

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TRAVIS GREER,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-2014-708-HE
)	
JANET DOWLING, JAY DRAWBRIDGE,)	
KELU CURRY, FELICIA HARRIS,)	
CATHY MILBERS, MIKE ROGERS,)	
DAN GROGAN, and MARK KNUTSON,)	
)	
Defendants.)	

**PLAINTIFF’S [PROPOSED] FIRST AMENDED COMPLAINT FOR DAMAGES,
DECLARATORY, INJUNCTIVE RELIEF**

Plaintiff, Travis Lemarr Greer, alleges as follows:

INTRODUCTION

1. This case is brought pursuant to the First Amendment, 42 U.S.C. § 1983, 42 U.S.C. § 2000cc-1(a), and 51 O.S. § 253, and challenges as a violation of religious liberty a prison’s unforgiving and unsound “zero-tolerance” religious-diet policy. Specifically, prison officials have conditioned an inmate’s access to kosher meals as a Messianic Jew on his agreement not to eat anything outside its “Kosher Diet.” But not only has the prison obscured what it means to be outside such a diet, any violation—no matter how minor, mistaken, or justified by the inmate’s own sincerely held beliefs—is summarily met with burdensome penalties. Indeed, when the inmate, on a single occasion, ate crackers and drank iced tea he reasonably believed to be kosher but later discovered did not accord with the prison’s definition, he was suspended from that diet in violation of his faith and continues under the threat of penalties for similar acts.

2. Federal and state law broadly protect the religious exercise of prisoners. As a baseline, the First Amendment affords the “free exercise” of religion to inmates and prohibits prisons from favoring one religion, or interpretation of religious belief, over another as an “establishment of religion.” More directly, the Religious Land Use and Institutionalized Persons Act (RLUIPA) and Oklahoma Religious Freedom Act (ORFA) forbid a prison from substantially burdening an inmate’s sincere religious practice absent compelling reason and proof such a burden is the least restrictive means of achieving its goal. 42 U.S.C. § 2000cc-1(a); 51 Okl. St. Ann. § 253.
3. Notably, to survive the “strict scrutiny” courts use to assess a prison’s actions under RLUIPA and ORFA, the prison cannot rely on generalizations or hypotheticals. Rather, it must prove that burdening the inmate in question is justified by a compelling interest for which there is no alternative. 42 U.S.C. § 2000cc-1(a) (applying strict scrutiny to burden “on that person”); 51 O.S. § 253(B) (assessing government’s interests when applied “to the person”); *see also Holt v. Hobbs*, 574 U.S. 352, 363 (2015) (emphasizing that the assessment of prison’s interests in safety and security must be made in the context of the particular claimant).
4. Among other accommodations, these laws require inmates receive “a diet that conforms with their religious beliefs.” *Gallagher v. Shelton*, 587 F.3d 1063, 1070 (10th Cir. 2009); *see also Abdulhaseeb v. Calbone*, 600 F.3d 1301, 1314–15 (10th Cir. 2010). And in doing so, a prison cannot impose an orthodoxy text favoring one understanding of faith over another. *See Larson v. Valente*, 456 U.S. 228, 244 (1982) (“The clearest command of the Establishment Clause is that one religious denomination cannot be officially preferred over another.”).
5. Nor can a prison exclude inmates from a religious diet for a purported violation before an opportunity to be heard. *Reed v. Bryant*, 719 Fed. App’x 771, 773-74 (10th Cir. 2017) (holding actionable under RLUIPA a “zero-tolerance [religious-diet] rule

that requires suspension of inmates who are falsely or mistakenly accused” of a violation); *see also United States v. Sec., Fla. Dep’t of Corrections*, 2015 WL 1977795, at *11 (S.D. Fla. 2015) (finding that a policy suspending inmates from a religious diet “before an opportunity for a prisoner to explain his position as to the alleged violation” qualifies as an actionable burden under RLUIPA).

