BUREAU OF COMPUTUM ANALYSIS • CONSTITUTIONAL LAW & ACADEMIC CASE STUDY

ECONOMIC PARTICIPATION & CONSTITUTIONAL CONSCIENCE

A RFRA Jurisprudential Analysis of Financial Obligations and Religious Freedom

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DATE & TIME: July 22, 2026 • Official Timestamp: 14:49:34 EDT

CLASSIFICATION: Supreme Court & Appellate Jurisprudential Synthesis

ABSTRACT: As modern economic and financial architectures become inescapable prerequisites for civic life, federal courts are increasingly forced to address whether economic conduct can constitute protected religious exercise. This academic case study synthesizes appellate and Supreme Court doctrinal layers under the Religious Freedom Restoration Act (RFRA), examining the tension between sincere religious conscience and national financial system stability.

I. THE APPELLATE LAYER — DOCTRINAL FIT

The role of the appellate court is not to decide the ultimate substantive outcome, but rather to determine whether a legal theory fits within established statutory and constitutional frameworks. Under the Religious Freedom Restoration Act (RFRA), the doctrinal hinge is established as follows:

> *"Economic conduct may constitute religious exercise when the conduct is motivated by sincere religious obligation."*

This formulation represents the most robust doctrinal assertion the theory can sustain without overreaching. RFRA explicitly protects religious exercise broadly and does not restrict protection strictly to worship, ritual, or pure speech. Precedent firmly establishes protection for conduct spanning across:

- Employment and labor compliance;
- Medical procedures and healthcare mandates;
- Civic and statutory obligations;
- Military service requirement exceptions.

Consequently, the appellate court rejects the government's categorical assertion that "money is not religion." Instead, it applies the fundamental RFRA inquiry: *The question is not whether the conduct is economic; the question is whether the conduct is religiously motivated.*

II. THE APPELLATE LAYER — BURDEN ANALYSIS

A critical judicial function under RFRA is distinguishing between mere personal preference and genuine religious obligation. The appellate framework maintains a strict division:

Economic Preference: *“I dislike interest.” (Unprotected)*
Religious Obligation: *“My faith prohibits participation in interest-bearing structures.” (Protected)*

RFRA safeguards the latter while excluding the former. The court's burden analysis is mathematically and doctrinally represented as:

Debt Obligation ≠ ***Religious Conflict***
versus
Interest Enforcement = ***Potential Religious Conflict***

This narrow framing ensures the legal challenge remains tightly bounded within statutory RFRA limits.

III. THE APPELLATE LAYER — STRICT SCRUTINY

Once a substantial burden on sincere religious practice is established, the burden shifts to the government to satisfy strict scrutiny through the **least restrictive means** test. The government must demonstrate that interest enforcement is strictly necessary—not merely convenient or administratively efficient—to achieve compelling state interests. Because RFRA mandates individualized accommodation where feasible, strict scrutiny cannot be resolved without a comprehensive factual record, necessitating remand.

IV. THE APPELLATE DISSENT — THE LIMITING PRINCIPLE

The counterargument, articulated by the appellate dissent, highlights institutional stability concerns and the risk of a slippery slope:

> *“If economic conduct becomes religious conduct, where does it stop?”*

The dissent warns that expanding RFRA into financial conduct risks destabilizing core civic frameworks, including statutory taxation, mandatory insurance mandates, commercial contract enforcement, and public investment protocols. The viability of the theory hinges on articulating a clear limiting principle.

V. THE SUPREME COURT LAYER — NATIONAL SIGNIFICANCE

A petition for certiorari before the Supreme Court focuses on issues of overarching national importance. The Court evaluates three core questions:

1. Is economic participation ever properly classified as religious exercise?
2. Does interest enforcement impose a substantial burden on such exercise?
3. Does RFRA mandate tailored accommodation within systemic financial structures?

These questions directly implicate federal lending programs, uniform administrative enforcement, and the legal boundary between religious liberty and civic duties. The Supreme Court would grant certiorari not to arbitrate monetary debt policy, but to define the constitutional boundary between religion and economic regulation.

