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**State of Minnesota
In Supreme Court**

REYZL GRACE MOCHRIDHE,
Petitioner,

v.

ACADEMY OF HOLY ANGELS,
Respondent,

and

THE ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS,
Respondent.

**BRIEF OF AMICI CURIAE ASSOCIATION OF CHRISTIAN SCHOOLS
INTERNATIONAL, TRANSFORM MINNESOTA, CROWN COLLEGE,
AND THE UNIVERSITY OF NORTHWESTERN – ST. PAUL**

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INTERESTS OF AMICI CURIAE¹

This case concerns the scope of church autonomy in the context of employment decisions, and its implications reach far beyond the interests of the named parties. Religious organizations across Minnesota rely on their ability to structure their workforce in accordance with their mission. This Court’s ruling will affect those decisions across a broad class of institutions, including Amici. The Association of Christian Schools International (“ACSI”), Transform Minnesota, Crown College, and the University of Northwestern – St. Paul (“Northwestern”) represent numerous Christian individuals, schools, ministries, and other organizations that must regularly navigate the intersection of employment law and state and federal constitutional protections for religious freedom.

ACSI’s mission is to advance Christian education. It aims to strengthen Christian schools and equip Christian educators worldwide as they prepare students academically and inspire students to become devoted followers of Jesus Christ. *See* ACSI, *About ACSI* (2026), <https://perma.cc/DRF9-V6WZ>. Founded in 1978 when several regional U.S. school associations joined together, ACSI has

¹ Pursuant to Minn. R. Civ. App. P. 129.03, the undersigned certifies that no counsel for a party authored this brief in whole or in part, and no person other than *amici curiae* or their counsel made a monetary contribution to its preparation or submission.

since grown and expanded, and now serves more than 25,000 schools in 108 countries, including over 30 schools in Minnesota. *See* Assoc. of Christian Schs. Int'l, Written Testimony on S.F. 2255 Before the Minn. Sen. Comm. on Educ. Fin., 94th Minn. Leg. (2025), <https://perma.cc/F2U8-HJPT>. As ACSI has grown, it has both hired more of its own employees and worked with an ever-expanding number of Christian schools and educators.

ACSI has adopted a Statement of Faith that guides its organizational efforts and Christian commitments. *See* ACSI, *Statement of Faith* (2026), <https://perma.cc/LRW2-ZERJ>. That Statement of Faith informs the criteria ACSI uses to determine whether to recognize and partner with schools. Member schools must affirm ACSI's Statement of Faith and comply with annual membership requirements that mandate alignment with ACSI's Christian mission and doctrinal standards. *See* ACSI, *School Membership Applications* (2026), <https://perma.cc/A76J-VEL4>. Those requirements provide, in part, that "[t]he Christian school must have a board, administration, faculty, and staff who are committed followers of Christ, teaching and leading from a biblically integrated perspective." *See* ACSI, *Essential Elements of an Effective Christian School*, <https://perma.cc/X8RP-APF4>. They also require member schools to affirm that their personnel and board members "are

followers of Christ who acknowledge Jesus as Lord and Savior,” and recognize that Christian schools “may make employment decisions on the basis of religion, requiring employees to serve as Christian role models.” See ACSI, *School Membership Applications* (2026), <https://perma.cc/A76J-VEL4>. Membership serves as a prerequisite for ACSI accreditation, which imposes additional faith-based requirements and religious training obligations for school staff.

Transform Minnesota is a network of churches representing a variety of denominations, ethnicities, and perspectives. It provides a space for pastors and Christian leaders to wrestle through complex issues from a biblical perspective. See Transform Minnesota, *Who We Are* (2024), <https://perma.cc/KBN4-BSLR>. Transform Minnesota hosts a variety of conferences, forums, and training sessions for its network.

Transform Minnesota is directed by a Statement of Faith, which shapes its mission, operations, and hiring decisions. See Transform Minnesota, *What We Believe* (2024), <https://perma.cc/N8WJ-YGG2>. Indeed, Transform Minnesota views agreement to this Statement of Faith as “imperative” “to adequately fulfill [its] mission.” Transform Minnesota, *Statement of Faith* (May 18, 2016), <https://perma.cc/D6BX-QNF2>. So, “all persons employed by Transform

Minnesota, in any capacity,” including interns, must “understand and agree to abide by the Statement of Faith, Core Values and Code of Conduct,” in addition to any “specific Resolutions adopted by the Transform Minnesota Board of Directors.” *Id.* This agreement includes an understanding that “behavior or promotion that contradicts [Transform Minnesota’s Statement of Faith, Core Values and Code of Conduct] will impede and burden the integrity and religious mission of Transform Minnesota and its affiliate ministries” and may be grounds for termination. *Id.* The Statement of Faith also provides that “God creates each person in His image as two distinct sexes; male and female. The determination of one’s gender is physically revealed at birth” *Id.*

