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The Influence of Christian Nationalism on U.S. Public Educators' Speech: Implications from *Meriwether vs. Hartop*

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Abstract: Public school educators must navigate very complex intersections of the First Amendment's Establishment, Free Exercise, and Free Speech clauses. The 6th Circuit's ruling in *Meriwether vs. Hartop* created a slippery slope that could create a hostile learning environment and be discriminatory speech while trying to balance public-school educators' sincerely held religious beliefs. This article examines the *Meriwether* case and court ruling while providing a background of U.S. Christian nationalism and its implications in American public education.

Keywords: speech; religion; preferred pronouns

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1. Introduction

Public school leaders and educators often must navigate the complex intersections of the First Amendment's Establishment, Free Exercise, and Free Speech clauses of the U.S. Constitution. How do educators and leaders balance their personal religious viewpoints and practices with their free speech rights and prohibited religious government conduct, especially in the classroom when it relates to their scholarship and teaching? This question has been looming for decades, waiting for clarity from the U.S. Supreme Court. For example, can a teacher have his Bible present in the classroom and read it during silent reading time (*Roberts vs. Madigan* 1990)? The use of the Free Speech Clause to protect religious speech has been proven effective when public officials have relied upon the Establishment Clause to protect the "separation between church and state" (Berg 1995). These strategic efforts by certain special interest groups have been part of an effort to reintroduce prayer in public schools along with further promotion of a Christian norm (Gey 2000). These efforts are further supported by the recent ruling in *Meriwether vs. Hartop* (2021) where the 6th Circuit Court of Appeals found that the university violated the professor's free speech rights when they disciplined him for not complying with the university's policy of addressing students using their preferred pronouns, which was at odds with his sincerely held religious belief that God made humans as men and women. The 6th Circuit's ruling created a slippery slope and added to a handful of circuit court cases that have interpreted free speech protections as it relates to scholarship and teaching. Since the Court decided not to take a firm stand against speech that could create hostile learning environments and be discriminatory, and since the Court failed to uphold the university's anti-discrimination policies, the ruling further supported dangerous beliefs related to Christian nationalism.

This article seeks to challenge current U.S. constitutional and case law that creates this collision between the Establishment, Free Exercise, and Free Speech clauses in public education. The first section provides a foundation of U.S. constitutional and case law on free speech and religion in American public education, with specific focus on the job duties

of faculty and teachers in scholarship and teaching. As part of this section, we review and discuss the latest 6th Circuit Court of Appeals ruling and its implications for U.S. education and society. Since this ruling creates a nuanced understanding of academic freedom as it collides with religious free exercise, we provide a socio-political background of Christian nationalism in the United States with implications for greater society and education systems to serve as a backdrop to this slippery slope. We conclude with some implications and recommendations for U.S. educators.

2. U.S. Legal Context

2.1. Constitutional Law

The U.S. Constitution's First Amendment provides three crucial clauses and principles to American democracy and society. The Establishment and Free Exercise clauses relate to one's practice of religion and the forbidden governmental entanglement with religion. The Free Speech clause, on the other hand, protects a person's speech rights against government intrusion and restriction. However, what happens when the speech itself is religious? Several U.S. federal Supreme and Appeals Court cases provide interpretation.

2.2. U.S. Federal Supreme and Appeals Court Cases

The collision of the Establishment, Free Exercise, and Free Speech clauses can be exhibited in the 1990 U.S. Supreme Court decision in *Westside Community Board of Education vs. Mergens*, when the Court stated, "There is a crucial difference between government speech endorsing religion, which the Establishment Clause forbids, and private speech endorsing religion, which the Free Speech and Free Exercise clauses protect." In this case, the Court ruled that the exclusion of religious oriented student-groups from a limited public forum violated the students' free speech rights. However, it was not until *Capitol Square Review and Advisory Board vs. Pinette* (1995) that the Supreme Court ruled how private religious speech is viewed. In its ruling, the Court stated that "private religious speech . . . is . . . fully protected under the Free Speech Clause as secular private expression . . . Accordingly, we have not excluded from free-speech protections religious proselytizing" (760). The Court has also found that in the public university context, religious speech in university facilities "does not confer . . . state approval on religious sects or practices" (*Widmar vs. Vincent* 1981, p. 274) because an observer would understand that the First Amendment mandates that administrators permit all non-disruptive speech. Similarly, in secondary schools the prohibition of discrimination based on religious speech, as well as political, philosophical, and otherwise, is sufficient for meeting the secular purpose under the Establishment Clause (*Mergens* 1990). These rulings demonstrate the complexity of religious speech and its interpretation by the courts.

As public employees, public school teachers and professors at public institutions must have a secular purpose for their religious speech since governmental action cannot endorse religion (*Lee vs. Weisman* 1992). As a result, religious speech by public employees is limited; however, government employees also have lives outside of their employment and their lives may be deeply religious. The lines drawn to distinguish private citizen speech from public employee speech can be blurred and difficult to discern and often depend on the job duties of the employee. The most recent ruling concerning religious speech by a public employee shows how complicated it is to discern this line and the implications of how deeply rooted religious beliefs may intersect with their employment as a public employee.

The question remains when the public employee is a teacher and engaged in scholarship and teaching. How does all this impact academic freedom? Since public employees do not have First Amendment free speech protections when speaking in their professional capacity and pursuant to their job duties (*Garcetti* 2006), speech by a public school teacher, either in a K-12 school or college, that occurs pursuant to their position is not viewed as private speech but speech as a result of their position. *Garcetti* (2006), however, created uncertainty about protections relating to academic freedom. The Court stated,

> "We need not, and for that reason do not, decide whether the analysis we conduct today would apply in the same manner to a case involving speech related to scholarship or teaching". (*Garcetti* 2006, 425)

Therefore, to determine First Amendment free speech rights, it is critical to identify the speaker—is it the public employee or the institution? If the institution is speaking, then the government speech doctrine applies (*Johnson vs. Poway* 2011; *Matal vs. Tam* 2017; *Rosenberger vs. Rector and Visitors of Univ. of Va.* 1995), which states that the government has its own rights as a speaker and is immune from free speech challenges. The government can assert its own ideas and messages without being subject to First Amendment claims of viewpoint discrimination (Norton 2009).

