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November 3, 2023

VIA E-MAIL

Zendo Kern
Planning Director
Jean Campbell
Corporation Counsel
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai‘i 96740
planning@hawaiicounty.gov

CC: Mr. Noah Sacks
U.S. Department of Justice Civil Rights Division
Housing and Civil Enforcement Section
950 Pennsylvania, Ave., NW
Washington, D.C. 20530

Re: July 24, 2023 Notice of Daily Fines

Mr. Kern:

We were disappointed to receive your September 29 email, in which the County continues to support its imposition of daily fines on our client, Rabbi Gerlitzky for hosting private prayer and religious gatherings in his residence (the "Home").

The County's position violates federal civil rights laws, as well as the Constitutions of the United States and Hawai‘i. *See* 42 U.S.C. §§ 2000cc *et seq.*; U.S. Const. amend. I; Haw. Const. Art. I, § 4. Indeed, the Ninth Circuit has repeatedly struck down zoning ordinances (like the County's) that freely permit secular meeting facilities, while limiting religious ones. *See, e.g.*, *New Harvest Christian Fellowship v. City of Salinas*, 29 F.4th 596 (9th Cir. 2022), *cert. denied*, 143 S. Ct. 567 (2023); *Centro Familiar Cristiano Buenas Nuevas v. City of Yuma*, 651 F.3d 1163 (9th Cir. 2011).

To that end, we expect the County to withdraw its Notice of Daily Fines, rescind any fines and associated liens placed on Rabbi Gerlitzky's house, and acknowledge in writing that the Rabbi

may host small Shabbat meals and other religious activities on his property. We of course welcome the opportunity to discuss these important issues with you to reach an amicable resolution—indeed, in times such as these, the Jewish community on Hawai‘i in particular needs a place to safely gather, to break bread, and to celebrate the traditions of their faith and their people in the face of excruciating suffering by the Jewish people in Israel and worldwide. Rabbi Gerlitzky's Home provides exactly that welcoming space, and we are prepared to initiate litigation to secure the full measure of declaratory, injunctive, and compensatory relief to which Rabbi Gerlitzky is entitled, if necessary.

Factual Background

As explained in our previous correspondence, Rabbi Gerlitzky first moved to the Big Island in 2017 to fulfill his religious obligation to build a Jewish community in places where Jewish people lived but lacked a congregation and community. To support his ministry, Rabbi Gerlitzky rents office space in the Kona Chamber of Commerce, where he conducts most of his office work and meetings. He also rents event spaces in the community for larger religious gatherings, such as Torah celebrations and the annual lighting of a Hanukkah menorah. But, because of ritual restrictions related to the Sabbath, he sometimes invites guests into his Home—where he has lived since 2019—for services or holidays when they can gather comfortably. When the Rabbi does host guests, the guests either walk to his Home (in accordance with their Orthodox faith) or drive and park on the two-car-wide public shoulder. The COVID-19 pandemic increased the frequency of prayer services at his Home due to the need to congregate outside, with the Rabbi setting up a tent in his backyard to safely host small Shabbat services, for example.

Since the County's first notice, the Rabbi engaged with the County in good faith to assuage concerns, including informing the County in April 2023 that he had ceased offering public services on his property and had removed his home address from his ministry's website. Further, the Rabbi rents space for larger gatherings at public facilities when able and maintains an official office space in the Kona Chamber of Commerce, with his religious organization's mailing address as 75-5737 Kuakini Hwy #202, Kailua-Kona, HI 96740. The Rabbi thus uses his Home only for smaller Shabbat meals and prayer meetings, as well as the occasional gatherings for Jewish holidays, like Purim and Passover, that are no different than a Christmas, Halloween, First Birthday Lū`au, or "Baby Lū`au" celebration—or, indeed, a family birthday party, Super Bowl party, game night, or dinner party.

