No. 22-174

IN THE

Supreme Court of the United States

GERALD E. GROFF, *Petitioner,*

v.

LOUIS DEJOY, POSTMASTER GENERAL, UNITED STATES POSTAL SERVICE, *Respondent.*

On Writ of Certiorari to the United States Court of Appeals for the Third Circuit

BRIEF OF AMICUS CURIAE THE ROBERTSON CENTER FOR CONSTITUTIONAL LAW IN SUPPORT OF PETITIONER

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INTEREST OF AMICUS CURIAE[1]

The Robertson Center for Constitutional Law is an academic center within the Regent University School of Law. Established in 2020, the Center pairs scholarship and advocacy to advance first principles in constitutional law, including religious liberty and the rule of law. The Center regularly represents organizations from various faith traditions that support religious freedom and rights of conscience.

Hardison's atextual gloss on the undue hardship standard has wrought undue—and unlawful—hardship on hard-working Americans of many faiths. The Center is strongly interested in ensuring that religious Americans receive the full protection afforded by the plain language of Title VII.

INTRODUCTION & SUMMARY OF ARGUMENT

In the early 20th century, workers across the United States routinely lost job opportunities because their religious practices inconvenienced their employers. Immigrants sought opportunity in America only to face a choice between their faith and their work. A generation ago, against this backdrop, Congress attempted to address this problem through Title VII.

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[1] No counsel for any party authored this brief in whole or in part, and no entity or person, aside from amicus, their members, and their counsel, made a monetary contribution intended to fund the preparation or submission of this brief.

But today working-class Americans still lose jobs for requesting time off for their Sabbath. They still lose jobs for attending worship services. And they still lose jobs for requesting variances from dress and grooming requirements. Even more tragically, some have forsaken their religious practices to keep food on the table. This is the distressing legacy of *Trans World Airlines, Inc. v. Hardison*, 432 U.S. 63 (1977).

It is well-known that *Hardison* disproportionately harms those who practice minority faiths. As others have observed, "The irony (and tragedy) of decisions like *Hardison* is that they most often harm religious minorities—people who seek to worship their own God, in their own way, and on their own time." *Small v. Memphis Light, Gas & Water*, 952 F.3d 821, 829 (6th Cir. 2020) (Thapar, J., concurring), *cert. denied*, 141 S. Ct. 1227 (Apr. 5, 2021) (No. 19-1388).

A closer look at religious accommodation cases over the past two decades reveals another disturbing pattern: Claimants in occupations that require only "little" or "some" preparation, like a high school diploma and up to a year of experience (e.g., receptionists, cashiers, and correctional officers), represent *more than 60%* of the cases that made it to the federal courts between 2000 and 2023. *See* Appendix to this brief. Including occupations that require only "medium" preparation, like two years of experience and vocational school, on-the-job experience, or an associate's degree (e.g., police officers, automotive mechanics, and nurses), the proportion rises to *over 80%* of the cases. *Id.*

This data supports Justice Marshall's prediction that "[a]ll Americans will be a little poorer until [*Hardison*] is erased." *Hardison*, 432 U.S. at 97 (Marshall, J., dissenting). But the data also demonstrates that the American working class has suffered the most. The most economically disadvantaged among us have borne the brunt of *Hardison*. The time has come to restore to working-class Americans the full protection of Title VII's plain language.

ARGUMENT

I. Working-Class People Brought More Than 80% of Religious Accommodation Cases Since 2000.

In recent petitions asking the Court to reconsider the *Hardison* standard, parties and amici have filed briefs collecting religious accommodation cases decided on summary judgment motions using the "undue hardship" standard over the past two decades.[2] Those briefs conclude that although minority faiths and Saturday Sabbatarians make up a small portion of the population, they make a majority of the claims for religious accommodations. *See id.*

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[2] *See* Brief Amicus Curiae of Christian Legal Soc'y et al. in Support of Petitioner at 15–17, *Small*, 141 S. Ct. 1227 (No. 19-1388); Petition for a Writ of Certiorari at 27–31, *Dalberiste v. GLE Assocs., Inc.*, 141 S. Ct. 2463 (2021) (No. 19-1461); Brief of Amicus Curiae Christian Legal Soc'y et al. in Support of the Petition at 23–25, *Patterson v. Walgreen Co.*, 140 S. Ct. 685 (2020) (No. 18-349).

Building on that prior work, we have compiled a universe of 140 religious accommodation cases decided between 2000 and 2023 on summary judgment motions relating to "undue hardship." We then examined each case to identify the occupation of the claimant. *See* Appendix to this brief (collecting cases and identifying and categorizing claimant occupations).

An analysis of these cases shows: Working-class occupations[3] represented 83.57% of claimants (117/140). Occupations that usually require no more than a high school diploma and up to a year of experience (zone two) accounted for 61.43% (86/140) of claimants. Occupations that may require an associate's degree or up to two years of training (zone three) added 20% (28/140). And occupations that may require a high school diploma or a few months of training (zone one) accounted for another 2.14% of claimants (3/140).

By contrast, managerial or professional occupations represented a total of 15% of claimants (21/140). Occupations that usually require a bachelor's degree or several years of experience (zone four) make up 11.43% of claimants (16/140). And occupations that often require graduate school or extensive experience (zone five) make up 3.57% of claimants (5/140).