Crown College is a Christian college rooted in The Christian and Missionary Alliance. Its mission is to equip students with a biblically based, faith-integrated education so that they can impact the world for Christ. *See* Crown College, *Mission + Vision* (2026), <https://perma.cc/5XKW-54WZ>. Crown College’s formal Statement of Faith defines its institutional identity, directing everything from its overarching mission to its everyday operations. *See* Crown College, *Our Theology* (2026), <https://perma.cc/2MHK-WPVP>.

Crown College requires all on-campus community members to sign its Statement of Faith and all students to participate in a “Spiritual Formation Program.” See Crown College, *Spiritual Life*, <https://perma.cc/6PXQ-KNMX>. The college’s curriculum reflects those commitments, with courses designed to integrate faith and education across disciplines. The same framework governs the college’s employment decisions: Crown College refers all potential hires to its mission, Statement of Faith, and Community Covenant. Any employee of Crown College must sign and demonstrate his or her commitment to these governing principles, which are foundational to the identity, culture, and day-to-day operations of the school. And all employees must do so regardless of whether they work on campus or remotely.

Northwestern is a Christian university located in the heart of the Twin Cities. Northwestern’s mission is to provide Christ-centered higher education equipping students to grow intellectually and spiritually, to serve effectively in their professions, and to give God-honoring leadership in the home, church, community and world. See University of Northwestern – St. Paul, *Mission and Vision* (2026), <https://perma.cc/Q64T-Q7NL>. Originally known as Northwestern Bible and Missionary Training School, Northwestern was founded in 1902 by

pastor and evangelist William Bell Riley. Northwestern's second president, Reverend Billy Graham, helped the school expand and gain national prominence. Under the leadership of Riley and Graham, and many other faithful leaders, the school has continued to flourish and provide a Christian education to thousands of students.

Northwestern incorporates its religious mission into everything it does and is directed by a Doctrinal Statement and Declaration of Christian Community, which Northwestern requires its community members sign and adhere to. *See* University of Northwestern – St. Paul, *Declaration of Christian Community* (2026), <https://perma.cc/C85H-5XK8>. The Declaration enumerates how community members are expected to “live out [their] commitment to a Christ-centered community.” *Id.* For example, employees of Northwestern “agree to put Jesus Christ at the center of [their] lives and work,” “strive to live and work in Christ-like community,” and are “dedicated to each other and [] God, for the betterment of His Kingdom, His people and Northwestern.” *Id.* The Declaration adds that “we are created by God in His image as two distinct sexes: male and female (Gen. 1:26-28; Matt. 19:4-5).” *Id.*

Amici support affirming the Minnesota Court of Appeals' decision dismissing MoChridhe's complaint. And while Amici agree the First Amendment forecloses MoChridhe's claims, this Court may also conclude, as the district court did, that MoChridhe's Minnesota Human Rights Act ("MHRA") claims are barred by the MHRA's religious exemption.

INTRODUCTION

Although the First Amendment’s church autonomy doctrine resolves this case, the Minnesota Human Rights Act (“MHRA”), Minn. Stat. § 363A.26 (2022), independently compels the same result. The MHRA exempts religious organizations from liability for employment actions relating to sexual orientation as to all employees within the organization, not only employees in expressly religious roles. The text of, the legislative history of, and a consistent line of appellate decisions interpreting the MHRA religious exemption all confirm that it does. This Court should affirm the Court of Appeals’ decision.

The plain text of the MHRA’s religious exemption confirms that it operates at the level of the organization, not the individual employee. The MHRA’s religious exemption protects all religious organizations from civil liability under the MHRA for “matters relating to sexual orientation,” with the small exception of “secular business activities engaged in by the religious association” that are “*unrelated to the religious and educational purposes for which it is organized.*” Minn. Stat. § 363A.26 (2022) (emphasis added). That statutory language plainly refers to the activities and purposes of the organization as a whole. It asks whether the organization’s activities and purposes are religious or

secular. It does not ask whether each individual employee performs religious duties or occupies a religious role.

Legislative history from the statute's enactment reinforces that reading. In Senate and House Floor debates when the MHRA was first considered, Minnesota lawmakers made clear that qualifying religious organizations could make employment decisions across their workforce, including for roles with no overtly religious duties, such as executive assistants and janitors, without risking MHRA liability. That understanding has governed for decades and tracks the constitutional principles backing the church autonomy doctrine. The later amendments to the MHRA do not change the statute's purpose.

