

No. 13-6827

In the
Supreme Court of the United States

GREGORY HOUSTON HOLT
A/K/A ABDUL MAALIK MUHAMMAD,
Petitioner,

v.

RAY HOBBS, DIRECTOR
ARKANSAS DEPARTMENT OF CORRECTION, ET AL.,
Respondents.

*ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE EIGHTH CIRCUIT*

**BRIEF OF ISLAMIC LAW SCHOLARS AS *AMICI CURIAE*
IN SUPPORT OF PETITIONER**

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TABLE OF CONTENTS

	Page
TABLE OF CONTENTS	i
TABLE OF AUTHORITIES.....	ii
INTEREST OF <i>AMICI CURIAE</i>	1
SUMMARY OF ARGUMENT.....	2
ARGUMENT	2
I. THE PROPHET MUHAMMAD, THE SUNNAH, AND HADITH.....	2
II. THE ROLE OF HADITH IN ISLAM.....	8
A THE DEVELOPMENT OF HADITH STUDIES... ..	8
B. THE MATURATION OF HADITH SCHOLARSHIP.....	12
III. THE HADITH COLLECTIONS AND THE INSTANT CASE.....	14
CONCLUSION.....	18

TABLE OF AUTHORITIES

	Page(s)
CASES	
<i>Fraze v. Illinois Dep't of Employment Sec.</i> , 489 U.S. 829 (1989).....	17
<i>Thomas v. Review Bd. of Indiana Employment Sec. Div.</i> , 450 U.S. 707 (1981).....	17
<i>Nat'l Group for Comms. & Computers, Ltd. v. Lucent Tech. Intern., Inc.</i> , 331 F.Supp.2d 290 (D.N.J. 2004)	7
OTHER AUTHORITIES	
SALIH AL-ABI, AL-THAMAR AL-DANI (1944)	18
MANSUR AL-BUHUTI, AL-RAWD AL-MURBI (1999).....	18
MUHAMMAD NASIR AL-DIN AL-ALBANI, ADAB AL- ZIFAF (1989).....	18
'ALA' AL-DIN AL-KASANI, BADA'I' AL-SANA'I (1982).....	18
AHMAD IBN NAQIB AL-MISRI, RELIANCE OF THE TRAVELLER (1991).....	17-18
MUHAMMAD ALI AL-SHAWKANI, NAYL AL-AWTAR (2001).....	18
JONATHAN A.C. BROWN, HADITH: MUHAMMAD'S LEGACY IN THE MEDIEVAL AND MODERN WORLD (2009)	3-5, 8-14, 17
JONATHAN A.C. BROWN, MUHAMMAD: A VERY SHORT INTRODUCTION (2011).....	5-7, 9, 12-13
FREDERICK M. DENNY, AN INTRODUCTION TO ISLAM (4th ed. 2011).....	3-4, 8-11, 13-14

FREDERICK M. DENNY, ISLAM AND THE MUSLIM COMMUNITY (1987)	4, 13, 15
JOHN L. ESPOSITO, THE OXFORD DICTIONARY OF ISLAM (2003)	11
HEBREWS 12:1-2.....	6
MOHAMMAD HASHIM KAMALI, SHARI‘AH LAW: AN INTRODUCTION (2008)	6
ANDREW RIPPIN, MUSLIMS: THEIR RELIGIOUS BELIEFS AND PRACTICES (4th ed. 2012).....	9
MUHAMMAD ZUBAYR SIDDIQI, HADITH LITERATURE: ITS ORIGIN, DEVELOPMENT, AND SPECIAL FEATURES (1993).....	15
THE TRANSLATIONS OF THE MEANINGS OF SAHIH AL-BUKHARI (Dr. Muhammad Muhsin Khan ed., 5th ed. 1984).....	15-16
SAHIH MUSLIM (Abdul Hamid Siddiqi trans., 1971).....	16

INTEREST OF AMICI CURIAE

Amici are scholars of Islamic history and culture, with particular expertise on Islamic law and jurisprudence.¹ Jonathan A. Brown is Associate Professor of Islamic Studies and Muslim-Christian Understanding at Georgetown University. Khaled M. Abou El Fadl is the Omar and Azmeralda Alfi Professor of Law at the UCLA School of Law. John L. Esposito is University Professor and Professor of Religion and International Affairs and of Islamic Studies at Georgetown University. Mohammad Fadel is Canada Research Chair for the Law and Economics of Islamic Law and Associate Professor of Law at the University of Toronto Faculty of Law. Ingrid Mattson is the London and Windsor Community Chair in Islamic Studies at Huron University College at the University of Western Ontario.²

