

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 3:20-cv-01669-VLB
CITY OF MERIDEN,)	
CONNECTICUT and)	
CITY OF MERIDEN)	
PLANNING COMMISSION,)	
Defendants.)	
)	

CONSENT ORDER

I. Introduction

1. The United States brought this action (the “Action”) against the City of Meriden, Connecticut (the “City” or “Meriden”) and the City of Meriden Planning Commission (“Planning Commission” and, together with the City, the “Defendants”), to enforce the Religious Land Use and Institutionalized Persons Act of 2000 (“RLUIPA”), 42 U.S.C. §§ 2000cc–2000cc-5.

2. In its Complaint, the United States alleges that the Defendants violated RLUIPA by denying an application by the Omar Islamic Center (the “Center”) for a special exception permit to operate an Islamic religious assembly or institution at 999 Research Parkway (the “Property”) and by imposing more onerous requirements on religious assemblies and institutions in certain zoning districts than on comparable nonreligious assemblies and institutions.

3. Specifically, the United States alleges that: (a) the Defendants’ actions in denying the Center’s application for a special exception permit imposed an unjustified substantial burden on the Center’s exercise of religion, and that such burden is not in furtherance of a compelling governmental interest and is not the least restrictive means of furthering such interest, in

violation of RLUIPA, 42 U.S.C. § 2000cc(a)(1); (b) the Defendants' denial of the Center's application for a special exception permit treated the Center, a religious assembly or institution, on less than equal terms with a nonreligious assembly or institution, in violation of RLUIPA, *id.* § 2000cc(b)(1); and (c) the City's zoning ordinance treats religious assemblies or institutions on less than equal terms with nonreligious assemblies or institutions in nine zoning districts, in violation of RLUIPA, *id.*

4. The Defendants maintain that they have complied with RLUIPA but want to resolve this Action without prolonged litigation and ensure that all the City's zoning ordinances fully comply with RLUIPA.

5. The Center filed a separate action, *Omar Islamic Center v. City of Meriden, et al.* (D. Conn.) (3:19-cv-488), in which the Center alleges RLUIPA violations and other federal and state claims based on some of the same conduct underlying the claims alleged by the United States. On July 16, 2020, the parties in *Omar Islamic Center v. City of Meriden* executed a settlement agreement setting forth with specificity a process that will allow the Center to use the Property for religious assembly and resolving all claims.

II. Stipulated Facts

6. The City of Meriden is a municipality in New Haven County, Connecticut.

7. Meriden is governed by a twelve-person elected City Council which has legislative and fiscal power in Meriden, including the authority to regulate and restrict the use of land and structures within its borders. The City's zoning ordinance is codified at Chapter 213 of the City Code ("Zoning Ordinance").

8. The Mayor recommends, and the City Council approves, the membership of a five-member Planning Commission, which, among other things, has the authority to approve special

exception permit applications in certain zoning districts. In addition, the Mayor recommends, and the City Council approves, the membership of a five-member Zoning Board of Appeals (“ZBA”), which, among other things, has the authority to approve special exception permit applications in those zoning districts where they are not approved by the Planning Commission.

9. The ZBA and the Planning Commission are agencies of the City.

10. Meriden is ultimately responsible for the acts and omissions of its agencies, including the Planning Commission.

11. Subject to the provisions of the Connecticut General Statutes and the City Charter and Code of Ordinances, Meriden has authority to legally bind and enter into legal agreements on behalf of its agencies and to require its agencies to adhere to the provisions of this Order as specified herein.

12. In its Complaint, the United States alleges that the Center is an organization of Muslim individuals who live and work in Meriden, Middletown, and other nearby towns. The Complaint further alleges that, since its founding in 2018, the Center has sought to provide a religious home for Muslims living in Meriden and the surrounding area. The Complaint alleges that the Center currently assembles in a small property located at 24 Broad Street in Middletown and that, prior to August 2019, the Center’s members had no permanent place to worship and worshipped in private. The Complaint also alleges that in December 2018, the Center obtained a commitment from the owner of the Property to donate that property to the Center for the purpose of establishing a mosque.

