

In the Supreme Court of the United States

CUTBERTO VIRAMONTES, ET AL.,
Petitioners,

v.

COOK COUNTY, ILLINOIS, ET AL.,
Respondents.

**On Writs of Certiorari to the United States Courts of
Appeals for the Seventh and Second Circuits**

**BRIEF OF *AMICI CURIAE* STATED CLERK OF THE GENERAL
ASSEMBLY OF THE PRESBYTERIAN CHURCH (U.S.A.); PRESIDING
BISHOP AND PRESIDENT OF THE HOUSE OF DEPUTIES OF THE
EPISCOPAL CHURCH; EVANGELICAL LUTHERAN CHURCH IN
AMERICA; GENERAL BOARD OF CHURCH AND SOCIETY OF THE
UNITED METHODIST CHURCH; UNION FOR REFORM JUDAISM;
CENTRAL CONFERENCE OF AMERICAN RABBIS; WOMEN OF
REFORM JUDAISM; MEN OF REFORM JUDAISM; SISTERS OF
MERCY OF THE AMERICAS JUSTICE TEAM; SISTERS OF ST.
JOSEPH OF CARONDELET; GENERAL SYNOD OF THE UNITED
CHURCH OF CHRIST; UNITARIAN UNIVERSALIST ASSOCIATION;
ALLIANCE OF BAPTISTS; RECONSTRUCTIONIST RABBINICAL
ASSOCIATION; AMERICAN ETHICAL UNION; AND NEARLY 150
INDIVIDUAL BISHOPS, CONFERENCE MINISTERS, CLERGY, AND
OTHER FAITH LEADERS FROM METHODIST, PRESBYTERIAN,
EPISCOPAL, ANGLICAN, LUTHERAN, BAPTIST, UNITED CHURCH
OF CHRIST, DISCIPLES OF CHRIST, UNITARIAN UNIVERSALIST,
QUAKER, CATHOLIC, JEWISH, AND NON-DENOMINATIONAL
TRADITIONS IN SUPPORT OF RESPONDENTS**

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EDDIE GRANT, JR., ET AL.,

Petitioners,

v.

RONNELL HIGGINS, IN HIS OFFICIAL CAPACITY

AS COMMISSIONER OF THE CONNECTICUT

DEPARTMENT OF EMERGENCY SERVICES

AND PUBLIC PROTECTION, ET AL.

Respondents.

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<i>Bianchi v. Brown</i> , 111 F.4th 438 (4th Cir. 2024).....	12
<i>Caetano v. Massachusetts</i> , 577 U.S. 411 (2016).....	10
<i>District of Columbia v. Heller</i> , 554 U.S. 570 (2008).....	8, 10, 11
<i>Mitchell v. Rite Aid of Md., Inc.</i> , 290 A.3d 1125 (Md. App. Ct. 2023).....	31
<i>N.Y. State Rifle & Pistol Ass’n v. Bruen</i> , 597 U.S. 1 (2022).....	8, 10, 13
<i>Ocean State Tactical, LLC v. Rhode Island</i> , 95 F.4th 38 (1st Cir. 2024).....	12
<i>Piazza v. Kellim</i> , 377 P.3d 492 (Or. 2016).....	30
<i>Rocky Mountain Planned Parenthood, Inc. v. Wagner</i> , 467 P.3d 287 (Colo. 2020).....	30
<i>Staples v. United States</i> , 511 U.S. 600 (1994).....	12
<i>United States v. Rahimi</i> , 602 U.S. 680 (2024).....	10
<i>Wisconsin v. Yoder</i> , 406 U.S. 205 (1972).....	24

TABLE OF AUTHORITIES—Continued

Page(s)

Other Authorities

- Andrew Adams, *Grand Blanc Shooting Survivor Shares Recovery Story*, KSL News (Dec. 9, 2025), <https://perma.cc/W5QN-TFZU> 17
- Al Jazeera, *Demand for ‘Active Shooter Insurance’ on the Rise as US Reopens* (May 13, 2021), <https://www.aljazeera.com/economy/2021/5/13/demand-for-active-shooter-insurance-on-the-rise-as-us-reopens>..... 32
- Deepa Bharath & Luis Andres Henao, *U.S. Houses of Worship Increase Security After Shootings*, Associated Press (July 17, 2022), <https://apnews.com/article/religion-shootings-violence-d114519eeb52ee7ba168ab6237d3ced6> 26
- Joseph Blocher & Reva Siegel, *Guns Are a Threat to the Body Politic*, The Atlantic (Mar. 8, 2021), <https://www.theatlantic.com/ideas/archive/2021/03/guns-are-threat-body-politic/618158/> 25
- Emma Bowman & Ayana Archie, *This Is How Handguns and Assault Weapons Affect the Human Body*, NPR (June 6, 2022), <https://www.npr.org/2022/06/06/1103177032/gun-violence-mass-shootings-assault-weapons-victims>..... 21
- Samuel Bray, *A Challenge to Hendiadys in the Law, Reason: Volokh Conspiracy* (Dec. 1, 2020), <https://perma.cc/4GX8-S9MJ> 11
- Marika Cabral et al., *Trauma at School: The Impacts of Shootings on Students’ Human Capital and Economic Outcomes* (Nat’l Bureau of Econ. Rsch., Working Paper No. 28311, 2020), <https://perma.cc/9KK6-HR6J> 22

TABLE OF AUTHORITIES—Continued

	Page(s)
Stuart Cameron, <i>Adapting to Today's Threats</i> , FBI Law Enforcement Bulletin (Feb. 5, 2019), https://perma.cc/YY5E-KZUN	29
Terry Camp & Ricardo Quintanilla, <i>Church Shooting Survivor Shares Story of Confronting Gunman</i> , ABC12 News (Oct. 4, 2026), https://perma.cc/SKW8-UV28	17
<i>Car Registered to Man Accused of Planning Mass Shooting Was at Hindu Temple He Targeted</i> , Police Say, NBC News (Oct. 16, 2026), https://www.nbcnews.com/news/us-news/car-registered-man-accused-planning-mass-shooting-was-hindu-temple-rcna603844	19
Central Conference of American Rabbis, <i>Resolution on Assault Weapons and High Capacity Magazine Ban</i> (May 10, 2018), https://perma.cc/TF36-VTME	7
CISA, <i>Physical Security Performance Goals for Faith-Based Communities</i> (Dec. 2023), https://perma.cc/S4DN-FMZH	29
Daniel Conrad, <i>Victims Bear Wounds in Damages Phase of Sutherland Springs Shooting Trial</i> , Courthouse News Serv. (Oct. 14, 2021), https://perma.cc/W6D9-HJ5M	19
Russell Contreras, <i>Jewish Institutions' Security Spending in U.S. Tops \$1 Billion</i> , Axios (Sept. 12, 2026), https://www.axios.com/2026/09/12/jewish-security-spending-holy-days	29

TABLE OF AUTHORITIES—Continued

	Page(s)
David Crary, Peter Smith & Tiffany Stanley, <i>Fear and Vigilance Rise as Attacks on Houses of Worship Intensify Worldwide</i> , Associated Press (Oct. 10, 2025), https://apnews.com/article/houses-worship-attacks-churches-mosques-synagogues-security-1c523496b8da9e40de7dab46c54121a9	27
Katie Day, <i>Guns, Construction of Threat, and Lived Ecclesiologies</i> , 12 J. Moral Theology 84 (2023), https://jmt.scholasticahq.com/article/89313-guns-construction-of-threat-and-lived-ecclesiologies	26
James Densley & Jillian Peterson, <i>Assault Weapon Platform Lethality in US Mass Public Shootings 1966-2025</i> , Sci. Reps. (Sept. 11, 2026), https://perma.cc/T47Z-QWHX	20, 23
James Densley & Jillian Peterson, <i>Trends and Recommendations: House of Worship Targeted Homicides</i> , CNA (2026) https://perma.cc/P9FL-GXYT	23
Jessica Eturralde, <i>Are 100K Churches Closing in America?</i> , Ministry Watch (Oct. 22, 2025), https://perma.cc/57E2-LCJK	28
Evangelical Lutheran Church in America, <i>Social Message on Gun-related Violence and Trauma</i> (Apr. 13, 2024), https://perma.cc/AW85-5HD2	7
Molly Evans, <i>What We Know About the Victims of the South Texas Church Shooting</i> , Houston Pub. Media (Nov. 9, 2017), https://perma.cc/WM8J-HY8J	18
Fed. Bureau of Invest., <i>FBI Detroit Update on Shooting and Fire at Grand Blanc LDS Church</i> (Sept. 30, 2025), https://perma.cc/YCC4-JBEC	16