This case raises important questions of law, but it also raises important questions about religion and Islam in particular. Petitioner here claims a right to wear a beard in conformity with his Muslim beliefs. But much about these beliefs—their origins, their historical evolution, their significance within Islam—may be unfamiliar to the Court. Much about

¹ Counsel for *amici* certifies that this brief was not authored in whole or in part by counsel for any party, and that no person or entity other than the *amici* or their counsel has made a monetary contribution to the preparation or submission of this brief. Letters of consent from both parties to the filing of this brief have been filed with the Clerk.

² *Amici* file this brief in their personal capacities as scholars. None of their respective universities takes any position on the issues in this case.

Islam has been misunderstood in the West, sometimes with unfortunate consequences. With the aim of assisting the Court in these matters, *amici* respectfully submit this brief.

SUMMARY OF ARGUMENT

Petitioner here seeks a right to wear a beard consistent with his Muslim beliefs. Throughout the litigation, he has claimed support in a traditional Islamic set of sources, known as the hadith. *See, e.g.*, Pet. Br. at 5-6; J.A. at 18 (Pl.'s Compl.); J.A. at 54, 58, 63 (Pl.'s Testimony before the Magistrate Judge). Such a perceived obligation to follow the hadith, *amici* explain, is a common belief among Muslims and has a long established theological and historical warrant. *Amici* point out some of the many hadith requiring beards, and explain how these hadith are widely followed by observant Muslims across the various schools of Islam.

ARGUMENT

I. THE PROPHET MUHAMMAD, THE SUNNAH, AND HADITH

To understand Islam, and to understand the role of hadith within Islam, one begins with the Prophet Muhammad. Muhammad's role in the historical development of Islam is something almost everyone knows. The Quran was revealed over a period of several decades to Muhammad and Muhammad alone. And while the Muslim community would eventually grow to over a billion people worldwide, it began as a small group of Muhammad's personal associates. Historically then, Islam organizes itself around Muhammad's life. But

Islam revolves around Muhammad in ways deeper still.

The Shahada, thought of often as the first Pillar of Islam, is the closest thing there is to a creed for Muslims. The first phrase of it, ‘There is no god but God,’ is well-known. “But there is a second clause that must also be uttered before one is a true Muslim: ‘Muhammad is the Messenger of God.’” FREDERICK M. DENNY, *AN INTRODUCTION TO ISLAM* 150 (4th ed. 2011) (hereinafter “DENNY, *AN INTRODUCTION TO ISLAM*”); JONATHAN A.C. BROWN, *HADITH: MUHAMMAD’S LEGACY IN THE MEDIEVAL AND MODERN WORLD* 16 (2009) (hereinafter “BROWN, *HADITH*”) (“In Islam, religious authority emanates from God through His Prophet.”). The idea that Muslims worship Muhammad is a regrettable caricature and a poor one at that; Muslims regard the worship of any human being, including even the Prophet, as idolatrous. But it is undeniably true that, for Muslims, the Prophet Muhammad stands alone among human beings:

It is as difficult to imagine Islam without Muhammad as Christianity without Jesus, even though the two play very different roles in the religions that they founded and have different places in doctrine and practice. Both, however, were so close to the source of their inspiration and so thoroughly dominated by it that in their words and gestures people have discerned clues and demonstrations of divine activity in the historical process. For Christians, Jesus shows how God behaves among his creatures. Muhammad’s life is exemplary in showing

people how they should behave in the presence of God.

DENNY, AN INTRODUCTION TO ISLAM, *supra*, at 150.