13. The Property is located in Meriden’s M-4 Planned Industrial zoning district. Places of worship must obtain a special exception permit from the Planning Commission, with approval from the City Council, in order to operate in the M-4 zone.

14. Nonreligious assemblies and institutions, such as institutional, public, and municipal buildings, convention centers, and theaters are permitted as a matter of right in the M-4 zone and are not required to obtain a special exception permit.

15. In January 2019, the Center applied to the Planning Commission for a special exception permit so that it could operate a place of worship at the Property. On March 13, 2019, the Planning Commission denied the Center's special exception permit application. The United States alleges that the Planning Commission did not consider less restrictive alternatives to denial.

16. The United States alleges that the denial of the Center's special exception permit application prevented the Center from operating a place of worship at the Property, and the Defendants deny said allegation.

17. The City's Zoning Ordinance also requires special exception permits for places of worship, or prohibits them entirely, in zoning districts where nonreligious places of assembly and institutions, such as convention and conference facilities, libraries, museums, theaters, public and municipal buildings, universities, and recreation centers are permitted as a matter of right, subject to compliance with the terms and conditions of the City's Zoning Ordinance. *See infra* ¶ 26.

III. Statement of Agreement on Legal and Other Terms

18. The parties agree that Meriden and the Planning Commission are "governments," as defined by RLUIPA, 42 U.S.C. § 2000cc-5(4)(A).

19. The parties agree that Meriden's Zoning Ordinance is a "land use regulation" that "limits or restricts a claimant's use or development of land," within the meaning of RLUIPA, 42 U.S.C. § 2000cc-5(5). The parties further agree that the Planning Commission's denial of the

Center's special exception permit constitutes the "application" of a "land use regulation" that "limits or restricts a claimant's use or development of land," within the meaning of 42 U.S.C. § 2000cc-5(5), and is an "implementation of a land use regulation" in which a government as defined by RLUIPA has made an "individualized assessment[] of the proposed uses for the property involved," within the meaning of 42 U.S.C. § 2000cc(a)(2)(C).

20. The parties agree that the Center is a "religious assembly or institution," under RLUIPA. 42 U.S.C. §§ 2000cc(a)(1), (b)(1).

21. The United States alleges that the Center has a "property interest" or "a contract or option to acquire such an interest" in the Property within the meaning of RLUIPA, 42 U.S.C. § 2000cc-5(5), and the Defendants deny said allegation.

22. The parties agree that the Center's efforts to establish a place of worship at the Property constitute "religious exercise" that "would affect [] commerce . . . among the several States," within the meaning of RLUIPA, 42 U.S.C. §§ 2000cc(a)(2)(B) and 2000cc-5(7).

23. The parties have voluntarily agreed to resolve the Action and the United States' claims against the Defendants by entering into this Consent Order (the "Order"), as indicated by the signatures below.

Therefore, it is hereby **ORDERED, ADJUDGED, and DECREED** as follows:

IV. Jurisdiction

24. The Court has jurisdiction over this action, and may grant the relief sought herein, under 28 U.S.C. §§ 1331 and 1345, and 42 U.S.C. § 2000cc-2.

V. Injunctive Relief

A. Prohibited Conduct and Affirmative Obligation

25. The Defendant City of Meriden and all of its boards, commissions and agencies,

including the City of Meriden Planning Commission, and all employees, are enjoined from:

- a. Imposing or implementing a land use regulation in a manner that, within the meaning of RLUIPA, imposes a substantial burden on the religious exercise of any person, including a religious assembly or institution, unless the Defendants can demonstrate that imposition of that burden furthers a compelling governmental interest and is the least restrictive means of furthering that compelling governmental interest;
- b. Imposing or implementing a land use regulation in a manner that treats a religious assembly or institution on less than equal terms than a nonreligious assembly or institution;
- c. Otherwise engaging in any conduct that violates RLUIPA; and
- d. Coercing, intimidating, threatening, interfering with, or retaliating against any person in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by RLUIPA.

