No. 25-965

In the
Supreme Court of the United States

DANIEL GRAND,

Petitioner,

v.

CITY OF UNIVERSITY HEIGHTS, OHIO, ET AL.

Respondents.

On Petition for Writ of Certiorari to the U.S. Court of Appeals for the Sixth Circuit

BRIEF *AMICUS CURIAE* OF THE AMERICAN CENTER FOR LAW & JUSTICE IN SUPPORT OF PETITIONER

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Other Authorities

INTEREST OF *AMICUS CURIAE*[1]

The American Center for Law and Justice ("ACLJ") is an organization dedicated to the defense of constitutional liberties secured by law, including the defense of religious liberty. The ACLJ has appeared before this Court in many cases advocating for the freedoms of religious groups and individuals, as counsel for a party, *e.g., Lamb's Chapel v. Center Moriches Union Free School District*, 508 U.S. 384 (1993); *Locke v. Davey*, 540 U.S. 712 (2004), or for amicus, *e.g., Landor v. Louisiana Department of Corrections & Public Safety*, No. 23-1197 (U.S. Sept. 3, 2025); *Carson v. Makin*, 596 U.S. 767 (2022); *City of Boerne v. Flores*, 521 U.S. 507 (1997).

This case presents a critical question about whether individuals can obtain meaningful relief when government officials violate their religious liberty. The ACLJ has a substantial interest in ensuring that federal civil rights statutes, including the Religious Land Use and Institutionalized Persons Act (RLUIPA), provide effective remedies for violations of religious freedom. The ACLJ files this brief on behalf of the churches and religious institutions it represents, who depend on RLUIPA when officials violate their rights.

SUMMARY OF ARGUMENT

The Sixth Circuit committed two fundamental errors, each independently sufficient to warrant this

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[1] Per Rule 37.2, *amicus* states that counsel of record received timely notice of the intent to file this brief. Per Rule 37.6, *amicus* states that no counsel for any party authored this brief in whole or in part, and no entity or person made any monetary contribution toward the preparation or submission of this brief.

Court's review, and each compounding the other in ways that systematically deprive the most vulnerable religious communities of the federal protection Congress enacted RLUIPA to provide.

First, the Sixth Circuit imported a finality requirement from *Williamson County Regional Planning Commission v. Hamilton Bank of Johnson City*, 473 U.S. 172 (1985), overruled on other grounds by *Knick v. Township of Scott*, 588 U.S. 180 (2019). It took the requirement from *Williamson*, a Takings Clause decision, and applied it wholesale to claims arising under the First Amendment and RLUIPA. That transplant cannot survive scrutiny.

First Amendment and RLUIPA harms are entirely different in kind. When government action causes a reasonable person to curtail or abandon protected religious exercise, the constitutional injury is complete. It does not await the outcome of the administrative process — it is caused by that process and often caused most acutely by its most coercive intermediate stages. A finality requirement that conditions federal relief on the completion of an administrative proceeding that the government has made openly hostile does not merely delay relief, it forecloses it entirely for precisely those plaintiffs who most urgently need it.

The second error is structural. By conditioning access to federal court on completion of a formal, multi-stage zoning process, the Sixth Circuit's rule does not burden all religious practitioners equally. Large, institutionally organized religious bodies — with legal departments, land-use counsel, and resources to absorb years of administrative proceedings — can meet the finality requirement at significant but manageable cost. The communities

RLUIPA was most urgently designed to protect cannot. The homeowner hosting a weekly prayer group, the family whose religious obligations cannot be satisfied at a distant formal institution, the small congregation without the means to commission architectural drawings or endure a three-hearing zoning process; for these practitioners, the administrative requirement is not the path to relief. It is the injury itself, dressed in procedural garb.

