IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

APOLLOS PROPERTIES, LLC, *et al.*,

Plaintiffs,

v.

LELAND TOWNSHIP, MICHIGAN, *et al.*,

Defendants.

Judge Paul L. Maloney

No. 26-cv-2307

DECLARATION OF JAMES H. VANSTEENHOUSE
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

Based upon my personal knowledge, I state and affirm that the following is true and correct to the best of my knowledge and belief, and I affirm this subject to the penalty of perjury.

A. The primary reason my wife and I bought the North Lake Street property was to provide a building where high school students could assemble for Christian prayer, fellowship, and Bible study.

1. My wife, Elizabeth R. VanSteenhouse, and I reside in Leland Township in Leelanau County, Michigan.

2. My wife and I have two children, one who currently attends and one who formerly attended Leland Public School. Our daughter graduated from Leland Public School in 2025, and our son is a senior at Leland Public School.

3. Elizabeth and I are both followers of Jesus Christ. We believe the Bible is the Word of God and the foundation for how we are called to live our lives. Our religious beliefs are deeply and sincerely held.

4. Our faith calls us to share the Gospel with those who do not know Jesus. See Mark 16:15, "And he said unto them, Go ye into all the world, and preach the gospel to every creature." (KJV). See also Matthew 28:18-20 and Acts 1:8.

5. We are also called to support those who proclaim the Gospel and engage in Christian ministry and outreach, including by providing financial support for their work. See I Corinthians 9:14, Galatians 6:6, Philippians 4:15-18, 3 John 5-9, and Matthew 10:40-42, among other passages.

6. Christians are instructed to assemble, pray together, worship together, hear teaching together, share fellowship, and encourage one another. See Hebrews 10:24–25: "And let us consider one another to provoke unto love and to good works: Not forsaking the assembling of ourselves together, as the manner of some is; but exhorting one another." (KJV). The English Standard Version renders the key phrase: "not neglecting to meet together, as is the habit of some, but encouraging one another." Jesus taught, "For where two or three are gathered in my name, there am I among them." Matthew 18:20 (ESV).

7. Following Pentecost, Acts 2:42, 46-47 tells of the earliest Christians' practice of gathering for prayer and fellowship. "And they devoted themselves to the apostles' teaching and the fellowship, to the breaking of bread and the prayers." Acts 2:42 (ESV). "And day by day, attending the temple together and breaking bread *in their homes*, they received their food with glad and generous hearts, praising God." Acts 2:46-47a (ESV) (emphasis supplied).

8. Thus, as followers of Jesus Christ, we are called to Christian communal life: teaching, fellowship, prayer, and Bible study. Assembling with other believers and

welcoming others who may not know Jesus is an integral part of our Christian faith. And, as the account in Acts describes, Christians assembled for this activity in private homes and on private property. See, for example, Acts 12:5-12, where Christians assembled at "the house of Mary, the mother of John whose other name was Mark, where many were gathered together and were praying." Acts 12:12 (ESV).

9. As residents of Leelanau County and parents of one current and one former Leland Public School student, Elizabeth and I believe God has particularly called us to support Christian ministry among the young people of our community.

10. In Matthew 19:13-15 (with parallel accounts in Mark 10:13-16 and Luke 18:15-17), Jesus directed his followers to "let the little children come to me and do not hinder them, for to such belongs the kingdom of heaven."

11. As followers of Jesus, these teachings are fundamental, sincerely held tenets of our faith.

12. In furtherance of our calling to proclaim the Gospel, Elizabeth and I took an active role in bringing Youth for Christ's ministry to Leelanau County. We helped recruit Micah and Kya Cramer to serve as Campus Life ministers with Youth for Christ. We worked with Micah and Kya to establish the Youth for Christ Club as a safe and welcoming place where local young people could gather, build meaningful relationships, and hear the Gospel of Jesus Christ.

13. We purchased the North Lake Street property for the purpose of religious exercise and to provide a location where Youth for Christ Club could assemble for prayer, Bible study, and fellowship. We took title to the North Lake Street property in

Apollos Properties, LLC, a Michigan limited liability company we formed for this purpose.

14. Youth for Christ Club is not organized, sponsored, or directed by any particular church or Christian denomination. Rather, it is a ministry of Youth for Christ, an interdenominational parachurch organization. The Club serves and welcomes young people from a wide range of Christian traditions, including Roman Catholic, Methodist, Lutheran, Presbyterian, Baptist, and evangelical churches. Young people with no church or denominational affiliation are equally welcome. See Declaration of Micah Cramer.

15. Participation in Youth for Christ Club activities is entirely voluntary and open to all young people, regardless of their religious beliefs or church affiliation. Through the Club, participants may learn about the Christian faith and the teachings of Jesus Christ, and may fellowship with those who follow Him. As Micah Cramer puts it, "One doesn't need to believe to belong."

