

## **Dad's Place Church Sues Bryan, Ohio Hoping to End Months of Harassment by City Officials**

*Mayor's actions single out church serving community by keeping doors open 24/7 to anyone in need of shelter, assistance.*

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**Toledo, OH**—First Liberty Institute and the law firms Taft Stettinius & Hollister LLP and Spengler Nathanson PLL today filed a federal lawsuit and motion for a temporary restraining order against Bryan, Ohio and city officials seeking to shut down the religious activities of Dad's Place and Pastor Chris Avell. Avell faces nearly two dozen criminal charges for keeping his church open 24 hours a day, 7 days a week.

You can read the complaint, filed in the United States District Court Northern District of Ohio, [here](#).

“Churches throughout history have been a shelter for anyone seeking a place of safety, and Dad's Place is no exception,” said Philip Williamson of Taft. “Ohio and federal law alike protect vital ministries like Dad's Place, and we look forward to defending those rights.”

Stephen Hartman of Spengler Nathanson said, “We hope the city of Bryan will drop all of these charges and begin talking with us about how Pastor Chris and Dad's Place will continue to contribute to the wonderful community of Bryan.”

“Mayor Schlade spearheaded months of harassment by Bryan, Ohio city officials to repeatedly violate the constitutional and statutory rights of Dad's Place Church and its pastor, Chris Avell,” said Jeremy Dys, Senior Counsel for First Liberty. “Instead of prosecuting a pastor in an effort to drive his congregation from her sight, Mayor Schlade should be supporting a church trying to care for the marginalized in her community (and in the dead of winter). The Constitution and the law demand nothing less.”

Pastor Avell said, “The ministry of the church is not confined to Sunday morning at 11am. We welcome anyone to experience the love and truth of Jesus, regardless of the time of day.”

In March 2023, Dad's Place began operating its ministry 24 hours a day to serve the most vulnerable in its community. For months, Dad's place did so without incident. However, in November 2023 as winter began in Northern Ohio, Bryan city officials issued an ultimatum to the church: cease operating 24 hours a day or face legal penalties. After Dad's Place refused to force those within its care out onto the streets, city officials began engaging in a campaign to harass, intimidate, and shut down Dad's Place. To date, Mayor Schlade and officials have criminally charged Pastor Avell, threatened to criminally charge the church's landlord, used law enforcement officials to needlessly harass and humiliate Dad's Place and its congregants, and is threatening to take additional actions to permanently shut down the church.

In its petition for a temporary restraining order, attorneys explain, “Defendants’ targeted use of zoning codes and city ordinances against the Church cannot withstand scrutiny under the Constitution, laws of the United States, and the laws of the state of Ohio. The actions of the City and its officials violate the Church’s rights under the Free Exercise Clause and Establishment Clause of the First Amendment, the Equal Protection Clause of the Fourteenth Amendment, the Religious Land Use and Institutionalized Persons Act (“RLUIPA”), the Fair Housing Act (“FHA”), and the Rights of Conscience clause of the Ohio Constitution.”

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### **About First Liberty Institute**

[First Liberty Institute](#) is a non-profit public interest law firm and the largest legal organization in the nation dedicated exclusively to defending religious freedom for all Americans.

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