The middle sentence in the above paragraph illustrates something important: By examining Muhammad's words and gestures, Muslims discern clues about how God wants them to live out their own lives. The word Sunnah (sometimes Sunna), the Arabic word for custom, is not widely known in the West. But it has tremendous importance within Islam. In the years before Muhammad, it referred to a person's statements and actions. But the word took on additional meaning with the birth of Islam. Muslims used the word to refer particularly to Muhammad, and it developed a normative aspect: "[I]t became a special term that denoted the category of exemplary words, deeds, and gestures that were destined to be authoritative in the life of the umma [the Muslim community]." DENNY, AN INTRODUCTION TO ISLAM, *supra*, at 151; *see also* FREDERICK M. DENNY, ISLAM AND THE MUSLIM COMMUNITY 64 (1987) (hereinafter "DENNY, ISLAM AND THE MUSLIM COMMUNITY") ("*Sunna* contains an implicit imperative . . .").

As one scholar explains:

The Quran is not a detailed legal manual. Only about five hundred of the book's verses provide legal injunctions, and even on major questions such as ritual prayer the Quran is often vague. For both Sunni and Shiite Islam, the Prophet's Sunna has thus proven an essential resource for explaining and supplementing the Quranic message. As the

Companion [of Muhammad] ‘Imran b. Husayn supposedly told a person who wanted to take religious law only from the Holy Book and not from the Sunna, ‘Indeed you are an idiot, do you find in the Book of God prayer explained!? Do you find in it fasting explained!? Indeed the Quran ordains this, but the Sunna explains it.’

BROWN, HADITH, *supra*, at 150; JONATHAN A.C. BROWN, MUHAMMAD: A VERY SHORT INTRODUCTION 103 (2011) (hereinafter “BROWN, MUHAMMAD”) (noting that “even practices as fundamental as the five daily prayers are found nowhere in the holy book [the Quran],” but are instead found in the Sunnah).

As the lens through which the Quran was understood, the Sunna of the Prophet has controlled the way in which Muslims have interpreted the Quranic revelation. Although no Muslim would claim that the word of Muhammad is *ontologically* equal or superior to the word of God, early Sunnis . . . long ago acknowledged that ‘the Sunna came to rule over the Quran, it is not the Quran that rules over the Sunna.’ This was not in any way an admission of any deficiency in the Quran—rather it recognizes that the book required the Prophet’s example and teaching in order to explain its verses and unlock its manifold meanings . . .

BROWN, HADITH, *supra*, at 150-51; *see also id.* at 3 (“Among Western readership, the question ‘What does Islam say about’ some issue is usually followed

by references to the Quran . . . Yet the Quran is not the source to which a curious reader should refer to answer the question . . .”).

The Prophet’s example and teaching are important to Muslims for a variety of reasons. They are seen through the lens of religious duty, to be sure: Seeing the Prophet as sinless, Muslims see compliance with the Sunnah as a sure path toward living a life pleasing to God. *See* MOHAMMAD HASHIM KAMALI, SHARI’AH LAW: AN INTRODUCTION 20 (2008) (noting the assessment, a millennia ago, that “every single chapter of fiqh [law] finds its origin in the Qur’an, which is then explained and elaborated by the Sunnah”). But they also experience the Sunnah as a source of meaning apart from duty: “[T]he Prophet’s persona is the earthly pivot of faith and Muslim communal identity.” BROWN, MUHAMMAD, *supra*, at 105.

This kind of emulative reverence is not unique to Islam. Jesus’s example has, quite understandably, extraordinary weight for Christians, *see* HEBREWS 12:1-2 (“[L]et us also lay aside every weight and the sin that clings so closely . . . looking to Jesus the pioneer and perfecter of our faith.”), and there are instructive analogies in Judaism as well, *see* BROWN, MUHAMMAD, *supra*, at 71-72 (noting that just as “the rabbis of late antiquity were viewed as living examples of how the Torah should be lived in daily life” and just as “[t]heir students copied how they bathed and ate,” so also “Muhammad’s Companions too looked to the minutest details of his conduct for insights into the behavior and lifestyle that most pleased God”).

This brings us to the hadith:

The Sunnah of the Prophet was transmitted from [Muhammad] primarily through Hadiths, or reports about Muhammad's words and deeds. Recalled by the Prophet's Companions, Hadiths were transmitted from them by their students. This second generation of Muslims began setting down hadiths, which had until then generally been transmitted orally, in written form in the early 700s [after Muhammad's death in 632]. Along with the Quran, the legal writings of the Companions and the legal opinions of the early *ulama* [Muslim scholars], Hadiths became a major component in the Muslim effort to answer the question that lies at the heart of the Shariah: 'Which actions are pleasing or displeasing to God?'

