



October 5, 2026

The Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

RE: A Discredited “Psychological Coercion” Doctrine Threatening Religious Freedom

Dear Mr. President,

We write as a multi-faith coalition of organizations and individuals — religious leaders, religious freedom advocates, scholars, and legal practitioners — convened through the International Religious Freedom (IRF) Roundtable, to raise a major concern and request corrective actions. A legal doctrine built on scientifically discredited “brainwashing” theory — written into the federal forced-labor statute in 2000 — is being used against religious and spiritual communities here in America: first through a decade of civil lawsuits reaching ever closer to mainstream churches, and now through the first federal criminal conviction based purely on “psychological coercion.” There is at least a dozen more cases in the pipeline.

In connection with America’s 250th anniversary, we respectfully ask you to take immediate actions, detailed below:

- 1) Convene a multi-faith White House meeting to discuss this doctrine;
- 2) Pause federally funded training built on rejected “coercive control” methodologies; and
- 3) Direct the Department of Justice to adopt a religious-freedom review before bringing such prosecutions.

The Supreme Court warned against exactly this — but Congress opened the door.

In *United States v. Kozminski* (1988), the Supreme Court held that federal forced-labor law reaches only physical or legal coercion — warning that extending it to “psychological coercion” would criminalize the conduct of “a religious leader who obtains personal services by means of religious indoctrination.” As long as that line held, religious practice was categorically outside the statute. In 2000, however, Congress erased the line, defining “serious harm” in 18 U.S.C. § 1589 to include psychological and reputational harm — removing the old protection without replacing it. In 2003, Congress went further and added a private right of action, which enabled private plaintiffs to test this same standard in civil court long before any prosecutor embraced it. More than \$100 million in federal grants have since conditioned prosecutors, judges, and service providers on a “victim-centered approach” under which a participant's own denial of harm is treated as further proof of harm — a subjective, unfalsifiable standard.

For over a decade, the theory marched through civil litigation toward mainstream churches.

In 2012, a federal appeals court confronted the claim that a church's shunning of a former member — protected First Amendment conduct — was itself evidence of coercion. In 2020, a former novice sued the Catholic Maryknoll Sisters, a century-old missionary order, on the theory that religious formation is forced labor. In 2021, temple volunteers sued BAPS, one of the largest Hindu organizations in the world. By 2023, the theory carried the government's own imprimatur: a Department of Justice report named “forced labor perpetrated by religious organizations” among the most notable trafficking trends, and the Department weighed in against a Christian youth camp in Wyoming. In 2024, the Salvation Army's voluntary rehabilitation program faced the same claim; by 2025, suits were pending against the Community of Jesus and against Shen Yun, the Falun Gong performing-arts company. In every case, religious teaching, communal life, and volunteer service are reframed as “psychological coercion.”

In 2025, the theory crossed into criminal law — and it is spreading.

In *United States v. Cherwitz* (E.D.N.Y.), federal prosecutors obtained the first-ever forced-labor conspiracy conviction against leaders of a meditation and spiritual-teaching organization on a pure “psychological coercion” theory. The government conceded that no one was physically restrained and that every alleged victim was free to leave. In their closing argument, prosecutors told the jury the “serious harm” was exclusion from a spiritual community. James R. Lawrence III, an evangelical Christian and former HHS Deputy General Counsel in your first Administration, warned that against conservative Christians “the playbook would be straightforward. Evangelization becomes recruitment. Labor is extracted through church ministries... There is no limiting principle.” Professor Alan Dershowitz calls it “a terrible, terrible, terrible precedent,” observing that “with a few changes of words, this indictment could have been directed against Mormon groups, against Hasidic groups, against various Protestant or Catholic sects.” Scholars now count at least a dozen active U.S. cases — roughly a third against mainline Pentecostal and Baptist churches — and these cases proceed even when the alleged victims deny being victims and forensic evaluations find them psychologically healthy.

The methodology was rejected by courts and scientists — yet it is embedded in federal training, and its architects now target Christianity itself.

The framework behind these cases, Steven Hassan's “BITE Model,” descends from “brainwashing” theories previously excluded from federal court as unreliable science (*United States v. Fishman*, 1990) and never endorsed by the American Psychological Association. Yet by his own account and that of the Department of Labor's federal trafficking coordinator, it has been incorporated into DOJ and DOL training since at least 2023. Mr. Hassan is also the author of *The Cult of Trump*, which brands tens of millions of your own voters as “mind-control cultists” requiring “deprogramming.” And the movement no longer hides its endgame: the newest anti-religious book, *The Savior Complex*, applies the same “coercive control” analysis to Jesus and Christianity itself, calling Christianity “a full-stack system of control.”

Abroad, this theory has just dissolved an entire religious denomination in Japan — upheld by Japan's Supreme Court in March, its assets now being liquidated. Meanwhile, Korea has jailed both that church's 83-year-old leader and the 95-year-old leader of another Christian movement, and Argentine prosecutors have indicted senior officials of Opus Dei on the same theory. The U.S. Commission on International Religious Freedom (USCIRF) has condemned this “pseudo-scientific” ideology for years when used by governments abroad.

We respectfully urge you and your Administration to:

1. **Convene a multi-faith meeting at the White House** with White House counsel, the White House Faith Office, and a designated DOJ liaison. Topic: the need to restore the protection for religious practice that federal forced-labor law provided before 2000, as the Trafficking Victims Protection Act comes before Congress for reauthorization this term.
2. **Direct an immediate review and pause of federally funded prosecutorial and judicial training** that embeds “coercive control” methodologies rejected by the courts and the relevant scientific bodies.
3. **Direct the Department of Justice to issue interim guidance** requiring a religious-freedom review step before prosecuting a recognized religious or philosophical organization under 18 U.S.C. § 1589.

Religious freedom is a foundational American liberty and a defining commitment of your Administration. A supporting memorandum documenting the cases, quotations, and sources cited above is enclosed. We stand ready to assist in any way that would be useful.

Respectfully,

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PATH OF YAHRA (POYRA)

PATMOS INSTITUTE

RELIGION NEWS

RELIGIOUS FREEDOM COALITION

SHINCHEONJI (NEW HEAVEN AND NEW EARTH)

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Enclosure:
Supporting Memorandum — Cases, Sources, and Documentation