TABLE OF AUTHORITIES—Continued

	Page(s)
Teri Figueroa, <i>Father of Girl Injured in Chabad of Poway Shooting Sues Over Security Measures</i> , San Diego Union-Trib. (Apr. 8, 2021), https://perma.cc/QY2R-SZ7L	30
Adam Goldman, Richard Pérez-Peña & Manny Fernandez, <i>Texas Church Shooting Video Shows Gunman’s Methodical Attack, Official Says</i> , N.Y. Times (Nov. 8, 2017), https://www.ny-times.com/2017/11/08/us/texas-shooting-video-devin-kelley.html	18
Andrew Goldstein, <i>Congregation Dor Hadash Was a Target for Its Immigrant Advocacy—And the Shooting Did Not Stop That Work</i> , Pittsburgh Post-Gazette (Oct. 26, 2019), https://perma.cc/554P-MXSX	27
Gun Violence Report and Recommendations, Approved Alternate Resolution of the 225th General Assembly of the Presbyterian Church (U.S.A.) (2022), https://www.pc-biz.org/search/3000927	6
Lee Harris, <i>The Booming Business of Insuring Against US Gun Violence</i> , Fin. Times (Sept. 29, 2026), https://www.ft.com/content/5ad7c42c-b95d-47b8-8dfd-896c1deda1df	31
Aleja Hertzler-McCain, <i>After Annunciation Shooting, Catholic Schools Pray, Prepare Drills in Sanctuaries</i> , Christian Century (Sept. 2, 2025), https://perma.cc/8BDQ-8FNW	25
<i>Holy Bible (New American Standard Bible)</i> (Lockman Found., 2020).....	11
<i>Holy Bible (New Life Version)</i> (Barbour Publ’g, Inc., 2003)	11

TABLE OF AUTHORITIES—Continued

	Page(s)
<i>Holy Bible (New Revised Standard Version Updated Edition)</i> (Nat'l Council of the Churches of Christ, 2021)	11
Ryan Jeltema, <i>Officers Ruled Justified for Killing Grand Blanc Church Attacker</i> , ABC12 News, (Sept. 25, 2026), https://perma.cc/59WZ-3QAN	16
Richard R. Johnson, Ph.D., Dolan Consulting Group, <i>Serious Violence at Places of Worship in the U.S.- Looking at the Numbers</i> (Sept. 2019), https://perma.cc/CHQ5-K4AD	23
<i>Journal of the 81st General Convention of the Episcopal Church</i> (2024), https://perma.cc/8RZW-5TSQ	6
Gina Kolata and C.J. Chivers, <i>Wounds From Military-Style Rifles? “A Ghastly Thing to See,”</i> N.Y. Times (Mar. 4, 2018), https://www.nytimes.com/2018/03/04/health/parkland-shooting-victims-ar15.html	21
Michelle Krupa, <i>The Shooting Finally Stopped. Then Came Everything Else</i> , CNN (May 17, 2026), https://www.cnn.com/interactive/2026/05/us/minneapolis-annunciation-school-shooting-recovery/	26
Tim Kummer, <i>Legislative Testimony of First Physician on the Scene at the Annunciation Shooting</i> , Minn. Reformer (Sept. 17, 2025), https://perma.cc/F8MS-2WDE	16
Beret Leone, <i>Annunciation Mass Shooting Investigation Detailed in 2,600-Page Report</i> , CBS News (Aug. 27, 2026), https://perma.cc/J6BK-36QE	16

TABLE OF AUTHORITIES—Continued

	Page(s)
Eric Levenson, <i>Religious Schools Like Annunciation Face Particular Security Challenges in the Age of School Shootings</i> , CNN (Aug. 29, 2025), https://www.cnn.com/2025/08/29/us/religious-schools-annunciation-shootings-minneapolis	15
Phillip B. Levine & Robin McKnight, <i>Exposure to a School Shooting and Subsequent Well-Being</i> (Nat'l Bureau of Econ. Rsch., Working Paper No. 28307, 2020), https://perma.cc/9AES-KMMH	22
Greg Lickenbrock, <i>Video Shows Annunciation Catholic School Shooter's Arsenal</i> , The Smoking Gun, (Aug. 29, 2025), https://perma.cc/YUY8-SUXX	15, 20
Sarah Lowe & Sandra Galea, <i>The Mental Health Consequences of Mass Shootings</i> , 18 Trauma, Violence & Abuse 62 (2017), https://perma.cc/YM6S-VYYE	22
Bob Mayo, <i>Jurors See and Hear Autopsy Evidence, Testimony at Pittsburgh Synagogue Shooting Trial</i> , WTAE Pittsburgh (June 6, 2023), https://perma.cc/MX6H-YHER	14
Bob Mayo, <i>Pittsburgh Synagogue Shooting Trial: Police Recount Gunfights with Defendant and His Words of Hate</i> , WTAE Pittsburgh (June 2, 2023), https://perma.cc/V9A9-TSVR	14, 15
Medieval Sourcebook: Edward Grim: The Murder of Thomas Becket, https://perma.cc/5FUA-GKQT	33
David Montgomery, Christopher Mele & Manny Fernandez, <i>Gunman Kills at Least 26 in Attack on Rural Texas Church</i> , N.Y. Times (Nov. 5, 2017), https://www.nytimes.com/2017/11/05/us/church-shooting-texas.html	18

TABLE OF AUTHORITIES—Continued

	Page(s)
<i>New Analysis Explores Frequency and Lethality of Assault-Style Rifles in Mass Shootings Over 50 Years</i> , Rockefeller Inst. of Gov’t (Mar. 22, 2019), https://perma.cc/56KK-WGDQ	20
Richard A. Oppel, Jr., <i>Synagogue Suspect’s Guns Were All Purchased Legally, Inquiry Finds</i> , N.Y. Times (Oct. 30, 2018) https://www.ny-times.com/2018/10/30/us/ar15-gun-pittsburgh-shooting.html	14, 15
Scott Pelley, <i>What Makes the AR-15 Style Rifle the Weapon of Choice for Mass Shooters?</i> , CBS News (June 13, 2021), https://perma.cc/2CD4-WMK6	18, 19
Press Release, Rep. Lauren Gillen, <i>Rep. Gillen Delivers Over \$2 Million in New Federal Security Funding for Houses of Worship</i> (Aug. 17, 2026), https://perma.cc/2N6K-GS9G	29
Press Release, U.S. Dep’t of Justice, <i>Additional Charges Filed in Tree of Life Synagogue Shooting</i> (Jan. 29, 2019), https://perma.cc/8F3H-NG9D	27
Press Release, U.S. Dep’t of Justice, <i>Jury Recommends Sentence of Death for Pennsylvania Man Convicted for Tree of Life Synagogue Shooting</i> (Aug. 2, 2023), https://perma.cc/UZ6D-P6PW	14
Marc Rod, <i>Congress Allocating \$300 Million for Nonprofit Security Grants in 2026</i> , Jewish Insider (Jan. 21, 2026), https://jewishinsider.com/2026/01/congress-nonprofit-security-grant-program-2026-jewish-leaders	30

TABLE OF AUTHORITIES—Continued

	Page(s)
Marc Rod, <i>Under Half of Nonprofit Security Grant Applications Funded in 2024, Despite Additional Funding</i> , Jewish Insider, (Aug. 30, 2024), https://jewishinsider.com/2024/08/under-half-of-nonprofit-security-grant-applications-funded-in-2024-despite-additional-funding	30
Maya Rossin-Slater et al., <i>Local Exposure to School Shootings and Youth Antidepressant Use</i> (Proceedings of the Nat’l Acad. of Scis., Sept. 22, 2020), https://perma.cc/GEG8-3A3R	22
Andre May Sahouri, John Wisely & Keith Matheny, <i>Suspect in Michigan Shooting at LDS Church Identified as Thomas Jacob Sanford</i> , Detroit Free Press (Sept. 29, 2025), https://perma.cc/6XHY-GQ2D	17
Jaclyn Schildkraut, <i>Assault Weapons, Mass Shootings, and Options for Lawmakers</i> , Rockefeller Inst. of Gov’t (Mar. 22, 2019), https://perma.cc/NAN8-NC7S	20
Ganesh Setty, <i>Victims of Las Vegas Massacre Settle with MGM Resorts for at Least \$735 Million</i> , CNBC (Oct. 3, 2019), https://perma.cc/Q9EM-6Z2M	31
Deepa Shivaram, <i>DOJ Reaches Settlement with Families of Sutherland Springs Mass Shooting</i> , NPR (Apr. 5, 2023), https://www.npr.org/2023/04/05/1168158219/doj-sutherland-springs-settlement-mass-shooting	19
Barbara Sprunt, <i>Religious Leaders, Lawmakers Push for \$1 Billion to Secure Houses of Worship</i> , NPR (May 24, 2026), https://www.npr.org/2026/05/24/nx-s1-5815007/religious-leaders-lawmakers-push-for-1-billion-to-secure-houses-of-worship	29