BROWN, MUHAMMAD, *supra*, at 103. This accurately states the sometimes confused relationship between Sunnah and hadith. The Sunnah is the overall precedent and teachings of the Prophet; the hadiths are the records of the particularities of that precedent and those teachings. Muslims imitate the Sunnah of the Prophet; they discern that Sunnah through the hadiths.³

³ Given that the distinction between Sunnah and hadith is subtle and unfamiliar, courts should be forgiven for their occasional imprecision. *See, e.g., Nat'l Group for Comms. and Computers, Ltd. v. Lucent Tech. Intern., Inc.*, 331 F.Supp.2d 290, 294 (D.N.J. 2004) (referring to "the recorded examples of the acts and words of Muhamm[a]d, known as the 'Sunnah'").

II. THE ROLE OF HADITH IN ISLAM

A. The Development of Hadith Studies

Yet the relationship between Sunnah and hadith is more complicated than it first appears. One way to explain that complication—which simultaneously goes to explain why Sunnah and hadith are different—is by turning to certain historical events within Islam. Shortly after Muhammad’s death, Islam fractured in a series of disruptive civil wars. The Quran had been codified before these wars—almost immediately upon Muhammad’s death—so questions about its authenticity were fairly easy for Muslims to put aside. But the process of formal codification for hadith happened slower and later. This created a problem with which Islam had to wrestle—the problem of false hadith. Consider the following:

When civil war broke out openly between ‘Ali [whose faction would later become known as Shi’a Muslims] . . . and the then governor of Syria and future founder of the [Sunni] Umayyad dynasty, Mu’awiya b. Abi Sufyan, both sides waged a propaganda war using the Prophet’s words as ammunition. ‘Ali’s supporters falsely claimed that Muhammad had said, *‘If you see Mu’awiya ascend my pulpit, then kill him,’* while Mu’awiya’s side countered by forging hadiths such as *‘It is as if Mu’awiya were sent as a prophet because of his forbearance and his having been entrusted with God’s word.’*

BROWN, HADITH, *supra*, at 70; DENNY, AN INTRODUCTION TO ISLAM, *supra*, at 155 (“The hadith

experts of Islam have been well aware since earliest times that many hadiths were fraudulent.”⁴

This posed an issue for observant Muslims: How could they know for sure whether the Prophet had really done or said something attributed to him in a hadith? “For example, if a Hadith says ‘the People in Islam with the greatest share of glory will be the Persians,’ is this a forgery by some Persian nationalist or really something that the Prophet knew would be true (the Persians have certainly been at the vanguard of Islamic thought)?” BROWN, MUHAMMAD, *supra*, at 104.

The solution lay in an intricate scholastic system of Hadith criticism that developed over the course of several centuries. Muslim scholars strove to make accurate determinations about the authenticity of each individual hadith. Recognizing that authenticity often could not be determined solely on the basis of a hadith’s contents (called *matn*), Muslim scholars also worked to form judgments based on a hadith’s transmission chain (called *isnād*, the Arabic word for support).⁵

Examining both *isnād* and *matn* together, scholars evaluated the authenticity of individual

⁴ And the possibility of intentional fraud, as Muslim scholars of this era knew well, comes on top of the other risks normally associated with hearsay—even honest people can misstate something, or misremember it, or subconsciously distort it. See BROWN, HADITH, *supra*, at 7 (“As in a game of ‘Telephone,’ a report could mutate as it was passed from person to person.”).

⁵ Precisely because everyone had become aware of the risk of fraud, hadith were transmitted from one person to another with both *isnād* and *matn*. See ANDREW RIPPIN, MUSLIMS: THEIR RELIGIOUS BELIEFS AND PRACTICES 47-51 (4th ed. 2012) (providing examples).

hadith. They worked to collect information about every individual listed as a link in the chain in all the various isnāds. Transmitters were ranked along two dimensions—their moral character (‘adl) and their literary accuracy (dabt)—and sorted on a finely graded spectrum, with categories ranging from reliable (thiqa) at the top to liar (kadhdhab) at the bottom. See BROWN, HADITH, *supra*, at 84 (explaining the intermediate categories like “sincere,” “lenient,” “not strong,” “weak,” and others).⁶