VI. THE SUPREME COURT LAYER — CONSTITUTIONAL TENSION

The supreme judicial inquiry exposes two competing institutional imperatives:

- **Majority Concern:** *"How do we protect religious conscience without making every economic dispute constitutional?"*
- **Minority Concern:** *"How do we protect religious exercise if economic systems are unavoidable parts of daily life?"*

VII. THE LIMITING PRINCIPLE

To prevent RFRA from being utilized as a universal mechanism for debt avoidance, the theory incorporates a precise accommodation-based limiting principle:

OPERATIONAL LIMITING PRINCIPLE

Religious economic conscience is protected only when the claimant demonstrates a sincere religious obligation governing economic conduct, and only when accommodation does not undermine compelling governmental interests.

VIII. THE FINAL CONSTITUTIONAL EQUATION

The legal balancing test applied by appellate courts under RFRA is formalized in the following structural equation:

$$\boxed{(RB + S + GB) > (GI + LM)}$$

Where: **RB** = Religious Basis • **S** = Sincerity • **GB** = Government Burden • **GI** = Government Interest • **LM** = Least Restrictive Means

- If **(RB + S + GB) > (GI + LM)**: Accommodation is constitutionally favored.
- If **(GI + LM) ≥ (RB + S + GB)**: Enforcement is likely upheld.

IX. SCHOLARLY THESIS & CONCLUSION

CORE INTELLECTUAL THESIS

As financial systems become unavoidable components of civic life, courts must confront whether economic participation can become religiously significant conduct. The constitutional challenge is balancing genuine religious conscience against the necessity of maintaining functional financial systems.

SUPREME COURT OF THE UNITED STATES

June Term, 2027

UNITED STATES DEPARTMENT OF EDUCATION,
Petitioner,

v. } **No. 28-137**

ST. CLARE,
Respondent.

MAJORITY OPINION

Justice __________ delivered the opinion of the Court.

I. INTRODUCTION

This case requires us to decide whether the Religious Freedom Restoration Act (RFRA) protects an individual who asserts that participation in interest-bearing financial mechanisms violates a sincere religious obligation grounded in Scripture. Respondent does not seek exemption from repayment of lawful obligations. Respondent seeks an accommodation permitting repayment of principal without compelled participation in interest structures he believes violate divine commands concerning justice and exploitation.

We hold that RFRA applies to Respondent's claim, that Respondent has alleged a substantial burden on religious exercise, and that the Government must demonstrate that enforcing interest obligations is the least restrictive means of achieving its compelling interests. We affirm the judgment of the Court of Appeals and remand for further proceedings.

II. BACKGROUND

Respondent asserts a religious obligation derived from:

- Psalm 15:5,
- Exodus 22:25, and
- Leviticus 25:35–37.

These passages, Respondent contends, prohibit participation in financial systems where economic gain arises from another person's hardship. Respondent does not object to repayment of principal. Respondent objects to interest accrual, compounding penalties, and enforcement mechanisms tied to interest-bearing structures.

The Department of Education continues to enforce interest obligations. Respondent seeks accommodation under RFRA.

III. RFRA'S FRAMEWORK

RFRA provides that the federal government:

> *"shall not substantially burden a person's exercise of religion" unless it demonstrates that application of the burden is the least restrictive means of furthering a compelling governmental interest.*

RFRA requires courts to evaluate:

1. Religious exercise
2. Substantial burden
3. Compelling interest
4. Least restrictive means

RFRA's protections apply to all federal action, including enforcement of federal lending programs.

IV. RELIGIOUS EXERCISE

The Government argues that Respondent's objection concerns economics rather than religion. RFRA forecloses such categorical distinctions.

Religious exercise is not confined to worship or ritual. It includes conduct in ordinary civic life, including employment practices, medical conscience, and military service. The question is not whether the conduct involves money. The question is whether the conduct is motivated by sincere religious obligation.

Respondent alleges:

- a theological foundation,
- a specific moral command, and
- a connection between belief and conduct.

This satisfies RFRA's definition of religious exercise.

V. SUBSTANTIAL BURDEN

The Government argues that Respondent is free to believe interest is wrong while still complying with federal repayment obligations. RFRA requires more.

A substantial burden exists when government action places significant pressure on a person to violate a sincere religious obligation. Respondent does not object to repayment. Respondent objects to a specific mechanism of repayment.

Thus:

Debt Obligation* ≠ *Religious Conflict

but:

Interest Enforcement* = *Potential Religious Conflict

Respondent has alleged a substantial burden under RFRA.

VI. COMPELLING GOVERNMENTAL INTERESTS

The Government identifies compelling interests in:

- maintaining federal lending programs,
- protecting public funds,
- ensuring uniform administration,
- preserving fiscal stability.