6. Despite this, state-prison officials in Oklahoma have imposed a “zero-tolerance” policy on Travis Greer, a Messianic Jewish inmate, by conditioning his admittedly sincere need for a kosher diet on absolute compliance with their own understanding of what such a diet entails and depriving him of the diet altogether or threatening other harsh penalties for consumption of food outside what they deem to be kosher—no matter his reason for such consumption.
7. Specifically, prison officials conditioned Mr. Greer’s access to the only diet comporting with his faith—the Oklahoma Department of Corrections’ “Kosher Diet”—on a pledge never to consume anything “not consistent with th[at] diet.” And whether that pledge was violated fell entirely under the discretion of the prison, without any regard for the severity of the violation, whether or not the violation was a mistake, or Mr. Greer’s beliefs on the meaning of kosher.
8. Then, on a single occasion, Mr. Greer consumed crackers and tea offered to him by the prison, which he understood to be kosher but the prison did not. And because of this, Mr. Greer was summarily removed from the diet program for 120 days—causing him spiritual anguish.
9. Mr. Greer was thereafter readmitted to the “Kosher Diet” program, yet the prison continues to insist on its own view of kosher and the summary imposition of penalties for violations; rather than removing inmates from the program, though, the prison now goes so far as to interpret a violation as a form of Class A Misconduct that results in a significant loss of privileges.

10. Defendants' actions against Mr. Greer—through their “zero-tolerance” policy, insistence on what is kosher, summary suspension of his religious diet, or threatened misconduct punishment for violations—contravene RLUIPA, ORFA, and the First Amendment.
11. Mr. Greer has exhausted his administrative remedies and now seeks all available equitable and legal relief—including injunctive relief under RLUIPA and damages under ORFA—so he can live in a manner consistent with his faith and protected by federal and state law.

PARTIES

12. Plaintiff Travis Greer is a resident of Oklahoma. He is a former inmate at the James Crabtree Correctional Center (JCCC) in Helena, Oklahoma, and presently an inmate at the William S. Key Correctional Center (William Key) in Fort Supply, Oklahoma.
13. Defendant Janet Dowling was, at all times relevant hereto, warden of JCCC. She is sued in her official capacity.
14. Defendant Jay Drawbridge was, at all times relevant hereto, facility chaplain at JCCC. He is sued in his official capacity.
15. Defendant Scott Crow is the director of the Oklahoma Department of Corrections (ODOC) and is responsible for the operations of prison facilities in the state, including JCCC and William Key. He is sued in his official capacity.
16. Defendant Mike Knutson is an administrative review authority with the ODOC in Oklahoma City, Oklahoma. He is sued in his official capacity.

JURISDICTION AND VENUE

17. This Court has subject-matter jurisdiction under 28 U.S.C. § 1331 (federal-question jurisdiction for the RLUIPA and federal constitutional claims), 28 U.S.C. § 1983 (deprivation of constitutional rights), and 28 U.S.C. § 1367 (supplemental jurisdiction for the claim under Oklahoma Religious Freedom Act from the same set of facts).

18. Venue is proper in the Western District of Oklahoma under 28 U.S.C. § 1391(b)(1) because all defendants reside in Oklahoma and/or under 28 U.S.C. § 1391(b)(1) because a substantial part of the events giving rise to this action took place in this district—at the James Crabtree Correctional Center in Helena, Oklahoma, or the William S. Key Correctional Center in Fort Supply, Oklahoma.

EXHAUSTION

19. Mr. Greer has fully exhausted his administrative remedies.
20. In particular, Mr. Greer submitted multiple grievance reports to prison officials beginning in 2014. And when remanding this case back to this court for further proceedings under the original complaint, the Tenth Circuit held Mr. Greer’s efforts satisfied the exhaustion requirements of the Prison Litigation Reform Act for purposes of his religious-liberty claims arising from his alleged mistreatment under the Oklahoma prison system’s Kosher Diet policy. *Greer v. Dowling*, 947 F.3d 1297, 1304 & n.5 (10th Cir. 2020) (holding that “the grievance encompassed Mr. Greer’s First Amendment and RLUIPA claims,” and his related state-law claim).
21. The Complaint initiating this action was filed within the appropriate time.

STATEMENT OF FACTS

22. Travis Greer, 53, is a military veteran and inmate in the Oklahoma state-prison system.
23. As an incarcerated person, Mr. Greer resides under the authority of, and is subject to the rules and regulations of, the Oklahoma Department of Corrections (ODOC), as well as the rules and procedures set by the warden of the facility where he resides.
24. Mr. Greer previously resided at the James Crabtree Correctional Center (JCCC), a medium-security facility in Helena, Oklahoma, but now resides at the William S. Key Correctional Center (William Key), a minimum-security facility in Fort Supply, Oklahoma.