TABLE OF AUTHORITIES—Continued

	Page(s)
Kyle Stokes, <i>The Survivors of Annunciation, in Their Own Words</i> , Axios (Aug. 27, 2026), https://www.axios.com/local/twin-cities/2026/08/27/1-big-thing-in-their-own-words	15
Alexis de Tocqueville, <i>Democracy in America</i> (Harvey C. Mansfield & Delba Winthrop eds. and trans., Univ. of Chi. Press 2000) (1840).....	5
United Church of Christ, <i>On Recognizing and Studying Gun Violence as a Public Health Emergency</i> , General Synod 31 (2017), https://perma.cc/MVZ9-YTKC	7
United Church of Christ, Resolution on Guns and Violence, General Synod 20 (1995), https://perma.cc/U2LM-E3AN	7
Vanessa Vieites, <i>How to Cope With Fear of Public Places After Mass Shootings</i> , Fla. Int’l Univ. News (Aug. 26, 2019), https://perma.cc/JPT6-6XNH	26
<i>Voice of America Special Report: House of Worship Shootings</i> , https://perma.cc/4UHX-V6L5 (last visited Oct. 21, 2026).....	23
Isabella Volmert & Hannah Schoenbaum, <i>FBI Says Shooter in Deadly Michigan Church Attack Was Motivated by Hatred Toward the Mormon Faith</i> , Associated Press (Oct. 31, 2025), https://apnews.com/article/church-shooting-michigan-mormon-church-12f6b905f09300e45050efa07a1701c8	17
<i>Why Nonprofit Insurance Premiums Are Rising-And How to Respond Strategically</i> , Cmty. Purchasing All. (May 12, 2025), https://perma.cc/SFQ7-WH2D	32

TABLE OF AUTHORITIES—Continued

	Page(s)
Noor Zainab Hussain & Carolyn Cohn, <i>U.S. Mass Shooting Insurance Rates Jump as Incidents Rise</i> , Reuters (June 29, 2022), https://www.reuters.com/world/us/us-mass-shooting-insurance-rates-jump-incidents-rise-2022-06-29	31, 32

INTEREST OF *AMICI CURIAE*¹

Amici curiae comprise a broad range of religious stakeholders (including nearly 150 individual bishops, conference ministers, clergy, and other faith leaders) who affirm their commitment to peace and human dignity.² *Amici* differ in their views regarding a variety of social issues. But they are united in their belief that reasonable gun regulation is essential to protect the safety and serenity of places of worship and the ability of religious institutions to carry out their missions and activities, all of which are threatened by the alarming escalation of gun violence in their communities—including gun violence committed with assault weapons.

Rev. Jihyun Oh, as Stated Clerk of the General Assembly, is the senior ecclesiastical officer of the Presbyterian Church (U.S.A.) (PC(USA)), a national Christian denomination with over 1,000,000 members in over 8,000 congregations. The General Assembly is the highest legislative and interpretive body of the denomination, the final point of decision in all disputes, and has long held social policy advocating for laws banning the manufacture, sale and possession of assault weapons. The General Assembly does not claim to speak for all Presbyterians, nor are its policies binding on the membership of the Presbyterian Church.

¹ No counsel for any party authored this brief in whole or in part, and no person or entity besides undersigned *amici* and their counsel made a monetary contribution intended to fund the preparation or submission of this brief.

² Appendix A lists all individual *amici*.

The Most Reverend Sean W. Rowe is the 28th Presiding Bishop of The Episcopal Church, a hierarchical religious denomination in the United States and 17 other countries. Under the Church's polity, the Presiding Bishop is charged with "speak[ing] God's words to the Church and to the world, as the representative of [the] Church."

Ms. Julia Ayala Harris is the President of the House of Deputies of The Episcopal Church. President Ayala Harris presides over a legislative chamber consisting of more than 800 elected clergy and lay leaders representing all dioceses of The Episcopal Church as part of its bicameral governing body, the General Convention.

The Evangelical Lutheran Church in America (ELCA) is one of the largest Christian denominations in the United States, with nearly three million members in more than 8,000 worshiping communities across the 50 states and in the Caribbean region.

The General Board of Church and Society of The United Methodist Church (UMC) is the denominational agency charged with seeking to implement the Social Principles and other policy statements adopted by the General Conference of the UMC concerning Christian social concerns, and with providing forthright witness. The UMC is a global denomination comprising more than 39,000 local churches and over 9 million members in the United States, Africa, Asia, and Europe. The General Conference, as the highest legislative body of the UMC, establishes the denomination's policies and is the only body authorized to speak on behalf of the denomination as a whole.

The Union for Reform Judaism, whose 825 congregations across North America include more than 1 million Reform Jews; the Central Conference of American Rabbis, whose membership includes more than 2,000 Reform rabbis; the Women of Reform Judaism; and the Men of Reform Judaism share a deep commitment to Jewish tradition that emphasizes the sanctity and eternal value of human life.

The Sisters of Mercy of the Americas Justice Team is charged with promoting and implementing the Sisters' Critical Concerns on behalf of the Sisters of Mercy of the Americas. The Sisters of Mercy of the Americas serves more than 4,500 Catholic sisters and associates in the United States, Latin America, Guam, and the Philippines.

The Sisters of St. Joseph of Carondelet is a congregation of 577 vowed Catholic sisters motivated in all things by their profound love of God and neighbor and their commitment to the dignity of every person.

The General Synod of the United Church of Christ (UCC) is the representative body of this Protestant denomination of more than 700,000 members and more than 4,600 churches.

The Unitarian Universalist Association is a religious denomination formed in 1961 by the union of the American Unitarian Association and the Universalist Church of America, with membership comprising approximately 1,000 congregations nationwide.

The Alliance of Baptists is a Baptist covenant community that includes approximately 150 Baptist congregations committed to following the movement of God's Spirit through justice, compassion and courageous witness. As reflected in its Statement on Gun

Violence adopted in 2014, the Alliance laments the death and injury caused by gun violence and supports legislation to ban assault weapons, in keeping with the Alliance's covenant to work for peace in its congregations, the nation, and the world.

The Reconstructionist Rabbinical Association (RRA), established in 1974, is the professional association of Reconstructionist rabbis. Comprised of over 300 rabbis, the RRA represents the rabbinic voice within the Reconstructionist movement.

The American Ethical Union (AEU) is the national federation of Ethical Culture Societies, which are non-theistic congregational communities that meet each Sunday for services. The AEU promotes ethics as the core of its religious message, which it expresses through charitable activities.

Amici curiae bishops, conference ministers, and other individual clergy and faith leaders, listed in Appendix A, come from various United States religious communities, including Methodist, Presbyterian, Episcopal, Anglican, Lutheran, Baptist, United Church of Christ, Christian Church (Disciples of Christ), Unitarian Universalist, Quaker, Catholic, Jewish, non-denominational, and multi-denominational traditions.

INTRODUCTION AND SUMMARY OF ARGUMENT

Gathering peacefully for prayer and community is central to the American experience. Nearly 200 years ago, Alexis de Tocqueville wrote that "Americans of all ages, all conditions, all minds constantly unite. Not only do they have commercial and industrial associations in which all take part, but they also

have a thousand other kinds: religious, moral, grave, futile [I]f it is a question of bringing to light a truth or developing a sentiment with the support of a great example, they associate.”³ For many millions of Americans, this tendency to join together is expressed by peacefully gathering for religious observance, a central aspect of their faith. Worship communities are an essential part of this country’s social fabric and a particular source of its cultural and moral strength.

And yet, in recent years, the peace and tranquility of religious gatherings—precisely the qualities that make houses of worship safe places for people to connect, share their faith, and forge community—have too often been shattered by violent attacks, most often carried out with firearms. Some of the most devastating of these attacks have been perpetrated with AR-15 semiautomatic rifles and similar assault weapons.⁴ Laws prohibiting these weapons, such as those enacted in Connecticut and Cook County, Illinois, provide a measure of protection against the ever-present threat of gun violence by limiting attackers’ access to firearms designed to inflict a greater number and severity of injuries than handguns or traditional sporting arms. Such laws thus reduce the opportunities for assault weapons to intrude upon the sanctuary of the worship space.

³ Alexis de Tocqueville, *Democracy in America* 408 (Harvey C. Mansfield & Delba Winthrop eds. and trans., Univ. of Chi. Press 2000) (1840).

⁴ The Connecticut statutes and Cook County ordinance at issue in these cases use the term “assault weapons” to refer to the prohibited firearms. Therefore, *amici* will do the same in this brief.

A wide range of organized religions and other religious stakeholders have spoken out against gun violence and endorsed reasonable regulations aimed at limiting the proliferation of assault weapons and other firearms in American society, including the following:

- The General Assembly of the Presbyterian Church (U.S.A.) advocates to “ban semiautomatic assault weapons,”⁵ and “calls upon all civilly elected representatives, at all levels, to earnestly, courageously and urgently pass meaningful legislation for the common good and public safety of all our citizens, residents, and visitors.”⁶
- A resolution of the General Convention of The Episcopal Church recognizes that assault weapons have been used in “some of the worst mass killings in the world” and reiterates the church’s longstanding opposition to assault weapons by calling for a federal ban on “the possession of all military-style assault weapons, bump stocks, and high-capacity magazines.”⁷
- The Evangelical Lutheran Church in America’s social message on gun violence supports “comprehensive legal controls of military assault

⁵ Report of the 219th General Assembly of the Presbyterian Church (U.S.A.), *Gun Violence, Gospel Values: Mobilizing in Response to God’s Call 2* (2010), <https://perma.cc/J3HU-DELK>.

