

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION**

UNITED STATES OF AMERICA,)	
)	Civil Action No.
Plaintiff,)	1:25-cv-00022
)	
v.)	
)	
SUGAR GROVE TOWNSHIP and the)	
SUGAR GROVE AREA)	
SEWAGE AUTHORITY,)	
)	
Defendants.)	

CONSENT ORDER

I. Introduction

1. The United States (“Plaintiff”) brought this action to enforce the Religious Land Use and Institutionalized Persons Act of 2000 (“RLUIPA”), 42 U.S.C. §§ 2000cc *et seq.*

2. In its Complaint, the United States alleges that Sugar Grove Township, Pennsylvania (“Township”) and the Sugar Grove Area Sewage Authority (“SUGASA” or “Authority”) (collectively, “Defendants”), violated RLUIPA by enacting and enforcing two ordinances against its Old Order Amish residents: (1) an ordinance mandating that certain structures connect to the Defendants’ municipal sewage system, which requires the use of an electric grinder pump (“Sewage Connection Ordinance”); and (2) an ordinance banning privies on property intended for permanent habitation (“Privy Ordinance”).

3. Specifically, the United States alleges that the Township’s and SUGASA’s enforcement of these ordinances against Old Order Amish households violates RLUIPA because they substantially burden the sincerely held religious beliefs and religious exercise of the

Township's Old Order Amish residents, whose religious beliefs restrict the use of electricity and require adherents to remain separate and apart from the modern world. See 42 U.S.C. § 2000cc(a)(1).

II. Stipulated Facts

4. Sugar Grove Township is a governmental unit in Warren County in the Commonwealth of Pennsylvania.
5. Sugar Grove Township spans approximately 35 square miles in Warren County, Pennsylvania. The Township encircles the much smaller Sugar Grove Borough ("Borough"), which has approximately 600 residents across 1 square mile.
6. The Township is governed by, and acts through, an elected three-member Board of Supervisors. The Board of Supervisors is a legislative body, responsible for enacting and applying zoning and land use regulations, among other things.
7. The Township is responsible for the acts and omissions of its agents and agencies.
8. The Township is party to a Pennsylvania Act 537 plan dated on or about June 20, 2002, which requires treatment of sewage pursuant to the Pennsylvania Sewage Facilities Act, 35 P.S. § 750.1, collected from certain areas within the Township.
9. The Township's municipal sewage system was constructed by the SUGASA pursuant to the Township's Act 537 Plan, and the SUGASA manages the municipal sewage system and enforces the Township's sewage-related ordinances.
10. SUGASA is an agent of the Township for enforcement purposes related to the municipal sewage system.
11. The Township and the SUGASA employ a Sewage Enforcement Officer ("SEO") who conducts sewage-related investigations on behalf of both entities.

12. Old Order Amish residents constitute approximately 25% of the Township's total population of approximately 1,500 people.

13. The Township's Old Order Amish residents use privies for the disposal of human waste (i.e., "black water"), which do not use running water or electricity and remain unconnected from municipal sewage systems.

14. In 2004, the Township enacted the Sewage Connection Ordinance pursuant to Pennsylvania Second Class Township Code 53 P.S. §67502. The Township's Sewage Connection Ordinance requires every structure within 150 feet of the municipal sewage system to connect to it and provides criminal penalties for failure to comply. Ordinance No. 04-06-15.

15. Approximately 14 properties owned by Old Order Amish residents have structures within 150 feet of the municipal sewage system that are subject to mandatory connection under the Sewage Connection Ordinance.

16. Since the 2004 enactment of the Sewage Connection Ordinance, residents of the 14 Old Order Amish properties with structures within 150 feet of the municipal sewage system have refused to connect because of their sincerely held religious beliefs.

17. As a result of not complying with the Township's Sewage Connection Ordinance, the Township and the SUGASA have imposed municipal liens and fines and obtained judgements against Old Order Amish property owners totaling more than \$200,000.

18. As a result of not complying with the Sewage Connection Ordinance, two Old Order Amish residents were charged and convicted of criminal offenses and sentenced to pay criminal fines.

19. On October 18, 1993, the Township passed its original Privy Ordinance, No. 93-10-01, which it subsequently amended three times: (1) in November 2012 by Ordinance No. 12-

11-06; (2) in December 2016 by Ordinance No. 16-12-06; and (3) in July 2017 by Ordinance No. 17-07-05.1. The amended 2017 Privy Ordinance prohibits residents from using a privy on any property intended for “permanent residence,” even if structures on the property are not within 150 feet of the municipal sewage system.

20. Old Order Amish residents cannot comply with the Privy Ordinance because of their sincerely held religious beliefs.

III. Statement of Agreement on Legal and Other Terms

21. The Parties agree that the Township and SUGASA each constitute a “government” under RLUIPA, 42 U.S.C. §§ 2000cc-5(4)(A)(i), (ii).

22. The Parties agree that the Sewage Connection Ordinance and the Privy Ordinance are “land use regulations” that “limit[] or restrict[] a claimant’s use or development of land” under RLUIPA, 42 U.S.C. §§ 2000cc-5(4)(A)(i) and 2000cc-5(5).

23. The Parties agree that the Sewage Connection and Privy Ordinance and the Township’s and SUGASA’s enforcement of them are part of a program or activity that “receives Federal financial assistance” within the meaning of 42 U.S.C. § 2000cc(a)(2)(A).

24. The Parties agree that the Old Order Amish are a “religious assembly or institution,” as defined by RLUIPA, 42 U.S.C. § 2000cc(2)(b)(2), (2)(b)(3).

25. The Parties agree that Old Order Amish residents’ ownership of their homes is a “property interest” within the meaning of 42 U.S.C. § 2000cc-5(5).

26. The Parties agree that Old Order Amish residents use their homes “for the purpose of religious exercise” within the meaning of 42 U.S.C. § 2000cc-5(7)(B).

27. The Parties have voluntarily agreed to resolve the United States’ claims against the Township and SUGASA by entering into this Consent Order (the “Order”), as indicated by

the signatures below. The Defendants do not admit liability for prior actions taken regarding the Sewage Connection and Privy Ordinances.

Therefore, it is hereby **ORDERED, ADJUDGED, and DECREED** as follows:

IV. Jurisdiction

28. The Court has jurisdiction over this action, and may grant the relief sought herein, under 28 U.S.C. § 1331, 28 U.S.C. § 1345, and 42 U.S.C. § 2000cc-2.