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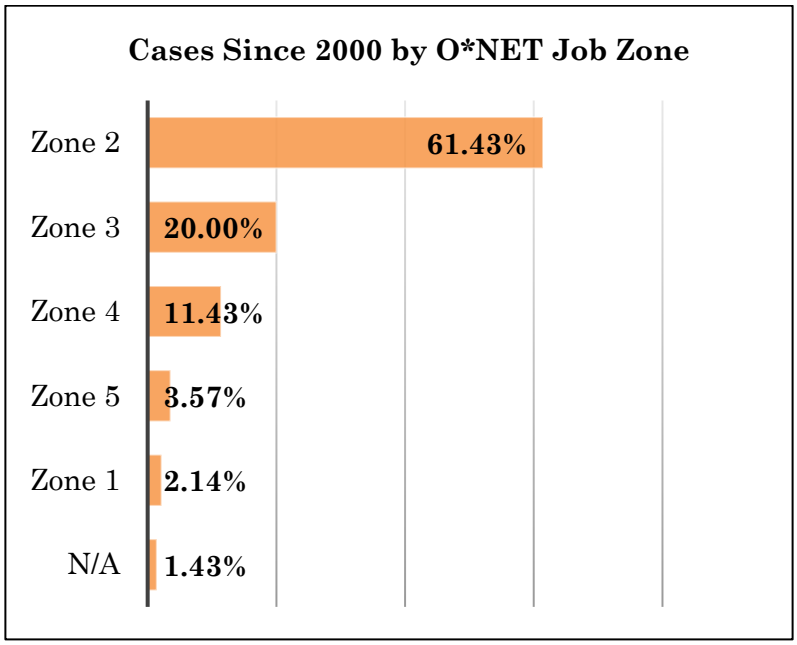
[3] *See, e.g.*, Oren Cass et al., *Work, Skills, Community: Restoring Opportunity for the Working Class* 12 (2018) (defining "working class" as "people with at least a high school diploma but less than a four-year college degree living in households between the 20th and 50th income percentiles").

This chart illustrates the findings, and the underlying data supporting our findings can be found in the Appendix.



This data should not come as a surprise. Those in the working class often have relatively little flexibility in their schedules. *See* Robert J. Friedman, *Religious Discrimination in the Workplace: The Persistent Polarized Struggle*, 11 Tenn. J. Bus. L. 143, 157–60 (2010). Moreover, as one study on reasonable accommodations noted, "[c]lerical, service, and blue-collar workers are easier and cheaper to replace than to accommodate" compared to managerial and professional workers. Sharon L. Harlan & Pamela M. Robert, *The Social Construction of Disability in Organizations: Why Employers Resist Reasonable Accommodations*, 25 Work Occupations 397, 422

(1998). When an employer can refuse to accommodate based on anything more than a *de minimus* cost, there is little reason to accommodate—rather than replace—the religious employee.

To come to those conclusions, we first identified the occupation of the claimants in those cases. Then, we categorized the occupation according to federal standards that define and describe occupations using the Occupational Information Network (O*NET) system. The O*NET system is a "comprehensive database of occupational competency profiles" sponsored by the U.S. Department of Labor. U.S. Bureau of Labor Statistics, *2018 Standard Occupational Classification User Guide* 5 (2017). The O*NET system is based on the Bureau of Labor Statistics' Standard Occupational Classification system, which also "classif[ies] workers and jobs into occupational categories" and is used by the Equal Employment Opportunity Commission and other federal agencies. *Id.* at 2, 21–22.

O*NET assigns occupations to one of five "job zones" that correspond to the level of education, related experience, and on-the-job training required for that occupation. *See* O*NET OnLine, *O*NET OnLine Help: Job Zones*;[4] *see also* O*NET OnLine, *Browse by Job Zone* (listing all occupational classifications and related job zones).[5] For the purposes of this brief, occupations in zones one through three are described as "working class," while

[4] https://www.onetonline.org/help/online/zones.
[5] https://www.onetonline.org/find/zone?z=0&g=Go.

occupations in zones four and five are described as "managerial or professional."

- **Job Zone 1:** Occupations in job zone one "may" require a high school diploma or GED certificate, "anywhere from a few days to a few months of training," and often "involve following instructions and helping others." O*NET OnLine, *O*NET OnLine Help: Job Zones*.[6]

- **Job Zone 2:** Occupations in job zone two "usually require a high school diploma," require "anywhere from a few months to one year of working with experienced employees," and often involve using "knowledge and skills to help others." *Id.*

- **Job Zone 3:** Most occupations in job zone three "require training in vocational schools, related on-the-job experience, or an associate's degree," "one or two years of training," and "usually involve using communication and organizational skills to coordinate, supervise, manage, or train others to accomplish goals." *Id.*

- **Job Zone 4:** Most zone four occupations require a four-year bachelor's degree, "several years of work-related experience" or training, and "involve coordinating, supervising, managing, or training others." *Id.*

[6] https://www.onetonline.org/help/online/zones.

- **Job Zone 5:** Most zone five occupations require graduate school, "[e]xtensive skill, knowledge, and experience," and "often involve coordinating, training, supervising, or managing the activities of others to accomplish goals." *Id.*

By matching each claimant's occupation with an O*NET definition and that definition's associated job zone, we differentiated between cases in which the claimant's occupation requires "little" to "medium" preparation (zones one through three) or "considerable" to "extensive" preparation (zones four and five). *See, e.g.*, *Lorenz v. Wal-Mart Stores*, 225 F. App'x 302, 302 (5th Cir. 2007) ("In March 2003, Appellant was hired as a cashier by Wal-Mart Stores, Inc."); O*NET OnLine, *Cashiers: 41-2011.00* (noting that cashiers fall within "Job Zone Two");[7] *see also* Appendix to this brief.

In sum, working-class Americans need Title VII's protection the most. They are often easier to replace than to accommodate, their schedules are less flexible and more demanding than the schedules of higher-level workers, and they accordingly comprise over 80% of religious accommodation claimants. But Title VII's promise is cold comfort when nearly any accommodation could impose more than a *de minimis* cost on the employer—especially when the claimant practices a minority faith.

[7] https://www.onetonline.org/link/summary/41-2011.00 (2023).

This Court should fix *Hardison*'s error. Until it does, these harms will continue.

II. *Hardison* Has Prevented America from Fully Realizing Title VII's Promise of a Workplace Free of Needless Discrimination.

Americans have long connected the freedom to work and the freedom to worship. For example, Alexander Hamilton believed that "a perfect equality of religious privileges," more than "mere religious toleration," would encourage skilled workers to "flock from Europe to the [U]nited [S]tates to pursue their own trades or professions." Alexander Hamilton, *Report on Manufactures* (Dec. 5, 1791), *in* 5 The Founders' Constitution 95, 95 (Philip B. Kurland & Ralph Lerner eds., 1986); *see also* James Madison, *Property* (Mar. 29, 1792), *in* 1 The Founders' Constitution 598, 598 (describing the freedom to work and freedom of worship as property rights).