⁶ Gun Violence Report and Recommendations, Approved Alternate Resolution of the 225th General Assembly of the Presbyterian Church (U.S.A.) (2022), <https://www.pc-biz.org/search/3000927>.

⁷ *Journal of the 81st General Convention of the Episcopal Church* 870 (2024), <https://perma.cc/8RZW-5TSQ>.

weapons” and calls for “shared societal resolve to reduce an untenable public threat in the production and sale of AR-15-style rifles.”⁸

- A resolution of the Central Conference of American Rabbis calls on state and federal law makers “to renew and make permanent a ban on assault rifles,” which “do not belong in civilian hands” because “their utility is only in killing multiple victims.”⁹
- A resolution of the General Synod of the United Church of Christ encourages Congress “to openly debate methods to improve gun safety, training and storage to reduce gun deaths.”¹⁰ The General Synod has also endorsed legislation that will “prohibit semiautomatic assault weapons.”¹¹

The challenged laws represent a constitutional exercise of Connecticut’s and Cook County’s authority to protect their citizens, including religious stakeholders, from a range of harms. *Amici* recognize that this Court has held that the Second Amendment encompasses an individual right to keep and bear arms for self-defense. But the Court has also observed that

⁸ Evangelical Lutheran Church in America, *Social Message on Gun-related Violence and Trauma* (Apr. 13, 2024), <https://perma.cc/AW85-5HD2>.

⁹ Central Conference of American Rabbis, *Resolution on Assault Weapons and High Capacity Magazine Ban* (May 10, 2018), <https://perma.cc/TF36-VTME>.

¹⁰ United Church of Christ, *On Recognizing and Studying Gun Violence as a Public Health Emergency*, General Synod 31 (2017), <https://perma.cc/MVZ9-YTKC>.

¹¹ United Church of Christ, *Resolution on Guns and Violence*, General Synod 20 (1995), <https://perma.cc/U2LM-E3AN>.

this right is “not unlimited” and has historically been subject to reasonable restrictions, including prohibitions on “dangerous and unusual weapons.” *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 597 U.S. 1, 21 (2022) (quoting *District of Columbia v. Heller*, 554 U.S. 570, 626–27 (2008)).

Assault weapons are dangerous and unusual weapons because, in the words of the Second Circuit, they are “uniquely designed to create mayhem.” *Grant* Pet. App. 9a. They give bad actors the capacity to inflict more devastating injuries on more victims within a far shorter timespan. Over the past decade, *amici* have witnessed the nightmarish violence that assault weapons can inflict on faith communities, including at a meetinghouse of the Church of Jesus Christ of Latter-day Saints in Grand Blanc, Michigan, in 2025; at the Church of the Annunciation in Minneapolis, Minnesota, in 2025; at Tree of Life Congregation in Pittsburgh, Pennsylvania, in 2018; and at the First Baptist Church of Sutherland Springs, Texas, in 2017.

If prohibitions on assault weapons were invalidated, congregations would face a heightened risk of gun violence. Deadly attacks on houses of worship, usually involving firearms, have been on the rise for years, causing a tragic loss of life and also long-lasting psychological trauma for survivors and the broader religious community, which may interfere with participation in religious practice. The presence of assault weapons in and around houses of worship disturbs the serenity of the worship space, as congregations must contemplate turning themselves into virtual fortresses, or else leave themselves vulnerable to

attack—either of which has the potential to chill congregants’ First Amendment right of free exercise. Striking down the challenged laws would also likely inflict tangible financial burdens on religious institutions, heightening the onerous costs of measures to mitigate the threat of attacks, increasing potential liability stemming from such incidents, and increasing insurance costs. For some already-struggling faith communities, these costs could be crushing.

It is no answer to say that individual houses of worship may choose to prohibit assault weapons within their walls. Assault weapons are unusually dangerous when they are permitted in society at large, and lawmakers should be permitted to decide whether their constituents—worshiping communities among them—are best served by such weapons’ prohibition. *Amici* therefore respectfully urge the Court to affirm the Courts of Appeals’ decisions.

ARGUMENT

The challenged laws are constitutional because AR-15-style rifles are unusually dangerous weapons. These laws reduce the threat of extreme mass violence, which has markedly increased at places of worship in recent years, and help protect religious institutions from enhanced dangers of gun violence that chill their right to exercise their faith and increase expenses that strain their finances.

I. The Second Amendment Does Not Protect Unusually Dangerous Weapons, Including AR-15-Style Semiautomatic Rifles and Similar Assault Weapons

In its recent Second Amendment jurisprudence, this Court has emphasized the longstanding principle

that the Second Amendment right to bear arms “is not unlimited” and is “not a right to keep and carry any weapon whatsoever in any manner whatsoever and for whatever purpose.” *Bruen*, 597 U.S. at 21 (quoting *Heller*, 554 U.S. at 626); see also *United States v. Rahimi*, 602 U.S. 680, 690–91 (2024). Under the methodology set forth in *Heller* and *Bruen*, gun regulations are lawful if they are “consistent with the principles that underpin our regulatory tradition.” *Rahimi*, 602 U.S. at 691–92. In particular, the Court has repeatedly recognized “the historical tradition of prohibiting the carrying of ‘dangerous and unusual weapons.’” *Heller*, 554 U.S. at 627 (quoting 4 W. Blackstone, *Commentaries on the Laws of England* 148–49 (1769)); see also *Caetano v. Massachusetts*, 577 U.S. 411, 412 (2016) (per curiam); *Bruen*, 597 U.S. at 21; *Rahimi*, 602 U.S. at 691.

As described by the Second Circuit below in *Grant*, the phrase “dangerous and unusual” is best understood to mean “unusually dangerous”—*i.e.*, those weapons that are “so lethal that legislators have presumed that they are not used or intended to be used for lawful purposes, principally individual self-defense.” *Grant* Pet. App. 32a & n.19; see *id.* at 72a (Nathan, J., concurring) (explaining that history makes clear that the “dangerous and unusual” standard “emerges from concern about danger to the public, not statistical commonality”). This interpretation, which reads “dangerous and unusual” as a hendiadys—a figure of speech in which a single complex idea is expressed by two words, usually joined by the

conjunction “and”¹²—is the only sensible reading of the phrase. Arms are inherently “dangerous,” so the inclusion of dangerousness would be entirely superfluous if “dangerous” and “unusual” are interpreted as independent requirements. If the two words are read as a single idea, this redundancy disappears.

Just as importantly for the Second Amendment analysis, the historical record points to a hendiadys. The sources cited in *Heller* refer to both “dangerous and unusual” and “dangerous or unusual” weapons—and Blackstone itself even uses the phrase “dangerous or unusual.” See *Grant* Pet. App. 69a–70a (Nathan, J., concurring) (emphasis added). That the historical analysis does not exclusively support either a conjunctive or disjunctive reading strongly suggests that “neither ‘and’ nor ‘or’ should be read so literally” and that the phrase should instead be read as a single concept:

¹² Hendiadys has a prominent place in the scriptures shared by a majority of *amici*. The second verse of Genesis contains perhaps the most famous example: In the beginning, when God created the heavens and the earth, the earth was *tohu va-bohu* (תוהו ובהו). Although those two nouns, literally rendered, mean “formlessness and emptiness,” they are widely understood to be a single concept meaning something like “a formless and desolate emptiness” (New American Standard Bible), “an empty waste” (New Life Version), or “complete chaos” (New Revised Standard Version Updated Edition). See also, e.g., Gen. 3:16 (“your pain and your conception,” *i.e.*, “your birth-pains”). Hendiadic expressions also figure in ordinary and legal usage as well—e.g., “nice and warm” or “necessary and proper.” Hendiadys would have been familiar to the founders from, among other sources, the Church of England’s Book of Common Prayer, from which worshippers would have daily prayed, “We have erred and strayed from thy ways like lost sheep.” See Samuel Bray, *A Challenge to Hendiadys in the Law*, Reason: Volokh Conspiracy (Dec. 1, 2020), <https://perma.cc/4GX8-S9MJ>.

“unusually dangerous.” *Id.* at 70a. Thus, when a weapon poses unusual dangers to a well-ordered society, it is not protected under the Second Amendment.

Assault weapons are unusually dangerous weapons. *See, e.g., Barnett v. Raoul*, 180 F.4th 1035, 1047 (7th Cir. 2026) (explaining that history of regulations on “dangerous and unusual” (or “unusually dangerous” or “especially dangerous”) weapons allows for “targeted restrictions on weapons whose danger and lethality stand out” and “justify restrictions on AR-15s”). This Court has recognized that the AR-15 “is the civilian version of the military’s M-16 rifle,” with the principal difference being that the AR-15 is, “unless modified, a semiautomatic weapon,” whereas the M16 has fully automatic or burst firing capabilities. *Staples v. United States*, 511 U.S. 600, 603 (1994); *see also Bianchi v. Brown*, 111 F.4th 438, 456 (4th Cir. 2024) (en banc) (explaining that this difference “pales in significance compared to the plethora of combat-functional features that makes the two weapons so similar”), *cert. denied*, 145 S. Ct. 1534 (2025). AR-15s boast a near-identical range and muzzle velocity as M16s, and they deliver comparable wounding capabilities. *See Barnett*, 180 F.4th at 1053–54. Because of these characteristics, assault weapons can rapidly fire rounds that cause unusually lethal injuries. Particularly when paired with large-capacity magazines, assault weapons empower a single person to, “in minutes, murder several dozen individuals.” *Ocean State Tactical, LLC v. Rhode Island*, 95 F.4th 38, 49 (1st Cir. 2024), *cert. denied*, 145 S. Ct. 2771 (2025). This capability is “empirically . . . not a useful feature for self-defense,” *id.*, and instead allows for

“unprecedented lethality,” *Barnett*, 180 F.4th at 1047 n.9 (citation omitted).