V. Injunctive Relief

A. Prohibited Conduct and Affirmative Obligation

29. The Defendants, their agents, agencies, subdivisions, entities, employees, successors, and all other persons or entities in active concert or participation with the Defendants are permanently enjoined from:

- i. Imposing or implementing a land use regulation in a manner that, within the meaning of RLUIPA, imposes a substantial burden on the religious exercise of any person, including a religious assembly or institution, unless the Defendants can demonstrate that imposition of that burden furthers a compelling governmental interest and is the least restrictive means of furthering that compelling governmental interest;
- ii. Imposing or implementing a land use regulation in a manner that treats a religious assembly or institution on less than equal terms than a nonreligious assembly or institution;
- iii. Requiring a property owner to connect to any future extensions of the municipal sewage system, in violation of RLUIPA, if the property owner owned the property before the extension;

- iv. Otherwise engaging in any conduct that violates RLUIPA; or
- v. Coercing, intimidating, threatening, interfering with, or retaliating against any person in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by RLUIPA.

30. Within sixty (60) days of this Order, the Defendants shall repeal the existing Privy Ordinance and will replace it with one that grants exceptions for sincerely held religious beliefs, as set forth in Appendix A (“Amended Privy Ordinance”). Old Order Amish residents may apply for religious exemptions through written form Appendix B (“Privy Exemption Request”), and for alternate sewage treatment systems through written form Appendix C (“Alternate Sewage Treatment System Request”).

31. To comply with RLUIPA’s provisions, the Defendants may grant waivers, accommodations, or adjustments to the requirements of the Sewage Connection Ordinance and Amended Privy Ordinance to avoid imposing a substantial burden on religious exercise.

32. Defendants shall exempt all property owners from mandatory connection under the Sewage Connection Ordinance, so long as:

- i. the property owner has a sincerely held religious belief against connection to the municipal sewage system;
- ii. the property owner owned the subject property on or before this Order’s entry date;
- iii. the property is not already connected to the municipal sewage system; and

- iv. the property owner submits a Request for Exemption from Sewage Connection Ordinance (Appendix D).

33. Within ninety (90) days of receiving a Request for Exemption from Sewage Connection Ordinance, Defendants shall take all necessary steps to release, relieve, discharge, and annul all liens, fines, citations, judgments and other monetary penalties against that household for noncompliance with the Sewage Connection Ordinance. This includes all liens, fines, judgments and other monetary penalties outlined in Appendix E and returning the Old Order Amish Church schoolhouse property (parcel YV-003-5284) listed as the last entry in Appendix E.

34. Within ninety (90) days of receiving a Privy Exemption Request or Request for Exemption from Sewage Connection Ordinance, the Defendants shall reconsider the denial of any building, construction or similar permit for that household based on prior non-compliance with the Sewage Connection Ordinance or the Privy Ordinance.

35. Any connection exemption granted under this Order must be transferrable to anyone who purchases, inherits, or otherwise obtains ownership of a connection-exempt property, so long as the new property owner has a sincerely held religious belief against connection to the municipal sewage system and submits a Request for Exemption from Sewage Connection Ordinance.

36. Nothing in this Order is meant to restrict the Township's or SUGUSA's ability to enforce the Sewage Connection Ordinance or Amended Privy Ordinance in a manner consistent with RLUIPA and all other applicable state and federal laws after this Order's entry date, except that the Township and SUGUSA shall not enforce either Ordinance against Old Order Amish residents until at least 120 days after this Order's entry date.

B. Notice to Public

37. Within sixty (60) days of this Order's entry date, the Defendants shall implement the following procedures to ensure notice is provided to the public of this Order and its requirements:

- i. *Signage.* The Township shall post and maintain a written notice in a conspicuous place in its Township Building. The notice shall conform in content to Appendix F;
- ii. *Notice to Future Old Order Amish Applicants.* Upon receipt of an application or inquiry about any land use determination requiring a decision of the Township concerning an Old Order Amish household, the Township shall provide to the applicant or the person inquiring a notice that conforms in content to Appendix F.

C. Complaint Procedure

38. Within sixty (60) days of this Order's entry date, the Township shall submit to the United States for review and approval a written process to address complaints by any person who believes that the Township, SUGASA, or other land use or zoning body of the Township, acting through their agents or employees, may have violated RLUIPA or otherwise discriminated on the basis of religion or burdened the exercise of religion through the implementation of its zoning or land use laws. The process shall include the requirements described in this Paragraph. The Township shall implement the process within fifteen (15) days of the United States' approval. The Township shall accept written and oral complaints. Upon receipt of an oral complaint, the Township shall offer and provide, but shall not require submission of, the form attached as Appendix G and shall provide assistance in completing and submitting the form if assistance is

requested or if it is apparent to a Township employee or staff member that assistance is needed. The Township shall respond in writing to any written or oral complaints within fifteen (15) days of its receipt of such complaint. The Township shall retain each original written complaint, its records concerning each written or oral complaint, and documents and information relating to any proposed or actual action taken by the Township in response to the complaint.

D. Training

39. Within 120 days of this Order's entry date, the Township and SUGASA shall provide training(s) on the requirements of this Order and RLUIPA to all Township and SUGASA officers, elected and appointed officials, employees, and agents whose duties relate to planning, permitting, construction, code enforcement, and building occupancy, including, but not limited to, the Board of Supervisors, the members of the SUGASA, the SEO, and the Township Attorney. The trainings shall be conducted consistent with the following:

- i. The training(s) shall be conducted by a qualified third-party or parties subject to the United States' approval. Within sixty (60) days after this Order's entry date, the Township and SUGASA shall submit to counsel for the United States the name of the person(s) or organization(s) proposed to provide the training, together with copies of the professional qualifications of such person(s) or organization(s) and copies of the materials proposed for use at the training;
- ii. The Township and SUGASA shall bear all expenses associated with the training;
- iii. The Township and SUGASA shall video-record the training(s) and maintain copies of the written materials provided for each training. Each newly elected, appointed, or hired individual covered by this Paragraph shall receive training within thirty (30) days after the date he or she enters office or begins service or

employment either by (i) attending the next regularly scheduled live training, if it occurs within the thirty (30) day period, or (ii) viewing the video recording of the most recent live training and receiving copies of any written materials provided for that training;

- iv. The Township and SUGASA shall provide each person covered by this Paragraph a copy of this Order at the time of the person's training; and
- v. The Township and SUGASA shall obtain a signed statement (in the form of Appendix H) from each person covered by this Paragraph stating that the person attended the training, received and understands this Order and its mandates, and understands that a violation of this Order may result in legal action against the Township. The Township shall retain the original of each signed statement and provide a copy of each signed statement to the United States within ten (10) days of the person's training.