Isnāds could be rejected for other kinds of reasons too. Hadiths with incomplete isnāds were judged unreliable, as were hadiths with transparently false isnāds. See DENNY, AN INTRODUCTION TO ISLAM, *supra*, at 153 (noting that even if two individuals had been judged as being of the highest reliability, if it was established that they lived in different places and never crossed paths, then any hadith purporting to be a communication from one to the other had to be rejected). Short isnād chains tended to be more reliable, because fewer links in the chain meant less risk of error. But dramatically short isnād chains provoked suspicion, and hadith with impossibly short isnād chains had to be rejected too. See BROWN, HADITH, *supra*, at 47-48.

⁶ To give an example of how hadith scholars could make such determinations: Say a scholar noticed several hadith on a common topic with a common link in the chain—say they all involved a teacher (X) who passed on information to three different disciples (A, B, and C), resulting in three separate hadith. The matn of the separate hadith could then be compared. If the accounts derived from A and B matched up perfectly, but the account derived from C was different, this suggested that either C or someone chronologically later in his chain was unreliable. See BROWN, HADITH, *supra*, at 30.

Hadith were also sometimes rejected on the basis of their *matn*. “Reports that were illogical, exaggerated, fantastic, or repulsive or that contradicted the Quran were considered suspect.” JOHN L. ESPOSITO, *THE OXFORD DICTIONARY OF ISLAM* 102 (2003). And most crucially, *matn* were compared to each other; a *matn* with one source chain could be corroborated by identical *matn* with different source chains.

Just as individuals were graded regarding their reliability, hadiths were graded regarding their authenticity from *sahih* (sound) to *da‘if* (unsound), again with a number of intermediate categories like *hasan* (fair). See BROWN, *HADITH, supra*, at 100-01.⁷

In this way, hadith study developed into a nuanced and elaborate field of inquiry—a science of a sort. See DENNY, *AN INTRODUCTION TO ISLAM, supra*, at 154 (referring to the “sophisticated complexity” behind the evaluation of hadith that “can only be hinted at here”). Of course this is not to say that hadith study should be thought of as the equivalent of modern-day historical criticism. There are similarities, to be sure. “Both are critical, in that they concern themselves with questions of the reliability of historical sources” BROWN, *HADITH, supra*, at 199. But the differences are pronounced. As faithful Muslims, hadith scholars of this era implicitly tended to assume the reliability of hadith (absent contrary evidence). Modern academic historians generally start with the opposite premise:

⁷ These intermediate categories meant that some hadith might be legitimately used for one purpose but not for another. See BROWN, *HADITH, supra*, at 102 (“[H]adiths that were not reliable enough to be admitted in discussions of law could still be used for other purposes . . . [such as] good manners”).

“[T]he default setting for [these] scholars [i]s to doubt the reliability of material transmitted about the past.” BROWN, HADITH, *supra*, at 201.

B. The Maturation of Hadith Scholarship

Hadith studies matured slowly. The eighth century saw the first organized works of Islamic scholarship, called mussanafs. They were a mix of hadiths and other materials, organized topically by regionally minded authors. The late eighth and early ninth century saw the emergence of musnad collections, collections composed solely of hadith and organized by isnād. *See* BROWN, HADITH, *supra*, at 18-31.

In the ninth century, the sahih movement emerged. Like the musnad collections, these too were composed solely of hadith. But there was a crucial difference. Until now, collections of hadith had not attempted to exclude inauthentic hadiths. This was the radical innovation of the sahih movement—hadith scholars now acted as editors, making principled decisions about what was reliable (and thus worthy of inclusion) and what was not. *See* BROWN, HADITH, *supra*, at 33 (“With the sahih/sunan movement, the hadith tradition had reached a watershed.”). These editorial choices, of course, would shape the future of Islam across the globe. *See* BROWN, MUHAMMAD, *supra*, at 65-66 (“The Muslim historian was thus much more an editor than an author. He expressed his opinions about what had happened in the past not through his prose and written analyses, but through his choices about including and excluding reports.”).

