuance of Executive Order 14,202, the Task Force has been stood up and launched, the majority of member agencies have initiated a thorough review of anti-Christian policies, practices, and conduct, and agencies have already begun to take action to remedy past wrongs. Though these investigations remain in their early stages, the evidence uncovered is unmistakable: during the Biden Administration, people of faith, particularly Christians, were repeatedly subjected to anti-religious bias at the hands of their own government.

Attorney General Bondi and the Task Force are resolved to end that pattern once and for all. Over the next twenty months, the Task Force will pursue its mandate with vigor, conducting robust investigations, enforcing the rule of law, and ensuring that the Trump Administration's commitment to equal treatment of all faiths is fully realized.

This work is not merely corrective. It is foundational. By eradicating anti-Christian bias in the federal government, the Task Force is reaffirming a principle older than the Republic itself, that freedom of religion is not granted by government but guaranteed against it. America must remain *One Nation Under God* if she is to remain *Indivisible, With Liberty and Justice for All*. The Task Force will never permit the federal government to be used as a weapon against faith.