History teaches that this aspiration has been elusive. For example, the combination of a Monday–Saturday work week and "strictly enforced" Sunday closure laws had a particularly devastating effect on the lives of Jewish immigrants. Jonathan D. Sarna, *American Judaism: A History* 162 (2004). "[U]nsympathetic employers" told their Jewish employees, "if you don't come in on Saturday, don't bother coming in on Monday." *Id.* at 162–63; *see also Jews in America: Shabbat as Social Reform (1925)*, Jewish Virtual Library (last visited Feb. 19, 2023)

("Almost no employers—even Jewish employers—honored Saturday as a day of rest.").[8]

Others share in that struggle. Muslims, Sikhs, Seventh-day Adventists, and many others face religious discrimination in the workplace simply because their religious practices are uncommon. The petitioners in recent cases asking this Court to overrule *Hardison* exemplify typical claimants: a Jehovah's Witness service dispatcher;[9] a Sabbatarian industrial hygienist;[10] a Sabbatarian trainer at Walgreens;[11] and here, a U.S. Postal Service employee who wishes to observe the Sabbath in accordance with his religious beliefs.

Congress passed Title VII to eliminate such cruelty and discrimination. But the relief was short-lived. Only five years after Congress strengthened Title VII's protections, *Hardison* placed working-class religious minorities back in the position of their immigrant ancestors—at the mercy of their employers. *See* Petition for a Writ of Certiorari at 30, *Dalberiste*, 141 S. Ct. 2463 (No. 19-1461) ("Employers . . . know they can make almost any request for an accommodation sound like it will impose more than *de minimis* hardship, and therefore, . . . they do not even try to accommodate religious employees—especially members of minority faiths.").

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[8] https://www.jewishvirtuallibrary.org/shabbat-as-social-reform-1925.

[9] *Small*, 952 F.3d 821, *cert. denied*, 141 S. Ct. 1227 (No. 19-1388).

[10] *Dalberiste v. GLE Assocs., Inc.*, 814 Fed. App'x 495 (11th Cir. 2020), *cert. denied*, 141 S. Ct. 2463 (Apr. 5, 2021) (No. 19-1461).

[11] *Patterson v. Walgreen Co.*, 727 Fed. App'x 581 (11th Cir. 2018), *cert. denied*, 140 S. Ct. 685 (Feb. 24, 2020) (No. 18-349).

This Court should take this opportunity to honor the promises of religious freedom embedded in our founding and affirmed in Title VII. When it does, some of the most marginalized Americans will benefit most.

CONCLUSION

No American should face the "cruel choice of surrendering their religion or their job." *Hardison*, 432 U.S. at 87 (Marshall, J., dissenting); *see also Abramson v. William Paterson Coll.*, 260 F.3d 265, 290 (3d Cir. 2001) (Alito, J., concurring). Pressure for Sabbath work, for instance, has long undermined Jewish workers' ability to live out their faith:

> A heartrending Yiddish prayer (*techinah*) written in America for women to recite privately when they lit their Sabbath candles, and printed in a widely distributed prayer book . . . laments that in "this diaspora land" where the "burden of making a living is so great," resting on Sabbath and holidays had become impossible, and it pleads for divine compassion. "Grant a bountiful living to all Jewish children," it entreats, "that they should not have to desecrate your holy day."

Sarna, *supra*, at 164 (quoting *Shas Tehinah Hadashah* 38–41 (1916)).

Working families of many faiths share in that lament and join in that prayer. The time has come for

this Court to restore the protection plainly required by the text of Title VII before further harm is done to religious, working-class Americans.

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APPENDIX

APPENDIX

Breakdown by Employee's Occupation and O*NET Job Zone in Religious Accommodation Cases Decided on Summary Judgment Motions Relating to "Undue Hardship" from 2000 to 2023

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. 704 HTL Operating, LLC, 979 F. Supp. 2d 1220 (D.N.M. 2013)	Muslim (minority)	"housekeeping" staff	1	37-2012.00	Maids and Housekeeping Cleaners
Logan v. Organic Harvest, LLC, 2020 WL 1547985 (N.D. Ala. Apr. 1, 2020)	Unspecified Sabbatarian	"hot bar cook"	1	35-2021.00	Food Preparation Workers
Winchester v. Wal-Mart Stores, 2017 WL 11489879 (6th Cir. 2017)	Salvation Army (Christian)	"Rotisserie Associate"	1	35-2021.00	Food Preparation Workers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Abdelwahab v. Jackson State Univ., 2010 WL 384416 (S.D. Miss. Jan. 27, 2010)	Muslim (minority)	"residence hall receptionist"	2	43-4171.00	Receptionists and Information Clerks
Adams v. Retail Ventures, Inc., 325 F. App'x 440 (7th Cir. 2009)	Unspecified Christian	"door greeter"	2	41-2031.00	Retail Salespersons
Adeyeyev. Heartland Sweeteners, LLC, 721 F.3d 444 (7th Cir. 2013)	African Religions	"material handler" & "packer/palletizer"	2	53-7064.00	Packers and Packagers, Hand
Antoine v. First Student, Inc., 713 F.3d 824 (5th Cir. 2013)	Seventh-day Adventist (minority)	"bus driver"	2	53-3051.00	Bus Drivers, School

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Ashley v. Chafin, 2009 WL 3074732 (M.D. Ga. Sept. 23, 2009)	Seventh-day Adventist (minority)	"detention officer"	2	33-3012.00	Correctional Officers and Jailers
Batson v. Branch Banking & Tr. Co., 2012 WL 4479970 (D. Md. Sept. 25, 2012)	Hebrew Israelite (minority)	"senior teller" & "relationship banker"	2	43-3071.00	Tellers
Bethea v. Access Bank, 2018 WL 3009114 (D. Neb. June 15, 2018)	Jewish (minority)	"teller"	2	43-3071.00	Tellers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Bolden v. Caravan Facilities Mgmt., LLC, 112 F. Supp. 3d 785 (N.D. Ind. 2015)	Unspecified Christian	"janitor"	2	37-2011.00	Janitors and Cleaners, Except Maids and Housekeeping Cleaners
Burdette v. Fed. Exp. Corp., 367 F. App'x 628 (6th Cir. 2010)	Seventh-day Adventist (minority)	"operations manager"	2	53-1041.00	Aircraft Cargo Handling Supervisors
Cameau v. Metro. Atlanta Rapid Transit Auth., 2014 WL 11379548 (N.D. Ga. Feb. 20, 2014)	Seventh-day Adventist (minority)	"bus operator"	2	53-3052.00	Bus Drivers, Transit and Intercity

