

[FirstName LastName]
J. Reuben Clark Law School
Provo, UT 84602
(000) 000-0000
email@law.byu.edu

Articles Department
[Law Review name and address]

March 20, 2025

Dear journal editor:

The Ninth Circuit's decision in *Apache Stronghold* last year has sparked intense debate about the religious freedoms of indigenous peoples. With the Supreme Court's recent grant of certiorari, many scholars anxiously await the final word on the rights that Native Americans will retain to their sacred land sites.

In the attached article, I hope to make two contributions to this discussion. First, I discuss the widespread negative consequences that would occur if the Supreme Court upholds the *Apache Stronghold* decision. By severely weakening the already limited legal recourse available to indigenous communities, the Ninth Circuit's ruling, if affirmed, would pose a significant threat to sacred sites across the country.

Second, I examine the biases implicit in the religious freedom legal framework that contributed to the Ninth Circuit's decision. Though the Religious Freedom Restoration Act gives Native Americans a seat at the table to discuss burdens on their religious freedoms, the ultimate determination of competing interests remains in the hands of decision-makers who may not fully appreciate indigenous perspectives. Through this analysis, I hope to start a greater discussion about the efficacy of this statute.

I would be happy to answer any questions you may have about the article. Thank you for your time and consideration—I look forward to hearing from you.

Sincerely,

[FirstName LastName]