E. Reporting, Record-Keeping, and Monitoring

40. Within one-hundred and eighty (180) days of this Order's entry date, and every subsequent six (6) months, the Township and SUGASA shall provide a report to the United States detailing its compliance with this Order, except the Township shall submit the last report sixty (60) days before the Order's expiration.¹ The Township and SUGASA shall include the following information in the reports:

- i. A signed declaration by the Township Board of Supervisors stating that the Township has complied with Section V of this Order;

¹ For purposes of this Consent Order, all submissions to the United States shall be sent via email to the United States' counsel, as instructed by the United States' counsel.

- ii. Appropriate documentary evidence, including but not limited to the text of all new policies or procedures implemented as a result of the Order, demonstrating the Township's and SUGASA's compliance with Section V of this Order;
- iii. Appropriate documentary evidence of all Privy Exemption Request and Request for Exemption from Sewage Connection Ordinance applications, in the form of Appendix B and Appendix D, submitted by Old Order Amish residents to the Township or SUGASA;
- iv. Appropriate documentary evidence demonstrating that liens, fines, judgments and other monetary penalties against Old Order Amish residents have been released and discharged as required by Paragraph 33;
- v. Appropriate documentary evidence of any actions taken by the Township pursuant to Paragraph 34;
- vi. Appropriate documentary evidence of any enforcement actions taken against Old Order Amish residents for alleged noncompliance with the Sewage Connection Ordinance and Amended Privy Ordinance, including any citations, liens, fines, judgments, or other monetary and non-monetary penalties imposed;
- vii. Any complaints of religious discrimination against the Township or SUGASA through the implementation of zoning or land use laws, either received as oral or written complaints described in Paragraph 38 or by another Township employee or official, including a copy of the complaint, any documents associated with the complaint, and any written response to the complaint by the Township and SUGASA. If the complaint has not been resolved, the Township and SUGASA shall report any efforts the Township and SUGASA took, or plan to take, to resolve the complaint; and

viii. Any plans the Township or SUGASA have to expand the municipal sewage system or its laterals, including any proposed blueprints, maps, or other documents that indicate where the extension might be located and whether any properties owned by Old Order Amish residents abut the proposed extension.

41. Within thirty (30) days of adopting any amendments or modifications to the Sewage Connection Ordinance, the Amended Privy Ordinance or other Township rules, laws, or ordinances that affect religious or nonreligious assembly or institutional land uses, the Township shall send copies of the enacted amendments or modifications to the United States. Any amendment or modification must be consistent with RLUIPA.

F. Inspection of Records

42. Upon reasonable notice to counsel for the Defendants, the Defendants shall permit representatives of the United States to inspect and copy all non-privileged, pertinent records related to the claims asserted in the Action, including, but not limited to, those records referenced in Section V.

VI. Enforcement

43. The Parties shall attempt in good faith to resolve informally any differences regarding interpretation of or compliance with this Order prior to seeking relief from this Court. However, if the United States believes that the Township and SUGASA have failed to timely perform any act required by this Order, or to act in conformance with any provision, whether intentionally or not, the United States may move the Court to impose any remedy authorized at law or equity, including, but not limited to, reasonable attorneys' fees that may have been occasioned by the violation or failure to perform. Absent exigent circumstances, the United

States will allow Defendants thirty (30) days to cure a violation of this Order once notified by the United States before moving the Court for relief.

VII. Termination of Litigation Hold

44. The Parties agree that, as of the date of this Order's entry, litigation is not "reasonably foreseeable" concerning the matters described above or in the United States' Complaint. If any Party previously implemented a litigation hold to preserve documents, electronically stored information (ESI), or things related to the matters described above or in the United States' Complaint, the Party is no longer required to maintain such litigation hold. Nothing in this Paragraph relieves any Party of any other obligations imposed by this Order.

VII. Duration

45. Except for Paragraph 29 where this Order expressly provides that its requirements are permanent, the duration of this Order shall be for a period of five (5) years from the Order's entry date.

46. For the duration of this Order, this Court has exclusive jurisdiction over and is the venue for any dispute relating to this Order.

47. If, prior to the expiration date of this Order, the United States determines that the Township and SUGASA have failed substantially, whether intentionally or not, to satisfy the terms of this Order, or the United States has good cause to believe that any violations of RLUIPA are ongoing, or if the interests of justice so require, the United States, upon notice to the Township and SUGASA, may seek to extend the term of this Order. If the Court has not granted the United States' request for extension by the time the Order is set to expire, the Order and its terms will remain in effect until the Court rules on the pending motion(s).

48. The case will be dismissed with prejudice upon the expiration of this Order.

49. Any other time limits for performance imposed by this Order may be extended by mutual written agreement of the Parties. The other provisions of this Order may be modified only by motion to the Court.

VIII. Costs

50. Except as noted in Paragraph 43, each Party shall bear its own legal and other costs incurred in connection with this litigation, including costs related to the preparation and performance of this Order.

IX. Scope and Execution

51. This Order contains the complete agreement between the Parties. No prior or contemporaneous communications, oral or written, between the Parties that are not included herein shall be of any force or effect.

52. The Township and SUGASA and their counsel represent and warrant that the Township and SUGASA are fully authorized to enter into this Order.

53. This Order is binding on Township's and SUGASA's successors, transferees, heirs, and assigns.

54. The Parties shall defend this Order against any legal challenge by any third-party. In the event that this Order or any of its terms are challenged in a court other than the United States District Court for the Western District of Pennsylvania, the Parties agree to seek removal or transfer to this Court. However, enforcement of the existing Sewage Connection Ordinance or the Amended Privy Ordinance may be initiated by the Defendants in the appropriate Pennsylvania state court(s).

55. The Parties agree that they shall not, individually or in combination with another, seek to have any court declare or determine that any provision of this Order is illegal or invalid.

56. Should any provision of this Order be declared or determined by any court to be illegal or invalid, the validity of the remaining parts, terms or provisions shall not be affected, and any provision determined to be invalid or illegal shall be stricken from the Order.

IT IS SO ORDERED this _____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE

FOR PLAINTIFF UNITED STATES OF AMERICA

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Western District of Pennsylvania

KATHLEEN WOLFE
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Appendix A: Amended Privy Ordinance

Appendix B: Privy Exemption Request

Appendix C: Alternate Sewage Treatment System Application

Appendix D: Request for Exemption from Sewage Connection Ordinance

Appendix E: Lien Information

Appendix F: Signage

Appendix G: Complaint Form

Appendix H: Training Certification

APPENDIX A

**SUGAR GROVE TOWNSHIP,
WARREN COUNTY, PENNSYLVANIA**

ORDINANCE NO. _____

AMENDED PRIVY ORDINANCE

WHEREAS, the Supervisors of Sugar Grove Township (“Township”), Warren County, Pennsylvania, previously adopted a Privy Ordinance No. 93-10-1, on October 18, 1993, which was subsequently amended by Ordinance No. 12-11-06, Ordinance No. 16-12-06, and Ordinance No. 17-07-05.1; and

WHEREAS, Ordinance Numbers 93-10-1, 12-11-06, 16-12-06, and 17-07-05.1 set forth the policies, requirements, rules, regulations, standards, limitations, and penalties relating to the use of privies within the Township; and

WHEREAS, the Supervisors of the Township find it necessary and appropriate to repeal Privy Ordinance No. 93-10-1 and its amendments, Ordinance No. 12-11-06, Ordinance No. 16-12-06, and Ordinance No. 17-07-05.1 in their entirety and replace them with the provisions set forth herein.