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Chavis v. Wal-Mart Stores, Inc., 265 F. Supp. 3d 391 (S.D.N.Y. 2017)	Pentecostal	"Asset Protection Manager"	2	33-9099.02	Retail Loss Prevention Specialists
Cherry v. Sunoco, Inc., 2009 WL 2518221 (E.D. Pa. Aug. 17, 2009)	Hebrew Israelite (minority)	"catalyst cracking unit" employee	2	51-8093.00	Petroleum Pump System Operators, Refinery Operators, and Gaugers
Cloutier v. Costco Wholesale Corp., 390 F.3d 126 (1st Cir. 2004)	Idiosyncratic Religions	"cashier"	2	41-2011.00	Cashiers
Creusere v. Bd. of Educ., 88 F. App'x 813 (6th Cir. 2003)	Unspecified Sabbatarian	"carpenter"	2	47-2031.00	Carpenters

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Creusere v. James Hunt Constr., 83 F. App'x 709 (6th Cir. 2003)	Unspecified Sabbatarian	"carpenter"	2	47-2031.00	Carpenters
Dale v. TWC Admin. LLC, 686 F. App'x 240 (4th Cir. 2017)	Unspecified	"sales agent"	2	41-3091.00	Sales Representatives of Services, Except Advertising, Insurance, Financial Services, and Travel
Daniel v. Kroger Ltd. P'ship I, 2011 WL 5119372 (E.D. Va. Oct. 27, 2011)	Unspecified Christian	"meat cutter"	2	51-3021.00	Butchers and Meat Cutters

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Doughty v. Dep't of Dev. Servs. STS, 607 F. App'x 97 (2d Cir. 2015)	Unspecified	"Cook Attendant"	2	31-1122.00	Personal Care Aides
E.E.O.C. v. Abercrombie & Fitch Stores, Inc., 731 F.3d 1106 (10th Cir. 2013)	Muslim (minority)	"sales-floor employee"	2	41-2031.00	Retail Salespersons
E.E.O.C. v. Abercrombie & Fitch Stores, Inc., 966 F. Supp. 2d 949 (N.D. Cal. 2013)	Muslim (minority)	"sales floor" associate	2	41-2031.00	Retail Salespersons
E.E.O.C. v. Alamo Rent-A-Car LLC, 432 F. Supp. 2d 1006 (D. Ariz. 2006)	Muslim (minority)	Car "rental agent"	2	41-2021.00	Counter and Rental Clerks

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Aldi, Inc., 2008 WL 5429624 (W.D. Pa. Dec. 31, 2008)	Unspecified Christian	"cashier"	2	41-2011.00	Cashiers
E.E.O.C. v. Bridgestone/Firestone, Inc., 95 F. Supp. 2d 913 (C.D. Ill. 2000)	Unspecified Christian	"tire builder"	2	51-9197.00	Tire Builders
E.E.O.C. v. Consol Energy, Inc., 860 F.3d 131 (4th Cir. 2017)	Evangelical Christian	"coal miner"	2	47-5044.00	Loading and Moving Machine Operators, Underground Mining

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. JBS USA, LLC, 2013 WL 3302429, (D. Colo. July 1, 2013)	Muslim (minority)	"meat packing plant" employees	2	51-3023.00	Slaughterers and Meat Packers
E.E.O.C. v. Jetstream Ground Servs., Inc., 134 F. Supp. 3d 1298 (D. Colo. 2015)	Muslim (minority)	"cabin cleaners"	2	53-7061.00	Cleaners of Vehicles and Equipment
E.E.O.C. v. Kroger Ltd. P'ship I, 2022 WL 2276835 (E.D. Ark. June 23. 2022)	Unspecified Christian	"associates"	2	41-2031.00	Retail Salespersons