26. The City of Meriden shall amend the Meriden Zoning Ordinance so that it treats religious assemblies and institutions on equal terms with comparable nonreligious assemblies and institutions in the C-1, C-1-A, C-2, C-3, M-1, M-3, M-4, Neighborhood Commercial Design (NCDD), and Regional Development (RDD) zoning districts. Specifically, the amendment shall ensure that religious assemblies and institutions are treated on equal terms with the following nonreligious assemblies and institutions in each zone:

- a. C-1, C-1-A, C-2, C-3: conference and convention facilities, libraries, galleries,

- museums, theaters;
- b. M-1: conference and convention facilities;
- c. M-3: recreation centers;
- d. M-4: conference and convention facilities, public and municipal uses and buildings, theaters;
- e. NCDD: libraries, galleries, museums, public and municipal land uses and buildings, theaters;
- f. RDD: conference and convention facilities, colleges and universities.

27. The Defendants shall make the amendments described in paragraph 26 consistent with federal, state, and local law. The Defendants shall provide a draft of the proposed amendments to the United States within sixty (60) days of this Order's entry date. The City shall enact said amendments within sixty (60) days of Defendants' receipt of written notice that the United States has approved the City's draft of the proposed amendments or resolution of a dispute as to whether the proposed amendments are consistent with RLUIPA. If the United States determines that the proposed amendments are inconsistent with RLUIPA, it will provide notice to the Defendants and the parties shall attempt to resolve the dispute under Paragraph 37 of this Order.

28. The Defendants shall not amend the Zoning Ordinance in any way that would prevent the Center from using the Property for religious worship.

29. The Defendants shall take all necessary steps, including granting any necessary approvals, to allow the Center to use the Property as a community center and place of worship, consistent with the separate settlement agreement reached between the Center and the Defendants. If the Defendants have not approved the Center's use of the Property by August 31,

2020, the Defendants shall provide the United States with a written statement of progress, including the reason(s) that the use has not been approved, a statement of whether the City expects that the use will be approved, and, if so, a statement of the City's expectation of when approval will be granted. If approval is not granted by October 31, 2020, the United States may pursue its claims against the Defendants with respect to the Center's use of the Property. In the event that the United States opts to pursue such claims under the terms of this paragraph, the Defendants expressly agree not to count time during which this Order is in place, or use the terms or existence of this Order to plead, argue or otherwise raise any defenses under theories of claim preclusion, issue preclusion, statute of limitations, estoppel, laches, or similar theories.

B. Notice to Public

30. Within sixty (60) days of this Order's entry date, the Defendants shall implement the following procedures to ensure notice is provided to the public of this Order and its requirements:

- a. *Signage and Internet Posting.* The City shall post and maintain a written notice in a conspicuous place in its Planning and Zoning Department and on the City's Planning and Zoning Department website. The notice will be entitled "RLUIPA Notice" or words to that effect and shall conform in content to Appendix A. Said notice on the Planning and Zoning website shall be in type equivalent in size to the other listed documents;
- b. *Notice to Future Religious Applicants.* Upon receipt of an application or inquiry about any land use determination requiring a decision of the City Council, Planning Commission, or ZBA concerning a property intended or used for religious purposes, the City Council, Planning Commission, ZBA, and all other

zoning or land use bodies of the City shall provide to the applicant or the person inquiring a notice that conforms in content to Appendix A; and

- c. *Notice to Past Religious Applicants.* The Defendants shall mail a notice that conforms in content to Appendix A to all religious assemblies and religious institutions that applied for land use determinations since January 1, 2015.

C. Complaint Procedure

31. Within ninety (90) days of this Order's entry date, the Defendants shall submit to the United States for review and approval a written process to address complaints by any person, including a religious assembly or institution, who believes that the Defendants, acting through their agents or employees, may have violated RLUIPA or otherwise discriminated on the basis of religion or religious denomination through the implementation of its zoning or land use laws or regulations. The process shall include the requirements described in this Paragraph. The United States' approval will not unreasonably be withheld. The Defendants shall implement the process within thirty (30) days of the United States' approval. The Defendants shall accept written and oral complaints. Upon receipt of an oral complaint, the Defendants, through designated non-clerical employees, shall offer and provide, but shall not require submission of, the form attached as Appendix B and shall use reasonable efforts to provide assistance in completing and submitting the form if assistance is requested or if it is apparent to an employee or staff member of the Defendants that assistance is needed. If the complaint is oral, the Defendants, through designated non-clerical employees, shall prepare a written summary of the complaint, along with the name, address, phone number, and other identifying information of the complainant and any proposed or actual action taken by the City in response to the complaint. The Defendants shall respond in writing to any written or oral complaints within thirty (30) days of receipt of such

complaint. The Defendants shall accept and maintain each original written complaint, its records concerning each written or oral complaint, and any proposed or actual action taken by the Defendants in response to the complaint.