NOW, THEREFORE, it is hereby **ENACTED AND ORDAINED** by the Supervisors of Sugar Grove Township, Warren County, Pennsylvania, as follows:

I. PURPOSE AND POLICY:

A. The purpose of this Ordinance is to establish procedures for the installation, use and maintenance of privies designed to receive and retain sewage. It is further ordained to be the policy of Sugar Grove Township that privies be implemented on as temporary a basis as possible. It is the declared policy of Sugar Grove Township that the installation of privies be on an interim basis on those premises which are ultimately to be served by other sewage systems, that privies be installed for temporary use at construction sites or at the sites of public gatherings and entertainment, or that privies be used on property upon which there is erected a structure intended

only for periodic habitation. Privies shall not be installed, utilized, or otherwise relied on for sewage disposal on properties upon which there is currently or is in the future a structure intended for permanent habitation or to be utilized as a permanent residence, except as set forth in Section I. B, below.

B. Notwithstanding the foregoing, the Township will permit individual requests for privies, based upon sincerely held religious beliefs, on properties in the Township upon which there are currently or will be in the future structures intended for permanent habitation, as follows:

1. Privies may be installed, used, or built by any Owner or Person, as defined herein, on a property in the Township that is for permanent habitation, as defined herein, on which a house, building or other structure used or intended for human occupancy is located, situated, built, replaced, upgraded, added onto or expanded, and who has a sincerely held religious belief against connecting to the municipal sewage facility or system (“Municipal Sewage System”), also defined as a community sewerage system, 25 Pa. Code §72.1, of the Sugar Grove Area Sewage Authority (“Authority”) under the Sewage Connection Ordinance, or otherwise uses a privy to accomplish sewage disposal based upon their sincerely held religious belief.

2. Any properties that are connected to the Municipal Sewage System are ineligible for this exemption and are prohibited from disconnecting from the Municipal Sewage System.

3. An Owner or Person seeking an exemption from this Ordinance based upon a sincerely held religious belief shall submit a written request to the Township and/or Authority, who will consider the request subject to applicable laws including but not limited to, the Religious Land Use and Institutionalized Persons Act, the Pennsylvania Sewage Facilities Act, the Clean Streams Law, and the Amended Sewage Connection Ordinance and the Sugar Grove Township and Sugar Grove Area Sewer Authority Proposal for Act 537 Update Revision and Compliance with Pennsylvania Sewage Facilities Act and Religious Land Use and Institutionalized Persons Act, and other ordinances and laws.

II. DEFINITIONS:

Unless the context specifically and clearly indicates otherwise, the meaning of terms used in this Ordinance shall be as follows:

A. Privy shall mean a watertight receptacle, whether permanent or temporary, which receives and retains sewage where water under pressure or piped wastewater is not available and is designed and constructed to facilitate the ultimate disposal of the sewage at another site.

B. Owner shall mean any individual or entity vested with ownership, legal or equitable, sole or partial, or possession of any property located in the Township.

C. Periodic Habitation shall mean the use of a structure which is intended for habitation, occupancy or use by human beings but which is not utilized as a domicile or residence by any individual for any period of time; not listed as an individual's place of residence on an official or recognized document or source, including but not limited to a property deed, tax statement, driver's license, vehicle registration, or other official document; or not utilized as a mailing address for bills or other correspondence.

D. Permanent Habitation shall mean the use of a structure which is intended for habitation, occupancy or use by human beings which is utilized as a domicile or residence by any individual for any period of time; listed as an individual's place of residence on a tax return, driver's license, car registration, voter registration, or any other official document; or utilized as a mailing address for bills or other correspondence.

E. Person shall mean any individual, partnership, company, contractor, association, corporation or other group or entity.

F. Sewage shall mean any substance that contains any of the waste products or excrement or other discharge from the bodies of human beings and any noxious or deleterious substance being harmful or inimical to the public health, or to animal or aquatic life or to the use of water for domestic water supply or for recreation or any substance which constitutes pollution under the Clean Streams Law (35 P.S. § 691.1-191.1001), as amended (which may be referred to

or characterized as “black water” and “grey water” respectively, although not defined as such under the Sewage Facilities Act, 35 P.S. §750.1 or regulations).

G. Sewage Facility shall mean a system of sewage collection, conveyance, treatment and disposal which will prevent the discharge of untreated or inadequately treated sewage or other waste into waters of the Commonwealth or otherwise provide for the safe and sanitary treatment and disposal of sewage or other waste. The term includes:

(i) Individual sewage system – a system of piping, tanks or other facilities serving a single lot and collecting and disposing of sewage in whole or in part into the soil or into waters of the Commonwealth or by means of conveyance to another site for final disposal. The term includes:

(A) Individual onlot sewage system - An individual sewage system which uses a system of piping, tanks or other facilities for collecting, treating and disposing of sewage into a soil absorption area or spray field or by retention in a retaining tank; and

(B) Individual sewerage system - An individual sewage system which uses a method of sewage collection, conveyance, treatment and disposal other than renovation in a soil absorption area, or retention in a retaining tank.

(ii) Community sewage system - A sewage facility, whether publicly or privately owned, for the collection of sewage from two or more lots, or two or more equivalent dwelling units and the treatment or disposal, or both, of the sewage on one or more of the lots or at another site. The term includes:

(A) Community onlot sewage system - A system of piping, tanks or other facilities serving two or more lots and collecting, treating and disposing of sewage into a soil absorption area or retaining tank located on one or more of the lots or at another site; and

(B) Community sewerage system—A publicly or privately-owned community sewage system which uses a method of sewage collection, conveyance,

treatment and disposal other than renovation in a soil absorption area, or retention in a retaining tank.

H. Municipality shall mean Sugar Grove Township, Warren County, Pennsylvania.

The terms used herein shall for all purposes of this Ordinance have the same definitions as those which are set forth in the rules and regulations applicable to the Sewage System as now and hereafter adopted by the Township and/or Authority and/or the Pennsylvania Department of Environmental Protection to be applicable to all users of the Sewage System.