Any large gatherings at the Rabbi's Home involve meals that he prepares for Jewish residents of the Big Island in accordance with the kosher dietary restrictions of their faith. Even these meals rarely exceed 30 people. These meals and the short service are important to the Jewish

community on the Big Island. Hosting such gatherings at his Home is necessary because (on information and belief) there is no public event space on the Big Island offering kosher kitchen facilities. Moreover, the Rabbi's Home is also within walking distance of many of his community members, which is crucial due to religious restrictions on operating machinery, including vehicles, on the Sabbath.

In its most recent letter, the County noted that the Rabbi's Home is classified as religious property and suggested such designation proves that the home is operating as a synagogue. But that designation is perfectly consistent with the law—the use of residential property as a charitable residence for clergy has a long historical pedigree and is enshrined in the County property tax code, which expressly allows (and even encourages) religious organizations to designate the homes of their clergy as parsonages exempt from taxation. *See* Hawai'i County Code 1983 § 19-77(b)(3) (exempting "[p]roperty used for church purposes including incidental activities, parsonages, and church grounds"). The Home is thus a parsonage. And the Rabbi made that clear when he first claimed the exemption—listing "church parsonage – housing for clergy" as the charitable use for the residence. *See* Attachment A. And that is consistent with the fact that he rents official office space for his religious organization in the Kona Chamber of Commerce.

Legal Analysis

By freely allowing secular meeting facilities in the Rabbi's zoning area while requiring religious meeting facilities to go through the use-permit process, the County's zoning code violates the Religious Land Use and Institutionalized Persons Act ("RLUIPA") on its face. And by levying fines on religious gatherings while allowing similar secular in-home gatherings to continue unmolested, the County is also violating RLUIPA as applied. Moreover, because these quickly accumulating fines impose a substantial burden on Rabbi Gerlitzky's religious practice, without any showing of a compelling government interest or narrow tailoring to that interest, the County's enforcement violates both RLUIPA and the free-exercise clauses of the federal and state constitutions.

I. RLUIPA Bars the Unequal Treatment of Religious and Secular Activities in Zoning Laws and in Their Enforcement.

RLUIPA explicitly prevents local governments from "impos[ing] or implement[ing] a land use regulation in a manner that treats a religious assembly or institution on less than equal terms with a nonreligious assembly or institution." 42 U.S.C. § 2000cc(b)(1). The County's zoning ordinance does just that by disfavoring religious activities and organizations on its face.

As the Ninth Circuit has explained, a land-use regulation violates Section 2000cc(b)(1) where it is imposed "on a religious assembly or institution . . . . on less than equal terms with a nonreligious assembly or institution." *Centro Familiar*, 651 F.3d at 1170–71 (cleaned up). Indeed, a religious plaintiff establishes a *prima facie* violation where the zoning ordinance "draws an express distinction between religious assemblies and nonreligious assemblies." *New Harvest*, 29 F.4th at 605 (cleaned up).

That is manifestly the case here. Section 25-5-3(a)(9) of the Hawai'i County Code freely allows for "[m]eeting facilities" as a sanctioned use in Single-Family Residential Districts, or "RS district[s]." *See* Hawai'i County Code § 25-5-3(a)(9). Conversely, Section 25-2-61(a)(3), entitled "Applicability; use permit required," requires churches and synagogues to apply for and receive a use permit to open "meeting facilities for churches, temples, synagogues and other such institutions, in RS" districts. *See id.* § 25-2-61(a)(3).

Nor can the County overcome that *prima facie* showing. *See Centro Familiar*, 651 F.3d at 1171, 1173 ("The burden is . . . on the city to show that the treatment received by the church should not be deemed unequal, where it appears to be unequal on the face of the ordinance."). To do so, the County would need to establish not only that "the zoning criterion behind the regulation at issue is an acceptable one," but also that "the religious assembly or institution is treated *as well as every other nonreligious assembly or institution that is similarly situated* with respect to that criterion." *New Harvest*, 29 F.4th at 607 (cleaned up) (emphasis added). The County cannot establish either. There is no reason to believe that a religious gathering would be more disruptive than any secular gathering. And the City allows meeting spaces and secular gatherings equivalent to the small dinner gatherings on Rabbi Gerlitzky's property to operate in RS districts on a regular basis.