D. Training

32. Within one hundred twenty (120) days of this Order's entry date, the Defendants shall provide training on the requirements of this Order and RLUIPA to all officers, elected and appointed officials, employees, and agents of the Defendants whose duties relate to planning, zoning, permitting, code enforcement, and building occupancy, including, but not limited to, the Mayor; the City Manager, members of the City Council, Planning Commission, and ZBA; the Director of Planning and Development and Enforcement and all Department of Development and Enforcement employees, including employees of the Division of Planning, the Division of Buildings, and the Division of Code Enforcement/Neighborhood Preservation; Corporation Counsel, and all City Attorney's Office employees. The training need not be provided to clerical staff except for those employees who could receive complaints, described in Paragraph 31, against the Defendants. The training shall be conducted consistent with the following:

- a. The training shall be conducted by the City Attorney, or, if not by the City Attorney, by a qualified third party approved by the United States. No fewer than sixty (60) days after this Consent Order's entry date, the Defendants shall submit to counsel for the United States the name of the person(s) or organization(s) proposed to provide the training, together with copies of the professional qualifications of such person(s) or organization(s) and copies of the materials proposed for use at the training. The United States' approval will not unreasonably be withheld.

- b. The Defendants shall bear all expenses associated with the training;
- c. The Defendants shall maintain copies of the written materials provided for each training;
- d. The Defendants shall provide each person covered by this Paragraph a copy of this Order at the time of the person's training;
- e. The Defendants shall obtain a signed statement, in the form of Appendix C, from each person covered by this Paragraph stating that the person attended the training, received and understands this Order and its mandates, and understands that a violation of this Order may result in further court action against the Defendants. The Defendants shall provide each signed statement to the United States within ten (10) days of the person's training; and
- f. For each newly elected, appointed, or hired individual covered by this Paragraph, the Defendants shall provide such individual the documents referred to in sub-paragraphs c and d and obtain the signed statement referred to in sub-paragraph e within thirty (30) days after such person enters office or begins service or employment.

E. Reporting, Record-Keeping, and Monitoring

33. Within one hundred and eighty (180) days of this Order's entry date, and every subsequent six (6) months, the Defendants shall provide a report to the United States detailing their compliance with this Order, except that the Defendants shall submit the last report sixty (60) days before the Order's expiration.¹ The Defendants shall include the following in the

¹ For purposes of this Consent Order, all submissions to the United States shall be sent via email to the United States' counsel, as instructed by the United States' counsel.

reports:

- a. A signed declaration by the City Manager stating that the Defendants complied with Sections V.A-V.D of this Order;
- b. Appropriate documentary evidence, including but not limited to the text of all new policies or procedures implemented as a result of the Order, demonstrating the Defendants' compliance with Sections V.A-V.D of this Order;
- c. Copies of any complaints of religious discrimination pertaining to the implementation of the City's zoning or land use laws or regulations, either received as written or oral complaints as described in Paragraph 31, any documents associated with the complaint, the status of the complaint, and any written response to the complaint by the applicable Defendants. If the complaint has not been resolved, the Defendants shall report any efforts said Defendants took, or plan to take, to resolve the complaint; and
- d. A summary of each application seeking the Defendants' consideration or approval for a land-use determination concerning a property intended or used for religious purposes,² indicating: (i) the application date; (ii) the applicant's name; (iii) the applicant's current address and contact information; (iv) the street address of the property at issue in the application or request; (v) the Defendants' decision on the application or request, including any decision on appeal; (vi) the reasons for each decision, including a summary of the facts upon which the Defendants relied; and (vii) complete copies of any minutes and audio or video recordings from all

² Such requests and applications include, but are not limited to, applications for site plan approval, special exception permit approval, accessory use approval, planned development approval, change in use approval, variances, building permits, and any associated renewals.

meetings or hearings discussing the request or application.