That these developments took so long to fully evolve reflects the monumental nature of the tasks involved. Take the experience of Al-Bukhari, an author of the most famous and praised hadith collection of the sahih movement. Al-Bukhari apparently spent 16 years making his collection. See BROWN, HADITH, *supra*, at 32. He spent those years sifting through around 600,000 hadith. Many he judged unreliable; others, he discovered, were duplicates. He ended up with only 9,000 hadith in his collection, with around 2,600 unique matn. See DENNY, AN INTRODUCTION TO ISLAM, *supra*, at 153.

The vast majority of these hadith, of course, have no bearing on prison administration. Al-Bukhari's collection, for instance, starts with hadith concerning revelation and faith, then turns to issues like prayer and charity, then addresses all manner of human interaction. The collection is a combination of spiritual and temporal guidance, ranging from the most ethereal to the most mundane. See DENNY, ISLAM AND THE MUSLIM COMMUNITY, *supra*, at 66 ("Hadith collections contain sections on such topics as God, faith, eschatology, worship . . . warfare, marriage and family life, divorce, inheritance, proper deportment and etiquette, food, clothing, toilette (e.g., cutting the nails, growing a moustache, dressing the hair), bodily functions and hygiene, travel, conversation, trade, funerals, Qur'an recitation [and so on] . . ."); BROWN, MUHAMMAD, *supra*, at 104 (noting that "[h]adiths were also crucial for the elaboration of Islamic theology," as "[m]any theological tenets, such as the nature of heaven and hell, and narratives about the end of the world, come not from the Quran but from Hadith").

These collections, once finished, became an enduring source of religious meaning for Muslims worldwide:

This process took over two centuries. But when it was completed, the Muslims had a solid second source of authoritative teaching [beside the Quran] to assist them in all aspects of their individual and corporate religious, social, civil, and legal life.

DENNY, AN INTRODUCTION TO ISLAM, *supra*, at 151; BROWN, HADITH, *supra*, at 15 (noting that the culmination of this process gave the Muslim world a set of hadith both to provide “an authoritative maxim used to elaborate Islamic law and dogma” and “a form of connection to the Prophet’s charismatic legacy”).

III. THE HADITH COLLECTIONS AND THE INSTANT CASE

Of the hadith collections that have been compiled over the centuries, six now stand as the most authoritative within Sunni Islam.⁸ All dating from around the close of the 9th century, and together referred to as the Kutub al-Sittah (the Six Books), these collections guide ordinary Muslims in countless ways in their ordinary lives. Of those six, two have particular importance—those of Al-Bukhari and Muslim ibn Al-Hajjaj. Sometimes referred to as

⁸ Shi’a Islam has a hadith tradition as well, but a substantially different one with different hadith and different collections deemed authoritative. See BROWN, HADITH, *supra*, at 123-49.

Sahih Bukhari and Sahih Muslim, and collectively referred to as the Sahihayn (the Two Sahihs), these two collections stand out even within the six. *See* BROWN, HADITH, *supra*, at 32 (claiming that these two are seen as “the most famous books of hadith”); DENNY, ISLAM AND THE MUSLIM COMMUNITY, *supra*, at 65-66 (claiming that these two are seen as “stand[ing] out for their high standards”).

Petitioner relies on both of these two hadith collections in his brief; in doing so, he fits within long-standing Sunni tradition. *See* Pet. Br. at 5-6. And this reliance is not the work of expert appellate counsel. Both Petitioner’s *pro se* complaint, *see* J.A. at 18, and his in-court testimony before the magistrate judge, *see* J.A. at 54, cited Sahih Bukhari—the single most important hadith collection. *See* MUHAMMAD ZUBAYR SIDDIQI, HADITH LITERATURE: ITS ORIGIN, DEVELOPMENT, AND SPECIAL FEATURES 53 (1993) (“The most important . . . of all the hadith collections is of course al-Jami al-Sahih of al-Bukhari [Sahih Bukhari] . . . [It] is generally considered by the Muslims as an authority second only to the Qur’an.”).

As Petitioner notes, *see* Pet Br. at 5-6, both Sahih Bukari and Sahih Muslim have hadith calling observant Muslims to wear beards. In fact, each of these collections have multiple hadith on the point—all to the effect that Muslims are to adopt habits of dress and grooming manifestly different than the surrounding cultures. Sahih Al-Bukhari, for instance, has these:

780. Narrated by Nafi': Ibn Umar said, The Prophet said, 'Do the opposite of what the pagans do. Keep the beards and cut the

moustaches short.' Whenever Ibn 'Umar performed the Hajj or 'Umra, he used to hold his beard with his hand and cut whatever remained outside his hold.