16. For the high school-aged students in Leelanau County to gather and participate in Youth for Christ Club activities, Elizabeth and I felt a suitable meeting place was necessary. We invested in this particular building because we believed it was special. It is centrally located in the heart of Leland, in a safe and well-known area familiar to local youth and families. We believed that establishing and celebrating youth ministry in one of the community's most cherished locations presented an extraordinary opportunity. We wanted to do something especially meaningful for the young people of Leelanau County - something that could serve them and future generations.

17. We considered other locations but there was no available property comparable to the North Lake Street property.

18. The central location of the North Lake Street property was important for practical reasons. The building needed to be readily accessible to local young people before and after school and during the summer before or after work at local businesses in the Leland Harbor area. See Amended Complaint, ECF 12, para. 165-173, and 184-187, and para. 205-213.

19. Land in the agricultural and residential zoning districts is not comparable in terms of accessibility, location, and access. Meeting at a barn or building in a cherry orchard or a private residence is not comparable to the North Lake Street property.

20. Elizabeth and I established Apollos Properties, LLC as a Michigan limited liability company to acquire, hold title to, and manage property in Leelanau County including the North Lake Street property.

21. In July 2024, Elizabeth and I learned that the Leland Harbor Shops property on North Lake Street in the Village of Leland was available for purchase. The property was then owned by Pete and Lisa Miller and their family. I understood that Pete and Lisa Miller supported youth ministry and were willing to sell the property knowing that we intended to use a portion of the property as a gathering place for Youth for Christ Club. From our conversations with Pete Miller, we understood he viewed the proposed Youth for Christ use favorably.

22. Pete Miller is an attorney familiar with real-estate and local zoning matters. Although he did not represent Apollos, and we did not treat his views as legal advice

or a guarantee of zoning approval, his favorable reaction and familiarity with local zoning gave us additional confidence in moving forward with the purchase.

23. Elizabeth and I anticipated continuing to lease portions of the property to retail businesses, but intended to reserve a substantial portion of the building for Youth for Christ Club. We intended that space to provide young people, particularly high school students, a place to gather for prayer, Bible study, fellowship, and other youth ministry activities.

24. Prior to closing on the purchase of the North Lake Street property, Elizabeth and I asked our attorney, Robert Parker of Parker Harvey, to thoroughly review the purchase documents, applicable zoning regulations, and permissible uses of the property to determine whether a portion of it could be used for Youth for Christ Club. As part of that review, Robert had several discussions with the late Timothy Cypher, then the Leland Township Zoning Administrator. Following that review, Elizabeth and I understood that the proposed use might not require a Special Use Permit and that, even if one were required, obtaining it was expected to be a routine and ministerial process. See Declaration of Robert Parker and the supporting Exhibits and Verified Complaint.

25. The North Lake Street building is ideally suited for Youth for Christ Club. The North Lake Street property is only several blocks from Leland Public School, and the surrounding streets are promptly cleared of snow.

26. The building required no construction or renovation for Club meetings and activities, and its large windows overlooking Leland Harbor make it an attractive and welcoming setting for young people. The building was physically ready for

immediate use by students. Elizabeth and I identified no other available property for sale in Leland offering a comparable combination of central location, accessibility, readiness, safety, and character.

27. Based on the due diligence described above, we understood that Apollos could lease a portion of the property to Youth for Christ Club as a "club" where young people, particularly high school students, could gather for prayer, Bible study, fellowship, and other ministry activities. That understanding was the sole reason Apollos decided to close on the purchase of the North Lake Street property on February 28, 2025.

B. Youth for Christ Club's use of the North Lake Street property for prayer, Bible study, and ministry activities.

28. In the spring of 2025, after Apollos purchased the North Lake Street property, students began gathering there for Youth for Christ Club activities, including prayer, Bible study, and fellowship.

29. During the summer of 2025, Youth for Christ Club wanted to raise funds for its ministry by selling hot dogs, soft drinks, popcorn, and candy. We learned that a food license was required to do so. Youth for Christ Club therefore applied and paid a fee for a temporary food license. The Benzie-Leelanau District Health Department approved the application and issued the temporary license. After receiving the license, we sold those items as a ministry fundraiser. See Declaration of Micah Cramer.

30. After the summer fundraising activities ended, the Club moved its activities back inside and outside the building. The temporary food license had expired, and the Club was no longer selling food or beverages. The Club provided participants with

coffee and hot chocolate made in a Keurig and pastries and doughnuts purchased from local businesses. The pastries and doughnuts were not prepared on the property.

31. I later learned that a complaint had been made to Leland Township concerning the Club's provision of coffee and hot chocolate from the Keurig and the pastries and doughnuts purchased from local businesses. In response, Nick Dow of the Benzie-Leelanau District Health Department advised Micah Cramer that the Club needed a food-service license to continue selling or providing food and beverages.

32. During a phone call with Nick Dow of the Health Department, Micah was told that he needed a license to continue providing food and drinks for the Youth for Christ Club programs. Nick told Micah that he (Nick Dow) did not want that to be a hindrance and would like to meet in the next few weeks to get the ministry a proper license. Micah agreed to meet with Nick Dow; however, the meeting never happened and that license was never issued because the Township told Youth for Christ Club that the Club could no longer assemble at the property.