Several Circuit Courts of Appeals have shied away from applying *Garcetti* (2006) to public employee speech related to scholarship and teaching. In *Adams vs. Trustees of the Univ. of N.C.—Wilmington* (4th Cir. 2011) an associate professor of criminology sued the university for denying him a promotion to full professor, claiming discrimination against his religious and conservative views. After being promoted to associate professor, the faculty member became a Christian and vocal about his religious views, writing in opinion columns, appearing on radio and TV as a commentator, and publishing a book about his views as a conservative college professor. While he received good teaching evaluations, he was critiqued by some colleagues for his views and stances. While Adams claimed that the university did not promote him because of his vocal religious and conservative beliefs, the 4th Circuit rejected his argument of discrimination of religion and ruled that his speech did not fall under *Garcetti* (2006). However, the 4th Circuit applied the *Pickering* (1968) balancing test and found that Adam's speech was private speech as a matter of public concern.

In *Demers vs. Austin* (9th Cir. 2014), the 9th Circuit Court of Appeals firmly ruled that *Garcetti* (2006) analysis did not apply to "speech related to scholarship or teaching (406)". Professor Demers took issue with policies and practices in his school. As a result, he authored and published two publications (one article and one pamphlet) criticizing the school and administration; he sued the university, claiming that his annual performance evaluation ratings were lowered as retaliation, and he was subjected to an unwarranted internal audit. In its superseding opinion, the 9th Circuit held that *Garcetti* (2006) did not apply to "speech related to scholarship or teaching" and reaffirmed that "*Garcetti* does not—indeed, consistent with the First Amendment, cannot—apply to teaching and academic writing that are performed 'pursuant to the official duties' of a teacher and professor" (412). As a result, the Court found that the article fell under this *Garcetti* (2006) exception. As for the pamphlet, the Court applied the *Pickering* (1968) test and found that it addressed matters of "public concern" since it "contained serious suggestions about the future course of an important department of WSU" (417).

In *Buchanan vs. Alexander* (5th Cir. 2019), the 5th Circuit found that the termination of a professor for her use of profanity and discussion of sex in the classroom did not violate the First Amendment free speech rights. While classroom speech is protected by the First Amendment, the 5th Circuit noted that the professor's speech did not serve an academic purpose. Utilizing *Pickering* (1968), the 5th Circuit found that for classroom speech to have First Amendment protection, that speech must involve a matter of public concern, but "in the college classroom context, speech that does not serve an academic purpose is not of public concern" (853). The professor's speech that included the use of profanity, discussion of her sex life, and a discussion of her students' sex lives was not related to the subject matter or purpose of training pre-service teachers.

These three circuit court decisions show the different approaches to considering free speech to the activities of scholarship and teaching as a public employee. The most recent circuit court case that examined public employee speech as it relates to scholarship and teaching was *Meriwether vs. Hartop* (6th Cir. 2021); however, *Meriwether* also involved a public employee's free exercise rights that intertwined with his academic freedom. The following section describes this contemporary case in greater detail.

2.3. Meriwether vs. Hartop et al.

The latest case where the individual rights of free speech and free exercise collided with the Establishment Clause was in the 6th Circuit Court of Appeals ruling in *Meriwether vs. Hartop et al.* (2021) (hereinafter "*Meriwether*"). The court found that educators have First Amendment rights in their classroom because of U.S. Supreme Court precedence that employee speech is not protected while performing job-related duties unless they work in academic settings (Porter 2021). The college philosophy professor's expression of his views on gender identity in his syllabus because of his religion was protected by "academic freedom" (*Meriwether* 2021, p. 507). The college's prohibition of this addition in his syllabus was a violation of his Free Exercise rights. A review of the case follows.

2.3.1. Facts

Nicholas Meriwether was a tenured philosophy professor at a public Ohio university with more than twenty-five years of experience and was well-respected with a clean disciplinary record. He was a devout Christian with personal and professional convictions that aligned closely with his religious beliefs. Among those convictions was his belief that "sex is fixed in each person from the moment of conception, and that it cannot be changed, regardless of an individual's feelings or desires" because God created human beings as either male or female (*Meriwether* 2021, p. 498). At the beginning of the 2016 academic year, the university introduced a new policy that mandated that students be recognized according to their self-addressed gender identity "regardless of the professor's convictions or views" (*Meriwether* 2021, p. 498). Meriwether inquired about this pronoun policy, and he was told that professors would be disciplined if they refused to comply. He had subsequent follow-up discussions with his department chair and university officials about the newly announced rules, and it was made clear that the policy would be applied to all university employees at academic events, non-academic events, and some off-campus events. For the next year and a half, Professor Meriwether continued to teach without incident.

The first day of the 2018 spring semester, Meriwether began his course, Political Philosophy, with his use of the Socratic method, where Meriwether addressed his students as either "Mr"or "Ms". This was an issue when he addressed a particular student named Doe as "Sir.". As she explained to him privately after class, Doe identified as a woman and insisted that Meriwether use feminine titles and pronouns when addressing her. Meriwether responded that his religious beliefs might prevent him from complying with her demands. Doe threatened to lodge a complaint against him if he did not consent. After the student reported the exchange to Meriwether's department chair, the Dean of Students, and other university officials, relayed information about the incident to the Title IX office. After meeting with Doe, officials from the Title IX office escalated the complaint to Meriwether's acting dean. The acting dean met with Meriwether to suggest that he eliminate "all sex-based references from his expression", to which Meriwether could not agree (*Meriwether* 2021, p. 499). Instead, Meriwether suggested that Doe be referred to by her last name, which the acting dean mistakenly agreed to, believing it was consistent with the university's new policy. Two weeks later, Doe, still unsatisfied with the results, raised the issue again, which prompted the acting dean to verbally warn Meriwether of the consequences for non-compliance with the pronoun policy. Two weeks later, under threat of legal action from the Title IX coordinator, the acting dean revisited Meriwether's office and threatened disciplinary actions after Meriwether mistakenly referred to Doe as "Mr " in class. Meriwether offered to comply with the pronoun policy if he was allowed to include a disclaimer in his syllabus that stated his moral objections to the policy. This idea was rejected by the acting dean, citing that the disclaimer would violate the university's gender-identity policy. Despite the warnings, Meriwether continued to call on Doe using only her last name.