As discussed further in Point II, *infra*, the special lethality of assault weapons poses grave threats to faith communities and their freedom of religion. Religious institutions serve as places of refuge where congregants exercise their fundamental rights of religious expression and peaceable assembly under the protection of the First Amendment. Faith communities should not be forced to choose between leaving themselves exposed to attackers armed with military-grade weapons and transforming themselves into armed bunkers, walled off from the world.

To be clear, *amici* do not encourage adoption of a means-end analysis, as was expressly foreclosed by *Bruen*. See 597 U.S. at 23–24. Rather, they write to share their understanding of why assault weapons are unusually dangerous weapons that the Second Amendment does not protect. Assault weapons pose special threats to civil society, as demonstrated by their impacts on the peaceful assembly of worshipping communities. Prohibiting such weapons is essential for religious communities to exercise their faith in peace.

II. Religious Institutions Have Experienced the Unusual Dangers Posed by Assault Weapons, and Eliminating Lawmakers’ Ability to Prohibit Such Weapons Would Exacerbate Those Dangers

A. Assault Weapons Pose a Threat of Unusual Violence to Religious Communities

Devastating mass shootings with assault weapons have been on the rise at American places of worship.

On October 27, 2018, a man armed with a Colt AR-15 SP1 semiautomatic rifle and three handguns attacked Tree of Life synagogue in Pittsburgh, Pennsylvania, in an act of antisemitic terror.¹³ He murdered eleven congregants and wounded seven other individuals, including five police officers.¹⁴ As he surrendered, the shooter exclaimed that he “had to do it, Jews are the children of Satan.”¹⁵

This gunman’s use of an assault weapon made his attempt to annihilate the Tree of Life community all the more destructive. His AR-15 permitted him to fire so rapidly that police believed he was wielding an automatic weapon and described themselves as “pinned down by gunfire” during the attack.¹⁶ At the gunman’s trial, one of the responding SWAT commanders testified that, when he entered the synagogue, he saw three dead bodies whose “faces were unrecognizable” due to their wounds.¹⁷ One victim’s x-ray showed rifle

¹³ Richard A. Oppel, Jr., *Synagogue Suspect’s Guns Were All Purchased Legally, Inquiry Finds*, N.Y. Times (Oct. 30, 2018), <https://www.nytimes.com/2018/10/30/us/ar15-gun-pittsburgh-shooting.html>.

¹⁴ Press Release, U.S. Dep’t of Justice, *Jury Recommends Sentence of Death for Pennsylvania Man Convicted for Tree of Life Synagogue Shooting* (Aug. 2, 2023), <https://perma.cc/UZ6D-P6PW>.

¹⁵ Bob Mayo, *Jurors See and Hear Autopsy Evidence, Testimony at Pittsburgh Synagogue Shooting Trial*, WTAE Pittsburgh (June 6, 2023), <https://perma.cc/MX6H-YHER>.

¹⁶ Oppel, *supra* note 13.

¹⁷ Bob Mayo, *Pittsburgh Synagogue Shooting Trial: Police Re-count Gunfights with Defendant and His Words of Hate*, WTAE Pittsburgh (June 2, 2023), <https://perma.cc/V9A9-TSVR>.

bullet fragments appearing like a “lead snowstorm” in his body.¹⁸ The shooter legally purchased all of his guns in Pennsylvania, which has no prohibition on assault weapons.¹⁹

This was not an isolated incident. Rather, it was a gruesome example of what assault weapons, in the hands of those filled with hatred and religious animus, can do to the most sacred of spaces. The carnage described stands as a horrific testament to the destruction that a single shooter, armed with a military-style firearm and hundreds of rounds of ammunition, can unleash upon an innocent congregation. Unfortunately, it was neither the first such attack nor the last.

On August 27, 2025, a shooter armed with an AR-15 rifle fired 116 rounds in less than four minutes during an all-school Mass at the Church of the Annunciation in Minneapolis, killing two students and injuring twenty-eight others.²⁰ It is all but certain that many more would have died, if not for the school’s policy of locking the church’s doors at the beginning of the service; the shooter could fire only through the church’s stained-glass windows.²¹ The children

¹⁸ Mayo, *supra* note 17.

¹⁹ Oppel, *supra* note 13.

²⁰ Kyle Stokes, *The Survivors of Annunciation, in Their Own Words*, Axios (Aug. 27, 2026), <https://www.axios.com/local/twin-cities/2026/08/27/1-big-thing-in-their-own-words>; Greg Lickenbrock, *Video Shows Annunciation Catholic School Shooter’s Arsenal, The Smoking Gun*, (Aug. 29, 2025), <https://perma.cc/YUY8-SUXX>.

²¹ Eric Levenson, *Religious Schools Like Annunciation Face Particular Security Challenges in the Age of School Shootings*, CNN

murdered were just eight and ten years old.²² According to a physician who attended to the victims, the use of a high-powered rifle “made everything worse[,] turn[ing] potentially minor wounds into life-threatening ones.”²³ For example, he treated one twelve-year-old girl who suffered what looked like a minor graze wound to her head, but “the energy from the rifle was so powerful it caused severe bleeding in her brain, and she had to have part of her skull removed.”²⁴ The guns used in the attack were all purchased legally.²⁵ Assault weapons are legal in Minnesota.

Just one month later, a man armed with an AK-47 rifle, SKS assault rifle, and a 12-gauge shotgun drove his vehicle into the wall of the Church of Jesus Christ of Latter-day Saints in Grand Blanc, Michigan; shot congregants inside; and set fire to the building during a Sunday worship service, killing four and injuring eight.²⁶ The FBI later confirmed that the

(Aug. 29, 2025), <https://www.cnn.com/2025/08/29/us/religious-schools-annunciation-shootings-minneapolis>.

²² Beret Leone, *Annunciation Mass Shooting Investigation Detailed in 2,600-Page Report*, CBS News (Aug. 27, 2026), <https://perma.cc/J6BK-36QE>.

²³ Tim Kummer, *Legislative Testimony of First Physician on the Scene at the Annunciation Shooting*, Minn. Reformer (Sept. 17, 2025), <https://perma.cc/F8MS-2WDE>.

²⁴ *Id.*

²⁵ Leone, *supra* note 22.

²⁶ Fed. Bureau of Invest., *FBI Detroit Update on Shooting and Fire at Grand Blanc LDS Church* (Sept. 30, 2025), <https://perma.cc/YCC4-JBEC>; Ryan Jeltima, *Officers Ruled Justified for Killing Grand Blanc Church Attacker*, ABC12 News, (Sept. 25, 2026), <https://perma.cc/59WZ-3QAN>.

shooter's actions appeared to be motivated by "anti-religious beliefs" against Mormons.²⁷ The high capacity of the gunman's assault weapons further facilitated the attack. When he first entered the meeting-house, he was briefly delayed by a congregant carrying a handgun, but that handgun could not hold off an assault weapon for long. As the man who confronted the shooter recalled: "after I quickly ran out of firepower, there was nothing left to do, and he turned his weapon on me and I was shot three times."²⁸ Those three shots left him in a coma for a week and in the hospital for two months. Another victim, shot in the abdomen, had to endure twenty-five subsequent surgeries because the damage to his body was so extensive.²⁹ Authorities do not appear to have confirmed whether the weapons used in the attack were purchased legally, but the shooter evidently did not have any criminal record that would have barred him from owning guns.³⁰ Assault weapons are legal in Michigan.

²⁷ Isabella Volmert & Hannah Schoenbaum, *FBI Says Shooter in Deadly Michigan Church Attack Was Motivated by Hatred Toward the Mormon Faith*, Associated Press (Oct. 31, 2025), <https://apnews.com/article/church-shooting-michigan-mormon-church-12f6b905f09300e45050efa07a1701c8>.

²⁸ Terry Camp & Ricardo Quintanilla, *Church Shooting Survivor Shares Story of Confronting Gunman*, ABC12 News (Oct. 4, 2026), <https://perma.cc/SKW8-UV28>.

²⁹ Andrew Adams, *Grand Blanc Shooting Survivor Shares Recovery Story*, KSL News (Dec. 9, 2025), <https://perma.cc/W5QN-TFZU>.

