

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ALL MUSLIM ASSOCIATION OF AMERICA, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:20-CV-00638
)	(LMB/JFA)
)	
STAFFORD COUNTY, VIRGINIA, <i>et al.</i>,)	
)	
)	
Defendants.)	

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:20-CV-00693
)	(LMB/JFA)
)	
STAFFORD COUNTY, VIRGINIA,)	
)	
Defendant.)	

NOTICE OF DISMISSAL

Because Plaintiff United States has achieved the relief it sought in filing this lawsuit against Defendant Stafford County, the United States has determined to dismiss this case in accordance with Rule 41(a)(1)(A) of the Federal Rules of Civil Procedure. In support of its dismissal, the United States avers:

1. On June 19, 2020, the United States filed a complaint against the County alleging violations of the substantial burden provision of the Religious Land Use and Institutionalized Persons Act of 2000 (“RLUIPA”), 42 U.S.C. §§ 2000cc(a)(1), arising from the County’s enactment of an ordinance prohibiting the All Muslim Association of America (“AMAA”) from

developing a religious cemetery. *See* Case No. 1:20-CV-00693, ECF. No. 1. On September 11, 2020, the United States filed an Amended Complaint. *See* Case No 1:20-CV-00683, ECF No. 44.

2. On October 29, 2020, the County repealed the ordinance that the United States alleged had substantially burdened the AMAA.

3. On July 9, 2021, the County granted the AMAA site plan approval of its cemetery.

4. On September 22, 2021, the County and the AMAA entered into a settlement agreement that requires the County to pay \$500,000 to the AMAA. *See* ECF No. 142-2. Under the agreement, the County “affirms its commitment to [RLUIPA],” “agrees that it shall not delay or hinder the reasonable review and approval of any AMAA applications or requests related to the AMAA’s establishment of the Proposed Cemetery,” and agrees not to “assist, other than as required by law, directly or indirectly, in any third-party action against the AMAA regarding the Proposed Cemetery.” *Id.* at ¶ 9.

5. As of the date of this notice of dismissal, and as typically required by settlements resolving RLUIPA complaints filed by the United States, the County has taken the following additional steps to comply with RLUIPA: posting notices of its obligations to comply with RLUIPA on several County website pages involving land use and planning agencies; placing RLUIPA notices in land use application documents; implementing an internal procedure to address complaints by any person who believes that the County may have violated RLUIPA; and offering and providing RLUIPA training to those responsible for the enactment, implementation and enforcement of its zoning and land use regulations.

6. In light of the above, the United States dismisses its Amended Complaint without prejudice.

Respectfully submitted,

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Dated: October 14, 2021

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2021, a true and accurate copy of this paper was filed electronically with the Court's CM/ECF system, which will then send a notification of such filing to the parties.

If required in accordance with judicial preferences and/or the local rules, copies of this pleading shall be delivered to the Office of the Clerk and/or Judge's Chambers.

By: s/ Steven Gordon
STEVEN GORDON