We agree these interests are compelling. A national lending system depends upon predictable enforcement.

VII. LEAST RESTRICTIVE MEANS

This is the decisive inquiry.

The Government argues that individualized accommodations would undermine uniform administration. RFRA demands more than administrative convenience. The Government must demonstrate that enforcing interest obligations is necessary—not merely efficient—to achieve its compelling interests.

Respondent identifies potential alternatives:

- principal-only repayment,
- modified interest structures,
- individualized review,
- alternative schedules.

RFRA requires the Government to show that these alternatives cannot achieve its interests. That showing has not yet been made. The record is insufficient to resolve the least restrictive means inquiry.

VIII. LIMITING PRINCIPLE

The Government warns that recognizing Respondent's claim will destabilize financial systems. RFRA's structure provides the limiting principle.

RFRA does not grant categorical exemptions. It requires individualized accommodation when feasible. Respondent does not seek debt cancellation. Respondent seeks a narrow accommodation that preserves repayment while avoiding compelled participation in religiously prohibited mechanisms.

RFRA's individualized-accommodation model prevents the parade of horribles the Government fears.

IX. HOLDING

We hold:

1. Economic conduct may constitute religious exercise when motivated by sincere religious obligation.
2. Respondent has alleged a substantial burden under RFRA.
3. The Government must demonstrate that enforcing interest obligations is the least restrictive means of achieving its compelling interests.
4. The case must be remanded for factual development on the least restrictive means inquiry.

The judgment of the Court of Appeals is affirmed, and the case is remanded.

X. CONCLUSION

This case does not ask whether debt exists. It asks whether the Government may enforce a particular repayment mechanism when less restrictive alternatives may exist. RFRA requires the Government to justify its chosen method of enforcement when it burdens sincere religious exercise.

The Constitution protects religious conscience. RFRA ensures that protection extends even when conscience intersects with the economic structures of modern life.

It is so ordered.

SUPREME COURT OF THE UNITED STATES

October Term, 2028

UNITED STATES DEPARTMENT OF EDUCATION,
Petitioner,

v. } **No. 28-137**

ST. CLARE,
Respondent.

DISSENTING OPINION

Justice __________, dissenting.

I. INTRODUCTION

The Court today recognizes a novel category of religious exercise: economic participation. In doing so, it extends RFRA beyond its intended scope and invites courts to constitutionalize ordinary financial obligations. Because RFRA does not transform neutral repayment requirements into religious burdens, and because the majority's reasoning threatens the stability of federal lending programs, I respectfully dissent.

II. RFRA'S LIMITS

RFRA protects religious exercise. It does not convert every civic or economic obligation into a matter of constitutional significance. The statute was enacted to restore strict scrutiny in cases involving targeted burdens on religion—not to create individualized exemptions from neutral, generally applicable financial laws.

The majority's approach risks collapsing the distinction between:

- religious obligation, and
- personal objection to economic terms.

RFRA does not require the Government to restructure financial systems whenever a borrower asserts a religious objection to interest.

III. ECONOMIC CONDUCT IS NOT RELIGIOUS EXERCISE

The majority holds that economic conduct may constitute religious exercise when motivated by sincere belief. This reasoning is too broad.

Under the majority's rule, any financial obligation—taxes, insurance premiums, contractual interest, banking fees—could become religious conduct if a claimant asserts a theological objection. The Constitution does not support such an expansive view.

Religious exercise traditionally involves:

- worship,
- ritual,
- moral conduct,
- observance of religious duties.

It does not include routine participation in neutral financial systems.

The relevant inquiry is not whether Respondent's belief is sincere. It is whether the Government has regulated religious conduct. Here, it has not.

IV. NO SUBSTANTIAL BURDEN

The majority concludes that enforcing interest obligations substantially burdens Respondent's religious exercise. I disagree.

A substantial burden exists when the Government coerces a person to violate religious belief. The Government does not compel Respondent to endorse interest, approve of interest, or participate in religiously meaningful conduct. It requires repayment of a lawful debt under neutral terms applicable to all borrowers.

The majority's framing—"interest enforcement equals religious conflict"—misstates RFRA's burden standard. RFRA does not protect individuals from the economic consequences of their religious beliefs. It protects them from government coercion of religious conduct.