In the Jewish tradition, the practice of daily prayer, or *daven*, is valued both in the synagogue and in the home. When conducted in a *minyan*—a quorum of ten or more—home prayer carries particular spiritual significance. In the Christian tradition, home-based fellowship, Bible study, and communal meals have been central to the faith since the earliest days of the Church, as described in Acts 2:42–47, and remain so today across Catholic, Protestant, Orthodox, and Pentecostal traditions alike. A zoning regime that treats twelve neighbors gathered for prayer as a regulated land use — while leaving comparable secular gatherings undisturbed — targets a specific form of faithful observance for millions of Americans. A finality rule that requires those Americans to complete an institutional-scale administrative process before seeking relief from that targeting penalizes the very qualities — smallness, informality, home-based intimacy — that make the religious practice most vulnerable to death by red tape.

The ACLJ's own experience confirms that municipal overreach frequently threatens these practices. Municipalities regularly deploy zoning enforcement as an instrument of suppression, relying on process itself — cease-and-desist letters, notices of

violation, escalating administrative demands — to deter religious activity without ever issuing a formal final decision. Under the Sixth Circuit's rule, each of those municipalities would escape federal liability simply by abandoning the harassment campaign early enough or by sufficiently bullying the victim into withdrawal via costly procedural demands. That cannot be what Congress intended when it enacted RLUIPA to provide "very broad protection for religious liberty." *Holt v. Hobbs*, 574 U.S. 352, 356 (2015) (internal citations omitted).

This Court should grant certiorari to correct the Sixth Circuit's doctrinal error and ensure that RLUIPA's protections are available to those for whom Congress most urgently designed them.

ARGUMENT

I. The Sixth Circuit's Chilling-Effect Analysis Fundamentally Misunderstands First Amendment Harm.

The Sixth Circuit took a standard, *Williamson*, designed for Takings Clause analysis and applied it wholesale to the fundamentally different context of the chilling effect upon First Amendment rights. In so doing, it placed on the victim of government harassment the burden of completing an administrative process that the government had made openly hostile. The result is a rule that insulates the most harmful form of religious discrimination—targeted, intimidating enforcement—from any judicial remedy.

This Court has consistently held that even a minimal temporal restriction on First Amendment rights causes irreparable harm: "the loss of First

Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality opinion). When the government takes action that causes a reasonable person to curtail or modify protected religious activity, the injury to constitutional rights is immediate and real—regardless of whether additional administrative proceedings have yet concluded. The Sixth Circuit's conclusion that Grand was "the author of any chilling effect on his First Amendment interests," *Grand,* 159 F.4th at 515, gets cause and effect precisely backwards. The court treated Mr. Grand's withdrawal of his permit application as evidence that no chilling had occurred — as if a person who flees a burning building bears responsibility for the smoke in his lungs.

But Mr. Grand did not withdraw because he was indifferent to his rights or unconcerned about the outcome. He withdrew after the City had already deployed every instrument of governmental pressure available to it short of a formal denial. A legal rule that treats the predictable effects and chill of government harassment as proof that the victim chose his own fate does not merely misread the First Amendment — it inverts it, shielding the most coercive form of religious discrimination from the very remedy RLUIPA was enacted to provide.

This Court has consistently characterized RFRA and RLUIPA as "sister statutes" that work together to safeguard religious liberty. *Ramirez v. Collier*, 595 U.S. 411, 424 (2022); *Holt*, 574 U.S. at 356 (2015); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 730 (2014). As this Court has explained, Congress designed these statutes "in order to provide very

broad protection for religious liberty." *Holt*, 574 U.S. at 356 (quoting *Hobby Lobby*, 573 U.S. at 693).

In a regulatory takings claim—the context in which the *Williamson County* finality requirement was developed—the harm is fundamentally economic and prospective. A diminution in property value, a lost development opportunity, a heightened cost of compliance: none of these can be calculated with precision until the government's final position on the regulation's application to a specific property is known. That is why *Williamson County Regional Planning Commission v. Hamilton Bank of Johnson City*, 473 U.S. at 186 (1985), held that a takings claim requires "a final decision regarding the application of the regulations to the property at issue[]" before it ripens. The finality requirement is "compelled by the very nature of the inquiry" in a takings case. *Id.* at 190.

But the "nature of the inquiry" in a First Amendment or RLUIPA case is entirely different. The harm is not an economic consequence that awaits final administrative calculation. It is a present, ongoing burden on protected religious activity—the cancellation of a prayer service, the abandonment of a *minyan*, the suppression of devotional practices; that is the very thing the Constitution protects. That injury occurs the moment government action causes a reasonable person of ordinary religious conviction to curtail their exercise of faith. No final zoning determination is needed to know whether it has occurred.