³⁰ Andre May Sahouri, John Wisely & Keith Matheny, *Suspect in Michigan Shooting at LDS Church Identified as Thomas Jacob*

And finally, in the deadliest mass shooting at a house of worship, a gunman wielding an assault rifle killed or wounded almost every single one of the approximately fifty people gathered to worship at First Baptist Church in Sutherland Springs, Texas, on November 5, 2017.³¹ The shooter, armed with a Ruger AR-15-style rifle and magazines capable of holding more than 400 rounds of ammunition, killed twenty-six parishioners and wounded twenty others over the course of approximately seven minutes.³² A recording of the service showed him methodically shooting his victims “execution-style,” pausing only to reload.³³ A first responder recalled that “90 percent of the people in there were unrecognizable. . . . They were shot in so many different places that you just couldn’t make out who they were.”³⁴ Survivors were left with life-altering injuries, including “paralysis, foot drop,

Sanford, Detroit Free Press (Sept. 29, 2025), <https://perma.cc/6XHY-GQ2D>.

³¹ Molly Evans, *What We Know About the Victims of the South Texas Church Shooting*, Houston Pub. Media (Nov. 9, 2017), <https://perma.cc/WM8J-HY8J>.

³² Adam Goldman, Richard Pérez-Peña & Manny Fernandez, *Texas Church Shooting Video Shows Gunman’s Methodical Attack, Official Says*, N.Y. Times (Nov. 8, 2017), <https://www.nytimes.com/2017/11/08/us/texas-shooting-video-devin-kelley.html>; David Montgomery, Christopher Mele & Manny Fernandez, *Gunman Kills at Least 26 in Attack on Rural Texas Church*, N.Y. Times (Nov. 5, 2017), <https://www.nytimes.com/2017/11/05/us/church-shooting-texas.html>.

³³ Goldman, *supra* note 32.

³⁴ Scott Pelley, *What Makes the AR-15 Style Rifle the Weapon of Choice for Mass Shooters?*, CBS News (June 13, 2021), <https://perma.cc/2CD4-WMK6>.

neuropathy, chronic pain, colostomy bags and other physical disabilities,” in addition to the mental scars of the attack.³⁵ The attacker should not have been able to obtain a gun due to his criminal record—but he was able to legally purchase his weapons in Texas due to reporting failures in the background check system.³⁶ Assault weapons are legal in Texas.

Faith communities live with the somber certainty that this list will continue to grow. Less than a month before this brief was filed, a teenager in Aurora, Illinois was arrested after allegedly attempting to commit mass murder at a Hindu temple. Reports describe the suspect as a self-identified neo-Nazi who drove to the temple to “kill Indian people,” but was thwarted because his AR-15 rifle jammed.³⁷

There can be little doubt why AR-15-style assault weapons have been described as the “weapon of choice for mass shooters”: Their design allows attackers to inflict maximum carnage on their targets.³⁸ The attacks on houses of worship described above illustrate

³⁵ Daniel Conrad, *Victims Bear Wounds in Damages Phase of Sutherland Springs Shooting Trial*, Courthouse News Serv. (Oct. 14, 2021), <https://perma.cc/W6D9-HJ5M>.

³⁶ Deepa Shivaram, *DOJ Reaches Settlement with Families of Sutherland Springs Mass Shooting*, NPR (Apr. 5, 2023), <https://www.npr.org/2023/04/05/1168158219/doj-sutherland-springs-settlement-mass-shooting>.

³⁷ *Car Registered to Man Accused of Planning Mass Shooting Was at Hindu Temple He Targeted, Police Say*, NBC News (Oct. 16, 2026), <https://www.nbcnews.com/news/us-news/car-registered-man-accused-planning-mass-shooting-was-hindu-temple-rcna603844>.

³⁸ See, e.g., Pelley, *supra* note 34.

this with devastating clarity. The biggest driver of mass-casualty potential is the assault weapon’s ability to deliver sustained, fast fire. Assault weapons autoloading new cartridges into the chamber and accept large-capacity magazines, allowing shooters to fire dozens of rounds in seconds, and reducing the number of times a gunman must stop to reload—meaning fewer forced pauses where people can flee, hide, or intervene.³⁹ In a house of worship, where congregants are gathered closely together in prayer and may be slow to recognize the danger, those seconds are critical—and the absence of any pause in firing can be the difference between a tragedy and an annihilation. This may exacerbate the already clear increase in casualties caused by assault weapons: On average, mass shootings using assault weapons result in 5.7 deaths and 7.6 injuries per shooting, while mass shootings involving other firearms result, on average, in 2.9 deaths and 3.2 injuries.⁴⁰ One recent study found that mass shootings specifically involving AR-15s resulted in an average of 10.1 deaths and 13.7 injuries—even after excluding as an outlier event the 2017 Las Vegas shooting that killed 60 and wounded more than 800 others.⁴¹ The attacks on faith communities recounted

³⁹ Lickenbrock, *supra* note 20; Jaclyn Schildkraut, *Assault Weapons, Mass Shootings, and Options for Lawmakers*, Rockefeller Inst. of Gov’t (Mar. 22, 2019), <https://perma.cc/NAN8-NC7S>.

⁴⁰ *New Analysis Explores Frequency and Lethality of Assault-Style Rifles in Mass Shootings Over 50 Years*, Rockefeller Inst. of Gov’t (Mar. 22, 2019), <https://perma.cc/56KK-WGDQ>.

⁴¹ James Densley & Jillian Peterson, *Assault Weapon Platform Lethality in US Mass Public Shootings 1966-2025*, Sci. Reps. 5 (Sept. 11, 2026), <https://perma.cc/T47Z-QWHX>.

above—in which a single gunman at Sutherland Springs killed or wounded nearly every worshipper, and a shooter at the Church of the Annunciation fired 116 rounds in less than four minutes—are tragically consistent with these statistics.

Assault weapons also inflict unusually devastating injuries. Bullets from an AR-15 “depart the muzzle at a velocity of more than 3,000 feet per second, while bullets from many common handguns move at less than half or a third that speed.”⁴² As such, wounds caused by assault weapons are more severe and lethal than those caused by other civilian firearms. Bullets from assault weapons can “liquefy organs” due to their “much higher projectile speeds.”⁴³ While bullets from a handgun mostly damage tissue and organs in their direct path, a single bullet from an assault weapon can shatter multiple organs, leaving exit wounds up to “a foot wide.”⁴⁴ It is common for the wounded to “bleed to death before they reach a hospital,” and those who survive often leave with irreparable injuries.⁴⁵

The attacks on houses of worship described above bear grim witness to this reality: faces rendered

⁴² Gina Kolata and C.J. Chivers, *Wounds From Military-Style Rifles? “A Ghastly Thing to See,”* N.Y. Times (Mar. 4, 2018), <https://www.nytimes.com/2018/03/04/health/parkland-shooting-victims-ar15.html>.

⁴³ Emma Bowman & Ayana Archie, *This Is How Handguns and Assault Weapons Affect the Human Body*, NPR (June 6, 2022), <https://www.npr.org/2022/06/06/1103177032/gun-violence-mass-shootings-assault-weapons-victims>.

⁴⁴ Kolata & Chivers, *supra* note 42.

⁴⁵ *Id.*

“unrecognizable” at Tree of Life and Sutherland Springs, a girl at the Church of the Annunciation who required partial removal of her skull from a bullet that merely grazed her head, a congregant in Grand Blanc who endured twenty-five surgeries because the damage to his body was so extensive. Assault weapons do not merely take lives. They devastate bodies, traumatize faith communities, and leave wounds—physical and psychological, individual and collective—that do not heal.⁴⁶

Faith-based communities thus have good reason to worry about the dangers of assault weapons, as they increasingly are targets of deadly violence. As reported by Voice of America, the percentage of mass shootings motivated by religious hate escalated from 1% during the period 1966–2000, to 9% during the period 2000–2014, to 17% during the period 2018–

⁴⁶ Studies examining the effect of school shootings on surviving youth reveal extensive mental health impacts. See Maya Rossin-Slater et al., *Local Exposure to School Shootings and Youth Antidepressant Use* (Proceedings of the Nat'l Acad. of Scis., Sept. 22, 2020), <https://perma.cc/GEG8-3A3R>; Marika Cabral et al., *Trauma at School: The Impacts of Shootings on Students' Human Capital and Economic Outcomes* (Nat'l Bureau of Econ. Rsch., Working Paper No. 28311, 2020), <https://perma.cc/9KK6-HR6J>; Phillip B. Levine & Robin McKnight, *Exposure to a School Shooting and Subsequent Well-Being*, (Nat'l Bureau of Econ. Rsch., Working Paper No. 28307, 2020), <https://perma.cc/9AES-KMMH>. Even those outside the immediate community can experience an increased fear of crime or victimization and uncertainty about their safety when gathering in public or private spaces. See Sarah Lowe & Sandra Galea, *The Mental Health Consequences of Mass Shootings*, 18 *Trauma, Violence & Abuse* 62, 78 (2017), <https://perma.cc/YM6S-VYYE>.