Partway through the semester, the acting dean issued Meriwether a written warning that threatened him with an investigation and possible disciplinary actions if he did not refer to Doe in the same manner as other students who identify as female. Shortly after this,

in response to another complaint from Doe, the acting dean announced she was initiating a formal investigation. Meriwether's request for a special accommodation was rejected. He was given the option of either removing all sex-based pronouns from his class or referring to Doe as a female.

Per the acting dean's recommendation, the university's Title IX office conducted their investigation and concluded that Meriwether's refusal to recognize Doe's gender identity qualified as discrimination and that he had created a hostile environment in defiance of the university's non-discriminatory policies. Formal charges were also brought against Meriwether under the faculty's collective bargaining agreement, and the acting dean found that Meriwether "repeatedly refused to change the way he addressed [Doe] in his class due to his views on transgender people, and because the way he treated [Doe] was deliberately different from the way he treated others in the class, ⋯ he effectively created a hostile environment for [Doe]" (*Meriwether* 2021, p. 501). The acting dean finally disciplined Meriwether with a formal warning in his personnel file for failing to create a safe, educational experience for all students. The university conducted a formal hearing and a follow-up investigation, and the professor was issued an official reprimand for refusing to comply with the university's directives.

The faculty union then filed a grievance on Meriwether's behalf and asked the university to (1) vacate the disciplinary action and (2) allow Meriwether to keep speaking in a manner consistent with his religious beliefs. The provost denied the grievance. Subsequently, two university representatives, the labor relations director and general counsel, met with Meriwether and agreed with the union that Meriwether's conduct had not created a hostile educational environment, but they sided with the university in its decision, likening Meriwether's actions to racist or sexist behavior.

The then-provost, now-president adopted the representatives' findings and denied the grievance again, ending the grievance process at the university. Meriwether feared that he would be fired, suspended, or be rejected at other institutions after retirement if he did not comply with the university's non-discriminatory policies. Meriwether did not retire and is still employed with the same institution.

Meriwether filed a lawsuit in the district court alleging that the university violated his rights under (1) the Free Speech and Free Exercise Clauses of the First Amendment; (2) the Due Process and Equal Protection Clauses of the Fourteenth Amendment; (3) the Ohio Constitution; and (4) his contract with the university. Doe and a student organization focused on the rights of transgender individuals, Sexuality and Gender Acceptance ("SAGA"), moved to intervene and their motion was granted. Meriwether later appealed the district court's dismissal of the lawsuit to the 6th Circuit Court of Appeals.

The 6th Circuit analyzed the following issues: (1) do a teacher's religious beliefs or freedom of speech supersede a student's right to be recognized according to their gender identity?; (2) did the university purposefully impede the professor's right to Free Speech and Free Exercise as stated in the First Amendment?; (3) did the university violate the professor's right to due process or his rights under the Equal Protection Clause of the Fourteenth Amendment?; and (4) did the university's policy and/or its discipline of the professor rise to the level that either (or both) could be seen as having satisfied the definition of a "public concern"?

2.3.2. Court's Ruling and Reasoning

The 6th Circuit Court of Appeals disagreed with the lower court's dismissal of Meriwether's free speech and free exercise claims and sided with Meriwether, asserting that the university denied its mission to be a beacon of "intellectual diversity and academic freedom" by censoring him. The court's opinion (without dissent) stated that the university had punished Meriwether for speaking on an issue of public concern, thereby denying his First Amendment rights. The Court's reasoning is anchored on the Free Speech Clause, starting with the rationale that "universities have historically been fierce guardians of intellectual debate and free speech" (*Meriwether* 2021, p. 503). They rejected the lower

court's assertion that Meriwether's speech was not protected, and they stated that "without genuine freedom of speech, the search for truth is stymied, and the ideas and debates necessary for the continuous improvement of our republic cannot flourish" as part of core academic functions as teaching and research, the academic freedom exception to *Garcetti v. Ceballos* (2006) (*Meriwether* 2021, p. 503). Contending with the university's argument that "even if there is an academic-freedom exception to *Garcetti*, it does not protect Meriwether's use of titles and pronouns in the classroom," the Court stated that the topic of gender identity is "a hotly contested matter of concern" and often comes up during discussion in Meriwether's political philosophy courses, in which the content is shaped by how the discussion is led (*Meriwether* 2021, p. 498).

The Court then applied the *Pickering* (1968) test, which determines whether Meriwether's speech was (1) a topic of public concern, and (2) that his interest in speaking out was greater than the university's interest in "promoting the efficiency of the public services it performs" (*Pickering vs. Board of Education* 1968, p. 568). The Court found in the affirmative for both questions. The content and form of Meriwether's speech related to a matter of political, social, or other concern to the community, and like a professor's in-class speech about race, gender, and power conflicts, Meriwether's speech on gender identity undoubtedly addressed matters of public concern. They continued that he conveyed a message that "one's sex cannot be changed" (*Meriwether* 2021, p. 508). The Court found that Meriwether's syllabus statement was advancing a viewpoint on gender identity and that "the 'focus,' 'point,' 'intent,' and 'communicative purpose' of the speech in question [were matters] of public concern" (*Meriwether* 2021, p. 509). Due to their conclusion that Meriwether spoke on a matter of public concern, the university violated his First Amendment rights.

2.3.3. Implications of the Court's Finding

The 6th Circuit Court of Appeals' finding in *Meriwether vs. Hartop* (2021) has several implications for education and society in the U.S. First, the Court's finding that Meriwether's speech concerning any transgender person's gender identity as a "public concern" further politicizes this minoritized and marginalized group (Boso 2021). In addition, the Court found that Meriwether did not create a hostile educational environment because the student academically thrived in the course. The Court here missed several issues. First, there is a weak correlation between a hostile educational environment and the level of students' success (Hubbard and Mehan 1999). Just because a student succeeded academically does not mean there was not a hostile environment. Students may have been extremely resilient and focused. The Court ignores the offensiveness of Meriwether's speech while classifying it as his own religious and philosophical beliefs. The court elevated and validated continued oppressive speech and expressions to be considered as part of one's religion. There are real consequences to misgendering others in society and education systems. The misgendering of a person erases their identity and displays hostility (Clarke 2019; *G.G. v. Gloucester Cty. Sch. Bd.* 2020).