RLUIPA itself confirms that the harm covered by the statute is not limited to final land-use determinations. Each of RLUIPA's land-use protections expressly reaches a government's

"impos[ition]" of land-use regulations and their "implement[ation]"—not merely their final application to a specific property. 42 U.S.C. § 2000cc(a)(1), (b)(1)–(3). These are present-tense verbs describing ongoing governmental conduct — not past-tense results of concluded administrative proceedings. Congress chose that language deliberately, to ensure that municipalities could not discriminate through the *process* of regulatory enforcement while shielding the *product* of that process from judicial review.

By conditioning RLUIPA liability on a "final decision" by a local zoning board, the Sixth Circuit effectively amended the statute to read "finally imposes" and "conclusively implements" — words Congress did not use. Where Congress specifically used language sweeping enough to cover mid-process governmental conduct, courts may not silently narrow that reach by grafting onto the statute a finality requirement borrowed from a different area of law governing a different type of harm. A First Amendment injury does not await a final zoning determination; it is complete the moment government action causes a reasonable person to curtail their exercise of faith. Importing *Williamson County*'s finality requirement into this context does not adapt a neutral jurisdictional doctrine to a new setting — it weaponizes a takings-era procedural rule to frustrate the very constitutional interests RLUIPA was designed to safeguard.

The Sixth Circuit's reliance on *Grace Community Church v. Lenox Township*, 544 F.3d 609 (6th Cir. 2008), is misplaced. That case, of course, does not bind this Court. Moreover, in that case, the church offered "no comment" at the revocation hearing, declined to appeal, and failed to seek reinstatement — a pattern

of complete disengagement from available process. *Id.* at 616. Mr. Grand's situation is categorically different. He appeared at the Commission hearing, responded through counsel, distinguished his proposed use from a formal synagogue, and engaged with the substance of the application. He withdrew after the campaign against him. Where withdrawal is the product of governmental pressure that would chill any reasonable person's willingness to continue, it is evidence of the constitutional violation — not a waiver of the right to challenge it.

The chilling of religious exercise is a present, immediate, and ongoing injury—it does not await the outcome of administrative proceedings that the government itself has inflicted. By reasoning that Mr. Grand was "the author of any chilling effect on his First Amendment interests," *Grand v. City of Univ. Heights*, 159 F.4th at 515, the Sixth Circuit inverted the First Amendment's (and RLUIPA's) protective structure, placing the burden of administrative navigation on the victim of religious discrimination rather than on the government that imposed it.

II. Small and Informal Home Religious Gatherings Enjoy the Core of Free Exercise Protection.

Beyond the specific doctrinal errors of the chilling-effect analysis, this case raises a constitutional question of importance extending far beyond Mr. Grand's situation: whether the administrative prerequisites the Sixth Circuit's rule erects systematically disadvantage small, informal, and home-based religious practice in ways inconsistent with the First Amendment and RLUIPA.

The Sixth Circuit's finality rule does not burden all religious practitioners equally. Large, institutionally organized religious bodies — those with dedicated legal departments, standing relationships with land-use counsel, and the financial resources to absorb multi-year administrative proceedings — can satisfy the finality requirement at manageable, if significant, cost. The faith communities this Court should be most concerned about are those who cannot: the homeowner hosting a weekly prayer group of neighbors or friends; the family whose religious obligations cannot be fulfilled at a formal institution miles away; the small congregation without the resources to navigate a three-hearing zoning process while paying attorney's fees and preparing architectural drawings. The examples below illustrate what is at stake when the finality rule is applied to home-based religious practice — and why those practices occupy the core, not the periphery, of what the First Amendment and RLUIPA protect.

A. Jewish Tradition

A practicing Orthodox Jew is expected to pray three times daily. These prayers can be said at the synagogue, with a quorum of other faithful, or alone. Judaism is one of many religions that emphasize group prayer and meeting within homes.