Courts have routinely invalidated zoning regulations like the one at issue here for this very reason. For example, in *Centro Familiar*, the Yuma City Code allowed secular meeting facilities (like auditoria, arts centers, and fitness facilities) to operate as of right in the Yuma Old Town District, while churches and other religious meeting facilities had to apply for a conditional use permit. *Centro Familiar*, 651 F.3d at 1166–67. The Ninth Circuit had no trouble concluding that this provision violated RLUIPA's equal-terms provision—no generally accepted zoning criteria, such as traffic or parking, justified this disparate treatment of religious meeting spaces. *Id.* at 1173–75.

So too in *New Harvest*. There, the City of Salinas "specifically prohibit[ed] clubs, lodges, [and] places of religious assembly" from operating on the ground floor in a part of downtown Salinas absent a conditional use permit. *New Harvest*, 29 F.4th at 600 (cleaned up). The Ninth Circuit again concluded that such regulation violated RLUIPA, explaining that "other nonreligious

assemblies, such as theatres, which are permitted to operate on the first floor of the Main Street Restricted Area, are similarly situated to religious assemblies with respect to the City's stated purpose and criterion." *Id.* at 607–08.

Just like in those cases, there is no zoning criteria here that the County can point to that would justify allowing secular meeting facilities in RS districts while prohibiting religious ones, as each can cause a similar amount of traffic or parking congestion, given similarly sized gatherings. And, on information and belief, private residences, such as the Pyramid House, are permitted to hold secular gatherings—including musical concert parties and talks on spirituality—which for all practical purposes are comparable to the gatherings at Rabbi Gerlitzky's Home. Under well-trodden Ninth Circuit precedent then, Hawai'i's zoning regulation at issue facially violates RLUIPA.

Furthermore, Rabbi Gerlitzky also has a strong argument that, at the least, the County is " 'implementing,' *i.e.*, enforcing, a facially neutral ordinance in a discriminatory manner" against him. *New Harvest*, 29 F.4th at 604 (cleaned up); *id.* (recognizing that "equal terms" claims can also be brought as "as-applied challenges"). The County has levied fines on Rabbi Gerlitzky's residence for months for hosting Shabbat gatherings, small prayer gatherings, and Jewish holiday celebrations equivalent to a neighbor's dinner party, poker game, or Christmas party. "By applying different standards for religious gatherings and nonreligious gatherings having the same impact, [the County's enforcement action] impermissibly targets religious assemblies." *Konikov v. Orange County*, 410 F.3d 1317, 1327–29 (11th Cir. 2005) (concluding that a zoning regulation employed to shut down *minyan* prayers in a rabbi's home supported an as-applied RLUIPA violation where the city allowed similar secular gatherings and offered no compelling governmental interest for distinct treatment).

Although the Rabbi hopes this issue can be resolved amicably without resort to litigation, it bears mentioning that, should he be forced to bring suit, he will be entitled to monetary damages, attorney fees, and injunctive relief. *See Centro Familiar*, 651 F.3d at 1168–69; *New Harvest*, 29 F.4th at 609; *Third Church of Christ, Scientist v. City of New York*, 626 F.3d 667, 673 (2d Cir. 2010); *Rocky Mountain Christian Church v. Bd. of Cnty. Comm'rs*, 613 F.3d 1229, 1240 (10th Cir. 2010).

II. The County's Punitive Fines Illegally Burden Rabbi Gerlitzky's Religious Free Exercise.

In addition to violating RLUIPA, the County also violates both the federal and state free-exercise clauses by burdening Rabbi Gerlitzky's sincere religious practice through the imposition of fines under a zoning ordinance that is neither neutral nor generally applicable. *See* U.S. CONST.

amend. I; HAW. CONST. Art. I, § 4; *Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407, 2421–22 (2022); 42 U.S.C. § 1983.