Respondent remains free to believe interest is immoral. RFRA does not entitle him to restructure federal lending programs accordingly.

V. COMPELLING INTERESTS AND INSTITUTIONAL STABILITY

The Government's interests here are not merely compelling—they are foundational:

- maintaining federal lending programs,
- ensuring uniform repayment,
- protecting public funds,
- preserving fiscal stability.

The federal student loan system serves millions of borrowers. It depends on predictable administration. Allowing individualized religious objections to interest threatens the integrity of the entire program.

The majority's suggestion that principal-only repayment or interest modification may be required ignores the systemic consequences. RFRA does not require the Government to adopt alternatives that undermine national financial systems.

VI. THE MAJORITY'S LIMITING PRINCIPLE IS ILLUSORY

The majority claims RFRA's individualized-accommodation model prevents destabilization. This is incorrect.

Once economic conduct becomes religious conduct, courts must evaluate:

- religious objections to interest,
- religious objections to taxes,
- religious objections to insurance,
- religious objections to contractual terms.

The judiciary becomes an administrator of personal financial exemptions. RFRA was never intended to serve that role.

The majority's rule lacks a workable limiting principle. It invites litigation that blurs the line between religious conscience and economic preference.

VII. THE PROPER RULE

The Constitution protects religious belief. It does not require the Government to restructure neutral financial systems to accommodate religious objections to economic terms.

The proper rule is:

> *"Neutral financial obligations do not become religious burdens merely because an individual objects to their terms on religious grounds."*

This rule preserves both religious liberty and institutional stability.

VIII. CONCLUSION

The Court's decision expands RFRA beyond its intended boundaries and risks destabilizing federal lending programs. It transforms neutral financial obligations into potential religious conflicts and invites courts to constitutionalize routine economic administration.

RFRA protects religious exercise. It does not create a constitutional right to redesign federal financial systems.

I respectfully dissent.

SUPREME COURT OF THE UNITED STATES

October Term, 2028

UNITED STATES DEPARTMENT OF EDUCATION,
Petitioner,

v. } **No. 28-137**

ST. CLARE,
Respondent.

CONCURRING OPINION

Justice __________, concurring.

I. INTRODUCTION

I join the Court's judgment and much of its reasoning. I agree that Respondent has stated a plausible claim under the Religious Freedom Restoration Act ("RFRA"), and that the Government must demonstrate that enforcing interest obligations is the least restrictive means of achieving its compelling interests.

I write separately to emphasize a narrower rationale. In my view, this case should be resolved not by expanding the definition of religious exercise, but by applying RFRA's established accommodation framework to a novel factual context. The Court need not decide today whether economic participation is categorically religious conduct. It need only decide that Respondent's specific claim fits within RFRA's existing doctrinal boundaries.

II. RFRA'S EXISTING FRAMEWORK IS SUFFICIENT

RFRA already contemplates that religious exercise may occur in ordinary civic life. We have applied RFRA to:

- employment practices,
- medical conscience claims,
- military service,
- prison administration.

RFRA's text does not limit religious exercise to ritual or worship. It protects conduct "whether or not compelled by, or central to, a system of religious belief."

Thus, the question is not whether economic conduct is inherently religious. The question is whether Respondent's specific conduct—refusing to participate in interest-bearing mechanisms—is religiously motivated.

Respondent alleges:

- a scriptural foundation,
- a moral prohibition,
- a consistent pattern of conduct.

This is sufficient to trigger RFRA's protections without redefining the category of religious exercise.

III. THE SUBSTANTIAL BURDEN INQUIRY

I agree with the Court that Respondent has alleged a substantial burden. But I emphasize a narrower point:

> *"The burden arises not from the existence of debt, but from the Government's chosen method of enforcing repayment."*

RFRA does not require courts to evaluate the morality of interest. It requires courts to evaluate whether the Government's enforcement mechanism forces Respondent to violate a sincere religious obligation.

This distinction preserves RFRA's doctrinal integrity and avoids transforming financial obligations into religious disputes.

IV. COMPELLING INTERESTS AND INSTITUTIONAL STABILITY

The Government's interests in maintaining federal lending programs are substantial. I agree with the Court that these interests are compelling.

But RFRA's strict scrutiny requires more than compelling interests. It requires the Government to show that its chosen enforcement mechanism is necessary. Respondent has identified potential alternatives that may preserve repayment while reducing the burden on religious exercise.