Within Judaism, the concept of daily prayer is known as "*daven*," which simply means prayer. Zale Newman, *How to Daven*, JEWISH ACTION, https://tinyurl.com/mpv4adpe (last visited Apr. 2, 2026). A central focus of this thrice-daily prayer is meditation and concentration, which lead to a deeply personal, supernatural conversation with God. *Id.*

And while this practice appears in the synagogue, it is equally valued in a home setting. It is about "spend[ing] a few minutes every day reminding yourself that Hashem is with you every step of the way, and that He is there to guide you and help you when you need Him." *Id.* This intense prayerful concentration can include both praying indoors and praying in nature to promote an experience of closeness with God. *Id.* This level of deep spiritual concentration should lead to deep experience, like having an intense conversation.

This concentration is known as *kavanah*. *Id.* Those deep in this state are focused solely on their conversation with God. *Kavanah* is not just a spiritual discipline and an uplifting experience, religious Jews believe that the concentration makes the prayers more efficacious and more likely to be heard. Aryeh Citron, *Minyan: The Prayer Quorum*, CHABAD.ORG (May 23, 2018), https://tinyurl.com/mw4f9euk. When *daven* is prayed in a *minyan*, a prayer quorum of ten or more men age 13 or older, the faithful believe God will look past a lapse in concentration. *Id.* That principle is especially important in our modern, distracted age. "Even if a person's kavanah (concentration, intention) is imperfect, if he prays with a congregation, his prayers will be heard. Nowadays, as we all do not have perfect concentration when we pray, it is all the more important that we pray with a minyan." *Id.* This is why the practice of *daven* in the context of a *minyan* is such an important part of the Jewish tradition and should not be gratuitously restricted by zoning ordinances or permitting requirements.

These features of Orthodox Jewish practice — the need for a quorum of ten, the spiritual importance of

kavanah in a familiar and non-institutional setting — make home-based prayer not merely convenient but sometimes the only practicable means of fulfilling religious obligations. A finality rule that requires a homeowner to complete a multi-stage zoning proceeding — hiring land-use counsel, preparing application materials, attending multiple hearings, appealing adverse decisions — before accessing federal court imposes costs in time, money, and exposure that fall with special severity on exactly this kind of informal, home-based observance. Mr. Grand cannot relocate his *minyan* to an institution with attorneys on retainer. For him, the administrative process is not the path to relief. It is the burden itself.

B. Christian Traditions

The Christian faith similarly has a strong tradition of personal group meetings in homes. While most Christians acknowledge a difference between corporate worship and home-gatherings, both are nevertheless important practices to the Christian faith. Church gatherings are primarily for corporate worship, while home groups—like Bible studies—center on building personal relationships, accountability, and spiritual growth among believers.

The Bible emphasizes that early Christians regularly gathered in their homes. Acts 2 recounts:

> . . . *day by day, attending the temple together and breaking bread in their homes, they received their food with glad and generous hearts*, praising God and having favor with all the people. And the Lord added to their number day by day those who were being saved.

Acts 2:46-47 (ESV) (emphasis added). Not only did they meet in public in temples, but they gathered in homes for a communal meal. This was typical of first-century Christianity; communal dining in homes was a key aspect of early Christian life. *See* Valeriy A. Alikin, THE EARLIEST HISTORY OF THE CHRISTIAN GATHERING: ORIGIN, DEVELOPMENT AND CONTENT OF THE CHRISTIAN GATHERING IN THE FIRST TO THIRD CENTURIES 31-32 (2010), https://tinyurl.com/ecalik. This communal aspect of corporate worship was an essential part of early Church thriving and growing, even with significant persecution.

As persecution subsided and Christianity became widely accepted, the Church moved outside of the home and other private places (like businesses and catacombs) and became established in dedicated, public houses of worship. While the church naturally developed larger corporate worship buildings to house the many new converts, meeting in homes was still a key part of the communal relationships and fellowship within the faith.