3. Socio-Political Milieu of Christian Nationalism

While considering the legal arguments with respect to *Meriwether*, it is crucial to keep in mind two intertwined social, cultural, and political phenomena that have risen to the forefront of American society in recent years. These two phenomena are the rise and mainstreaming of Christian nationalism and the shift in focus from the Establishment Clause to the Free Exercise and Free Speech clauses of the First Amendment. Recognizing the power plays that inform the legal discussions is critical for understanding the complexities of the social, cultural, and material outcomes of the law and legal discourse. Given that *Meriwether* is the first circuit case that has opened the door for religious exercise to have implications for free speech among public employees through a *Garcetti* exception for scholarship and teaching, the ruling supports and furthers the mission of Christian nationalists of bringing religion back into public education. While Meriwether himself does not overtly claim to

be a Christian nationalist or white nationalist, his claims and practices align with these movements. Christian nationalists do not just seek to symbolically return the nation and its policies to Christian roots, they seek to instill and create permanent imprints of a Christian America since scholars, judges, and the liberal elite have censored Christianity and installed a regime of secularism (Green 2015). The belief that a public educator should not have to censor their religious exercise at the expense of a pluralism believes that this bias is anti-Christianity and a fundamental foundation of Christian nationalism (LaHaye 1987). In order to better understand this backdrop and how the *Meriwether* ruling has implications for U.S. public education, this section will explore these intertwined phenomena and then explain the central role educational settings have taken in this power play.

3.1. The Increasing Visibility and Power of Christian Nationalism

A straight-forward definition of Christian nationalism is the contention that, "America has been and should always be distinctively 'Christian' from top to bottom—in its self-identity, interpretations of its own history, sacred symbols, cherished values and public policies—and it aims to keep it this way" (Whitehead and Perry 2020, p. 10). It is therefore the belief that the United States was founded for Christians and should therefore reflect these beliefs, sensibilities, positions, and biases. Christian nationalism is a stumbling block when considering sincerely held beliefs in the context of case law, as it should also be noted that this Christian nationalist agenda is not pluralistic—that is, it does not seek to *add* the voice of Christians to the legal and educational discourse in the U.S., but rather to exclusively dominate it and not allow alternative perspectives, positions, and approaches to be considered (Stewart 2020a). Many educational practices that could be considered as religiously neutral are Christian normative, for example, Christmas or winter break, the school calendar, reciting the pledge of allegiance, etc. Other aspects of Christian normativity may be imposed by the dominant population through prayer, release time activities, and the rise of academic credit for release time courses.

In many ways, one should consider Christian nationalists as analogous to white nationalists (Feldman 2021; Gorski 2021). Like white nationalists, Christian nationalists operate in several different strata that influence the methods they employ to reach their goal. There are overlaps between white supremacy, heteronormativity, xenophobia, and Christian nationalism (Gorski 2021; Whitehead and Perry 2020), but it is important to tease out the inherently Christian aspects to discuss them in the context of this manuscript. While it can be argued that Christian nationalism is the external intrusion of white nationalism into the Christian religion or that Christian nationalism is a perversion of the Christian faith (Feldman 2021) there is sufficient evidence to indicate that the roots of Christian nationalism can be found in Christianity itself, (Gorski 2021; Ingersoll 2015; Leviter 2020; Perry et al. n.d.; Stroop 2021a) as such roots can be found in all religions. Meriwether's refusal to acknowledge the gender identity of his student as a gender non-conforming student and claiming it to be his right to religious freedom is like white nationalists being dismissive of the rights of people of color who are being brutalized by American law enforcement, claiming that it is the fault or result of the person of color and not of a flawed law enforcement system. Meriwether took the approach that he was right and only right without acknowledging another perspective, which is like the approach of white nationalists.

Like white nationalists, Christian nationalists rely on a large casual or implicit base of support. Using contemporary terminology of the alt-right white nationalists, this base can be seen as analogous to "normies," people who have not yet "been red pilled" and transformed into nationalists (Nagle 2017; Paul 2021). Normies typically harbor Christian nationalist beliefs, particularly the belief that America is and always has been a Christian nation, and they will take those beliefs as common sense. They do not necessarily act upon these beliefs, but the other two groups rely upon the normies to vote in a way that promotes Christian nationalism or even just to remain idle, so they are not prevented from working for Christian nationalism in active ways.

The other two groups of Christian nationalists are radical and active compared to the indirect and passive participation of the normies. The second group, still in line with the white nationalism analogy, is comprised of "outsider accelerationists". This group seeks to enact change and realize a Christian nation by any means, including terror and violence. This group is comprised of networks—such as Catholic identifying Groypers and TradCaths (Johnson n.d.; Sixsmith 2019), the Eastern Orthodox-identifying Traditionalist Worker Party (Kelaidis 2016; Riccardi-Swartz n.d.; Southern Poverty Law Center n.d.(a), n.d.(b)), and Evangelical and Fundamentalist Protestant-aligned ACT for America, America for Americans, and the Minute Men (Burress 2008; Embattled Washington Rep n.d.; Far-Right Survivalist and Icon of 'Patriot' Movement Predicts Religious Civil War n.d.)—that find common cause primarily through online social media platforms and are aligned with the alt- and far-right. It is members of this group of Christian nationalists who were represented during the 6 January 2021, insurrection (Gorski 2021; Jenkins 2021; Stroop 2021a), and have carried out violent hate crimes in Atlanta, GA (Stroop 2021b), Poway, CA (Strenski 2019; Zauzmer 2019), and Pittsburgh, PA (Moss 2018; Tree of Life Massacre Has Roots in Religious Hatred n.d.).

The last group can be considered the "insider incrementalists". These are Christian nationalists who work on Christian nationalist issues from within institutions, particularly government, through the passage and enactment of law and policy, the appointment of officials, and the hiring of personnel to protect, sustain, and expand the white Christian hetero- and cis-normative status quo. Their agenda is wrapped up in white identity politics, the defense of whiteness, and racism (Butler 2021). Former Vice President Mike Pence and former cabinet members, including Attorney General William Barr, Secretary of Education Betsy DeVos, and Secretary of State Mike Pompeo (Stewart 2020a, 2020b), as well as organizations such as the Fellowship Foundation (Sharlet 2008) fall into this category.