I emphasize that RFRA does not require the Government to adopt alternatives that undermine fiscal stability. It requires the Government to demonstrate that no feasible alternative exists.

This inquiry is fact-intensive and cannot be resolved on the present record.

V. A NARROW LIMITING PRINCIPLE

I write separately to articulate a limiting principle that prevents RFRA from becoming a vehicle for broad economic exemptions:

CONCURRING LIMITING PRINCIPLE

RFRA protects religiously motivated conduct only when the claimant demonstrates a specific, sincere religious obligation governing that conduct, and only when accommodation does not undermine compelling governmental interests.

This principle ensures:

- RFRA does not constitutionalize ordinary financial preferences,
- courts do not become administrators of personal economic exemptions,
- federal lending systems remain stable,
- religious conscience receives individualized protection.

The Court’s opinion is consistent with this principle, but I believe it should be stated explicitly.

VI. WHAT THIS CASE DOES NOT DECIDE

This concurrence emphasizes what the Court does not hold:

1. We do not hold that interest is unconstitutional.
2. We do not hold that debt obligations are subject to categorical religious exemption.
3. We do not hold that all economic conduct is religious conduct.
4. We do not hold that RFRA requires restructuring federal lending programs.

We hold only that Respondent has stated a plausible RFRA claim and that the Government must justify its enforcement mechanism under strict scrutiny.

VII. CONCLUSION

RFRA’s accommodation framework is capable of addressing this case without expanding the definition of religious exercise. Respondent alleges a sincere religious obligation, a substantial burden, and the possibility of less restrictive alternatives. The Government must respond with evidence, not assumptions.

I therefore concur in the Court’s judgment and opinion, with the narrower rationale stated above.

I respectfully concur.

SUPREME COURT OF THE UNITED STATES

October Term, 2028

UNITED STATES DEPARTMENT OF EDUCATION,
Petitioner,

v. } **No. 28-137**

ST. CLARE,
Respondent.

ORAL ARGUMENT TRANSCRIPT (SIMULATED)

APPEARANCES:
Solicitor General, for Petitioner (United States Department of Education)
Counsel for Respondent, for St. Clare

CHIEF JUSTICE:

We will hear argument this morning in Case No. 28-137, United States Department of Education v. ST. CLARE. General, you may proceed.

ARGUMENT FOR PETITIONER (GOVERNMENT)

SOLICITOR GENERAL:

Mr. Chief Justice, and may it please the Court: RFRA does not convert neutral financial obligations into matters of religious exercise. The Department of Education enforces repayment terms applicable to all borrowers. Respondent's objection concerns economics, not religion, and RFRA does not require individualized restructuring of federal lending programs.

JUSTICE _________:

General, RFRA protects conduct "whether or not compelled by a system of religious belief." Why isn't Respondent's objection—grounded in Scripture—religious conduct?

SOLICITOR GENERAL:

Justice _________, Respondent's belief may be sincere, but RFRA requires a government burden on religious exercise. The Government is not regulating Respondent's religious conduct. It is enforcing a neutral repayment obligation.

JUSTICE _________:

But Respondent says the method of repayment—interest—forces him to violate a religious command. Why isn't that a burden?

SOLICITOR GENERAL:

Because the Government is not compelling Respondent to engage in religiously meaningful conduct. It is compelling repayment. Interest is an economic mechanism, not religious conduct.

JUSTICE _________:

General, we've recognized religious exercise in employment, medicine, military service. Why draw a categorical line at economics?

SOLICITOR GENERAL:

Because economic systems require uniformity. If every borrower may assert religious objections to interest, federal lending becomes unmanageable. RFRA was not intended to destabilize national financial programs.

JUSTICE _________:

But RFRA was intended to require strict scrutiny. Why shouldn't the Government have to show that interest enforcement is the least restrictive means?

SOLICITOR GENERAL:

Because Respondent's claim does not involve religious exercise. Strict scrutiny never begins.

CHIEF JUSTICE:

Thank you, General. Counsel for Respondent.

ARGUMENT FOR RESPONDENT

COUNSEL FOR RESPONDENT:

Mr. Chief Justice, and may it please the Court: Respondent does not seek exemption from repayment. He seeks an accommodation allowing repayment of principal without compelled participation in interest-bearing structures he sincerely believes violate divine commands. RFRA protects religiously motivated conduct in civic life. Economic participation can be religiously significant when governed by sincere religious obligation.