25. Both JCCC and William Key are facilities of the ODOC, and operate under its authority.
26. Mr. Greer is an observant Messianic Jew—a religion recognized by the ODOC and with an estimated 350,000 practitioners worldwide, including up to 250,000 in the United States.
27. Messianic Jews obey traditions and norms of conventional Judaism but further believe that Jesus is the Messiah.
28. Consistent with his faith, Mr. Greer believes he must follow a kosher diet according to his understanding of the Messianic Jewish interpretation of the requirements in the Torah.
29. Mr. Greer’s beliefs in Messianic Jewish kosher dietary laws restrict what foods he may eat, how those foods can be combined, and how those foods must be prepared.
30. At no point have Defendants disputed the sincerity of Mr. Greer’s Messianic Jewish religious beliefs, including his commitment to a kosher diet thereunder.
31. “Messianic Jewish” is a religion authorized by the ODOC to receive what it refers to as a “Kosher Diet.”
32. Whether housed at JCCC or William Key, Mr. Greer has been subject in particular to the rules and regulations promulgated by the ODOC and the rules and procedures established by the respective wardens of each facility concerning food service.
33. The standard diet of ODOC inmates—both at JCCC and William Key—contains food that violates the dietary laws of Mr. Greer’s Messianic Jewish faith. Only a kosher diet would allow Mr. Greer to live in accordance with his religious beliefs.
34. Starting at his time at JCCC, therefore, Mr. Greer has been a participant in the ODOC’s only kosher-diet program there, the “Kosher Diet.”
35. To participate in the kosher program, however, Mr. Greer was required to sign ODOC Special/Religious Diet Request Form OP-030113, which, in turn, required him to agree not to “consume or possess any food that is not consistent with the diet

requested, regardless of the source of the food,” under penalty of removal from the program for violating that prohibition.

36. This sort of religious-diet policy is referred to as “zero-tolerance,” where even one misstep prompts removal from it. *See Colvin v. Caruso*, 605 F.3d 282, 296 (6th Cir. 2010) (so classifying a policy that withdrew inmates from a kosher-meal program after only one diet violation).
37. What’s more, the ODOC policy provided—and continues to provide—no opportunity to be heard prior to the imposition of any penalties for a purported violation.
38. And, furthermore, the ODOC, JCCC, and Warren Key obscure what constitutes a kosher diet for the purposes of the “Kosher Diet” policy, leaving the ultimate determination of whether a food item is kosher to prison officials—not to the inmates who adhere to these diets as part of their religious practice.
39. On March 20, 2014, Mr. Greer attended a banquet for military veterans at JCCC.
40. At the banquet, and in lieu of meals that were provided at the event, Mr. Greer ate a pre-packaged kosher meal he had brought with him.
41. As an accompaniment to that pre-packaged meal, Mr. Greer also consumed crackers and iced tea that were provided to attendees at the banquet by the prison.
42. Mr. Greer believed the crackers he consumed were kosher. Indeed, he understood the packaging of the crackers to have included a symbol designating them as kosher.
43. Mr. Greer likewise believed the iced tea was kosher. This belief was based on the assurance of a caterer that the brand of tea being served was Lipton, which had previously been included in Mr. Greer’s pre-packaged kosher meals and he had understood previously as including a kosher symbol on its packaging.
44. After the banquet, the JCCC chaplain in charge of “approving and monitoring Religious Diets” under ODOC policy at the time watched security camera footage of the event and saw Mr. Greer consuming the tea and crackers.

45. Notwithstanding Mr. Greer's belief that the crackers and iced tea were in fact kosher and that at no time did he violate or intend to violate his religious beliefs, the prison unilaterally determined that Mr. Greer's consumption of the crackers and tea violated the "zero-tolerance policy" not to consume non-kosher items and suspended him from the kosher diet for 120 days.
46. Before suspending him from kosher meals, moreover, the prison gave Mr. Greer no opportunity to explain himself or his interpretation of kosher beliefs as a Messianic Jew.
47. The prison's 120-day suspension from a kosher diet in turn forced Mr. Greer to violate his sincerely held religious beliefs in that period rather than starve—a "Hobson's choice" condemned by the courts. *Abdulhaseeb v. Calbone*, 600 F.3d 1301, 1315 (10th Cir. 2010).
48. Since Mr. Greer's suspension from the religious-diet program and despite his insistence on its illegality, not only has the ODOC continued to require participants—including Mr. Greer in his present participation in the program at William Key—not to "consume or possess any food" that in the prison's sole determination is "not consistent with the diet requested," it now also insists that violating this requirement constitutes Class A Misconduct.
49. Sanctions for Class A Misconduct include restitution, extra duty, visitation restrictions, telephone restrictions, and canteen restrictions.
50. Consequently, Mr. Greer continues to live under the threat of substantial and summarily imposed penalties for the consumption of any food that, in his prison's view and regardless of his sincerely held religious beliefs to the contrary, is not kosher.
51. As a proximate result of Defendants' unlawful actions, Mr. Greer has suffered physical, spiritual, emotional, and mental distress.