Individuals in the insider incrementalist group can represent a range of Christian denominations, although a noted increase in representation from Renewalist, Charismatic, and Dominionist branches of Christianity has occurred concomitant with the rise of Sarah Palin, the Tea Party, and the America First/Make America Great Again movements (Balmer et al. 2017; Butler 2012). This has brought with it new initiatives and new directions, including an approach known as the Seven Mountains Mandate (Clarkson 2016). Loosely drawing on Isaiah 2:2 (Sefaria n.d.), the Seven Mountains Mandate provides an overarching dominionist-nationalist blueprint for exerting control over the seven sociocultural mountains of family, religion, education, the media, entertainment, business, and government.

To these ends, initiatives such as Project Blitz, which is a coordinated effort by Christian nationalists to inject religion in public education, health care, and other public services, have taken this blueprint and developed a more detailed set of directives and legislative templates that allow state legislators to introduce bills aligned with the Christian nationalist agenda (Stewart 2018; Clarkson 2018). While these templates range from establishing "Freedom of Religion Days" to the placement of the "In God We Trust" motto on license plates, much of the effort is squarely focused on the classroom and the educational space. Insider incrementalist Christian Nationalist William Barr points to this while emphasizing an important shift in focus around the First Amendment during an address:

> Ground zero for these attacks on religion are the schools. To me, this is the most serious challenge to religious liberty. For anyone who has a religious faith, by far the most important part of exercising that faith is the teaching of that religion to our children. The passing on of the faith. There is no greater gift we can give our children and no greater expression of love. *For the government to interfere in that process is a monstrous invasion of religious liberty*. (emphasis added; Barr 2019)

Meriwether's claims that he should not have to abide by university policy to respect a student's desired gender pronouns because of his religious free exercise without understanding how his beliefs and actions can create a hostile learning environment aligns with the intent and foundation of the Christian and white nationalist movements.

3.2. The Constitutional Shift

The second area is the shift in the focus on the interpretation of the First Amendment, including the Establishment Clause, Free Exercise, and Free Speech clauses. This shift from the Establishment Clause to the Free Exercise Clause has free speech implications because one's ability to freely exercise their religion may come in the form of one's speech and or expression, which is also protected by the free speech clause of the first amendment. The pathway for this shift began with *Bd. of Airport Comm'rs v. Jews for Jesus* (1987), which held that religious proselytization is protected under the First Amendment as a form of free exercise and free speech. More recently, *Pleasant Grove City v. Summum* (2009) found that institutions are not required to include or accept counter-monuments, particularly when it comes to religious monuments such as the Ten Commandments. These shifts have free speech implications but also occur within the sociopolitical milieu of rising Christian nationalism on multiple fronts. *Meriwether* adds to a body of circuit appeals court cases that create circuit conflicts that may lead to a U.S. Supreme Court review and ruling, especially at a time when the make-up of the Supreme Court favors the Christian nationalist agenda (Green 2021).

4. Workplace and Classroom Implications for Educators in Light of *Meriwether* and Christian Nationalism

Given the rise of Christian nationalism and knowing how this will influence U.S. laws, policies, and practices, it is important for educators to understand the socio-political backdrop of Christian nationalism and the implications of the *Meriwether* ruling. The violation of workplace policy, infringement on basic constitutional rights, questioning of sincerely held religious beliefs, and the redress of these for remedies all point to the complexities of learning about and practicing religion, which continue to arise in today's classrooms across the country. The repercussions from recent court rulings affect routine interactions between students, staff, and educators, and there is a wide range of concerns and contradictions. When diversity is situated in a hierarchal system reigned by power and influence, a just and democratic society becomes unattainable. Some of the practical ways that can help translate the law into daily lives include how educators can check for bias, understand what constitutes discrimination, determine the extent of personal freedoms, and understand how privilege affects expectations and relationships.

4.1. Checking for Bias

Even though neurologists and psychologists have confirmed that bias simply exists as brains attempt to constantly process a great amount of information at high speed, they do not absolve the individual from being fair and responsible in their relations with others. It is impossible for every individual to have accurate and complete information about everything and everyone around them, hence bias exists. Unchecked bias makes it possible for bias to be reproduced and confirmed (Eberhardt 2020; Staats 2016). Conducting some sort of quality-control on the conclusions drawn and the opinions held will result in more informed and effective decisions.

Religious diversity and the mere co-existence of people of other faiths or no faith does not mean one's belief is threatened or violated. While individuals' faiths and religious practices are protected under the law, Christians often operate from a place of dominance, institutionalizing their beliefs and expecting non-Christians to abide by Christian values. An effectual test of bias, in this case, is to create objective standards that can be applicable to other faith groups across the board (Eberhardt 2020). For example, Meriwether invoked his sincerely held religious beliefs to oppose addressing a person by their preferred pronouns. What if a Buddhist educator refused to call Angel by her name because he does not believe in Angels, or a Jewish educator refused to call Christian by his name because she does not believe in Christ? Addressing others the way they want to be addressed is not a religious practice that would require legal protection for Christians only.

On another note, policies are written by individuals who may be enacting their own bias and therefore produce policies that may be discriminatory. While a school has a policy, it does not imply that the policy is equitable or inclusive. Furthermore, even when policies are fair, individuals enforcing the policies may not be doing so impartially across different social groups because of their bias. On the one hand, the policy that Meriwether was opposing did not address the controversial nature of the social and political issue, while on the other hand, it did not require Meriwether or any other students to use pronouns when identifying themselves. Meriwether's belief that a gender is unchangeable is not a belief he can impose on others; however, it applies to him and how he chooses to be addressed. Making assumptions and dictating how someone else ought to identify themselves is wrong regardless of to whom it applies.

4.2. Markers of Discrimination

While the mere existence of bias is a function of the human brain, discrimination is not. As a result, actions and words that either confirm bias or rectify it are choices. Anti-discrimination policies and practices aim to ensure a certain level of protection; therefore, discrimination in all its forms is not determined solely by how someone feels or by the fact that they hold a different opinion on any matter. Aligning the understanding of what constitutes discrimination across administrators, educators, and their students can be beneficial in achieving the very goal of minimizing discrimination and protecting human dignity.