JUSTICE _________:

Counsel, how do we avoid opening the door to objections to taxes, insurance, or any financial obligation?

COUNSEL FOR RESPONDENT:

Justice _________, RFRA already contains the limiting principle: individualized accommodation. Respondent must show:

- a scriptural foundation,
- sincerity,
- a specific religious obligation,
- a substantial burden,

- and feasible alternatives.

Most claimants will not meet this standard.

JUSTICE _________:

What is the religious obligation here?

COUNSEL FOR RESPONDENT:

Scripture prohibits profiting from hardship. Respondent believes interest is a form of exploitation. His faith requires him to avoid participation in such structures.

JUSTICE _________:

But the Government says interest is simply part of the repayment system. Why is that religious conduct?

COUNSEL FOR RESPONDENT:

Because Respondent's religious obligation governs how he may repay. RFRA protects conduct shaped by religious conscience, even in economic contexts.

JUSTICE _________:

Counsel, what is the least restrictive means alternative?

COUNSEL FOR RESPONDENT:

Principal-only repayment, modified interest structures, or individualized review. These preserve repayment while reducing the burden.

JUSTICE _________:

Would this destabilize federal lending?

COUNSEL FOR RESPONDENT:

No. RFRA requires individualized accommodation, not categorical exemption. The Government retains authority to deny accommodation if it proves no alternative can achieve its compelling interests.

JUSTICE _________:

So your theory is not “religion cancels debt,” but “religion may require a different method of repayment”?

COUNSEL FOR RESPONDENT:

Exactly. Respondent seeks accommodation, not exemption.

CHIEF JUSTICE:

Thank you, Counsel. General, you have rebuttal.

REBUTTAL FOR PETITIONER

SOLICITOR GENERAL:

The Government cannot administer a lending program if repayment terms become subject to individualized religious redesign. RFRA does not require restructuring national financial systems. Respondent's claim, if recognized, has no limiting principle.

JUSTICE _________:

General, RFRA always requires individualized analysis. Why is this case different?

SOLICITOR GENERAL:

Because the conduct at issue is not religious. It is economic. RFRA does not apply.

CHIEF JUSTICE:

Thank you, Counsel. The case is submitted.

ORAL ARGUMENT TAKEAWAY

DOCTRINAL FAULT LINE ANALYSIS

- **Sympathetic Justices:** Focus on RFRA's broad protection of religiously motivated conduct—even in economic life.
- **Skeptical Justices:** Focus on institutional stability and the danger of turning financial obligations into constitutional disputes.
- **The Decisive Issue:** Whether interest enforcement is a government burden on religious exercise, and whether the Government can prove it is the least restrictive means.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF [HYPOTHETICAL STATE]

ST. CLARE,
Plaintiff,

v. } **Civil Action No. 26-CV-0001**

UNITED STATES DEPARTMENT OF EDUCATION,
Defendant.

MEMORANDUM OPINION AND ORDER ON REMAND

Judge __________

I. INTRODUCTION

This matter returns to the Court following the Supreme Court's decision in *United States Department of Education v. St. Clare*, 598 U.S. ___ (2028). The Supreme Court held that Plaintiff stated a plausible claim under the Religious Freedom Restoration Act ("RFRA") and directed this Court to conduct factual development concerning whether the Department of Education's enforcement of interest-bearing repayment obligations is the least restrictive means of achieving its compelling governmental interests.

The Supreme Court emphasized that RFRA does not create categorical exemptions from debt obligations. Instead, RFRA requires individualized accommodation analysis when a claimant demonstrates a sincere religious obligation and a substantial burden.

This opinion sets forth the Court's application of the Supreme Court's instructions and resolves several preliminary issues necessary to proceed to evidentiary hearings.

II. PROCEDURAL POSTURE

On remand, the Court ordered supplemental briefing addressing:

- sincerity of Plaintiff's religious belief;
- the nature and extent of the alleged burden;
- the Government's asserted compelling interests;
- feasibility of alternative repayment mechanisms;
- evidentiary requirements for strict scrutiny.

Both parties submitted extensive materials. The Court now issues preliminary rulings and sets the evidentiary path forward.

III. SINCERITY OF RELIGIOUS BELIEF

RFRA requires a showing of sincerity. The Supreme Court assumed sincerity for purposes of its analysis but left factual determination to this Court.