The Minnesota Court of Appeals' decisions also support this reading of the MHRA's religious exemption. For decades, the Court of Appeals has interpreted the exemption to turn on the religious and educational purposes of organizations—and not particularized job descriptions. For instance, in both *Thorson v. Billy Graham Evangelistic Ass'n*, 687 N.W.2d 652 (Minn. Ct. App. 2004), *review denied* (Minn. Dec. 22, 2004), and *Doe v. Lutheran High Sch. of Greater Minneapolis*, 702 N.W.2d 322 (Minn. Ct. App. 2005), *review denied* (Minn. Oct. 26,

2005), the Court of Appeals rejected a position-specific inquiry and applied a mission-focused rule. This Court denied review in both cases.

MoChridhe's contrary interpretation asks this Court to rewrite the statutory text and apply a position-specific approach to the religious exemption, which would have far-reaching consequences. Religious organizations across Minnesota rely on the ability to structure their workforce in light of their mission. And adopting MoChridhe's approach would create a chilling effect, forcing religious organizations to make staffing decisions under the constant threat of litigation and judicial second-guessing. As the U.S. Supreme Court has recognized, "it is a significant burden on a religious organization to require it, on pain of substantial liability, to predict which of its activities a secular court will consider religious." *Corp. of the Presiding Bishop of the Church of Jesus Christ of Latter-day Saints v. Amos*, 483 U.S. 327, 336 (1987). The U.S. Supreme Court warned that "[f]ear of potential liability might affect the way an organization carried out what it understood to be its religious mission." *Id.* That is precisely the harm Section 363A.26's religious exemption was enacted to prevent. This Court should affirm.

ARGUMENT

I. The MHRA exempts qualifying religious organizations based on the organization's mission, not an employee's particular duties.

Minnesota Statute § 363A.26 exempts qualifying religious organizations from MHRA employment actions relating to sexual orientation based on the mission of the whole entity, not the secular or religious character of a particular employee's job duties. The statute's text and legislative history, as well as precedent interpreting the statute, all make this clear.

The MHRA creates a straightforward rule. Under the text of the statute in effect during MoChridhe's employment, the MHRA exempts qualifying religious organizations from civil liability for "*any* action with respect to . . . employment" "in matters relating to sexual orientation." Minn. Stat. § 363A.26 (2022) (emphasis added).² At the time, "sexual orientation" included "having or being perceived as having a self-image or identity not traditionally associated with one's biological maleness or femaleness." *Id.* § 363A.03, subd. 44; *see also Cooper v. USA Powerlifting*, 26 N.W.3d 604, 610 (Minn. 2025) (noting that parties understood this definition of

² Although not in effect during MoChridhe's employment, in 2024, the Legislature further clarified and expanded § 363A.26's religious exemption. It anchored the exemption to the full scope of the U.S. Constitution's First Amendment and Minnesota's constitutional protections. *See* 2024 Minn. Sess. Law Serv. Ch. 105 (H.F. 4109) (West).

“sexual orientation” to include “transgender status”). And the MHRA’s exemption withdraws that protection only when the organization engages in “secular business activities . . . unrelated to the religious and educational purposes for which [it] is organized.” *Id.* § 363A.26 (2022). This meant that when a religious organization took an employment action in matters relating to sexual orientation, the religious organization was exempted from liability under the MHRA, regardless of the employee’s job-specific duties or job title.

Legislative history from the MHRA’s enactment confirms this reading. During the Senate floor debate, the bill’s sponsor, Senator Allan Spear, explained that the exemption was “broad[]” and that a religious organization could “hire as they choose without regard to the restrictions of this bill,” including for positions like teachers, cooks, and janitors. *See* Minn. Sen., Floor Debate on S.F. 444, 78th Leg., Reg. Sess. (Mar. 18, 1993), available at <https://tinyurl.com/27pmre2h> (0:36:35-0:40:00). The Legislature intended to make it “absolutely clear that religious organizations would not be forced to hire people who adhere to a lifestyle that is contrary to their religious beliefs.” *Id.* (0:36:54-0:37:08). The House sponsor for the religious exemption likewise explained that the exemption was meant to include people like a pastor’s “secretary,” “a choir director,” or “a janitor” whose

employment was challenged on sexual orientation grounds. *See* Minn. H., Floor Debate on H.F. 585, 78th Leg., Reg. Sess. (Mar. 18, 1993), available at <https://tinyurl.com/bpac5jzb> (1:15:04-1:17:04). The Legislature did not design a position-specific inquiry; it designed a mission-focused one.

