



DISTRICT OF COLUMBIA



TENNESSEE



VIRGINIA



May 7, 2025

Harmeet Dhillon, Assistant Attorney General
Civil Rights Division
United States Department of Justice
[Redacted]
Washington, D.C. 20530

Assistant Attorney General Dhillon,

The American Center for Law & Justice (ACLJ) would like to bring to your attention a recent federal lawsuit claiming religious discrimination by a Haymarket, Virginia homeowner's association (HOA) and its managing agent: *Kidd v. Associa Community Management Corporation et al.*, No. 1:25-cv-00599-CMH-WBP (E.D. Va., filed April 8, 2025) (a copy of the complaint is enclosed). We represent the plaintiff, Kurt Kidd, and on his behalf respectfully request that the Department of Justice (DOJ) consider filing a statement of interest in this case.

The case involves an HOA targeting our client because of his religion. Earlier this year, the HOA passed a policy denying the "use of Clubhouse and Clubhouse Campus" to "any club, organization, or entity that is primarily religious . . . or faith based in purpose, nature, and/or intent." Our client has led the HOA's only religious club for years and participates in a weekly men's Bible study that was banned by the policy. This rule, both on its face and as applied to our client, violates the Federal Fair Housing Act (FHA).

Over the past several years, the ACLJ has sent numerous letters on behalf of homeowners to HOAs that have discriminated against the religious expression of our clients. While most of these matters were amicably resolved, that did not happen in the case of our client, Mr. Kidd. In response to our demand letter, the HOA refused to back down, arguing that because its anti-religion policy applied to all religions, the policy does not violate the FHA.

We applaud the Trump Administration's commitment to protecting religious freedoms guaranteed by federal law. As was recently stated in the May 1, 2025, Executive Order, establishing the Religious Liberty Commission: "It shall be the policy of the executive branch to vigorously enforce the historic and robust protections for religious liberty enshrined in Federal law."

This lawsuit presents an opportunity for the Administration to address an important issue of ongoing concern: the religious freedoms of homeowners as protected by the FHA.

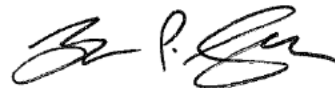
Defendants recently filed a motion to dismiss our complaint, and our response is due on May 13, 2025. A hearing on the motion to dismiss is scheduled for May 23, 2025. We respectfully ask that DOJ consider filing a statement of interest in this matter to protect our client's rights as a homeowner under the FHA.

Should you require any additional information, please do not hesitate to contact me.

Sincerely,



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American Center for Law & Justice



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American Center for Law & Justice



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