The bottom line: corporate worship and home gathering are both important parts of life for many Christians. Today, many denominations encourage meeting in homes in addition to corporate services to build community. For example, St. Gabriel Church, a Catholic church in Charlotte, North Carolina, promotes their "At-Home Connect Groups." *At-Home Connect Groups*, ST. GABRIEL CATH. CHURCH, https://tinyurl.com/46h5vk8j (last visited Apr. 2, 2026). While the corporate Mass is the peak of the Catholic faith tradition, "[h]osting a connect group in your home is one of the most meaningful and accessible ways to share your faith and build community. You don't need to be a theologian or a

teacher—you simply need a willing heart, a welcoming space, and a desire to walk alongside others in their spiritual journey." *Id.*

This is the same in other denominations. A nondenominational apologetic group puts it plainly:

> The richness of community among first-century believers provides a worthy model for Christians today. These early believers were devoted to meeting daily in their homes for teaching, fellowship, worship, eating meals, sharing in the Lord's Supper, and praying together (Acts 2:42). "Every day they continued to meet together in the temple courts. They broke bread in their homes and ate together with glad and sincere hearts" (Acts 2:46). Besides gathering in smaller home groups, the book of Acts confirms that the early believers came together for larger corporate meetings (Acts 2:44). Their commitment to one another was so profound that they pooled their resources and shared what they had with those in need (Acts 2:44–45).

Why is it Important to "Not Give Up Meeting Together" (Hebrews 10:25)?, GOTQUESTIONS.ORG, https://tinyurl.com/wc2fks6c (last visited Mar. 31, 2026).

An apologetics arm of Indiana Bible College, associated with a Pentecostal denomination, draws essentially the same distinctions. "A home is a very private and personal place where the most intimate moments of family life take place. Knowing that the most meaningful teaching and fellowship could not be achieved in a large public gathering, the Lord ordained that His people also gather for ministry

within each other's homes." David A. Huston, *The Biblical Basis for Home Groups*, APOSTOLIC INFO. SERV. (Apr. 4, 2009), https://tinyurl.com/jrjps83s. What is done in the home is not what is done in corporate worship, but it nevertheless is a key part of the Christian tradition.

The intimacy and informality of home fellowship are not incidental features of these traditions — they are constitutive of them. As the sources above reflect, across Catholic, nondenominational, and Pentecostal Christianity, the home gathering serves a distinct spiritual function that the corporate service does not replicate: the building of personal relationships, accountability, and spiritual depth that requires a small, familiar setting. A zoning regime that treats a dozen neighbors gathering in a living room for Bible study as a place of religious assembly requiring a special use permit targets the specific form their faith most naturally takes. The Sixth Circuit's finality rule, by requiring these believers to complete an institutional-scale administrative process before seeking relief, penalizes exactly the qualities — smallness, informality, home-based intimacy — that make the religious practice most vulnerable to administrative squelching.

C. ACLJ Experience

The ACLJ's own experience in RLUIPA litigation across the country confirms that the pattern this case represents is not aberrational. Municipalities regularly deploy zoning enforcement not to achieve legitimate land-use objectives, but to suppress disfavored religious practice — using the process itself as an instrument of intimidation. In each of the

following matters, the ACLJ's involvement prompted a municipal reversal before any formal administrative decision issued. Under the Sixth Circuit's rule, those mid-process reversals would have left the affected individuals with no federal remedy at all, because no "final decision" ever reached them. That result rewards municipalities for abandoning harassment campaigns just early enough to escape judicial scrutiny, and it strips individuals who successfully resist the initial pressure of any recourse against the government that applied it.

In 2014, one such zoning amendment was proposed in Fairfax County, Virginia. Matthew Clark, *County Backtracks, Decides Not to Violate Right of Assembly with Proposal that Could Cripple Home Bible Studies*, ACLJ (June 10, 2014), https://tinyurl.com/vbzoning. The amendment would have prohibited "large gatherings" of more than 49 people to three times per forty-day period. *Id.* This rule would have severely curtailed Bible studies and prayer groups. One Fairfax county resident wrote in an op-ed that two supervisors mentioned impeding home worship services as the motive behind the ordinance. *Id.* Even Fairfax County's own website listed "religious meetings" as a target of the proposal. *Id.* Thankfully, the proposal was defeated quickly, but the attempt alone serves as an example of zoning ordinances being recruited to suppress religious activity. *Id.*