And each of the three Court of Appeals cases interpreting the MHRA's religious exemption accords with the plain text and legislative history. First, *Thorson v. Billy Graham Evangelistic Association* is instructive. In *Thorson*, the Court of Appeals looked to the text of the MHRA and discussed the legislative history of the statute. There, a mailroom clerk with no evangelical duties—someone whose responsibilities were limited to sorting and shipping mail—sued her employer for sexual orientation discrimination. 687 N.W.2d at 655. The employer, the Billy Graham Evangelistic Association, moved for summary judgment on the ground that it was exempt from the MHRA's sexual orientation provisions as a nonprofit religious organization not engaged in secular business activities. *Id.* The court agreed, holding that “the phrase ‘secular business activities’ is properly considered in light of the purpose and mission of the entire entity, not the job responsibilities of the individual employee.” *Id.* at 657 (citation omitted). Because the Billy Graham Evangelistic Association existed to advance an evangelical

mission, the fact that the plaintiff personally handled mail rather than preached sermons was beside the point.

Second, in *Doe v. Lutheran High School of Greater Minneapolis*, the Court of Appeals confirmed that *Thorson's* mission-focused rule applies with full force in the religious school context. 702 N.W.2d 322. There, an employee whose duties included both ministerial and secular responsibilities challenged his discharge. The court applied *Thorson*, holding that the religious exemption covered the school's employment decision, and squarely rejected the argument that *Thorson* had read the statute too broadly. Bound by stare decisis—which “direct[s] that [courts] adhere to former decisions in order that there might be stability in the law’”—the court declined the invitation to deviate from settled law. *Id.* at 330-31 (quoting *Oanes v. Allstate Ins. Co.*, 617 N.W.2d 401, 406 (Minn. 2000)). This Court denied review in both *Thorson* and *Doe*, allowing the mission-focused test to govern for the last two decades. *See Thorson, review denied* (Minn. Dec. 22, 2004); *Doe, review denied* (Minn. Oct. 26, 2005).

Despite the Court of Appeals' focus in *Thorson* and *Doe* on the religious mission of the employer, MoChridhe argues that the case-specific context of a plaintiff's job duties should determine whether the MHRA's exemption applies.

MoChridhe principally relies on a third case, *Egan v. Hamline United Methodist Church*. There, the Court of Appeals held that a church music director fell within MHRA's exemption as a matter of law, reasoning that the music director's work was "related to the religious and educational purposes for which [the church] is organized." 679 N.W.2d 350, 355-56 (Minn. Ct. App. 2004) (citation omitted). The court did not construe the phrase "secular business activities" or consider whether that phrase turns on the employee's role or the entity's mission. Instead, the court analyzed the employee's duties in light of the church's broader religious and educational mission and concluded that those duties furthered that mission. So, as the *Doe* court pointed out, *Egan* does not conflict with *Thorson* or undermine the mission-focused test. *Doe*, 702 N.W.2d at 330. What is more, "*Egan* did not engage in statutory construction or address the broader question decided in *Thorson*." *Id.*³

The MHRA forecloses MoChridhe's argument that the Archdiocese and Holy Angels lose the benefit of the exemption because a library and media

³ Even if this Court were to approach this case as *Egan* did to analyze MoChridhe's position-specific approach, the MHRA exemption would still apply. MoChridhe's own complaint acknowledged that the medial specialist/librarian's role includes "collaborat[ing] with the professional staff to support the mission of the Academy of Holy Angels." *MoChridhe v. Acad. of Holy Angels*, 29 N.W.3d 753, 758 (Minn. Ct. App. 2025) (emphasis added). MoChridhe's role was defined by its relationship to the religious mission of the school.

specialist performs “secular” work. The Minnesota Court of Appeals has rejected precisely this position-specific theory, explaining that the job duties of an individual employee simply do not determine whether the exemption applies. Instead, MoChridhe’s own allegations concede that the Archdiocese and Holy Angels are religious organizations whose activities are not secular and are related to the religious and educational purposes of the Archdiocese. For example, MoChridhe concedes that Holy Angels “teach[es] in the name of the Catholic Church.” *MoChridhe*, 29 N.W.3d at 758. And the Guiding Principles provided to MoChridhe detail how Catholic teaching “permeates and shapes the ethos of Catholic schools.” *Id.* at 756-57. Further, “[a]ccording to MoChridhe’s complaint,” MoChridhe was asked to “adhere to the [Guiding Principles] requirements” but admittedly “could not abide by them.” *Id.* at 762.

II. Adopting MoChridhe’s position-specific test would cause serious harm to religious schools across Minnesota beyond this case.