- 52. In managing Mr. Greer's participation, or lack thereof, in the kosher-diet program, Defendants have acted under color of state law.
- 53. The ODOC, JCCC, and William Key each receive federal financial assistance.
- 54. Mr. Greer grieved his mistreatment under the religious-diet policy and has exhausted his administrative remedies in a manner that encompassed his First Amendment, RLUIPA, and supplemental state-law claims. *Greer v. Dowling*, 947 F.3d 1297, 1304 (10th Cir. 2020).

FIRST CLAIM FOR RELIEF

**Violation of the Religious Land Use and Institutionalized Persons Act
(42 U.S.C. § 2000cc-1)**

- 55. Mr. Greer re-alleges and incorporates by reference all preceding paragraphs herein.
- 56. The Religious Land Use and Institutionalized Persons Act (RLUIPA) forbids a state prison or prison system that receives federal financial assistance from imposing a substantial burden on an inmate's sincere religious exercise, unless the prison "demonstrates that imposition of the burden on that person—(1) is in furtherance of a compelling governmental interest; and (2) is the least restrictive means of furthering that compelling governmental interest." 42 U.S.C. § 2000cc-1.
- 57. Because the Oklahoma Department of Corrections, James Crabtree Correctional Center, and/or William S. Key Correctional Center receive federal financial assistance, RLUIPA applies to this case.
- 58. Accordingly, Mr. Greer has a sincerely held religious belief protected under RLUIPA that keeping a kosher diet is mandated by his Messianic Jewish faith.
- 59. But Defendants have unlawfully imposed a substantial burden on Mr. Greer's sincere religious exercise in keeping such a kosher diet because their zero-tolerance policy and practice prevented, and threatens to prevent, him from practicing that core tenet of his faith.

60. Under this policy, the determination of any violation is subject to the unilateral discretion of prison officials as to what counts as kosher, regardless of whether their determinations align with Mr. Greer's own religious beliefs—which imposes a substantial burden on his religious exercise. *See Holt v. Hobbs*, 574 U.S. 352, 362 (2015) (noting that under RLUIPA, strains on even “idiosyncratic” religious beliefs are substantial burdens).
61. Additionally, due to this policy, Defendants removed Mr. Greer from the kosher-diet program and forced him to choose between violating his religious beliefs and starving—a further substantial burden on his religious exercise. *Reed v. Bryant*, 719 Fed. App'x 771, 778 (10th Cir. 2017) (holding for purposes of summary judgment that the ODOC zero-tolerance rule for kosher-diet violations qualifies as “a substantial burden on an inmate's sincerely held religious beliefs”).
62. And finally, due to this same policy, Defendants presently require Mr. Greer to live under the threat of other substantial penalties—likewise a substantial burden on his religious exercise.
63. For their part, Defendants cannot prove that their zero-tolerance policy, as applied to Mr. Greer, was or is justified by a compelling government interest. *See* 42 U.S.C. § 2000cc-1(a) (framing compelling-interest analysis in terms of the burdened person).
64. The standard for this showing is high; for example, courts have deemed security concerns and the cost of kosher meals insufficiently compelling. *See Moussazadeh v. Texas Dep't of Crim. Just.*, 703 F.3d 781, 794–95 (5th Cir. 2012). Courts have similarly rejected a prison's scrupulous insistence on the lack of mistakes—a point all the more salient where, as here, there is no concern over an inmate's sincerity. *See Grayson v. Schuler*, 666 F.3d 450, 454 (7th Cir. 2012) (denying government's interest in perfect religious adherence by observing “a sincere religious believer doesn't forfeit his religious rights merely because he is not scrupulous in his

observance; for where would religion be without its backsliders, penitents, and prodigal sons?”).

