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The Roberts Court avoided any re-assessment of *Employment Division v. Smith* (again, which applies to laws characterized as neutral and generally applicable) because it characterizes the government’s actions as discriminatory (*Trinity Lutheran*, *Masterpiece Cakeshop*, and *Espinoza*) or as an exceptional (*Hosanna-Tabor* and *Our Lady of Guadalupe School* ministerial exception). As a result, the Court has not attempted any transformational changes to the Free Exercise Clause. Thus, the contours of the Clause remain substantially undefined.