34. Within thirty (30) days of adopting any amendments or modifications to the Zoning Ordinance or any other City rules, laws, regulations, or ordinances that affect religious or nonreligious assembly or institutional land use, the Defendants shall send copies of the enacted amendments or modifications to the United States. Any amendment or modification must be consistent with Section V.A. of this Order and RLUIPA.

35. The Defendants shall retain all records related to the Center for the duration of this Order. These records shall include, but are not limited to, correspondence received by or generated by the Defendants concerning the Center or its members pertaining to religious land use; complaints made to City code enforcement, planning, law enforcement, or any other departments about the Center; and, any law enforcement, regulatory, or investigative action taken by the Defendants concerning the Center.

F. Inspection of Records

36. Upon reasonable notice to counsel for the Defendants, the Defendants shall permit representatives of the United States to inspect and copy all non-privileged, pertinent records related to the claims asserted in the Action, including, but not limited to, those records referenced in Section V.

VI. Enforcement

37. The parties shall attempt in good faith to informally resolve any differences regarding interpretation of or compliance with this Order prior to seeking relief from this Court. However, if the United States believes that the Defendants failed to timely perform any act required by this Order, or to act in conformance with any provision, whether intentionally or not, the United States may move the Court to impose any remedy authorized at law or equity. Remedies

include, but are not limited to, findings of contempt, an order requiring performance of such act or deeming such act to have been performed, and costs and reasonable attorneys' fees that may have been occasioned by the violation or failure to perform. Absent exigent circumstances, the United States will allow the Defendants forty-five (45) days to cure a violation of this Order once notified by the United States before moving the Court for relief.

VII. Termination of Litigation Hold

38. The parties agree that, as of this Order's entry date, litigation is not "reasonably foreseeable" concerning the matters described above or in the United States' Complaint. If any party previously implemented a litigation hold to preserve documents, electronically stored information (ESI), or things related to the matters described above or in the United States' Complaint, the Party is no longer required to maintain such litigation hold. Nothing in this Paragraph relieves any party of any other obligations imposed by this Order.

VIII. Duration

39. The duration of this Order shall be for a period of three (3) years from the Order's entry date.

40. For the duration of this Order, this Court has exclusive jurisdiction over and is the venue for any dispute relating to this Order.

41. The Defendants or the parties jointly may seek to terminate this Order if the Defendants demonstrate that they have reached "durable compliance," as defined below, with this Order. At all times, the Defendants shall bear the burden of demonstrating by a preponderance of the evidence their durable compliance. "Durable compliance" means "full, effective, and lasting compliance" with this Order. Full, effective, and lasting compliance must be continuously maintained for all of the requirements referenced herein for at least two (2) years

prior to expiration of the Order. To achieve full, effective, and lasting compliance, the Defendants must demonstrate that:

- a. The Defendants have complied with their commitment to adhere to RLUIPA as required in Paragraph 25;
- b. The Defendants have amended Meriden's land use regulations so that they treat religious assemblies and institutions at least as well as nonreligious assemblies and institutions, as required in Paragraph 26;
- c. The Defendants have allowed the Center to operate at the Property, as required in Paragraph 29;
- d. The Defendants have ensured the public received notice of their commitment to RLUIPA's requirements as required in Paragraph 30;
- e. The Defendants have implemented the complaint procedures described in Paragraph 31 and Appendix B;
- f. The Defendants have trained relevant personnel, as required in Paragraph 32; and
- g. The Defendants have maintained records and provided to counsel for the United States all documents required in Paragraphs 33 through 35.

42. If the Defendants have reached full, effective, and lasting compliance for at least one (1) year with a part of the Order, the Defendants or the parties jointly may move the Court to terminate that part of the Order if it is sufficiently severable from the other requirements of the Order. In determining whether there is full, effective, and lasting compliance with a part of the Order, all of the requirements of the Order must be assessed collectively to determine whether the intended outcome of the part has been achieved.