2020.⁴⁷ A 2019 study examining the FBI’s National Incident-Based Reporting System data from 2000 through 2016 found that 1,652 incidents of serious violence occurred at places of worship—including aggravated assaults, shootings, stabbings, and bombings—with 57% of those incidents involving the use of a firearm.⁴⁸ According to the Violence Prevention Project, nearly half of the active shooter incidents in their 2000–2025 database involved some form of anti-religious hate.⁴⁹ Meanwhile, the prevalence of assault weapons’ use in mass shootings has also significantly increased. Assault weapons were used in between 17% and 20% of mass shootings recorded in the Violence Prevention Project Mass Shooter Database before 2010, but this figure increased to 36% in the 2010s and has now reached 60% in the 2020s.⁵⁰ There

⁴⁷ *Voice of America Special Report: House of Worship Shootings*, <https://perma.cc/4UHX-V6L5> (last visited Oct. 21, 2026). VOA reports that the increasingly frequent “mass shootings in churches, temples, synagogues and mosques have . . . been committed by perpetrators with a history of racism, anti-Semitism, anti-Christianity and Islamophobia, with ties to white supremacist and neo-Nazi groups.” *Id.*

⁴⁸ Richard R. Johnson, Ph.D., Dolan Consulting Group (DCG), *Serious Violence at Places of Worship in the U.S.—Looking at the Numbers* (Sept. 2019), <https://perma.cc/CHQ5-K4AD>. Extrapolating from the NIBRS data, which covers about 20% of the nation’s population, DCG estimates that “there are actually about 480 incidents of serious violence at places of worship in the U.S. each year,” producing “about 46 deaths and 218 serious injuries annually.” *Id.* at 1.

⁴⁹ James Densley & Jillian Peterson, *Trends and Recommendations: House of Worship Targeted Homicides*, CNA (2026), <https://perma.cc/P9FL-GXYT>.

⁵⁰ Densley & Peterson, *supra* note 41, at 3.

is every reason to believe that shooters equipped to inflict unusually devastating violence will target places of worship in future attacks—particularly if lawmakers are stripped of their ability to prohibit assault weapons.

B. Eliminating Lawmakers’ Ability to Prohibit Assault Weapons Would Chill the Free Exercise of Religious Belief

The free exercise of religion is one of the fundamental liberties enshrined in and protected by the First Amendment. *See Wisconsin v. Yoder*, 406 U.S. 205, 215 (1972) (“The essence of all that has been said and written on the subject is that only those interests of the highest order and those not otherwise served can overbalance legitimate claims to the free exercise of religion.”).

Inherent in the right of free exercise is the ability to worship in peace and without fear. Houses of worship are intended to provide serene and welcoming spaces in which members of religious communities gather together to practice their faith. The presence of assault weapons in the community, as well as the measures needed to protect against them, necessarily interfere with the serenity of the worship space, creating an environment of fear and unease and chilling congregants’ right of free exercise:

[G]uns inflict more than physical injuries—they transform the public sphere on which a constitutional democracy depends. America must regulate guns not only to protect life, but to protect its citizens’ equal freedoms to speak, assemble, worship, and vote without fear. If legislators and judges do not focus on the freedoms that gun

regulation protects, guns will threaten those freedoms.⁵¹

Assault weapons empower the enemies of religious freedom. Attacks on houses of worship “are often designed to maximize casualties, exploit predictable gathering times, and evoke symbolic or ideological messages to intimidate a community.”⁵² In multiple recent attacks on religious communities involving assault weapons, including at Tree of Life and the Grand Blanc LDS meetinghouse, the shooter was expressly motivated by anti-religious bigotry and sought to annihilate members of minority faiths. And, even when a shooter’s motive is less clear, religious groups understandably interpret an attack on a house of worship as an attack on their beliefs. Following the assault on the Church of the Annunciation, a Catholic school superintendent described the shooting as an “attempt to silence our prayer, to silence our faith, to silence our children.”⁵³ While many people of faith respond to targeted mass violence with courage and conviction, the specter of such attacks necessarily threatens the ability of congregants to pray without fear and chills their right of free exercise. As one security consultant has described the grim calculations of congregants: “They’re asking a lot more questions: ‘Should I come to the weekly services or just come for the

⁵¹ Joseph Blocher & Reva Siegel, *Guns Are a Threat to the Body Politic*, The Atlantic (Mar. 8, 2021), <https://www.theatlantic.com/ideas/archive/2021/03/guns-are-threat-body-politic/618158/>.

⁵² Densley & Peterson, *supra* note 49.

⁵³ Aleja Hertzler-McCain, *After Annunciation Shooting, Catholic Schools Pray, Prepare Drills in Sanctuaries*, Christian Century (Sept. 2, 2025), <https://perma.cc/8BDQ-8FNW>.

holidays? And if I come, should I bring my kids?”⁵⁴ Americans should not need to contemplate the possibility of martyrdom when they choose to gather in their sacred spaces.

The unusual dangers posed by assault weapons also chill religious institutions’ ability to bear public witness to their beliefs. Not infrequently, faith communities feel called to speak on a wide range of hotly debated social issues, expressing views as varied as the communities themselves. Religious leaders who choose to take a public stance on any given issue are prepared to face opposition, even anger. But when assault weapons are present in society, that anger can become a mass-casualty event. The Tree of Life shooter specifically targeted that synagogue because one of the congregations that worshiped there was outspoken in its support for refugees and the Hebrew

⁵⁴ Deepa Bharath & Luis Andres Henao, *U.S. Houses of Worship Increase Security After Shootings*, Associated Press (July 17, 2022), <https://apnews.com/article/religion-shootings-violence-d114519eeb52ee7ba168ab6237d3ced6>; see also, e.g., Vanessa Vieites, *How to Cope With Fear of Public Places After Mass Shootings*, Fla. Int’l Univ. News (Aug. 26, 2019), <https://perma.cc/JPT6-6XNH> (describing public anxiety about large gatherings following mass shootings); Michelle Krupa, *The Shooting Finally Stopped. Then Came Everything Else*, CNN (May 17, 2026), <https://www.cnn.com/interactive/2026/05/us/minneapolis-annunciation-school-shooting-recovery/> (half of Annunciation students continued to opt out of school prayer services, which had been moved to the school’s auditorium, months after shooting); Katie Day, *Guns, Construction of Threat, and Lived Ecclesiologies*, 12 J. Moral Theology 84, 103 (2023), <https://jmt.scholasticahq.com/article/89313-guns-construction-of-threat-and-lived-ecclesiologies> (almost 30% of surveyed congregations responded that they were concerned about “personal safety and security when you gather”).

Immigrant Aid Society (HIAS).⁵⁵ Immediately before commencing the attack, the gunman made a final online post: “HIAS likes to bring invaders in that kill our people. I can’t sit by and watch my people get slaughtered. Screw your optics, I’m going in.”⁵⁶ Because this congregation made its convictions known, it suffered the deadliest antisemitic attack in our nation’s history.

In response to these threats, religious institutions could choose to strengthen their walls and bar their doors. As noted above, the doors of the Church of the Annunciation were locked as the students’ Mass began, which prevented the shooter from entering and doubtless saved many lives. However, outside of the school context, locked doors are incompatible with the openness valued by many worshiping communities.⁵⁷ The widely shared religious value of welcoming newcomers, guests, and those in need of spiritual or

⁵⁵ Andrew Goldstein, *Congregation Dor Hadash Was a Target for Its Immigrant Advocacy—And the Shooting Did Not Stop That Work*, Pittsburgh Post-Gazette (Oct. 26, 2019), <https://perma.cc/554P-MXSX>.

⁵⁶ Press Release, U.S. Dep’t of Justice, *Additional Charges Filed in Tree of Life Synagogue Shooting* (Jan. 29, 2019), <https://perma.cc/8F3H-NG9D>.

⁵⁷ See, e.g., David Crary, Peter Smith & Tiffany Stanley, *Fear and Vigilance Rise as Attacks on Houses of Worship Intensify Worldwide*, Associated Press (Oct. 10, 2025), <https://apnews.com/article/houses-worship-attacks-churches-mosques-synagogues-security-1c523496b8da9e40de7dab46c54121a9> (Episcopal bishop “reject[ed] suggestions to lock church doors during worship” following Grand Blanc shooting); Day, *supra* note 54, at 92 (“Many congregations have increased their security systems, although locking doors during worship has been seen as problematic in light of commitments to hospitality.”).

material aid runs counter to the kinds of hardened security measures that could protect congregants against shooters armed with assault weapons. Faith communities cannot freely gather and exercise their beliefs if they are forced to close themselves off from the world.

C. Eliminating Lawmakers’ Ability to Prohibit Assault Weapons Would Also Strain the Financial Resources of Religious Institutions

Many religious institutions are already struggling financially. “From mainline Protestants to evangelicals, the pattern is consistent: attendance, membership, and financial contributions have been falling nationwide for years,” forcing religious institutions to consolidate or close in the face of mounting financial pressures.⁵⁸ These pressures are likely to escalate as “aging congregations with fewer young members face dwindling attendance and financial support.”⁵⁹

Already facing such challenges, religious institutions are ill-positioned to face additional costs arising out of the threat of dangerous and unusual weapons:

- **The Cost of Increased Security.** First and foremost, religious institutions seeking to secure their physical premises against the threat of violent attacks must pay to protect themselves. The U.S. Cybersecurity and Infrastructure Security Agency encourages religious institutions to adopt extensive security measures to guard against the

⁵⁸ See Jessica Eturralde, *Are 100K Churches Closing in America?*, Ministry Watch (Oct. 22, 2025), <https://perma.cc/57E2-LCJK>.