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Oak-Rite Mfg. Corp., 2001 WL 1168156 (S.D. Ind. Aug. 27, 2001)	Pentecostal	"press operator"	2	51-4031.00	Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic
E.E.O.C. v. Papin Enters, Inc., 2009 WL 961108 (M.D. Fla. Apr. 7, 2009)	Idiosyncratic Religions	"assistant manager"	2	35-1012.00	First-Line Supervisors of Food Preparation and Serving Workers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Red Robin Gourmet Burgers, Inc., 2005 WL 2090677 (W.D. Wash. Aug. 29, 2005)	African Religions (minority)	"server"	2	35-3031.00	Waiters and Waitresses
E.E.O.C. v. Rent-A-Ctr., Inc., 917 F. Supp. 2d 112 (D. D.C. 2013)	Seventh-day Adventist (minority)	"Store Manager"	2	41-1011.00	First-Line Supervisors of Retail Sales Workers
E.E.O.C. v. Robert Bosch Corp., 169 F. App'x 942 (6th Cir. 2006)	Old Path Church of God	"foundry casting" employee	2	51-4052.00	Pourers and Casters, Metal
E.E.O.C. v. Sw. Bell Tel., L.P., 550 F.3d 704 (8th Cir. 2008)	Jehovah's Witness (minority)	"customer service technicians"	2	49-9052.00	Telecommunications Line Installers and Repairers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Tex. Hydraulics, Inc., 583 F. Supp. 2d 904 (E.D. Tenn. 2008)	Unspecified Sabbatarian	"saws department" employee	2	51-4031.00	Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic
E.E.O.C. v. Thompson Contracting, Grading, Paving, & Util., 499 F. App'x 275 (4th Cir. 2012)	Hebrew Israelite (minority)	"dump truck driver"	2	53-3032.00	Heavy and Tractor-Trailer Truck Drivers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Triangle Catering, LLC, 2017 WL 818261 (E.D.N.C. Mar. 1, 2017)	Rastafarian (minority)	"delivery driver"	2	53-3031.00	Driver/Sales Workers
E.E.O.C. v. Walmart Stores East, L.P., 992 F.3d 656 (7th Cir. 2021)	Seventh-day Adventist (minority)	"assistant manager"	2	41-1011.00	First-Line Supervisors of Retail Sales Workers
Farah v. A-1 Careers, 2013 WL 6095118 (D. Kan. Nov. 20, 2013)	Muslim (minority)	"Centrinex" (call center) employee	2	43-2021.00	Telephone Operators
Fazlovic v. Maricopa Cty., 2012 WL 12960870 (D. Ariz. Sept. 28, 2012)	Muslim (minority)	"detention officer"	2	33-3012.00	Correctional Officers and Jailers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Finnie v. Lee Cty., Miss., 907 F. Supp. 2d 750 (N.D. Miss. 2012)	Pentecostal	"detention officer"	2	33-3012.00	Correctional Officers and Jailers
Fouche v. NJ Transit, 470 F. App'x 96 (3d Cir. 2012)	Unspecified Christian	"bus driver"	2	53-3052.00	Bus Drivers, Transit and Intercity
Gay v. Lowe's Home Ctrs., Inc., 2007 WL 1599750 (S.D. Miss. June 4, 2007)	Unspecified Christian	"installed sales coordinator"	2	41-1011.00	First-Line Supervisors of Retail Sales Workers
George v. Home Depot Inc., 51 F. App'x 482 (5th Cir. 2002)	Catholic	"cashier" & "greeter"	2	41-2011.00	Cashiers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Groff v. DeJoy, 35 F.4th 162 (3d Cir. 2022)	Evangelical Christian	"United States Postal Service" employee	2	43-5052.00	Postal Service Mail Carriers
Graff v. Henderson, 30 F. App'x 809 (10th Cir. 2002)	Worldwide Church of God	"United States Postal Service" employee	2	43-5051.00	Postal Service Clerks
Harrell v. Donahue, 638 F.3d 975 (8th Cir. 2011)	Seventh-day Adventist (minority)	"United States Postal Service" employee	2	43-5052.00	Postal Service Mail Carriers
Hebrew v. Collier, 2022 WL 4866719 (S.D. Tex. Sept. 19, 2022)	Unspecified	"Correctional Officer"	2	33-3012.00	Correctional Officers and Jailers
Hill v. Cook Cty., 2007 WL 844556 (N.D. Ill. Mar. 19, 2007)	Jewish (minority)	"patient transporter"	2	31-1132.00	Orderlies

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Hussaini v. G4S Secure Sols. (USA) Inc., 379 F. Supp. 3d 679 (N.D. Ill. 2019)	Muslim (minority)	"security guard"	2	33-9032.00	Security Guards
Hussein v. Hotel Emps. & Rest. Union, Local 6, 108 F. Supp. 2d 360 (S.D.N.Y. 2000)	Muslim (minority)	"roll call waiter"	2	35-3031.00	Waiters and Waitresses
Hussein v. The Waldorf-Astoria, 134 F. Supp. 2d 591 (S.D.N.Y. 2001)	Muslim (minority)	"banquet waiter"	2	35-3031.00	Waiters and Waitresses

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Jacobs v. Scotland Mfg., Inc., 2012 WL 2366446 (M.D.N.C. June 21, 2012)	Unspecified Christian	"Lead Hand"	2	51-4031.00	Cutting, Punching, and Press Machine Setters, Operators, and Tenders, Metal and Plastic
Jamil v. Sessions, 2017 WL 913601, (E.D.N.Y. Mar. 6, 2017)	Jewish (minority)	"correctional officer"	2	33-3012.00	Correctional Officers and Jailers
Jones v. United Parcel Serv., Inc., 2008 WL 2627675 (N.D. Tex. June 30, 2008)	Seventh-day Adventist (minority)	"package car driver"	2	53-3033.00	Light Truck Drivers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Kilpatrick v. Hyundai Motor Mfg. Ala., LLC, 911 F. Supp. 2d 1211 (M.D. Ala. 2012)	Seventh-day Adventist (minority)	"glass repair" employee	2	49-3022.00	Automotive Glass Installers and Repairers
King v. Borgess Lee Mem'l Hosp., 2015 WL 852324 (W.D. Mich. Feb. 26, 2015)	Muslim (minority)	"secretary"	2	43-6013.00	Medical Secretaries and Administrative Assistants
Leonce v. Callahan, 2008 WL 58892, (N.D. Tex. Jan. 3, 2008)	Seventh-day Adventist (minority)	"detention officer"	2	33-3012.00	Correctional Officers and Jailers
Lorenz v. Wal-Mart Stores, 225 F. App'x 302 (5th Cir. 2007)	Muslim (minority)	"cashier"	2	41-2011.00	Cashiers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Maroko v. Werner Enters., Inc., 778 F. Supp. 2d 993 (D. Minn. 2011)	Seventh-day Adventist (minority)	"delivery-truck driver"	2	53-3032.00	Heavy and Tractor-Trailer Truck Drivers
McIntyre-Handy v. W. Telemarketing Corp., 238 F.3d 413 (4th Cir. 2000)	Atheist (minority)	"telemarketing representative"	2	41-9041.00	Telemarketers
Miller v. Port Auth. of N. Y. & N.J., 788 F. App'x 886 (3d Cir. 2019)	Jewish (minority)	"utility systems maintainer"	2	47-2073.00	Operating Engineers and Other Construction Equipment Operators
Mohamed v. 1st Class Staffing, LLC, 286 F. Supp. 3d 884 (S.D. Ohio 2017)	Muslim (minority)	"line associates" at packaging facility	2	53-7064.00	Packers and Packagers, Hand