43. Subject to the cure period in Section VI, if the Defendants have failed substantially, whether intentionally or not, to satisfy the terms of this Order, or the United States has good cause to believe that any violations of RLUIPA are ongoing, the United States, upon notice to the Defendants, may file a motion requesting that the term of this Order be extended. If the Court has not ruled on a motion to extend the duration of the Order or on a motion for enforcement of the Order by the time the Order is set to expire, the Order and its terms will remain in effect until the Court rules on the pending motion(s).

44. Any other time limits for performance imposed by this Order may be extended by mutual written agreement of the parties. The other provisions of this Order may be modified only by motion to the Court.

IX. Costs

45. Each party shall bear its own legal and other costs incurred in connection with this litigation, including costs related to the preparation and performance of this Order.

X. Scope and Execution

46. This Order contains the complete agreement between the parties. No prior or contemporaneous communications, oral or written, between the parties that are not included herein shall be of any force or effect.

47. The undersigned representatives of the Defendants and their counsel represent and warrant that they are fully authorized to enter into this Order on behalf of the Defendants.

48. This Order is binding on the Defendants' successors, transferees, heirs, and assigns.

49. The Defendants shall defend this order against any challenge by any third party. In the event that this Order or any of its terms are challenged in a court other than the United States District Court for the District of Connecticut, the Defendants agree that they shall seek removal

or transfer to the District of Connecticut.

50. The parties agree that they shall not, individually or in combination with another, seek to have any court declare or determine that any provision of this Order is illegal or invalid.

51. Should any provision of this Order be declared or determined by any court to be illegal or invalid, the validity of the remaining parts, terms or provisions shall not be affected, and any provision determined to be invalid or illegal shall be stricken from the Order.

The undersigned apply for and consent to the entry of this Consent Order:

Dated: November 5, 2020

FOR PLAINTIFF UNITED STATES OF AMERICA

JOHN H. DURHAM
United States Attorney
District of Connecticut

ERIC S. DREIBAND
Assistant Attorney General
Civil Rights Division

SAMEENA SHINA MAJEED
Chief

/s/ David C. Nelson
JOHN B. HUGHES (ct05289)
Chief, Civil Division
DAVID C. NELSON (ct25640)
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United States Attorney's Office
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/s/ Eliza H. Simon
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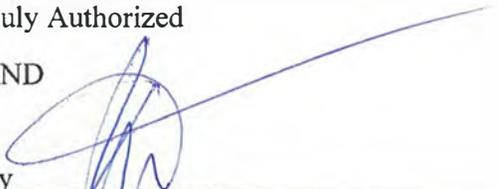
FOR DEFENDANT CITY OF MERIDEN, CT



TIMOTHY COON
City Manager
City of Meriden
Duly Authorized

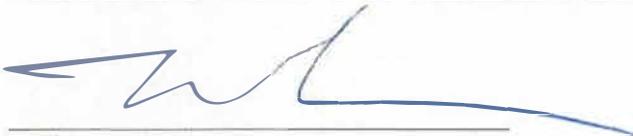
AND

By



Richard J. Buturla (ct05967)
Berchem Moses PC
75 Broad Street
Milford, CT 06460
Tel: (203) 783-1200
Fax: (203) 878-4912
rbuturla@berchemmoses.com

FOR DEFENDANT CITY OF MERIDEN PLANNING COMMISSION



TIMOTHY COON
City Manager
City of Meriden
Duly Authorized

AND

By



Richard J. Buturla (ct05967)
Berchem Moses PC
75 Broad Street
Milford, CT 06460
Tel: (203) 783-1200
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So Ordered:
/s/ Vanessa L. Bryant
United States District Judge

APPENDIX A

RLUIPA NOTICE

In considering applications under the City zoning ordinance and in creating and implementing its zoning ordinance and land use regulations, the City of Meriden does not discriminate against or treat any person unequally based on religion or discriminate against or treat unequally any religious assembly or institution. On _____ 2020, the United States District Court for the District of Connecticut entered a Consent Order resolving a religious-discrimination lawsuit brought by the United States against the City of Meriden and the City’s Planning Commission under a federal law called the Religious Land Use and Institutionalized Persons Act (“RLUIPA”). A copy of the Consent Order in *United States v. City of Meriden, et al.*, Civ. No. _____ (D. Conn.), is available on the City’s website at _____ or the Department of Justice’s website at _____.