III. RULES AND REGULATIONS:

The installation and operation of privies within the Township shall hereinafter be governed by the Pennsylvania Sewage Facilities Act (35 P.S. §750.1 et seq.) and regulations thereunder, as the same may be amended, and the terms of this Ordinance together with rules and regulations, which may be adopted and amended, from time to time, by resolution of the Supervisors of the Township or the Pennsylvania Department of Environmental Protection, and any Act 537 Plan Amendments/Updates and/or Component 2 Sewage Planning Module.

A privy or other suitable individual sewage system for disposal of waste or excrement or other discharge from the bodies of human beings (“black water”), is permitted for those who meet the criteria under Section 1.B., provided that:

A. The privy or other suitable individual sewage system – whether existing or new – meets the standard requirements for construction, location, installation and maintenance, in compliance with the Pennsylvania Sewage Facilities Act, the implementing regulations, and any other state or federal requirements, unless compliance with specific provisions of law are identified to be contrary to RLUIPA, in which case further discussion regarding options and accommodations will be undertaken.

B. The property has an existing permitted sewage facility for treating household wastewater (“grey water”), or the property owner submits a written application to the Township for such sewage facility.

- C. The Sewage Enforcement Officer performs an inspection of any existing or new privy or other individual sewage system, and/or the subject property, to verify that the property and privy or other individual sewage system are suitable for such use.
- D. Payment of the Sewage Enforcement Officer's customary fees for inspection of a privy or other individual sewage system and issuance of a permit.
- E. Payment of an application fee for the permit in an amount to be determined by Sugar Grove Township based on costs to be incurred for issuance, administration and verification of the application and permit.
- F. Inspection of the privy or other individual sewage system three (3) years after the initial permit is issued and every three (3) years thereafter, or sooner as circumstances require, including but not limited to situations in which there is a report of a malfunction, breach of the privy/sewage system, failure to use the privy/sewage system, or failure to verify the removal and disposal of sewage contents from the privy/sewage system.
- G. Pumping/removal of contents of the privy/sewage system including transportation, treatment and disposal of the sewage, paid for by the property owner, every one to two years, and more or less frequently as needed, as determined upon inspection, failure of the privy/sewage system, alleged malfunction, or otherwise. The pumping/removal/ treatment of the sewage may be done by the Sugar Grove Area Sewage Authority, with costs thereof paid by the property owner.
- H. Alternatively, the property owner may use a sewage disposal company or operator of their own choice to perform the pumping, transportation, treatment and disposal of the sewage, provided that written verification of the pumping and removal of the contents of the privy or individual sewage system is provided to the Sugar Grove Area Sewer Authority within thirty (30) days thereof, which shall include the following: date; company or operator who performed the sewage disposal; identification that the company or operator is licensed and bonded for sewage disposal to the extent required by the Pennsylvania Department of Environmental Protection; gallons of sewage removed; receipt for payment of cost of sewage disposal; and identity and location of treatment facility for sewage disposal.

IV. PERMITS:

A. Upon and after the enactment of this Ordinance, no privy shall be installed, utilized or otherwise placed in service by any Owner or Person of a permanent habitation until said Owner or Person has obtained a privy permit from the Township.

B. In addition to the requirements set forth herein for obtaining a privy permit, a sewage planning module may be required in accordance with the Pennsylvania Sewage Facilities Act prior to obtaining a privy permit. Said sewage planning module must indicate that a privy is an acceptable means for disposing of sewage generated on the subject property, pursuant to the requirements of the Pennsylvania Sewage Facilities Act and all other relevant laws, rules, and regulations.

C. The Township or the Township's Sewage Enforcement Officer shall have the right to inspect a privy to ensure the proper installation, operation, maintenance, and content disposal, and to determine the amount and harmful content of the sewage. A privy inspection may be performed every three years or as necessary to ensure compliance with state law, rules, regulations and standards.

D. It shall be unlawful for any individual, contractor, company, or other entity to obtain or issue a building permit or an occupancy permit prior to a privy permit or a privy permit exemption being properly obtained as set forth herein.

V. APPLICATION; FEES:

A. Application for the use of a privy permit shall be made upon a form available from the Township and/or a form designated by the applicable State agency and shall be accompanied by the required fees, as set forth below, and as designated by resolution or ordinance of the Supervisors of the Township.

B. The following fees shall be required and paid to the Township or the Township's agent in connection with the application for a privy permit and the use of a privy for permanent habitation:

1. Application fee: Every permit application shall be accompanied by a minimum one-time permit application fee of One Hundred Twenty-Five Dollars (\$125.00), which amount may be amended by resolution of the Supervisors of the Township.
2. Authority sewage disposal fee: In the event that a privy permit holder disposes of their sewage at the Authority's sewage processing facility, a fee in an amount to be determined shall be charged to cover the costs of the Authority to reserve capacity, pump, transport, treat and dispose of sewage from a privy at the Sewage Facility owned and operated by the Authority at least one (1) time per year. In the event that the privy must be pumped more than one (1) time per year for any reason, the costs of additional pumping and inspections shall be paid for by the Owner or Person.
3. Alternative sewage disposal fee: For an Owner or Person that is subject to Section I. B. 1. (use of privy based upon sincerely held religious belief), they may utilize a sewage disposal company or operator of their own choice other than the Township or Authority to pump, transport, treat and dispose of the sewage from the privy, paid for by the Owner or Person, provided that the Owner or Person complies with Section III.H.
4. Inspection Fee: A fee in an amount to be determined shall be charged to the Owner or Person on which a privy is installed or used to verify the proper and correct installation, implementation and use of the privy in compliance with applicable state laws, regulations, and standards, and as a condition for obtaining a privy permit.
5. Failure to pay the fees as required herein will constitute the automatic revocation of the privy permit.

VI. PLAN:

The permit application shall require submission of a plan setting forth the proposed construction and design of the privy. Specifications required to be set forth in said plan shall be issued by the Township's Sewage Enforcement Officer or by another individual designated by the Township. Failure to construct in accordance with any plan approved by the Township or its agent

shall be deemed a violation of this Ordinance. A plan is not required for an existing privy; however, if the privy becomes non-operational and/or does not pass the inspection identified in Section IV. C. or does not meet the standards of Section VII, thereby requiring a new privy or reconstruction of the existing privy, a plan is required.

VII. PRIVY STANDARDS:

At a minimum, any privy located within the Township shall be constructed and maintained so as to be in compliance with applicable state laws, regulations and standards, and any Act 537 Plan Amendments/Updates and/or Component 2 Sewage Planning Module, including, but not limited to, the following:

A. The privy shall be located so as to minimize any danger of contamination of water supplies. Unless exemption shall be granted by the Supervisors, in writing, the privy shall be down grade and at least fifty (50) feet from any source of water supply.