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Nichols v. Ill. Dep't of Transp., 152 F. Supp. 3d 1106 (N.D. Ill. 2016)	Muslim (minority)	"Highway Maintainer"	2	47-4051.00	Highway Maintenance Workers
Prach v. Hollywood Supermarket, Inc., 2010 WL 3419461 (E.D. Mich. Aug. 27, 2010)	Seventh-day Adventist (minority)	"produce clerk, register clerk," & "service desk clerk"	2	41-2021.00	Counter and Rental Clerks
Privler v. CSX Transp. Inc., 2021 WL 3603334 (N.D.N.Y. Aug. 13, 2021)	Jewish (minority)	"utility worker" for locomotives	2	49-3043.00	Rail Car Repairers
Rice v. U.S.F. Holland, Inc., 410 F. Supp. 2d 1301 (N.D. Ga. 2005)	Seventh-day Adventist (minority)	"driver/dockman position"	2	53-3032.00	Heavy and Tractor-Trailer Truck Drivers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Rivera v. Choice Courier Sys., Inc., 2004 WL 1444852 (S.D.N.Y. June 25, 2004)	Unspecified Christian	"courier"	2	43-5021.00	Couriers and Messengers
Robinson v. Children's Hosp. Boston, 2016 WL 1337255 (D. Mass. Apr. 5, 2016)	Muslim (minority)	"administrative associate"	2	43-6013.00	Medical Secretaries and Administrative Assistants
Rose v. Potter, 90 F. App'x 951 (7th Cir. 2004)	Seventh-day Adventist (minority)	"United States Postal Service" employee	2	43-5052.00	Postal Service Mail Carriers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Ross v. Colo. Dep't of Transp., 2012 WL 5975086 (D. Colo. Nov. 14, 2012)	Unspecified Christian	"Administrative Assistant"	2	43-6014.00	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive
Rumfola v. Total Petrochemical USA, Inc., 2012 WL 860405 (M.D. La. Mar. 13, 2012)	Unspecified Sabbatarian	"Control Specialist"	2	51-8091.00	Chemical Plant and System Operators
Sanchez-Rodriguez v. AT & T Mobility Puerto Rico, Inc., 673 F.3d 1 (1st Cir. 2012)	Seventh-day Adventist (minority)	"Retail Sales Consultant"	2	41-2031.00	Retail Salespersons

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Shatkin v. Univ. of Tex. at Arlington, 2010 WL 2730585 (N.D. Tex. July 9, 2010)	Unspecified Christian	"administrative assistants"	2	43-6014.00	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive
Slater v. Douglas Cty., 743 F. Supp. 2d 1188 (D. Or. 2010)	Unspecified Christian	"County Clerk's Office" employee	2	43-4031.00	Court, Municipal, and License Clerks
Stanley v. ExpressJet Airlines, Inc., 356 F. Supp. 3d 667 (E.D. Mich. 2018)	Muslim (minority)	"flight attendant"	2	53-2031.00	Flight Attendants

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Stolley v. Lockheed Martin Aeronautics Co., 228 F. App'x 379 (5th Cir. 2007)	United Church of God	"aircraft assembler"	2	51-2011.00	Aircraft Structure, Surfaces, Rigging, and Systems Assemblers
Thomas v. Nat'l Ass'n of Letter Carriers, 225 F.3d 1149 (10th Cir. 2000)	Pentecostal	"United States Postal Service" employee	2	43-5052.00	Postal Service Mail Carriers
Vaughn v. Waffle House, Inc., 263 F. Supp. 2d 1075 (N.D. Tex. 2003)	Seventh-day Adventist (minority)	"district manager"	2	11-9051.00	Food Service Managers
Virts v. Consol. Freightways Corp. of Del., 285 F.3d 508 (6th Cir. 2002)	"Born Again" Christian	"over-the-road truck driver"	2	53-3032.00	Heavy and Tractor-Trailer Truck Drivers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Wagner v. Saint Joseph's/Candler Health Sys., Inc., 2022 WL 905551 (S.D. Ga. March 28, 2022)	Jewish (minority)	"Admissions Notification Specialist"	2	43-9041.00	Insurance Claims and Policy Processing Clerks
Weber v. Roadway Exp., Inc., 199 F.3d 270 (5th Cir. 2000)	Jehovah's Witness (minority)	"truck driver"	2	53-3032.00	Heavy and Tractor-Trailer Truck Drivers
E.E.O.C. v. Chemsico, Inc., 216 F. Supp. 2d 940 (E.D. Mo. 2002)	Unspecified Sabbatarian	"line worker"	2	51-9199	Production Workers, All Other

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Kenner v. Domtar Indus., Inc., 2006 WL 522468 (W.D. Ark. Mar. 3, 2006)	Unspecified Christian	"super will sheet operator"[1]	2	51-9199	Production Workers, All Other

[1] There were not enough details to attribute a particular O*NET code with a matching job zone. The job zone was assigned based on language from the case and similar O*NET occupational descriptions. *See Kenner*, 2006 WL 522468, at *1 ("At Domtar, Kenner's job title is super will sheet operator, and Kenner operates machine number 17 along with three other operators."); O*NET OnLine, *Adhesive Bonding Machine Operators and Tenders: 51-9191.00*, https://www.onetonline.org/link/summary/51-9191.00 (listing as a work activity "[u]sing either control mechanisms or direct physical activity to operate machines or processes").

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Mohamed-Sheik v. Golden Foods/Golden Brands LLC, 2006 WL 709573 (W.D. Ky. Mar. 16, 2006)	Muslim (minority)	"manufacturing floor" employees[2]	2	51-3099	Food Processing Workers, All Other
Tabura v. Kellogg USA, 880 F.3d 544 (10th Cir. 2018)	Seventh-day Adventist (minority)	"packaging" & "processing" employees at food production plant	2	53-7064.00	Packers and Packagers, Hand

[2] There were not enough details to attribute a particular O*NET code with a matching job zone. The job zone was assigned based on the court's opinion and similar O*NET occupational descriptions. *See Mohamed-Sheik*, 2006 WL 709573, at *1 (noting that the claimants "began working on the manufacturing floor" at a plant that converted edible oil to shortening); O*NET OnLine, *Food Batchmakers: 51-3092.00*, https://www.onetonline.org/link/summary/51-3092.00 (describing the position as one that "[s]et[s] up and operate[s] equipment that mixes or blends ingredients used in the manufacturing of food products").