In Meriwether's case, the fact that he was instructed not to share his views on the matter is discriminatory regardless of his religious affiliation. In essence, this is what distinguishes a democratic society from those who persecute individuals for their opposing opinions. While we expect Meriwether to come to terms with the fact that not everyone agrees with his opinion, is it possible to expect the same from the student? It is not the function of the school policy to ensure that every individual holds the same opinions on matters of religion, politics, and social norms. This case reveals that we can grow more intolerant while in pursuit of equitable and inclusive campuses.

A few examples that worked in Meriwether's favor starts with the fact that he was willing to offer solutions to accommodate the policy he disagreed with. Furthermore, he was not reported to mock the situation, make inappropriate comments, or encourage others not to use the student's preferred pronouns. In addition, the student reportedly earned a high grade in the class. However, if the student in this case had struggled in the class or was an average "C" student, would that have changed the outcome of the case? While circumstances and individuals involved may change, discrimination is not a matter of opinion and is not measured by the silence or the support of the majority in society. For example, a policy that protects religious liberties is as critical as a policy that ensures that Christian norms are not imposed on society at large (Altman 2011).

4.3. Freedoms Rationed

The democratic process and First Amendment rights are trademarks of the U.S. way of governance; however, in many cases involving freedom of religion, it is apparent that everyone is expected to act in accordance with the religion of the majority (PEW Forum). It is the Christian majority that seems to be unable to freely exercise their religion without infringing on others in the process, imposing their religious expectations on those of other faiths or no faith affiliation. In zero-sum thinking, individuals expect policies, rules, and systems to benefit them, even if it is at the expense of others (Davidai and Ongis 2019). This was apparent in Meriwether's case, and it was precisely why the case escalated. On one hand, the professor insisted that someone else's identity is part of his personal beliefs, and on the other hand, the student pushed back in a similar notion expecting a unanimous agreement. Neither the professor nor the student were willing to extend the same level of exercise of freedom they want for themselves to others with whom they disagree with.

Is there enough freedom to go around? Since the professor is not mandated via school policy to announce pronouns for himself, it seems to have been sufficient to share with his class his opposing opinion or belief and continue to address the student the way the student wanted to be addressed. This was one of the ways he was willing to accommodate yet was rejected by the administration. However, in the presence of a one-sided discriminatory school policy that does not consider many religious practices, this seemed impossible. At the core of this issue is the fact that educational leaders, teachers, and students are not literate in the First Amendment as well as the applications and extent of constitutional rights. Consequently, educators are often left to their personal convictions and interpretation of the law, creating an impossible path to eliminate discrimination and promote democratic practices.

4.4. Citing Privilege

Embracing unchecked bias, suing for discrimination, and dictating who is worthy of constitutional protection are all indicators of how privilege plays a critical role in our society. It determines who has the power to be heard, to expect accommodations, to take financial risk, and to presume compliance. In this case, privilege is apparent on both sides. Meriwether, a Christian white, male, not only was able to hire one of the largest and most successful firms that aligned with his values but also his odds at facing a potentially white and Christian majority of a panel of judges were in his favor as well. He could count on the fact that he did not have to explain his religion to the court and hoped that they did not misunderstand or dismiss his beliefs. Subsequently, he expected non-Christians to align with the way he wanted to practice his faith as well, even if it meant imposing on someone else's identity and beliefs.

On a similar note, trans students are privileged in that they can expect to assert their right to self-declared pronouns and preferred names while many of their classmates are not afforded the right to be called by their actual legal names. There was never a school policy that prohibited educators from addressing Miguel as Michael, or even reversing the systemic erasure of Native, African, and ethnic names. Considering how recent these practices are, it is hard to consider this in a vacuum. In fact, it is common for educational institutions today to require no legal documentation to issue an official school ID with a student's preferred name with an incredible number of resources such as trainings, software, and months of planning to ensure smooth implementation of such policies (Hudson 2015). Does the university have to question the affiliation of the student or is an alternate ID with a preferred name also afforded to any student who asks for it? How can a school ensure that some IDs are not issued to those who may have an ill-intent to fake their identity or conceal a misconduct which poses a security risk? Can a student change their preferred name often or is there a limit on their preference? There is a clear expectation, both socially and legally, that others are obligated to uphold the personal convictions of those with more privilege. Therefore, acknowledging privilege enables us to widen the conversation and allow for more diverse points of view to emerge with zero tolerance to bigotry, hate, and harm.

The contradictions highlighted through this case reflect more broadly on society and the way in which individuals negotiate their relationships with one another. Despite our greater understanding of intersectionality and our desire to see the "whole" person, we continue to fall short when some identities are given unequal voice, space, and protection over others. While unchecked bias incites discrimination, unchecked privilege fosters a sense of entitlement, making it impossible to achieve equitable and inclusive practices. Without a knowledge base about fundamental constitutional rights, their application, and their limitations, educational institutions will not be able to uphold and perpetuate the very democracy that defines our nation.

5. Conclusions

There is no dispute that the intersection of the Establishment, Free Exercise, and Free Speech clauses is messy and complicated. It is even more so with public employees, such as school teachers, leaders, and professors given the line between private speech, public speech, and religious speech. While court rulings may provide some clarity into how these constitutional rights may be protected, our judicial system does not consider the socio-political backdrop that impacts the education and employment of many Americans. It is critical that we understand the implications of court rulings and our actions and decisions in our workplace, as many times, court rulings do not stay in a vacuum and have real-world implications for our young people and marginalized groups.