B. The privy shall be located at least fifty (50) feet away from any building served.

C. The privy shall be located at least fifty (50) feet from any structure owned by any individual other than the user/applicant, which other structure is used seasonally or on a full-time basis for human occupation unless said individual shall, in writing, consent to the placement closer than said distance.

D. The privy shall be located at least ten (10) feet away from any boundary line unless the owner of the adjacent property shall consent, in writing, to the placement closer than said distance.

E. Privies installed in accordance with Section VIII. C. below, may consist of or utilize portable retention tanks and/or retention tanks which are located above ground. In all other instances, the retention tank shall meet state requirements and shall be installed below ground level.

F. The provisions and standards of this Section may be waived by resolution of the Supervisors, which waiver will be considered on a case-by-case basis but will not be granted if in violation of any federal or state law or regulation involving privies.

VIII. LIMITATIONS UPON USE OF PRIVY:

Except for privies approved under Section I.B.1. above (use of privy based upon sincerely held religious belief), privies may be installed only upon the following additional conditions:

A. The applicable official Township plan or the revision thereto indicates the use of privies for the lot at issue and further that said premises have been tested for and meet the requirements for the ultimate sewage disposal by one of the systems described in Title 25, Chapter 73 of the Pennsylvania Code (relating to construction of absorption areas); or

B. When the privy will be installed upon an isolated lot which is one (1) acre or larger and which lot is not served by water under pressure (including pressure by gravity); or

C. When the privy or privies will be installed for a period of less than one hundred twenty (120) days when a use is proposed at construction sites or at the site of public gatherings and entertainments; or

D. When a privy will be installed or utilized on property to service a structure intended only for Periodic Habitation.

E. In all events, privies may not be utilized or constructed upon premises served by water under pressure or upon premises for which piped waste water collection services are available. This subparagraph E may be waived by resolution of the Supervisors of the Township when the privy is to be permitted for temporary installation in accordance with subparagraph C, above, or if an exemption is granted pursuant to Section 1. B., above.

IX. REMOVAL OF PRIVY:

The Owner of any premises upon which there is erected or installed a privy or any Person occupying premises upon which there is erected or installed a privy shall comply with the

following conditions upon said premises becoming served with water under pressure or upon piped wastewater collection becoming available to said premises, unless an exemption is granted pursuant to Section 1. B., above:

A. Within sixty (60) days of said event, remove all contents from the privy and discontinue use of the same; and

B. Within one hundred twenty (120) days of said event, unearth, disconnect and remove all plumbing and piping attached to said privy and remove, fill or otherwise render said privy unusable for the purpose of the storage or sewage.

X. DUTIES OF OWNER AND PERSON:

Owners of property upon which there is installed a privy and any Person occupying a property upon which there is installed a privy shall:

A. Permit the Township or the Township's Sewage Enforcement Officer to inspect a privy to ensure the proper operation, maintenance, and content disposal once every three (3) years or as necessary to ensure compliance with state law, rules, regulations and standards. Application for a privy permit shall be deemed consent by the Owner and all subsequent Owners of said privy and any Person occupying the premises for the Township, its agents or employees to enter upon the premises upon which the privy is located and to make all necessary inspections thereof.

B. Maintain and operate the privy in conformance with this and all other Ordinances and Resolutions of the Township and the provisions of any applicable law, rule or regulation of the Commonwealth of Pennsylvania, its subdivisions and administrative agencies.

C. Provide for sewage disposal from the privy as set forth in Section V. B. 2 and 3.

D. Maintain copies of all pumping and sewage disposal receipts and records for a period of five (5) years for all times that the Owner or Person has the privy pumped other than when the Township pumps the privy.

E. Not permit the discharge of sewage onto the surface, into the ground, or into the water of the Commonwealth of Pennsylvania.

Sections IV, V, VI, VIII and X, A, C and D, of this Ordinance, do not apply to properties in the Township used for periodic habitation, as defined herein.

XI. CHARGES:

The Owner shall pay to the Township all amounts which shall be assessed or charged to the Owner as set forth herein and, also, those costs incurred by the Township in association with the enforcement of this Ordinance. It is intended that said charges incurred by the Township will include, but not necessarily be limited to, the hourly or other fees as charged by the Township's Sewage Enforcement Officer for inspection or other tasks necessary for the maintenance of the privy pursuant to this Ordinance. In addition, the Township shall have the right and power to fix, alter, charge and collect rates, assessments and other charges as it shall, from time to time, adopt by Resolution or Ordinance or as the same may be required within thirty (30) days of the mailing of said charges to the Owner or the posting of notice of said charges upon the premises which the privy is located and may be collected from one or more or all of the Owners of said premises. Any charges imposed hereunder may also be charged and collected as municipal liens in accordance with law.

XII. NOTICE TO SUBSEQUENT PURCHASERS OR TENANTS:

When any property which is served by a privy is granted, sold, conveyed, leased, subleased, or otherwise assigned or transferred to another person or party, any privy permit issued under the provisions of this Ordinance shall automatically become null and void, or alternatively at the discretion of the Township, shall require an inspection and the issuance of a new permit in accordance with this Ordinance prior to the sale, conveyance, lease, assignment or transfer of the property. In addition, any Person or Owner of premises upon which there is installed a privy who intends to grant, sell, convey, lease, sublease, or otherwise assign or transfer an interest in the

premises to another party shall be required to provide the other party thirty (30) days' advance notice, in writing, of the fact that the premises is served by a privy.

XIII. PENALTY:

In addition to any penalty hereinabove prescribed, any Owner or Person violating any provision of this Ordinance shall, upon conviction by action brought before a District Justice in the same manner provided for the enforcement of summary offense under the Pennsylvania Rules of Criminal Procedure, be subject to the following criminal penalties:

- A. For the first offense, be required to pay a fine of not less than \$500.00 and not more than \$1,000.00.

- B. For the second and each subsequent offense, be required to pay a fine of \$1,000.00 and to undergo imprisonment for a period of not less than thirty (30) days nor more than ninety (90) days.

Whenever such Owner or Person shall have been notified in writing by the Township or its agent that such Owner or Person is violating this Ordinance, each full week that said violation continues after receipt of said notification shall constitute a separate offense.

XIV. ABATEMENT OF NUISANCE:

In addition to any other remedy provided in this Ordinance or available under law, any violation of this Ordinance shall be reviewed by the Supervisors of the Township and, if said review shall warrant, be deemed a nuisance to be abated by the Township by either seeking mitigation of the nuisance or appropriate equitable or legal relief from a Court of competent jurisdiction. The Township may assess to the Owner or Person any and all charges or other costs incurred in the abatement of said nuisance in accordance with Section XI hereof.