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Walker v. Alcoa, Inc., 2008 WL 2356997 (N.D. Ind. June 9, 2008)	Unspecified Christian	"finish metal operator" in "Extrusion Department"	2	51-4021.00	Extruding and Drawing Machine Setters, Operators, and Tenders, Metal and Plastic
Aron v. Quest Diagnostics, Inc., 174 F. App'x 82 (3d Cir. 2006)	Jewish (minority)	"phlebotomist"	3	31-9097.00	Phlebotomists
Barton v. Metro. Gov't of Nashville & Davidson Cnty., 2022 WL 989100 (M.D. Tenn. Mar. 31, 2022)	Jehovah's Witness (minority)	"Information System Specialist"	3	11-3012.00	Administrative Services Managers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Brown v. F.L. Roberts & Co., 419 F. Supp. 2d 7 (D. Mass. 2006)	Rastafarian (minority)	"lube technician"	3	49-3023.00	Automotive Service Technicians and Mechanics
Dalberiste v. GLE Associates, Inc., 2020 WL 2529752 (11th Cir. 2020)	Seventh-day Adventist (minority)	"industrial hygiene technician"	3	19-5012.00	Occupational Health and Safety Technicians
Daniels v. City of Arlington, 246 F.3d 500 (5th Cir. 2001)	Evangelical Christian	"police officer"	3	33-3051.00	Police and Sheriff's Patrol Officers
Davis v. Fort Bend Cty., 765 F.3d 480 (5th Cir. 2014)	Unspecified Christian	"Desktop Support Supervisor"	3	15-1232.00	Computer User Support Specialists

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Dalfort Aerospace, 2002 WL 255486 (N.D. Tex. Feb. 19, 2002)	Seventh-day Adventist (minority)	"Aviation Maintenance Technician" trainee	3	49-3011.00	Aircraft Mechanics and Service Technicians
E.E.O.C. v. Firestone Fibers & Textiles Co., 515 F.3d 307 (4th Cir. 2008)	Living Church of God	"lab technician"	3	19-4031.00	Chemical Technicians
E.E.O.C. v. Geo Grp., Inc., 616 F.3d 265 (3d Cir. 2010)	Muslim (minority)	"correctional officer," "medication"/ "chronic infectious disease" nurse, & "intake specialist"	3	29-2061.00	Licensed Practical and Licensed Vocational Nurses

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Endres v. Ind. State Police, 334 F.3d 618 (7th Cir. 2003)	Baptist	"State Police" officer	3	33-3051.00	Police and Sheriff's Patrol Officers
Hommel v. Squaw Valley Ski Corp., 89 F. App'x 650 (9th Cir. 2004)	Unspecified Christian	"ski instructor"	3	25-3021.00	Self-Enrichment Teachers
Jean-Pierre v. Naples Cmty. Hosp., 2020 WL 3121297 (11th Cir. 2020)	Seventh-day Adventist (minority)	"clinical technician"	3	29-2012.00	Medical and Clinical Laboratory Technicians
Jiglov v. Hotel Peabody, G.P., 719 F. Supp. 2d 918 (W.D. Tenn. 2010)	Unspecified Christian	"kitchen mechanic"	3	49-9071.00	Maintenance and Repair Workers, General

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Litzman v. N.Y. City Police Dep't, 2013 WL 6049066 (S.D.N.Y. Nov. 15, 2013)	Jewish (minority)	"Probationary Police Officer"	3	33-3051.00	Police and Sheriff's Patrol Officers
Mathis v. Christian Heating & Air Conditioning, Inc., 158 F. Supp. 3d 317 (E.D. Pa. 2016)	Non-religious	"[HVAC] installation mechanic"	3	49-9021.00	Heating, Air Conditioning, and Refrigeration Mechanics and Installers
Morris v. Four Star Paving, LLC, 2013 WL 1681835 (M.D. Tenn. Apr. 17, 2013)	Seventh-day Adventist (minority)	"base foreman"	3	47-1011.00	First-Line Supervisors of Construction Trades and Extraction Workers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Nobach v. Woodland Vill. Nursing Ctr., Inc., 799 F.3d 374 (5th Cir. 2015)	Non-religious	"nursing home activities aide"	3	31-1131.00	Nursing Assistants
O'Barr v. United Parcel Serv., Inc., 2013 WL 2243004 (E.D. Tenn. May 21, 2013)	Unspecified Sabbatarian	"mechanic"	3	49-9071.00	Maintenance and Repair Workers, General
Perkins v. Town of Princeville, 216 F. App'x 293 (4th Cir. 2007)	Seventh-day Adventist (minority)	"police officer"	3	33-3051.00	Police and Sheriff's Patrol Officers
Rojas v. GMD Airlines Servs., Inc., 254 F. Supp. 3d 281 (D.P.R. 2015)	Pentecostal	"mechanic"	3	49-3011.00	Aircraft Mechanics and Service Technicians

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Small v. Memphis Light, Gas & Water, 952 F.3d 821 (6th Cir. 2020)	Jehovah's Witness (minority)	"electrician" & "service dispatcher"	3	51-8012.00	Power Distributors and Dispatchers
Tagore v. United States, 735 F.3d 324 (5th Cir. 2013)	Sikh (minority)	"revenue agent for the IRS"	3	13-2081.00	Tax Examiners and Collectors, and Revenue Agents
Vaynshelboym v. COMHAR, Inc., 2021 WL 4399651 (E.D. Pa. Sept. 27, 2021)	Jewish (minority)	"licensed practical nurse"	3	29-2061.00	Licensed Practical and Licensed Vocational Nurses

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Villareal v. Rocky Knoll Health Care Ctr., 2022 WL 17092090 (E.D. Wis. Nov. 21, 2022)	Unspecified Christian	"licensed practical nurse"	3	29-2061.00	Licensed Practical and Licensed Vocational Nurses
Wallace v. City of Philadelphia, 2010 WL 1730850 (E.D. Pa. Apr. 26, 2010)	Muslim (minority)	"police officer"	3	33-3051.00	Police and Sheriff's Patrol Officers
Webb v. City of Philadelphia, 562 F.3d 256 (3d Cir. 2009)	Muslim (minority)	"police officer"	3	33-3051.00	Police and Sheriff's Patrol Officers
Westbrook v. N.C. A&T State Univ., 51 F. Supp. 3d 612 (M.D.N.C. 2014)	Jehovah's Witness (minority)	"parking services officer"	3	33-3051.00	Police and Sheriff's Patrol Officers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Lindsey v. Bridge Rehab, Inc., 369 F. Supp. 3d 1204 (N.D. Ala. 2019)	Unspecified Christian	"treatment aide"[3]	3	21-1099	Community and Social Service Specialists, All Other
Baltgalvis v. Newport News Shipbuilding, Inc., 15 F. App'x 172 (4th Cir. 2001)	Unspecified Christian	"Senior Analyst Technician"	4	13-1081.00	Logisticians