The U.S. Supreme Court has held that government actions that burden a sincere religious practice and aren't neutral towards religious exercise or generally applicable suffice to establish a violation of the First Amendment. *See Kennedy*, 142 S. Ct. at 2421–22; *Thomas v. Rev. Bd. of Ind. Emp. Sec. Div.*, 450 U.S. 707, 718 (1981). And the Supreme Court of Hawai'i has held that the free-exercise clause of the state constitution, HAW. CONST. Art. I, § 4, similarly subjects to strict scrutiny any laws that provide for a system of individualized assessments. *State v. Armitage*, 132 Haw. 36, 59 (2014).

There can be no question that Rabbi Gerlitzky "seeks to engage in a sincerely motivated religious exercise." *Kennedy*, 142 S. Ct. at 2422. An essential part of Rabbi Gerlitzky's religious activities involves maintaining the Sabbath, celebrating Jewish holidays, and engaging in communal prayer with family and friends. Some of these activities require the presence of non-residents and a kosher kitchen, as certain Jewish prayers cannot occur without ten Jewish males over the age of 13, a *minyan*, present. And certain celebrations, like Shabbat dinners, require a meal prepared in a kosher kitchen, which no public facility on the Big Island offers. The County's fines seek to burden Rabbi Gerlitzky's faithful exercises under policies that are neither neutral, nor generally applicable.

Governmental entities violate principles of neutrality and general applicability "whenever they treat *any* comparable secular activity more favorably than religious exercise." *Tandon v. Newsom*, 141 S. Ct. 1294, 1296 (2021); *see also Fellowship of Christian Athletes v. San Jose Unified Sch. Dist. Bd. of Educ.*, 82 F.4th 664, 686 (9th Cir. 2023) (en banc) ("[T]argeting is not required . . . to violate the Free Exercise Clause. Instead, favoring comparable secular activity is sufficient."). And laws that either provide discretion to government officials or are imposed pursuant to systems of "individualized exemptions" aren't generally applicable. *See Fulton v. City of Philadelphia*, 141 S. Ct. 1868, 1877–78 (2021) (cleaned up) (applying strict scrutiny to a law that gave city officials the "sole discretion" to determine exemptions from the law). Moreover, governmental entities must also treat religious activity in a neutral manner, and action "that targets religious conduct for distinctive treatment" is equally subject to strict scrutiny. *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 546 (1993).

Here, Rabbi Gerlitzky's religious gatherings are, by design, small, intimate, and conducted in accordance with the Jewish faith. The number of individuals in attendance is comparable to other gatherings that regularly occur in the neighborhood. For example, on information and belief, house concerts of similar size to Rabbi Gerlitzky's prayer meetings occur on a regular basis in the same zoning district, undisturbed by threat of civil and criminal proceedings. And larger parties

(like Christmas parties) of similar size to his larger gatherings for major Jewish holidays are likely to have occurred.

Yet the County has targeted Rabbi Gerlitzky's Home, and his Home alone, with an overly aggressive interpretation of its zoning code while failing to enforce a similarly aggressive position against other private gatherings in neighboring homes. This does not constitute neutral application of the law. *See Tandon*, 141 S. Ct. at 1297 (holding that a California law likely violated the First Amendment by allowing secular gatherings while prohibiting religious ones).

And the County can't overcome that conclusion by proving its discriminatory actions otherwise satisfy strict scrutiny by furthering "interests of the highest order [through] means narrowly tailored in pursuit of those interests." *Tandon*, 141 S. Ct. at 1298 (internal quotation marks omitted). Indeed, the County has not and cannot proffer any compelling governmental interest that would justify quashing the small religious gatherings in the Rabbi's home while permitting larger secular gatherings. After all, any interest rooted in parking, safety, or traffic congestion would be no less affected by the comparable secular gatherings in Rabbi Gerlitzky's neighborhood.