781. Narrated by Ibn 'Umar: Allah's Messenger said, 'Cut the moustaches short and leave the beard (as it is).

7 THE TRANSLATIONS OF THE MEANINGS OF SAHIH AL-BUKHARI 516-17 (Dr. Muhammad Muhsin Khan, 5th ed. 1984).⁹

Sahih Muslim has these hadith:

500. Ibn 'Umar said: The Messenger of Allah (may peace be upon him) said: Act against the polytheists, trim closely the moustache and grow beard.

501. Abu Huraira reported: The Messenger of Allah (may peace be upon him) said: Trim closely the moustache, and grow beard, and thus act against the fire-worshippers.

SAHIH MUSLIM ¶¶ 500-01 (Abdul Hamid Siddiqi trans., 1971).

To be sure, modern-day Muslims take an array of approaches to hadith. While some Muslims

⁹ Petitioner quotes these same hadith, but uses a different edition of Sahih Bukhari. See Pet. Br. at 5-6. The content of the hadith are the same in both briefs, but the numbering is different. *Amici* uses a 1984 printing in which the numbering of the hadith start over at the beginning of each volume, while Petitioner uses a 1997 edition in which the hadith are apparently numbered continuously.

feel obligated to follow hadith, others—some Islamic modernists, for example—reject hadith as a source of religious obligation. See BROWN, HADITH, *supra*, at 245 (noting that “the ‘Quran only’ movement flourished in India,” although “it flared only briefly in the Arab world”). This kind of diversity is unsurprising; it surfaces in other religious traditions. Jews disagree not only about what is kosher, but about whether the kosher laws should be followed at all. That Reform Jews exist, however, does not impeach the sincerity of the Orthodox (or vice versa). Catholics may believe in transubstantiation; Reform Christians (like Presbyterians) may deny it. This inculcates no one; this is ordinary religious pluralism and nothing more. See *Thomas v. Review Bd. of Indiana Employment Sec. Div.*, 450 U.S. 707, 716 (1981) (“[I]t is not within the judicial function and judicial competence to inquire whether the petitioner or his fellow worker more correctly perceived the commands of their common faith.”)

What matters is that the Petitioner here is a traditionalist Salafi who believes that God commands him to wear a beard. See J.A. at 18, 162. Even if he were the only Muslim that felt this way, it would not matter. See *Frazee v. Illinois Dep’t of Employment Sec.*, 489 U.S. 829, 834 (1989) (“[T]he Free Exercise Clause does not demand adherence to a tenet or dogma of an established religious sect.”).

But Petitioner is hardly alone. Of the four major schools of Islamic law in Sunni Islam, three (Hanbali, Maliki, Hanafi) require a man to have a beard and the fourth (Shafi’i) at least strongly recommends it: “Shaving one’s beard is unlawful according to all Imams except Shafi’i, who wrote two opinions about it, one that it is offensive, and the

other that it is unlawful.” AHMAD IBN NAQIB AL-MISRI, *RELIANCE OF THE TRAVELER: A CLASSIC MANUAL OF ISLAMIC SACRED LAW* 58 (Nuh Ha Mim Keller trans., 1991).¹⁰

CONCLUSION

For the foregoing reasons, the judgment of the Court of Appeals below should be reversed.

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¹⁰ Sources in Arabic make the point about the three schools in more detail. See MANSUR AL-BUHUTI, *AL-RAWD AL-MURBI* 25 (1999) (Hanbali); SALIH AL-ABI, *AL-THAMAR AL-DANI* 500 (1944) (Maliki); ‘ALA’ AL-DIN AL-KASANI, *BADA’I’ AL-SANA’I*, 2:141 (1982) (Hanafi). Sources in Arabic also speak to how for Salafis, like Petitioner, a beard is absolutely required. See MUHAMMAD NASIR AL-DIN AL-ALBANI, *ADAB AL-ZIFAF* 135-140 (1989); MUHAMMAD ALI AL-SHAWKANI, *1 NAYL AL-AWTAR* 192-94 (2001).