Plaintiff identifies scriptural foundations in:

- Psalm 15:5,
- Exodus 22:25,
- Leviticus 25:35–37.

Plaintiff asserts that these passages impose a religious obligation to avoid participation in interest-bearing structures perceived as exploitative.

Plaintiff has submitted:

- personal testimony;
- statements of religious practice;
- corroborating evidence from religious community members.

The Government argues that Plaintiff's belief is selective and economically motivated.

Ruling: The Court finds that Plaintiff has produced sufficient preliminary evidence of sincerity to proceed. This is not a final determination. The Government may challenge sincerity at the evidentiary hearing.

IV. SUBSTANTIAL BURDEN

The Supreme Court held that Plaintiff plausibly alleged a substantial burden. This Court must now determine whether the burden exists as a matter of fact.

Plaintiff asserts that:

- interest accrual,
- compounding penalties,
- and enforcement mechanisms tied to interest

require participation in conduct Plaintiff believes violates religious obligation.

The Government argues that repayment is a neutral obligation and that interest is merely an economic term.

Ruling: The Court concludes that factual development is necessary. The burden inquiry will require:

- testimony regarding Plaintiff's religious understanding of interest;
- evidence concerning federal repayment structures;
- analysis of whether interest enforcement compels religiously prohibited conduct.

This issue cannot be resolved on the present record.

V. COMPELLING GOVERNMENTAL INTERESTS

The Supreme Court recognized that the Government's interests in maintaining federal lending programs are compelling. This Court adopts that holding.

The Government identifies interests in:

- fiscal stability;
- uniform administration;
- protection of public funds;
- integrity of federal lending systems.

Ruling: These interests satisfy RFRA's compelling-interest requirement. The remaining question is whether the Government's chosen enforcement mechanism is the least restrictive means.

VI. LEAST RESTRICTIVE MEANS

This is the central issue on remand.

The Supreme Court instructed that the Government must demonstrate that enforcing interest obligations is necessary—not merely convenient—to achieve its compelling interests.

Plaintiff identifies potential alternatives:

- principal-only repayment;
- modified interest structures;
- individualized hardship review;
- alternative repayment schedules.

The Government argues that these alternatives would undermine uniform administration and create inequities among borrowers.

Ruling: The Court cannot resolve this dispute without evidence. The least-restrictive-means inquiry requires:

- financial analysis of alternative repayment structures;
- administrative feasibility studies;
- expert testimony regarding federal lending systems;
- comparative analysis of existing hardship programs;
- assessment of whether individualized accommodation is possible without destabilizing federal programs.

The Court will therefore set an evidentiary schedule.

VII. LIMITING PRINCIPLE

The Supreme Court emphasized that RFRA does not require categorical exemptions and that individualized accommodation is the proper framework.

This Court adopts the following limiting principle:

DISTRICT COURT LIMITING PRINCIPLE

RFRA protects religiously motivated conduct only when the claimant demonstrates a specific, sincere religious obligation governing that conduct, and only when accommodation does not undermine compelling governmental interests.

This principle will guide all evidentiary determinations.

VIII. EVIDENTIARY SCHEDULE

The Court orders the following:

1. **Sincerity Hearing:** A limited hearing to evaluate Plaintiff's sincerity and religious foundation. The Court will not adjudicate theological correctness.
2. **Burden Evidence:** The parties shall submit evidence concerning the nature of interest enforcement, whether enforcement compels religiously prohibited conduct, and Plaintiff's understanding of religious obligation.
3. **Government Interest Evidence:** The Government shall submit financial models, administrative feasibility studies, and expert testimony regarding federal lending systems.
4. **Alternative Mechanisms:** Both parties shall submit evidence concerning principal-only repayment feasibility, interest modification, individualized accommodation programs, and administrative impact.

IX. INTERIM RULINGS

The Court issues the following interim rulings:

1. Plaintiff's RFRA claim remains viable.
2. The Government's motion to dismiss on categorical grounds is denied.
3. The Government may challenge sincerity and burden at the evidentiary stage.
4. No relief will be granted until strict scrutiny is fully evaluated.

X. CONCLUSION

The Supreme Court has instructed this Court to determine whether the Government's enforcement of interest obligations is the least restrictive means of achieving its compelling interests. That inquiry requires factual development.

The case proceeds to evidentiary hearings consistent with this opinion.

SO ORDERED.