Even assuming the County could identify some sort of compelling interest, it's unlikely its sweeping prohibition on all religious activity at the Home is the "least restrictive means of achieving [that] compelling state interest." *Thomas*, 450 U.S. at 718. Less restrictive measures surely exist here, because the County may put in place additional parking restrictions, so long as they are neutrally enforced, and accept the Rabbi's invitation to work together to assuage any other concerns the County may have. Because other alternatives exist that don't burden Rabbi Gerlitzky's exercise of religion, the County cannot satisfy strict scrutiny.

In sum, any attempt by the County to continue its campaign to prevent Rabbi Gerlitzky from engaging in religious activities in his home violates the First Amendment and gives rise to liability for declaratory, injunctive, and compensatory relief, as well as attorney fees. *See* 42 U.S.C. §§ 1983, 1988. Furthermore, damages are available against government officials in their individual capacities when they deprive a person or group of people of rights secured by the U.S. Constitution. *See Kentucky v. Graham*, 473 U.S. 159, 166 (1985) ("[A]n award of damages against an official in his personal capacity can be executed . . . against the official's personal assets[.]").

III. RLUIPA Also Prohibits the County from Substantially Burdening this Religious Use of Rabbi Gerlitzky's Home.

The County's position violates yet another provision of RLUIPA through the substantial burden that its zoning laws impose on Rabbi Gerlitzky's free exercise of his faith. For the same

reasons that the County's actions and interests cannot satisfy the First Amendment's strict scrutiny test, it also cannot satisfy RLUIPA's prohibition that:

> No government . . . impose or implement a land use regulation in a manner that imposes a substantial burden on the religious exercise of a person, including a religious assembly or institution, unless the government demonstrates that imposition of the burden on that person, assembly, or institution—
>
> (A) is in furtherance of a compelling governmental interest; and
>
> (B) is the least restrictive means of furthering that compelling governmental interest.

42 U.S.C. § 2000cc(a)(1). RLUIPA's "Substantial Burden" provision applies if the regulation at issue involves "individualized assessments of the proposed uses for the property involved." *Id.* § 2000cc(a)(2)(C).

That prohibition applies here. The County "t[ook] into account the particular details of [the Rabbi's] proposed use of land when deciding to permit or deny that use" and determined his use isn't allowed in a RS zone. *Guru Nanak Sikh Soc. of Yuba City v. County of Sutter*, 456 F.3d 978, 986, 988–92 (9th Cir. 2006).

In doing so, the County has substantially burdened Rabbi Gerlitzky's religious exercise. *See supra* Part II. The Big Island lacks suitable kosher facilities. In fact, on information and belief, there is no suitable public or commercial event space available to Rabbi Gerlitzky on the Big Island. The Rabbi accordingly cannot prepare a meal for his guests at any rented facility without violating some of the most important laws of his faith. Moreover, the Torah's ban on work during Shabbat means that some of his guests cannot operate machinery, such as cars, to travel to such a venue either. Rabbi Gerlitzky thus hosts such gatherings in his Home to ensure that his family and friends who observe this law can all gather for a kosher Shabbat meal at his home without needing to drive. Because Rabbi Gerlitzky has no "ready alternatives" available to him that could accommodate prayer meetings and Shabbat gatherings for family and friends, the County substantially burdens his free exercise by restraining him from using his Home to serve his and his neighbors' religious needs. *Int'l Church of Foursquare Gospel v. City of San Leandro*, 673 F.3d 1059, 1068 (9th Cir. 2011) ("And when the religious institution has no ready alternatives, or where

the alternatives require substantial delay, uncertainty, and expense, a complete denial of the [religious institution's] application might be indicative of a substantial burden." (cleaned up)).[1]

That Rabbi Gerlitzky could hypothetically relocate and worship elsewhere doesn't alter that analysis. *See Holt v. Hobbs*, 574 U.S. 352, 361–62 (2015) (explaining the substantial burden inquiry doesn't ask "whether [the religious adherent] is able to engage in other forms of religious exercise"). After all, "a burden need not be found insuperable to be held substantial." *Int'l Church of Foursquare Gospel*, 673 F.3d at 1068 (cleaned up); *see also Sts. Constantine and Helen Greek Orthodox Church, Inc. v. City of New Berlin*, 396 F.3d 895, 901 (7th Cir. 2005) (holding that "delay, uncertainty, and expense" associated with relocating to another property for worship was a substantial burden). In any event, the travel and food-preparation laws of his religion mean there aren't any "quick, reliable, and financially feasible alternatives [he] may utilize to meet [his] religious needs absent [his] obtaining the [special use] permit." *Westchester Day Sch.*, 504 F.3d at 352.