The stakes of this case extend well beyond its particular facts. Adopting MoChridhe’s position-specific approach to the MHRA’s religious exemption—measuring the availability of the exemption by whether a court finds an individual employee’s duties sufficiently religious—would require religious organizations in Minnesota to make staffing decisions consistent with their religious mission under

the constant threat of litigation and judicial second-guessing. MoChridhe’s narrow view of the MHRA’s exemption would also permit courts to force religious organizations to employ individuals who reject the organizations’ core religious principles. These results would be profoundly harmful and would contradict everything the Legislature intended when it enacted the exemption’s protections against sexual orientation claims.

A position-specific inquiry would require courts to assess the religious character of individual roles across the full range of functions a religious school performs—classroom teachers, coaches, counselors, librarians, administrative assistants, facilities staff, and everyone in between. As Justice Brennan warned in his concurrence in *Amos*, that kind of granular judicial review would “result[] in considerable ongoing government entanglement in religious affairs” because “the character of an activity is not self-evident.” 483 U.S. at 343 (Brennan, J., concurring); *see also id.* at 336.⁴ More pointedly, “[w]hile a church may regard the

⁴ The Supreme Court’s decision in *Amos* was focused on Title VII rather than the MHRA, but this Court has explained that it looks to, even if it is not bound by, “principles developed under Title VII,” in federal courts. *Ray v. Miller Meester Advert., Inc.*, 684 N.W.2d 404, 408 (Minn. 2004) (“In construing the MHRA, we have at times ‘relied on principles developed under Title VII’ but we are not bound by interpretations of Title VII.” (citation omitted)).

conduct of certain functions as integral to its mission, a court may disagree As a result, the [religious] community’s process of self-definition would be shaped in part by the prospects of litigation.” *Id.* at 343-44. That chilling effect on religious staffing decisions is, itself, an unconstitutional burden on free exercise and religious association, which is precisely the burden the Legislature designed § 363A.26 to foreclose.

In addition, a narrow construction of the exemption would create serious constitutional problems under the church-autonomy doctrine because it would permit courts to force religious organizations to employ individuals who reject the organizations’ core religious principles. This Court and the U.S. Supreme Court have repeatedly instructed courts to avoid construing statutes in ways that create substantial constitutional concerns in matters involving religious governance and internal church affairs. In *NLRB v. Catholic Bishop of Chicago*, the Court declined to construe the National Labor Relations Act to authorize jurisdiction over church-operated schools absent a clear statement from Congress because doing so would create “significant risk” of infringement on Religion Clauses protections. 440 U.S. 490, 502 (1979). This Court applied the same principle in *Hill-Murray Federation of Teachers v. Hill-Murray High School*. There, the Court construed state labor law to

avoid entanglement with religious school operations and governance by distinguishing between matters of religious doctrine and practice, including hiring employees who satisfy the school's religious standards, and terms and conditions of employment unrelated to religious doctrine. *See* 487 N.W.2d 857, 865-66 (Minn. 1992) (holding that the school "retains the power to hire employees who meet their religious expectations, to require compliance with religious doctrine, and to remove any person who fails to follow the religious standards set forth."). MoChridhe's position-specific rule would thrust courts directly into the same constitutionally fraught inquiries those decisions sought to avoid by requiring judges to determine which positions are sufficiently religious to justify faith-based employment standards.

The national landscape confirms that these concerns are real. Religious organizations across the country, like Respondents and Amici, structure their entire operations as an integrated expression of their institutional faith. For example, in this case, the Guiding Principles of Respondents explain that "Catholic teaching permeates and shapes the ethos of Catholic schools." Thus, those principles "inform the creation of policies, handbooks, statements, employee agreements, training for employees, and the approach to accompaniment in the

Catholic schools of the Diocese[.]” *MoChridhe*, 29 N.W.3d at 756. Amici are also led by their own statements of faith, which inform their mission and structure everything they do. *See supra* pp. 1-6. Requirements like Amici’s statements of faith help organizations ensure that their “activities are in furtherance of [their] religious mission, and that only those committed to that mission should conduct them.” *Amos*, 483 U.S. at 342 (Brennan, J., concurring).

Adopting *MoChridhe*’s position-specific approach here would put Minnesota’s religious organizations in a materially worse position than their counterparts in jurisdictions where mission-focused, entity-wide protections have been upheld, and it would signal to religious organizations across the state that the protection they believed the Legislature had guaranteed them is subject to erosion whenever a plaintiff can characterize a particular employee’s job as nominally secular. The Legislature did not write that statute, and this Court should not rewrite it that way.

CONCLUSION

This Court should affirm.

Dated this 26th day of May, 2026

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Certificate of Compliance

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