⁵⁹ *Id.*

elevated threat of attacks, even as it recognizes that such institutions often have a “[l]imited budget for security that results in unaddressed vulnerabilities.”⁶⁰ The cost of such measures—security guards, surveillance systems, force-resistant doors, and fencing, among other things—often runs into tens if not hundreds of thousands of dollars.⁶¹ Security measures must be even more durable, and thus more expensive, to protect against assault weapons, which “allow perpetrators to . . . penetrate standard-issue law enforcement protective gear.”⁶² These expenses are simply beyond the wherewithal of many religious communities, and government aid to protect

⁶⁰ CISA, *Physical Security Performance Goals for Faith-Based Communities* 5 (Dec. 2023), <https://perma.cc/S4DN-FMZH>.

⁶¹ See Barbara Sprunt, *Religious Leaders, Lawmakers Push for \$1 Billion to Secure Houses of Worship*, NPR (May 24, 2026), <https://www.npr.org/2026/05/24/nx-s1-5815007/religious-leaders-lawmakers-push-for-1-billion-to-secure-houses-of-worship> (mosque spent \$50,000 to strengthen doors and buy security cameras and alarms); Press Release, Rep. Lauren Gillen, *Rep. Gillen Delivers Over \$2 Million in New Federal Security Funding for Houses of Worship* (Aug. 17, 2026), <https://perma.cc/2N6K-GS9G> (awarding nearly \$200,000 each to eleven faith-based institutions for safety enhancements, such as physical barriers, security cameras, and personnel); Crary, Smith & Stanley, *supra* note 57 (congregation paid \$20,000 per month for increased security); Russell Contreras, *Jewish Institutions’ Security Spending in U.S. Tops \$1 Billion*, Axios (Sept. 12, 2026), <https://www.axios.com/2026/09/12/jewish-security-spending-holy-days> (“more than 4,500 synagogues, Jewish community centers, schools, summer camps and other nonprofits spend an average of roughly \$225,000 each” annually on security).

⁶² Stuart Cameron, *Adapting to Today’s Threats*, FBI Law Enforcement Bulletin (Feb. 5, 2019), <https://perma.cc/YY5E-KZUN>.

houses of worship has fallen woefully short of demand for years.⁶³

- **The Prospect of Liability.** Religious institutions also face the risk of ruinous civil liability if a congregant is injured in a shooting. For example, the father of a girl injured in a 2019 synagogue shooting in San Diego, California, asserted negligence and other claims against Chabad of Poway and related defendants based on allegations that the synagogue failed to hire security guards or install adequate barriers and instead left its doors propped open.⁶⁴ And in other settings, courts have suggested that private property owners may be liable for failing to take reasonable precautions against mass shootings. *See, e.g., Rocky Mountain Planned Parenthood, Inc. v. Wagner*, 467 P.3d 287, 293 (Colo. 2020); *Piazza v. Kellim*, 377 P.3d 492, 507 (Or. 2016). Even settlements short of judgment may impose immense

⁶³ *See, e.g.,* Marc Rod, *Under Half of Nonprofit Security Grant Applications Funded in 2024, Despite Additional Funding*, Jewish Insider, (Aug. 30, 2024), <https://jewishinsider.com/2024/08/under-half-of-nonprofit-security-grant-applications-funded-in-2024-despite-additional-funding> (religious institutions sought nearly \$1 billion in security funding from a government program that was only funded to provide half as much); Marc Rod, *Congress Allocating \$300 Million for Nonprofit Security Grants in 2026*, Jewish Insider (Jan. 21, 2026), <https://jewishinsider.com/2026/01/congress-nonprofit-security-grant-program-2026-jewish-leaders> (“[T]otal [funding] falls short of what Jewish leaders were advocating for, amid a rise in antisemitic attacks.”).

⁶⁴ Teri Figueroa, *Father of Girl Injured in Chabad of Poway Shooting Sues Over Security Measures*, San Diego Union-Trib. (Apr. 8, 2021), <https://perma.cc/QY2R-SZ7L>.

costs for such claims.⁶⁵ “As grim statistics and the development of the law in our sister states foreshadow, the standards of care surrounding a . . . duty to protect invitees from gun violence are not static and will continue to evolve in light of common sense perceptions of the risks created by various conditions and circumstances.” *Mitchell v. Rite Aid of Md., Inc.*, 290 A.3d 1125, 1131 (Md. App. Ct. 2023) (cleaned up). Thus, as violence against religious institutions continues to escalate, those institutions will be subject to an increased risk of liability.

- **Higher Insurance Costs.** In turn, the “business of insuring against US gun violence” is “booming.”⁶⁶ Many major carriers impose sublimits or exclusions specifically for active-shooter events, forcing religious institutions to seek standalone policies.⁶⁷ And premiums for such policies have risen 100% or more since 2020.⁶⁸ Coverage for schools and churches ranges from \$1 million to

⁶⁵ See generally Ganesh Setty, *Victims of Las Vegas Massacre Settle with MGM Resorts for at Least \$735 Million*, CNBC (Oct. 3, 2019), <https://perma.cc/Q9EM-6Z2M> (noting settlement of up to \$800 million for 2017 MGM Las Vegas shooting, based in part on allegations of failure to implement adequate security measures).

⁶⁶ Lee Harris, *The Booming Business of Insuring Against US Gun Violence*, Fin. Times (Sept. 29, 2026), <https://www.ft.com/content/5ad7c42c-b95d-47b8-8dfd-896c1deda1df>.

⁶⁷ *Id.*; Noor Zainab Hussain & Carolyn Cohn, *U.S. Mass Shooting Insurance Rates Jump as Incidents Rise*, Reuters (June 29, 2022), <https://www.reuters.com/world/us/us-mass-shooting-insurance-rates-jump-incidents-rise-2022-06-29/>.

⁶⁸ Harris, *supra* note 66.

\$75 million and typically covers victim lawsuits, building repairs, legal fees, medical expenses, and trauma counseling and can cost “tens of thousands of dollars” for each \$1 million in coverage per year.⁶⁹ Of course, this is all on top of exorbitant rises in the cost of other insurance.⁷⁰

In short, the additional costs associated with the threat of mass shootings are imposing material financial burdens on already strapped religious communities. Eliminating states’ ability to restrict assault weapons would likely only increase those burdens.

* * *

Religious institutions have borne mournful witness to the destructive power of assault weapons. Faith leaders desire to protect their congregants against this power, but for many communities, the measures required to do so would not only be financially ruinous, but would also destroy the open and peaceful character of their places of worship. In the words of St. Thomas Becket, Archbishop of Canterbury during the reign of King Henry II, “It is not

⁶⁹ Al Jazeera, *Demand for ‘Active Shooter Insurance’ on the Rise as US Reopens* (May 13, 2021), <https://www.aljazeera.com/economy/2021/5/13/demand-for-active-shooter-insurance-on-the-rise-as-us-reopens>; Hussain & Cohn, *supra* note 67.

⁷⁰ See *Why Nonprofit Insurance Premiums Are Rising—And How to Respond Strategically*, Cmty. Purchasing All. (May 12, 2025), <https://perma.cc/SFQ7-WH2D> (“Nonprofits of every shape and size, from charter schools to religious institutions, are experiencing notable spikes in their insurance premiums. Increases of 15% to 30% annually are becoming more common, and many organizations are seeing these jumps despite having no changes to their claims history, asset valuations, or operational risk.”)

proper that a house of prayer . . . be made a fortress.”⁷¹ *Amici* respectfully urge the Court not to adopt a rule of law that would threaten the ability of houses of worship to serve as places of comfort and sanctuary where Americans may come together in peace and shared faith.

CONCLUSION

For the foregoing reasons, *amici* respectfully submit that the Court should affirm the judgments of the Second and Seventh Circuit Courts of Appeals.

⁷¹ When knights in the service of the king approached the cathedral looking for Becket on December 29, 1170, monks “hastened to close the doors of the church in order to bar the enemies from slaughtering the bishop,” whereupon Becket ordered that the doors be opened, uttering the words quoted above. Medieval Sourcebook: Edward Grim: The Murder of Thomas Becket, <https://perma.cc/5FUA-GKQT> (quoting Grim’s *Vita S. Thomae, Cantuariensis Archiepiscopi et Martyris*, ed. in James Robertson, *Materials for the Life of Thomas Becket* (London: Rolls Series, 1875-1885), Vol. II).

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October 28, 2026

APPENDIX

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Appendix A: List of Individual <i>Amici Curiae</i>	1a
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**APPENDIX A: LIST OF INDIVIDUAL
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- Cantor Charles Bernhardt, Cantor Emeritus, Oseh Shalom, Jewish, Laurel, MD
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