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References

Primary Sources

Michael S. Adams v. The Trustees of the University of North Carolina—Wilmington, et al. 2011. 640 F.3d 550 (4th Cir. 2011).
Board of Airport Commissioners v. Jews for Jesus. 1987. 492 U.S. 569 (1987).
Westside Community Board of Education v. Mergens. 1990. 496 U.S. 226 (1990).
Teresa Buchanan v. F. King Alexander; et al. 2019. 919 F.3d 847 (5th Cir. 2019).
Capitol Square Review & Advisory Board v. Pinette. 1995. 515 U.S. 753 (1995).
David K. Demers v. Erica Austin; et al. 2014. 746 F.3d 402 (9th Cir. 2014).
Gil Garcetti et al. v. Richard Ceballos. 2006. 547 U.S. 410 (2006).
Gavin Grimm v. Gloucester County School Board. 2020. 972 F.3d 596 (4th Cir. 2020).
Bradley R. Johnson v. Poway Unified School District; et al. 2011. 658 F.3d 954 (9th Cir. 2011).
Lee v. Weisman. 1992. 505 U.S. 577 (1992).
Joseph Matal v. Simon Shiao Tam. 2017. 137 S.Ct. 1744 (2017).
Meriwether v. Hartop et al. 2021. 992 F.3d 492 (6th Cir. 2021).
Marvin L. Pickering v. Board of Education of Township High School District 205. 1968. 391 U.S. 563 (1968).
Pleasant Grove City v. Summum. 2009. 555 U.S. 460 (2009).
Roberts v. Madigan. 1990. 921 F.2d 1047 (10th Cir. 1990).
Ronald W. Rosenberger; et al. v. Rector and Visitors of the University of Virginia et al. 1995. 515 U.S. 819 (1995).
Widmar v. Vincent. 1981. 454 U.S. 263 (1981).

Published Sources

Altman, Andrew. 2011. Discrimination. Available online: https://plato.stanford.edu/entries/discrimination/#IndDisReaDis (accessed on 1 August 2021).
Balmer, Randall, Kate Bowler, Anthea Butler, Maura Jane Farrelly, Wes Markofski, Robert Orsi, Jerry Z. Park, James Clark Davidson, Matthew Avery Sutton, and Grace Yukich. 2017. Forum: Studying Religion in the Age of Trump. *Religion and American Culture* 27: 2–56. [CrossRef]
Barr, William P. 2019. Remarks to the Law School and the de Nicola Center for Ethics and Culture at the University of Notre Dame. United States Department of Justice. October 14. Available online: https://www.justice.gov/opa/speech/attorney-general-william-p-barr-delivers-remarks-law-school-and-de-nicola-center-ethics (accessed on 15 August 2021).
Berg, Thomas C. 1995. Church-State Relations and the Social Ethics of Reinhold Niebuhr. *North Carolina Law Review* 73: 1567–639.
Boso, Luke A. 2021. Anti-LGBT Free Speech and Group Subordination. *Arizona Law Review* 63: 341–97. [CrossRef]
Burress, Charles. 2008. Fight over Alameda GOP Seats Heading to Court. SFGATE. October 26. Available online: https://www.sfgate.com/bayarea/article/Fight-over-Alameda-GOP-seats-heading-to-court-3264314.php (accessed on 10 August 2021).

Butler, Anthea D. 2012. From Republican Party to Republican Religion: The New Political Evangelists of the Right. *Political Theology* 13: 634–51. [CrossRef]
Butler, Anthea. 2021. *White Evangelical Racism: The Politics of Morality in America*. Chapel Hill: UNC Press Books.
Clarke, Jessica A. 2019. They, them, and theirs. *Harvard Law Review* 132: 894–991. [CrossRef]
Clarkson, Frederick. 2016. Dominionism Rising. Political Research Associates. Available online: https://www.politicalresearch.org/2016/08/18/dominionism-rising-a-theocratic-movement-hiding-in-plain-sight (accessed on 24 July 2021).
Clarkson, Frederick. 2018. 'Project Blitz' Seeks to Do for Christian Nationalism What ALEC Does for Big Business. Religion Dispatches. April 27. Available online: https://religiondispatches.org/project-blitz-seeks-to-do-for-christian-nationalism-what-alec-does-for-big-business/ (accessed on 24 July 2021).
Davidai, Shai, and Martino Ongis. 2019. The Politics of Zero-Sum Thinking: The Relationship Between Political Ideology and the Belief that Life is a Zero-Sum Game. *Science Advances* 5: no. 12. Available online: https://www.science.org/doi/pdf/10.1126/sciadv.aay3761 (accessed on 15 July 2021). [CrossRef]
Eberhardt, Jennifer L. 2020. *Biased: Uncovering the Hidden Prejudice that Shapes What We See, Think, and Do*. London: Penguin Books.
Embattled Washington Rep. Matt Shea Is Skirting State Law to Funnel Campaign Funds to Far-Right Groups. n.d. Southern Poverty Law Center. Available online: https://www.splcenter.org/hatewatch/2018/12/07/embattled-washington-rep-matt-shea-skirting-state-law-funnel-campaign-funds-far-right (accessed on 4 July 2021).
Far-Right Survivalist and Icon of 'Patriot' Movement Predicts Religious Civil War. n.d. Southern Poverty Law Center. Available online: https://www.splcenter.org/hatewatch/2019/01/03/far-right-survivalist-and-icon-patriot-movement-predicts-religious-civil-war (accessed on 4 July 2021).
Feldman, Matthew. 2021. Christianism: The Elephant in the Extremism Room. Fair Observer. July 1. Available online: https://www.fairobserver.com/politics/matthew-feldman-religious-extremism-christianity-history-violence-christianism-news-37281/ (accessed on 24 July 2021).
Gey, Steven G. 2000. When is Religious Speech not "Free Speech"? *University of Illinois Law Review* 2000: 379–460. [CrossRef]
Gorski, Philip. 2021. White Christian Nationalism: The Deep Story Behind the Capitol Insurrection. Berkley Forum. January 22. Available online: https://berkleycenter.georgetown.edu/responses/white-christian-nationalism-the-deep-story-behind-the-capitol-insurrection (accessed on 30 July 2021).
Green, Steven K. 2015. *Inventing a Christian America: The Myth of the Religious Founding*. Oxford: Oxford University Press.
Green, Steven K. 2021. The Legal Ramifications of Christian Nationalism. *Roger Williams University Law Review* 2021: 430–94. [CrossRef]
Hubbard, Lea, and Hugh Mehan. 1999. Race and Reform: Educational "Niche Picking" in a Hostile Environment. *The Journal of Negro Education* 68: 213–26. [CrossRef]
Hudson, Andrew. 2015. What's in a Name. *CR80 News*. Available online: https://www.cr80news.com/news-item/whats-in-a-name/ (accessed on 3 July 2021).
Ingersoll, Julie J. 2015. *Building God's Kingdom: Inside the World of Christian Reconstruction*, 1st ed. New York: Oxford University Press.
Jenkins, Jack. 2021. For Insurrectionists, a Violent Faith Brewed from Nationalism, Conspiracies and Jesus. *Religion News Service*. January 12. Available online: https://religionnews.com/2021/01/12/the-faith-of-the-insurrectionists/ (accessed on 30 July 2021).
Johnson, Craig A. n.d. When Christ and Trump Are Kings. Available online: https://divinity.uchicago.edu/sightings/articles/when-christ-and-trump-are-kings (accessed on 4 July 2021).
Kelaidis, Katherine. 2016. How Orthodox Christianity Became the Spiritual Home of White Nationalism. Religion Dispatches. November 30. Available online: https://religiondispatches.org/how-orthodox-christianity-became-the-spiritual-home-of-white-nationalism/ (accessed on 24 July 2021).
LaHaye, Tim. 1987. *Faith of our Founding Fathers*. Green Forest: Master Books.
Leviter, Lee. 2020. The Myth of Christian Innocence Reinforces Anti-Semitism. Sojourners. April 30. Available online: https://sojo.net/articles/myth-christian-innocence-reinforces-anti-semitism (accessed on 30 July 2021).
Moss, Candida. 2018. How Bigots Easily Exploit the Bible for Anti-Semitism. The Daily Beast. October 30. Available online: https://www.thedailybeast.com/how-bigots-easily-exploit-the-bible-for-anti-semitism (accessed on 30 July 2021).
Nagle, Angela. 2017. *Kill All Normies: Online Culture Wars From 4Chan and Tumblr To Trump and The Alt-Right*. Hampshire: John Hunt Publishing.
Norton, Helen. 2009. Constraining Public Employee Speech: Government's Control of its Workers Speech to Protect its Own Expression. *Duke Law Journal* 2009: 1–68.
Paul, Joshua. 2021. 'Because for Us, as Europeans, It Is Only Normal Again When We Are Great Again': Metapolitical Whiteness and the Normalization of White Supremacist Discourse in the Wake of Trump. *Ethnic and Racial Studies* 44: 2328–2349. [CrossRef]
Perry, Samuel L., Andrew L. Whitehead, and Joshua T. Davis. n.d. Nationalism Shapes Americans' Views about Police (Mis)Treatment of Blacks. *Sociology of Race and Ethnicity* 17: 130–46.
Porter, Michael. 2021. When Individual Rights Collide: Know How to Prepare, Respond. Campus Legal Advisor. 21, no. 11:1-6. Available online: https://onlinelibrary.wiley.com/doi/pdf/10.1002/cala.40548 (accessed on 1 November 2021).
Riccardi-Swartz, Sarah. n.d. American Conversions to Russian Orthodoxy Amid the Global Culture Wars. Berkley Forum. Available online: https://berkleycenter.georgetown.edu/responses/american-conversions-to-russian-orthodoxy-amid-the-global-culture-wars (accessed on 3 July 2021).