The City is committed to fully complying with RLUIPA. The requirements of the RLUIPA law are briefly summarized below.

Under RLUIPA, no government may apply its zoning or land use laws in a manner that imposes a substantial burden on the religious exercise of a religious assembly or institution unless in furtherance of a compelling governmental interest in the least restrictive way.

RLUIPA also provides that no government may apply its zoning or land use laws in a manner that treats a religious assembly or institution on less than equal terms than a comparable non-religious assembly or institution.

RLUIPA also provides that no government may impose or implement a zoning or other land use regulation in a manner that discriminates against a religious assembly or institution or that unreasonably limits the free exercise of religion.

Additional details about RLUIPA are available on the United States Department of Justice’s RLUIPA information page, available at

<https://www.justice.gov/crt/religious-land-use-and-institutionalized-persons-act>.

If you believe you or your religious assembly or institution has been discriminated against or treated on less than equal terms because of religion or that the RLUIPA has been violated in connection with zoning, permitting, code enforcement, or other land use, please fill out a RLUIPA complaint form. The City's RLUIPA complaint form is available on the City of Meriden's website and at the City Development and Enforcement Department at City Hall. All RLUIPA complaints will be promptly and thoroughly investigated.

You may also report complaints to the U.S. Attorney's Office for the District of Connecticut at 203-821-3700 or the United States Department of Justice, Civil Rights Division, at (202) 514-4713. You may also register a complaint via email to rluipa.complaints@usdoj.gov or by writing to either of the following addresses:

**United States Attorney's Office
District of Connecticut
Attention: Civil Division,
Civil Rights Intake
157 Church Street, 25th Floor
New Haven, CT 06510**

**United States Department of Justice
Civil Rights Division
Housing & Civil Enforcement Section
Four Constitution Square
150 M Street NE
Washington, DC 20530**

APPENDIX B

RLUIPA COMPLAINT AGAINST THE CITY OF MERIDEN

Name: _____

Address: _____

Telephone: _____

1. Please state briefly the nature of the request that you made of the City of Meriden related to the implementation of its zoning or land use laws (*e.g.*, special exception permit, variance, re-zoning, *etc.*). In addition, please include a description of the religious land use and the assembly or institution at issue in your request:

2. Please state briefly in what way(s) you believe that the City of Meriden, the City Council, Planning Commission, Zoning Board of Appeals, or other land use or zoning body of the City may have violated your rights in the exercise of your religion under the United States Constitution, federal law (including the Religious Land Use and Institutionalized Persons Act of 2000 (RLUIPA)), the Connecticut State Constitution, Connecticut State law, or the City's Code or Ordinances through the implementation of its zoning or land use laws:

If you believe that the City of Meriden, the City Council, Planning Commission, Zoning Board of Appeals, or any other land use or zoning body of the City, or any other local government or municipality, has discriminated against you in the exercise of your religion through the implementation of its zoning or land use laws, in addition to completing this complaint form, please contact the U.S. Attorney's Office at 203-821-3700 or the United States Department of Justice Civil Rights Division at: (202) 514-4713. You may also register a complaint via email to rluipa.complaints@usdoj.gov or by writing to either of the following addresses:

United States Attorney's Office
District of Connecticut
Attention: Civil Division,
Civil Rights Intake
157 Church Street, 25th Floor
New Haven, CT 06510

United States Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
Four Constitution Square
150 M Street NE
Washington, DC 20530

APPENDIX C

CERTIFICATION OF RLUIPA TRAINING AND RECEIPT OF CONSENT ORDER

I, _____, certify that I have received a copy of the Consent Order resolving *United States v. City of Meriden, et al.*, Case No. _____, filed by the United States in the United States District Court for the District of Connecticut.

I further certify that on _____ I participated in training on the Religious Land Use and Institutionalized Persons Act of 2000 (RLUIPA) and the Consent Order, that I read and understand the Consent Order, that all my questions concerning RLUIPA and the Consent Order were answered, and that I understand that my violation of the Consent Order or RLUIPA may result in a court action against the City of Meriden and the City of Meriden Planning Commission.

Signature

Print name and title

Date