Just four years later in 2018, a matter similar to the instant case was also handled by the ACLJ. After 14 years of opening their home for use as "a quiet place for individuals to rest, re-energize themselves, and recuperate from the daily stresses of the ministry," a retired couple in Georgia received a

notification that they were in violation of a city ordinance. Abigail A. Southerland, *ACLJ Intervenes in County's Efforts To Regulate a Couple's Religious Use in the Privacy of Their Own Home*, ACLJ (July 2, 2018), https://tinyurl.com/gazoning. The county claimed that they were operating their house as a bed and breakfast and needed to obtain a special use permit. *Id.* This even though the couple never charged a fee to any of their guests and spent most of their time talking and praying with them as they would with any other house guest. *Id.* Once again, the county thankfully changed course after the ACLJ specifically directed them to RLUIPA as the appropriate protection for religious land use. *Id.* As in the instant case, special use permits and the bureaucratic proceedings surrounding the permit process were wielded as tools to suppress a fundamental element of Christian religious practice.

Similar attempts to chill religious activity continue. As recently as last summer, the ACLJ resolved yet another abuse of zoning ordinances, this time in Manhattan Beach, California. In early 2024, a resident began gathering with fellow Christians in his own home to watch church on TV and engage in religious fellowship. Abigail A. Southerland, *California City Complies With ACLJ's Demand To Stop Interfering With Private In-Home Bible Studies and Religious Gatherings*, ACLJ (July 25, 2024), https://tinyurl.com/mbzoning. He soon received a notice from the City of Manhattan Beach that he was in violation of a zoning ordinance and had "establish[ed] a new religious assembly use without a permit." *Id.* During a later meeting requested by our client, he was informed that "he could not hold a gathering in his home for any religious purpose or

activity without a permit." *Id.* The religious discrimination was blatant: officials went so far as to say that he was permitted to have one hundred people visit every week to watch Lord of the Rings and there would be no zoning violation. *Id.* This was another blatant violation of protected religious activity, which the ACLJ thankfully resolved through prompt action. *Id.*

These examples share a common structure. In each case, a municipality characterized ordinary home-based religious activity as a zoning violation. In each case, the government's position was communicated through enforcement mechanisms — cease-and-desist letters, notices of violation, meetings with officials — rather than through a formal final decision by a zoning board. And in each case, the practical effect was to force the affected individual to choose between abandoning their religious practice and absorbing the cost and exposure of a prolonged administrative proceeding. Under the Sixth Circuit's rule, none of these individuals would have been able to access federal court at the moment of maximum harm — when the government's pressure was most acute and their religious practice most directly threatened. That is precisely backwards. RLUIPA was enacted to provide a federal forum for exactly these disputes, and a finality rule that closes that forum until the municipality has completed its work defeats the statute's core purpose. Mr. Grand, following in his Orthodox Jewish tradition, is yet another target and should be protected from this overreach.

The Sixth Circuit's finality rule imposes what is effectively a pricy "entry fee" for access to federal court in RLUIPA cases: a plaintiff must complete the zoning process—however hostile, however expensive,

however protracted—before his claims will be heard. A large diocese perhaps can afford to complete the permit process before suing. A homeowner hosting a *minyan* of twelve neighbors cannot—particularly when the process includes a three-hour quasi-judicial hearing, demands for architectural drawings, and an escalating campaign of governmental and neighbor surveillance.

These considerations reinforce the need for this Court to clarify that RLUIPA's protections reach government officials who use the zoning process itself as an instrument of suppression — without requiring the victims of that conduct to complete the very process being weaponized against them before seeking relief in federal court. The communities RLUIPA was most urgently designed to protect are not those with the institutional resources to treat a multi-year administrative proceeding as a cost of doing business. They are communities like Mr. Grand's: small, home-based, and entirely without the legal infrastructure that would make a prolonged zoning proceeding survivable. Granting certiorari in this case would allow the Court to ensure that RLUIPA fulfills its congressional mandate for those who need it most.

CONCLUSION

For these reasons, the Court should grant certiorari.

Respectfully submitted,

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