33. Youth for Christ Club participants continued to meet at the North Lake Street property through October 2025. At that time, all meetings ceased in response to the Township directive described below.

C. Leland Township's prohibition on Youth for Christ Club meetings at the North Lake Street property without a Special Use Permit.

34. In October, Leland Township Zoning Administrator, Tim Cypher, told Robert Parker that Youth for Christ Club could not continue meeting at the North Lake Street property unless and until Apollos obtained a Special Use Permit. See Declaration of Robert Parker and supporting exhibits.

35. To comply with the Township's directive, I asked our attorney, Robert Parker, to prepare and submit a Special Use Permit application on behalf of Apollos. Robert submitted the application to Leland Township on October 17, 2025, and I paid the required application fee.

36. Based on Robert Parker's review and discussions with Zoning Administrator Tim Cypher, I understood that the proposed Youth for Christ use qualified as a "club", an allowable use in the C-1 zoning district upon issuance of a Special Use Permit. I therefore expected a routine and straightforward application process and believed the permit likely would be granted following the required public hearing.

37. While the application remained pending, Youth for Christ Club could not meet at the North Lake Street property for prayer, Bible study, fellowship, or other ministry activities. The space remained ready for immediate use throughout that period.

38. Since October 2025, the Township's prohibition has prevented Elizabeth and me from using the North Lake Street property to support the youth ministry we believe God has called us to support, and has prevented local young people from gathering there for prayer, Bible study, fellowship, and other ministry activities. Throughout this period, Apollos has continued to pay for routine cleaning services and utilities each month so that the space remains ready for immediate use if Youth for Christ Club is permitted to resume meeting there.

39. Beginning in November 2025, the Planning Commission scheduled a series of meetings and public hearings to consider Apollos's Special Use Permit application. Some were canceled or rescheduled because of weather, while others were moved to larger venues to accommodate public attendance.

40. On April 15, 2026, the Planning Commission voted four-to-one to deny Apollos's Special Use Permit application for Youth for Christ Club. On May 6, 2026, the Commission adopted amended and corrected Findings and Conclusions that again denied the application for a Special Use Permit.

41. Additional details concerning the hearings, denial, and amended Findings and Conclusions are set forth in the Verified Corrected First Amended Complaint and accompanying exhibits.

42. Following the Planning Commission's April 15, 2026, denial, Apollos paid a $300 fee and filed a notice of appeal with the Leland Township Zoning Board of Appeals on April 23, 2026. After the Planning Commission adopted amended Findings and Conclusions on May 6, 2026, Apollos paid a second $300 fee and filed a second notice of appeal on May 15, 2026. Apollos requested that the two appeals be consolidated.

43. The Township also required Apollos to pay $8,000 to pursue the appeal of the Planning Commission's denial of the Special Use Permit application. As of the date of this declaration, the appeals remain unresolved.

44. The Township Clerk, Lisa Brookfield, recently advised Robert Parker that the Township was using this $8,000 to pay the Township's attorney, Lauren Teichner, to represent Leland Township in the Township's opposition to the appeal of the Planning Commission's denial of the Special Use Permit application. See **Exhibit 1**

45. The Leland Township Zoning Board of Appeals has not yet met to consider either appeal. I understand that the ZBA had scheduled a hearing, but that hearing has been rescheduled until October or November.

46. I understand that, on several occasions by telephone and email, Robert Parker asked Township officials and attorneys whether Youth for Christ Club could resume meeting at the North Lake Street property while the appeals were pending without the Township taking enforcement action under the Township's Zoning Ordinance.

47. To my knowledge, the Township has not provided the assurance Robert requested, and neither the Township's new Zoning Administrator nor the Township's legal counsel has confirmed that the Township would refrain from taking enforcement action if Youth for Christ Club resumed meeting at the North Lake Street property while the appeals remain pending.

48. Accordingly, Youth for Christ Club has complied with the Township's directive. Since October 2025, Youth for Christ Club has not met at the North Lake Street property, and local young people have been unable to gather there for prayer, Bible study, fellowship, or other ministry activities.

49. I understand that Leland Township's General Code Penalty Ordinance (Ordinance No. 2016-02) provides that a misdemeanor violation may be punished by a fine of up to $500, costs of prosecution, imprisonment for up to 93 days, or both. Each day a violation continues constitutes a separate offense. I understand that, under the Township's position, these penalties could apply if Youth for Christ Club resumed meeting at the North Lake Street property.

50. The possibility that Apollos could be fined and that individuals gathering at the property could be fined or imprisoned is a serious threat. Because of that threat, we have continued to comply with the Township's directive, and Youth for Christ Club and local young people have been deterred from resuming meetings at the property.

51. The costs of complying with Leland Township's land use requirements for the North Lake Street property, including legal fees, permit fees paid to the Township, and the fees for the appeal of the Planning Commission's decision to the Zoning Board of Appeals, have exceeded $100,000 so far.

AFFIRMATION

I, James H. VanSteenhouse, affirm under penalty of perjury, that the foregoing statements are true and correct to the best of my knowledge and belief.



JAMES H. VANSTEENHOUSE