The County's prohibition—which the County is unlikely to demonstrate is "in furtherance of a compelling governmental interest" and "the least restrictive means of furthering that compelling governmental interest," 42 U.S.C. § 2000cc(a)(1)(A), (B), for the reasons described in Part II—thus doubly violates RLUIPA. *See Holt*, 574 U.S. at 364 (describing RLUIPA as imposing an "exceptionally demanding" standard) (quoting *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 728 (2014)).

Conclusion

In the spirit of cooperation and with hopes that the parties can reach an amicable resolution, we would be pleased to meet with you in your office at your convenience to discuss this matter. Otherwise, we stand prepared to take any and all legal action necessary to safeguard Rabbi Gerlitzky's statutory and constitutional rights. To that end, we respectfully request that you respond to this letter by Friday, November 17, 2023.

[1] *See also Westchester Day Sch. v. Vill. of Mamaroneck*, 504 F.3d 338, 352–53 (2d Cir. 2007) (recognizing that preventing a religious school from expanding its facilities to engage in religious education substantially burdened its religious exercise); *Redeemed Christian Church of God (Victory Temple) Bowie v. Prince George's Cnty.*, 485 F. Supp. 3d 594, 604 (D. Md. 2020) (holding the denial of a water and sewer category change that prevented the development of a proposed church constituted a substantial burden).

Respectfully,

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ATTACHMENT A

CASE NO. _____

RP Form 19-77 (Rev 02/2011)
DEPT. OF FINANCE

	TAX MAP KEY/PARCEL ID				
ISLE	Z	S	PLAT	PARCEL	CPR
3	7	5	32	53	0000

COUNTY OF HAWAI'I
REAL PROPERTY TAX DIVISION

101 Pauahi St., Ste. No. 4, Hilo, Hawai'i 96720
Phone: (808) 961-8201
74-5044 Ane Keohokalole Hwy., Bldg. D, 2nd Flr., Kailua-Kona, Hawai'i 96740
Phone: (808) 323-4880

CLAIM FOR CHARITABLE AND MISCELLANEOUS EXEMPTION

Exemption is hereby claimed from Real Property under County Ordinance Chapter 19 Section 19-77.

[ ] SCHOOL
[ ] HOSPITAL/NURSE HOME
[✓] CHURCH
[ ] OTHER SPECIFY: _____
[ ] CEMETERY
[ ] PUBLIC USE
[ ] NON-PROFIT

Name of Organization: chabad jewish center of the Big island

Mailing Address 75-353 Nani kailua dr. kailua-kona, HI 96740

808-999-9161
Telephone Number

1. Explain the charitable or miscellaneous use: church, parsonage - housing for clergy
2. Is all the land and/or buildings used exclusively for the purpose claimed? [✓] Yes [ ] No
3. If the answer is no, explain and state area used for business.
4. **Submit documentation from the Internal Revenue Service verifying exemption status.**

CERTIFICATION

I declare, under penalty of law, that all statements in this return are true and correct to the best of my knowledge. I understand that any misstatement of facts will be grounds for disqualification and penalty.

Date April 12 2020

Levi Geriitzky - president
(Print Officer's Name)

Officer's Signature

(For Tax Office Use Only)

Effective 2021 Tax Year

Date Received (U.S. Postmark): 4/14 2020

By: _____

Input Date: _____

By: _____

Claim Disallowed for _____ Tax Year

Input Date: _____

By: _____

Reason: _____

PITT_____ EX CD _____ CARD # _____ BUILDING % _____ LAND % _____

Hawai'i County is an Equal Opportunity Provider and Employer