

**Tennessee City Issues “Cease and Desist” Letter to Local Homeless Ministry Despite Previous Approval to Operate**  
*Attorneys representing ministry send letter to City of Westmoreland officials demanding withdrawal of letter*

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**Westmoreland, TN**—The law firm Anderson & Reynolds PLC and First Liberty Institute sent a letter today to the city of Westmoreland (TN) urging the city to withdraw a “cease and desist letter” preventing The Father’s House, a homeless ministry of Living Water Full Gospel Church, from operating. The letter informs city officials that they are violating state and federal law by preventing the ministry from fulfilling its mission to provide housing.

You can read the letter [here](#).

Steve Anderson of Anderson & Reynolds said, “The housing and program provided by The Father’s House to men who are becoming better and more productive citizens should be encouraged, rather than prevented. The Father’s House welcomes the opportunity to work with the city to resolve this issue.”

“The Father’s House is an essential part of meeting the needs of its community,” added Ryan Gardner, Counsel for First Liberty Institute. “Simply put, The Father’s House is already complying with the city’s zoning ordinances. There is simply no basis in the zoning ordinances – nor in any applicable building code – which justifies the city’s ‘Cease and Desist’ letter. The city is violating both state and federal law by blocking The Father’s House from fulfilling its religious mission.”

Living Water Full Gospel Church operates a ministry called The Father’s House Sober Living, which provides housing and support for men seeking to escape drug addiction. The structure was approved by the city in 1999 as a “new addition” for “institutional” use. The city’s zoning ordinances specifically permits residential living in the attached building owned by the Church. Church officials asked city officials early in 2022 if they needed additional permits to provide housing in their already permitted facility and were told there were no additional requirements or conditions that had to be met. But, in August 2022, city officials sent the church a cease and desist letter based on an alleged violation of the city’s building code.

The letter states, “...the City’s ‘Cease and Desist’ letter violates Tennessee law because the City is substantially and unfairly burdening the Church’s free exercise of religion. The Tennessee Religious Freedom Restoration Act (‘TRFRA’) prohibits any governmental entity in the state from substantially burdening the free exercise of religion unless it can demonstrate that: (a) the application of the burden is essential to furthering a compelling

governmental interest; and (b) is accomplished in the least restrictive means of furthering that compelling government interest. TRFRA defines a substantial burden to include any government action that ‘inhibit[s] or curtail[s] religiously motivated practice.’ Here, the City is clearly burdening the Church’s religious conduct because it has ordered the Church to cease operating a religious ministry to help men escape the trappings of drug addiction. Thus, the City must prove both that its actions are furthering a compelling government interest and that the burden it is imposing is the least restrictive means of achieving that interest.”

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**About First Liberty Institute**

[First Liberty Institute](#) is the largest legal organization in the nation dedicated exclusively to defending religious freedom for all Americans.

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