- 65. Defendants also cannot prove that the zero-tolerance policy is the least restrictive means of satisfying any purported compelling interest when it comes to Mr. Greer.
- 66. As a proximate result of Defendants’ unlawful actions under RLUIPA, Mr. Greer has suffered physical, spiritual, emotional, and mental distress.
- 67. Accordingly, Mr. Greer seeks all appropriate and available declaratory and equitable relief, as well as attorney’s fees and costs.

SECOND CLAIM FOR RELIEF
Violation of the Oklahoma Religious Freedom Act
(51 Okl. St. Ann. § 253)

- 68. Mr. Greer re-alleges and incorporates by reference all preceding paragraphs herein.
- 69. The Oklahoma Religious Freedom Act (ORFA) prohibits an Oklahoma state-government entity or official from substantially burdening an individual’s exercise of religion unless “it demonstrates that application of the burden to the person is—
1. Essential to further a compelling government interest; and 2. The least restrictive means of furthering that compelling government interest.” 51 O.S. § 253(B).
- 70. As a remedy, ORFA allows for any person whose religion has been substantially burdened by a governmental entity in violation of the statute to obtain injunctive and declaratory relief and monetary damages. 51 O.S. § 256.
- 71. The state entity or official imposes a substantial burden under ORFA when it “prevents participation in conduct motivated by a sincerely held religious belief.” *Steele v. Guilfoyle*, 76 P.3d 99, 102 (Okl. Civ. App. 2003) (state policies that “inhibit or constrain Plaintiff’s religious conduct” impose a substantial burden).
- 72. Defendants here are state entities or officials in the state-prison system and thus are subject to the Oklahoma Religious Freedom Act. *See Steele*, 76 P.3d at 101.

73. Mr. Greer has a sincerely held religious belief that keeping a kosher diet is mandated by his Messianic Jewish faith.
74. But Defendants have unlawfully imposed a substantial burden on Mr. Greer's sincere religious exercise in keeping such a kosher diet because their zero-tolerance policy and practice prevented, and threatens to prevent, him from practicing that core tenet of his faith.
75. Under this policy, the determination of any violation is subject to the unilateral discretion of prison officials as to what counts as kosher, regardless of whether their determinations align with Mr. Greer's own religious beliefs—which imposes a substantial burden on his religious exercise.
76. Additionally, due to this policy, Defendants removed Mr. Greer from the kosher-diet program and forced him to choose between violating his religious beliefs and starving—a further substantial burden on Mr. Greer's religious exercise.
77. Finally, due to this same policy, Defendants continue to impose a substantial burden on Mr. Greer's exercise of religion by requiring him to live under the threat of other substantial penalties.
78. As in the RLUIPA context, Defendants cannot prove that their actions are justified by a compelling government interest or that they were the least restrictive means of furthering any such interest. *See Hardeman v. Trammell*, 2019 WL 1141069, at *4 (E.D. Okla. 2019) (observing that ORFA required the ODOC to “[make] every effort to accommodate” an inmate's religious practice, including by demonstrating that it explored several alternative means of furthering its interests).
79. As a proximate result of Defendants' unlawful actions under ORFA, Mr. Greer suffered physical, spiritual, emotional, and mental distress.
80. Accordingly, Mr. Greer seeks monetary damages and all appropriate and available declaratory and equitable relief, as well as attorney's fees and costs.

THIRD CLAIM FOR RELIEF

**Violation of the Free Exercise Clause of the First Amendment to the U.S.
Constitution**

(via 42 U.S.C. § 1983)

81. Mr. Greer re-alleges and incorporates by reference all preceding paragraphs herein.
82. The First Amendment forbids government from “prohibiting the free exercise” of religion. U.S. Const. amend. I. And its protections may be enforced by a private action at law or equity against any person acting under “color of state law” via 42 U.S.C. § 1983.
83. Furthermore, under the First Amendment, “an inmate’s right to free exercise of religion includes the right to a diet that conforms with [his] religious beliefs.” *Gallagher v. Shelton*, 587 F.3d 1063, 1070 (10th Cir. 2009).
84. Defendants are governmental entities or officials and thus are obliged to comply with the First Amendment and, accordingly, are subject to liability under Section 1983. *Cantwell v. Connecticut*, 310 U.S. 296, 303 (1940).
85. Mr. Greer has a sincerely held religious belief that keeping a kosher diet is mandated by his Messianic Jewish faith.
86. But Defendants unlawfully violated Mr. Greer’s constitutional right to free religious exercise because they deprived him of access to a kosher diet in accordance with core requirements of his faith, and under a zero-tolerance policy that not only reserved for prison officials the unilateral right to determine the meaning of kosher but also allowed them to summarily impose penalties—including the removal of kosher meals or misconduct charges—without any exception or a pre-deprivation opportunity for the inmate to explain.
87. As a proximate result of Defendants’ unlawful actions under the Free Exercise Clause of the First Amendment, Mr. Greer has suffered physical, spiritual, emotional, and mental distress.