[3] There were not enough details to attribute a particular O*NET code with a matching job zone. The job zone was assigned based on the court's opinion and similar O*NET occupational descriptions. *See Lindsey*, 369 F. Supp. 3d at 1208 ("As a treatment aide, Ms. Lindsey supervised clients' safety and conducted basic living skills group instruction sessions."); O*NET OnLine, *Occupational Therapy Aides: 31-2012.00*, https://www.onetonline.org/link/summary/31-2012.00 (listing as a task "[e]ncourag[ing] patients and attend[ing] to their physical needs to facilitate the attainment of therapeutic goals").

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Brown v. Hot Springs Nat. Park Hosp. Holdings, LLC, 2013 WL 1968483 (E.D. Ark. May 13, 2013)	Seventh-day Adventist (minority)	"Director of Physician Clinic Operations"	4	11-9111.00	Medical and Health Services Managers
Cassell v. Skywest, Inc., 2022 WL 375855 (D. Utah Feb. 8, 2022)	Seventh-day Adventist (minority)	"pilot"	4	53-2011.00	Airline Pilots, Copilots, and Flight Engineers
Dixon v. The Hallmark Cos., Inc., 627 F.3d 849 (11th Cir. 2010)	Unspecified Christian	"property manager" & "maintenance technician"	4	11-9141.00	Property, Real Estate, and Community Association Managers

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
E.E.O.C. v. Healthcare & Ret. Corp. of Am., 2009 WL 2488110 (E.D. Mich. Aug. 11, 2009)	Sikh (minority)	"Nurse Supervisor"	4	11-9111.00	Medical and Health Services Managers
Filinovich v. Claar, 2005 WL 2709284 (N.D. Ill. Oct. 19, 2005)	Seventh-day Adventist (minority)	"Director of Finance"	4	11-3031.00	Financial Managers
Ford v. City of Dallas, 2007 WL 2051016 (N.D. Tex. July 12, 2007)	Seventh-day Adventist (minority)	"Code Compliance Department" employee	4	11-9199.02	Compliance Managers
Kennedy v. Bremerton Sch. Dist., 991 F.3d 1004 (9th Cir. 2021)	Unspecified Christian	"football coach"	4	27-2022.00	Coaches and Scouts

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Lizalek v. Invivo Corp., 314 F. App'x 881 (7th Cir. 2009)	Unspecified	"RF [Radio Frequency] Engineer"	4	17-2072.01	Radio Frequency Identification Device Specialists
O'Brien v. City of Springfield, 319 F. Supp. 2d 90 (D. Mass. 2003)	Unspecified Christian	"public school teacher"	4	25-2022.00	Middle School Teachers, Except Special and Career/Technical Education
Quental v. Conn. Comm'n on Deaf & Hearing Impaired, 122 F. Supp. 2d 133 (D. Conn. 2000)	Unspecified Christian	"interpreter"	4	27-3091.00	Interpreters and Translators

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Shelton v. Univ. of Med. & Dentistry of N.J., 223 F.3d 220 (3d Cir. 2000)	Pentecostal	"staff nurse"	4	29-1141.00	Registered Nurses
Shepherd v. Gannondale, 2014 WL 7338714 (W.D. Pa. Dec. 22, 2014)	Jehovah's Witness (minority)	"Fiscal Supervisor"	4	11-3031.00	Financial Managers
Zamora v. Gainesville City Sch. Dist., 2015 WL 12851549 (N.D. Ga. June 22, 2015)	Jehovah's Witness (minority)	"Finance Administrative Assistant/Workers Comp Coordinator"	4	11-3111.00	Compensation and Benefits Managers
Berry v. Dep't of Soc. Servs., 447 F.3d 642 (9th Cir. 2006)	Evangelical Christian	"Department of Social Services" welfare transition employee	4	21-1099	Community and Social Service Specialists, All Other

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Patterson v. Walgreen Co., 727 F. App'x 581 (11th Cir. 2018)	Seventh-day Adventist (minority)	"training instructor"	4	13-1151.00	Training and Development Specialists
Andrews v. Va. Union Univ., 2008 WL 2096964 (E.D. Va. May 16, 2008)	Unspecified Christian	"Chair of the Department of Social Work"	5	11-9033.00	Education Administrators, Postsecondary
Bruff v. N. Miss. Health Servs., 244 F.3d 495 (5th Cir. 2001)	Unspecified Christian	"Employee Assistance Program" counselor	5	21-1012.00	Educational, Guidance, and Career Counselors and Advisors

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Moore v. Metro. Human Serv. Dist., 2010 WL 1462224 (E.D. La. Apr. 8, 2010)	Unspecified Christian	"social worker"	5	21-1023.00	Mental Health and Substance Abuse Social Workers
Noesen v. Med. Staffing Network, Inc., 232 F. App'x 581 (7th Cir. 2007)	Catholic	"pharmacist"	5	29-1051.00	Pharmacists
Crider v. Univ. of Tenn., 492 F. App'x 609 (6th Cir. 2012)	Seventh-day Adventist (minority)	"Programs Abroad Coordinator"	5	25-9099	Educational Instruction and Library Workers, All Other

Case	Religious affiliation	Occupation	Job Zone	O*NET Code	O*NET Description
Peterson v. Hewlett-Packard Co., 358 F.3d 599 (9th Cir. 2004)	Unspecified Christian	"office" employee[4]	N/A	N/A	N/A
Seaworth v. Pearson, 203 F.3d 1056 (8th Cir. 2000)	Unspecified Christian	Unclear[5]	N/A	N/A	N/A

[4] There were not enough details to attribute a particular O*NET code or assign a job zone.
[5] There were not enough details to attribute a particular O*NET code or assign a job zone.