XV. APPLICABILITY:

All privies in service on the effective date of this Ordinance, as well as all privies installed after the effective date of this Ordinance, shall be subject to the provisions contained herein.

XVI. REPEAL:

Ordinance Numbers 93-10-1, 12-11-06, 16-12-06 and 17-07-05.1 and all Ordinances or Resolutions or part of Ordinances or Resolutions, insofar as they are inconsistent herewith, be and they are hereby repealed.

XVII. SEVERABILITY:

If any sentence, clause, section or part of this Ordinance is for any reason found to be unconstitutional, illegal or invalid, it is hereby declared as the intent of the Board of Supervisors of the Township, that this Ordinance would have been adopted had such unconstitutional, illegal or invalid sentence, clause, section or part thereof not been included therein.

XVIII. EFFECTIVE DATE:

This Ordinance shall become effective immediately.

IN WITNESS WHEREOF, the Supervisors of Sugar Grove Township have caused this Ordinance to be adopted this _____ day of _____, 2025.

ATTEST: (corporate seal)

SUGAR GROVE TOWNSHIP

Secretary

APPENDIX B

SUGAR GROVE TOWNSHIP
REQUEST FOR EXEMPTION FROM PRIVY ORDINANCE

The Sugar Grove Township Amended Sewage Privy Ordinance, No. _____, authorizes an exemption* from the prohibition of privies when they are used to accomplish sewage disposal pursuant to a property owner’s sincerely held religious beliefs.

As owner of the identified property, the undersigned verifies that they and/or the persons residing upon the property have a sincerely held religious belief that would be substantially burdened by not permitting the use of a privy, and thereby requests an exemption from the Amended Privy Ordinance as provided in section I.B.3 thereof.

Name(s) _____

Address of property _____

City _____ State ____ Zip _____

Telephone number _____

Date _____

This request and verification is made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Signature of Owner

Acknowledgment of Receipt of Exemption Request:

Sugar Grove Township

Date

*This exemption is not available to properties that are already connected the Sugar Grove Area Sewage Authority’s Municipal Sewage System.

APPENDIX C

SUGAR GROVE TOWNSHIP
APPLICATION FOR ALTERNATIVE SEWAGE FACILITY PERMITS*

Effective _____, 2025

1. Property Owner Information:

Name(s) _____

Address _____

City _____ State ____ Zip _____

Telephone numbers _____

Email address _____

2. Site for Alternative Sewage Facility Systems (one permit per residence required)

Property Address _____

Type of property (check one)

_____ Single family residential

_____ Multi family residential

_____ Other (specify)

Number of residences on property _____

Number of bedrooms in each residence (sewage facilities' size is based on number of bedrooms) _____

3. Current Methods of Sewage Disposal (check which apply)

_____ Connection to Sugar Grove Area Sewer Authority

_____ Privy, tank and/or other method of disposal of sewage

If other than privy or tank, specify _____

Size (gallons) of privy, tank or other _____

Date (estimated) privy, tank or other installed _____

Date (estimated) most recent inspection _____

4. Proposed Alternative Sewage Facility

_____ Privy

State the tank size (in gallons): _____

_____ Septic or holding tank

State the tank size (in gallons): _____

_____ Sand mound

State the sand mound size or area: _____

_____ Other (specify) _____

5. Verification of Requirements for Alternative Sewage Facility Permits

Applicant hereby acknowledges and agrees to the following terms and conditions to obtain and use an alternative sewage facility for disposal of sewage:

_____ Payment of fee for application for permit(s) (due with this application)

_____ Submit written request for an exemption from the Sugar Grove Township Sewage Connection Ordinance and/or Amended Privy Ordinance

_____ Cooperate in the evaluation, testing, design, implementation, maintenance, inspection, and monitoring of an alternative sewage facility

_____ Implement a suitable alternative sewage facility within one (1) year of the date of this application with submission of a plan for the facility

_____ Initial inspection by Sewage Enforcement Officer to verify that the sewage facility is suitable for use and compliant with state and federal law

_____ Inspection of sewage facility three years after initial permit is issued and every three years thereafter or sooner as required

_____ Payment of Sewage Enforcement Officer's customary fee for inspections

_____ Pumping/removal of contents of privy or other sewage facility every one to two years, or sooner if needed, with written verification per Amended Privy Ordinance

_____ Payment of fee for sewage disposal per Amended Privy Ordinance if disposal occurs at Sugar Grove Area Sewer Authority/Township facility

_____ Completion of any required Department of Environmental Protection Application for On-Lot Sewage System

_____ Payment of any required Department of Environmental Protection fee(s)

Permits will be issued upon submission of a completed, signed application and payment of the application fee(s). Permits may be revoked if any of the above requirements are not complied with or are breached.

Name of Applicant

Date

Name of Applicant

Date

This request and verification is made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Signature of Applicant

Signature of Applicant

Acknowledgment of Receipt of Application and Payment of Fee:

Sugar Grove Township Representative

Date

*The use of any alternative sewage facility (as defined by the Pennsylvania Sewage Facilities Act) in Sugar Grove Township is an exemption from the current Act 537 Plan on file with the Pennsylvania Department of Environmental Protection and the Sewage Facilities Act and regulations thereof. This exemption is not available to properties that are already connected to the Sugar Grove Area Sewage Authority's Municipal Sewage System.

APPENDIX D

SUGAR GROVE TOWNSHIP
REQUEST FOR EXEMPTION FROM SEWAGE CONNECTION ORDINANCE

Sugar Grove Township may exempt* a property owner from mandatory connection to the Sugar Grove Area Sewage Authority’s Municipal Sewage System when connection would substantially burden the property owner’s sincerely held religious beliefs.

As owner of the identified property, the undersigned verifies that they and/or the persons residing upon the property have a sincerely held religious belief that would be substantially burdened by requiring that structures on the property be connected to the Municipal Sewage System, and thereby requests an exemption from mandatory connection.

Name(s) _____

Address of property _____

City _____ State ____ Zip _____

Telephone number _____

Date _____

This request and verification is made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Signature of Owner

Acknowledgment of Receipt of Exemption Request:

Sugar Grove Township

Date

*This exemption is available to property owners with sincerely held religious beliefs against connection to the Municipal Sewage System whose property abuts the Municipal Sewage System as of [date of Consent Order entry] or whose property abuts any future extensions of the Municipal Sewage System if the property owner owned the property before the extension. Connection exemptions are transferrable to anyone who purchases, inherits, or otherwise obtains ownership of a connection-exempt property, so long as the new property owner has a sincerely held religious belief against connection to the Municipal Sewage System. This exemption does not apply to properties that are already connected to the Municipal Sewage System.