88. Accordingly, Mr. Greer seeks all appropriate and available declaratory and equitable relief, as well as attorney's fees and costs.

FOURTH CLAIM FOR RELIEF

**Violation of the Establishment Clause of the First Amendment to the U.S.
Constitution
(via 42 U.S.C. § 1983)**

89. Mr. Greer re-alleges and incorporates by reference all preceding paragraphs herein.
90. The First Amendment forbids government "establishment of religion." U.S. Const. amend. I. Such forbidden "establishment" has, in turn, been interpreted to require the government to be committed to "official religious neutrality." *McCreary Cnty. v. ACLU*, 545 U.S. 844, 860 (2005). And violations of this neutrality may enforced by a private action at law or equity against any person acting under "color of state law" via 42 U.S.C. § 1983.
91. Defendants are governmental entities or officials and thus are obliged to comply with the First Amendment and, accordingly, are subject to liability under Section 1983. *Everson v. Bd. of Educ.*, 330 U.S. 1, 8 (1947).
92. Defendants violated, and continue to violate, the Establishment Clause by preferencing their interpretation of a kosher diet, to the exclusion of Mr. Greer's own understanding of kosher dietary laws as informed by his personal Messianic Jewish faith and to the point of conditioning his access to a diet consistent with his faith on such an understanding by the state.
93. In so doing, Defendants favored one understanding of religious practice over another to the detriment of the latter, violating the "clearest command of the Establishment Clause." *Larson v. Valente*, 456 U.S. 228, 244 (1982).
94. Furthermore, by conditioning Mr. Greer's ability to keep kosher in accordance with his religious beliefs on his adherence to their ad hoc determinations of what constitutes a kosher diet—determinations that are obscured to inmates or to the

public—Defendants acted coercively and, thus, improperly violated the Establishment Clause for this reason as well.

95. As a proximate result of Defendants' unlawful actions under the Establishment Clause of the First Amendment, Mr. Greer has suffered physical, spiritual, emotional, and mental distress.

96. Accordingly, Mr. Greer seeks all appropriate and available declaratory and equitable relief, as well as attorney's fees and costs.

REQUEST FOR RELIEF

97. WHEREFORE, Mr. Greer prays the Court grants the following relief:

- (a) Issue a declaration that he is entitled under RLUIPA, ORFA, and the First Amendment to participate in a manner consistent with his faith in the Oklahoma Department of Corrections' provision of kosher meals in any state-prison facility in which he resides;
- (b) Issue a declaration that in denying Mr. Greer the right to receive kosher meals as described above the Defendants violated RLUIPA, ORFA, and the First Amendment;
- (c) Issue an injunction ordering Defendants to admit Mr. Greer to the ODOC's kosher-diet program for the remainder of his sentence in a manner consistent with his sincere understanding of what it means to keep kosher;
- (d) Issue an injunction ordering Defendants to publish the standards that govern what constitutes a kosher diet, and what does not;
- (e) Issue an injunction ordering Defendants, upon learning of alleged violations of religious diets, not to impose any penalties on the inmate until notice has been given and the inmate has been given an opportunity to be heard;
- (f) Award Mr. Greer monetary damages for Defendants' deprivation of his statutory rights under ORFA;

- (g) Award Mr. Greer a reasonable amount of attorney's fees for the work of his attorneys in pursuit of this action and the protection of his rights, as permitted by the laws under which he brings this complaint;
- (h) Award Mr. Greer all costs, disbursements, and expenses he has paid or will pay, or that were or will be incurred on his behalf in the course of this action;
- (i) Award such additional relief that the Court deems just and proper; and
- (j) Any other relief as allowed by law.¹

Dated: December 23d, 2020.

Respectfully submitted,

/s/ Anthony J. Ferate

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