Sefaria. n.d. Isaiah 2:2. Sefaria. Available online: https://www.sefaria.org/Isaiah.2.2 (accessed on 5 July 2021).
Sharlet, Jeff. 2008. *The Family: The Secret Fundamentalism at the Heart of American Power*. New York: Harper.
Sixsmith, Ben. 2019. What the Heck Is a 'Groyper'? *Crisis Magazine*. November 19. Available online: https://www.crisismagazine.com/2019/what-the-heck-is-a-groyper (accessed on 3 July 2021).
Southern Poverty Law Center. n.d.(a) Matthew Heimbach. Available online: https://www.splcenter.org/fighting-hate/extremist-files/individual/matthew-heimbach (accessed on 4 July 2021).
Southern Poverty Law Center. n.d.(b) Traditionalist Worker Party. Available online: https://www.splcenter.org/fighting-hate/extremist-files/group/traditionalist-worker-party (accessed on 4 July 2021).
Staats, Cheryl. 2016. Understanding implicit bias: What educators should know. *American Educator* 39: 29.
Stewart, Katherine. 2018. A Christian Nationalist Blitz. *The New York Times*, May 26. Available online: https://www.nytimes.com/2018/05/26/opinion/project-blitz-christian-nationalists.html (accessed on 3 July 2021).
Stewart, Katherine. 2020a. *The Power Worshippers: Inside the Dangerous Rise of Religious Nationalism*. New York: Bloomsbury Publishing.
Stewart, Katherine. 2020b. Trump or No Trump, Religious Authoritarianism Is Here to Stay. *The New York Times*, November 16. Available online: https://www.nytimes.com/2020/11/16/opinion/trump-religion-authoritarianism.html (accessed on 4 July 2021).
Strenski, Ivan. 2019. The Theology That Inspired the Poway Synagogue Shooting (and New Zealand) Remains Strikingly Commonplace. *Religion Dispatches*. May 9. Available online: https://religiondispatches.org/the-theology-that-inspired-the-poway-synagogue-shooting-and-new-zealand-remains-strikingly-commonplace/ (accessed on 4 July 2021).
Stroop, Chrissy. 2021a. Where Were They Radicalized? No Answer Is Complete without Addressing Evangelical. Available online: https://religiondispatches.org/where-were-they-radicalized-no-answer-is-complete-without-addressing-evangelical-churches-and-schooling/ (accessed on 3 July 2021).
Stroop, Chrissy. 2021b. Don't Discount Evangelicalism as a Factor in Racist Murder of Asian Spa Workers in Georgia. *Religion Dispatches*, March 17. Available online: https://religiondispatches.org/dont-discount-evangelicalism-as-a-factor-in-racist-murder-of-asian-spa-workers-in-georgia/ (accessed on 3 July 2021).
Tree of Life Massacre Has Roots in Religious Hatred. n.d. Available online: https://hds.harvard.edu/news/2018/10/30/tree-of-life-roots (accessed on 4 July 2021).
Whitehead, Andrew L., and Samuel L. Perry. 2020. *Taking America Back for God: Christian Nationalism in the United States*. New York: Oxford University Press.
Zauzmer, Julie. 2019. The Alleged Synagogue Shooter Was a Churchgoer Who Talked Christian Theology, Raising Tough Questions for Evangelical Pastors. *Washington Post*, May 1. Available online: https://www.washingtonpost.com/religion/2019/05/01/alleged-synagogue-shooter-was-churchgoer-who-articulated-christian-theology-prompting-tough-questions-evangelical-pastors/ (accessed on 4 July 2021).