APPENDIX E**OUTSTANDING LIENS AGAINST OLD ORDER AMISH PROPERTIES FOR
SEWAGE CONNECTION ORDINANCE NONCOMPLIANCE**

Lien - Old Order Amish Trust/Entity	Old Order Amish Owner/Property Address
0556-Yoder Family Trust 2	c/o Joseph Yoder 738 Caitlin Hill Road
0643-Dapple Grey Trust	c/o Aden Yoder 7277 Page Hollow Road
0644-Willow Creek Trust	c/o Melvin Yoder 7352 Page Hollow Road
0645-Stoney Lane Trust	c/o Emanuel Yoder 6564 Page Hollow Road
0697-Rolling Acres Trust	c/o Samuel and Lovina Byler 1295 Rounds Hill Road
0721-Hill Top Trust	c/o Atlee Yoder 1471 Wilson Road
0722-Hill Top Trust	c/o Atlee Yoder 1471 Wilson Road
0724-Maple Grove Trust	c/o Iva Shetler 1638 Wilson Road
0725-Maple Grove Trust	c/o Iva Shetler 1638 Wilson Road
0755-Briar Patch Trust	c/o Andy and Lizzie Byler 1370 Rounds Hill Road
0756-Shady Lane Trust	c/o John and Ada Detweiler 1511 Eccles Road

0757-Shady Lane Trust	c/o John and Ada Detweiler 1511 Eccles Road
0759-Rocky Lane Trust	c/o Joe and Lizzie Byler 3156 Rounds Hill Road
0760-Scenic View Trust	c/o Samuel and Lovina Byler 1295 Rounds Hill Road
0761-Small Farm Trust	c/o Abe Byler 1216 Rounds Hill Road
0723-Little Ash Trust	c/o Iva Byler 1050 Wilson Road
Old Order Amish Church schoolhouse (parcel YV-003-5284)	c/o Raymond Miller 1295 Rounds Hill Road

APPENDIX F

NOTICE OF CONSENT ORDER BETWEEN THE UNITED STATES AND SUGAR GROVE TOWNSHIP, PA AND SUGAR GROVE AREA SEWAGE AUTHORITY

Consistent with the United States Constitution and the Religious Land Use and Institutionalized Persons Act of 2000 (“RLUIPA”), Sugar Grove Township and the Sugar Grove Area Sewage Authority do not apply the Township’s land use regulations in a manner that: (1) imposes a substantial burden on the free exercise of religion, unless it is in furtherance of a compelling governmental interest and imposed in the least restrictive means; (2) treats religious assemblies or institutions on less than equal terms with nonreligious assemblies or institutions; (3) discriminates against any religious assembly or institution on the basis of religion or religious denomination; or (4) totally excludes or unreasonably limits religious assemblies, institutions or structures.

On _____, 2025, the Federal District Court for the Western District of Pennsylvania entered a Consent Order resolving a lawsuit between the United States and Sugar Grove Township, Pennsylvania and the Sugar Grove Area Sewage Authority, under the Religious Land Use and Institutionalized Persons Act of 2000 (“RLUIPA”), for the Township’s enforcement of its Sewage Connection and Privy Ordinances against members of the Old Order Amish community despite their inability to comply due to their sincerely held religious beliefs. A copy of the Consent Order referenced above in United States v. Sugar Grove Township, et al., _____, is available on the Township’s website at _____ or the Department of Justice’s website at _____.

RLUIPA prohibits governments from applying land use laws in a way that discriminates against religious uses of land, imposes unjustifiable substantial burdens on religious exercise, treats religious assemblies or institutions on less than equal terms with nonreligious assemblies or institutions, or totally or unreasonably excludes religious institutions. Additional details about RLUIPA are available on the United States Department of Justice’s RLUIPA information page, available at <https://www.justice.gov/crt/religious-land-use-and-institutionalized-persons-act>.

If you believe that Sugar Grove Township, Sugar Grove Area Sewage Authority, or any other land use or zoning body of Sugar Grove Township, or any other local government or municipality, has violated your rights under RLUIPA, please contact the U.S. Attorney’s Office for the Western District of Pennsylvania at (412) 644-3500 or the United States Department of Justice, Civil Rights Division, at (202) 514-4713. You may also register a complaint via email to rluipa.complaints@usdoj.gov, or by writing to either of the following addresses:

United States Attorney’s Office
Civil Division
Western District of Pennsylvania
700 Grant Street, Suite 4000
Pittsburgh, PA 15219

United States Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
4 Constitution Square
150 M Street NE
Washington, DC 20530

APPENDIX G

**COMPLAINT AGAINST SUGAR GROVE TOWNSHIP AND/OR SUGAR GROVE
AREA SEWAGE AUTHORITY**

Name: _____

Address: _____

Telephone: _____

1. Please state briefly the nature of the service or request that you made of Sugar Grove Township and/or the Sugar Grove Area Sewage Authority. In addition, please include a description of the religious land use and the assembly or institution at issue in your request:

2. Please state briefly in what way(s) you believe that Sugar Grove Township, Sugar Grove Area Sewage Authority, or any other land use or zoning body of the Township may have violated your rights in the exercise of your religion under the United States Constitution, federal law (including the Religious Land Use and Institutionalized Persons Act), the Pennsylvania Constitution, Pennsylvania law, or the Township's Codes or Ordinances through the implementation of its zoning or land use laws:

3. If you believe that Sugar Grove Township, Sugar Grove Area Sewage Authority, or any other land use or zoning body of the Township, or any other local government or municipality, has discriminated against you in the exercise of your religion through the implementation of its zoning or land use laws, in addition to completing this complaint form, please contact the U.S. Attorney's Office for the Western District of Pennsylvania at (412) 644-3500 or the United States Department of Justice Civil Rights Division at: (202) 514-4713. You may also register a complaint via email to rluipa.complaints@usdoj.gov or by writing to either of the following addresses:

United States Attorney's Office
Civil Division
Western District of Pennsylvania
700 Grant Street, Suite 400
Pittsburgh, PA 15219

United States Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
4 Constitution Square
150 M Street NE
Washington, DC 20530

APPENDIX H

CERTIFICATION OF RLUIPA TRAINING AND RECEIPT OF CONSENT ORDER

I, _____, certify that I have received a copy of the Consent Order resolving United States v. Sugar Grove Township, et al., Case No. _____, filed by the United States in the United States District Court for the Western District of Pennsylvania.

I further certify that on _____ I attended a training on the Religious Land Use and Institutionalized Persons Act of 2000 (“RLUIPA”) and the Consent Order, that I read and understand the Consent Order, that all my questions concerning RLUIPA and the Consent Order were answered, and that I understand that any violation of the Consent Order or RLUIPA may result in a court action against the Township or Sugar Grove Area Sewage Authority.

(Signature)

(Print name and title)

(Date)