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 MICAH CRAMER
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

I, Micah Cramer, declare as follows:

1. I am over eighteen years of age and competent to testify concerning the matters stated in this Declaration. I make this Declaration based upon my personal knowledge. The following statements are true and correct to the best of my knowledge and belief.

2. I am the Campus Life Director for Youth for Christ.

3. My wife Kya is the Ministry Site Leader and Administrative Coordinator for Youth for Christ, and we serve together in this ministry to high school students in Leelanau County, Michigan.

4. Kya and I were called to this ministry because of our deeply held belief and conviction that, as Jesus told his followers, in Mark 16:15, "Go into all the world and proclaim the gospel to the whole creation." And in Matthew 28:19–20, "Go therefore and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, teaching them to observe all that I have commanded you." And in Acts 1:8, "You will be my witnesses in Jerusalem and in all Judea and Samaria, and to the end of the earth."

5. Youth for Christ is an evangelical Christian ministry devoted to sharing the Gospel of Jesus Christ with young people and providing opportunities for young people to gather in Christian fellowship.

6. My work with Youth for Christ includes creating faith-based programs that nurture high school students in their physical, emotional, social, and spiritual well-being through sharing the love of Jesus Christ; developing local leaders who help pour into the youth and regularly gather for prayer; and connecting with local churches to help meet the spiritual needs of families.

7. Kya and I are trained in abuse prevention, mandatory reporting, and navigating difficult conversations with youth and their families.

8. Prayer, studying the Bible, Christian fellowship, discussing the Christian faith, and proclaiming the Gospel are central parts of Youth for Christ's ministry and my own exercise of my Christian faith.

9. Youth for Christ Club has ministered to high school students in the Leland and Leelanau County community through Bible studies, fellowship, and prayer meetings.

10. Youth for Christ Club is a voluntary assembly of students that desire to learn more about Jesus Christ and Christianity. Participation in Youth for Christ Club activities is not restricted to any particular denomination. Students participating in Youth for Christ Club activities are from many different church backgrounds including Presbyterian, Lutheran, Baptist, and Roman Catholic churches as well as some with no congregational affiliation.

11. Kya and I believed we needed a building where we could gather with students to carry out this ministry. In our view, the right location had to be in the central part of Leland, accessible to students and those wanting to participate in both summer and winter, and near the

Leland public school and local businesses so students could meet before and after school and, during the summer, before and after their jobs.

12. The building at North Lake Street is the perfect location for this ministry. The property is convenient and accessible even during the winter and meets all of the criteria for an ideal location to assemble. The property also has large windows facing out to the sidewalk and neighboring properties and businesses.

13. In response to the need for Youth for Christ Club to find a location to meet, James and Elizabeth VanSteenhouse purchased property on North Lake Street for Youth for Christ Club to use for its ministry activities.

14. The private property is located on North Lake Street in Leland, Michigan (the "North Lake Street property") as a place where high school students could gather for Youth for Christ Club activities.

15. The North Lake Street property provided Youth for Christ Club with a location where high school students could voluntarily gather for prayer, Bible study, Christian fellowship, and discussion of their faith.

16. Youth for Christ Club and high school students did, in fact, gather at the North Lake Street property for prayer, Bible study, fellowship, and other Youth for Christ Club activities.

17. The Youth for Christ Club gatherings at the North Lake Street property were peaceful.

18. The North Lake Street property does not require any alteration or expansion of the existing building, and the Youth for Christ Club gatherings do not create any health, safety, traffic, fire-code, or infrastructure issues.

19. Kya and I attend and lead these gatherings. Kya and I have prayed with students, studied and discussed the Bible with them, and spoken with them about the Christian faith and values at the North Lake Street property.

20. In October 2025, I was informed by Jim VanSteenhouse that Youth for Christ Club could not continue meeting at the North Lake Street property without obtaining a Special Use Permit from the Township.

21. Jim VanSteenhouse communicated this to me by phone call, after he had been informed by the Township. Jim told me that we were no longer able to use the property to preach the Gospel and build biblical community without first obtaining a Special Use Permit.

22. I understood the Township's direction to mean that Youth for Christ Club and the students could not continue gathering at the North Lake Street property for prayer, Bible study, and Christian fellowship unless and until the Township granted permission for those religious gatherings.

23. I also understood that using the property in violation of the Township's prohibition could subject persons violating the Township's ordinance to civil and/or criminal penalties.

24. Because of the Township's prohibition and threatened enforcement, Youth for Christ Club completely stopped its meetings at the North Lake Street property and has not used the property since October 2025.

25. Youth for Christ Club and Apollos Properties submitted an application for a Special Use Permit on October 17, 2025, seeking permission for Youth for Christ Club to use the North Lake Street property.

26. I attended and spoke at the proceedings before the Leland Township Planning Commission concerning Youth for Christ Club's application.

27. The Planning Commission denied the Special Use Permit application twice.

28. It is my understanding that the Commission denied the application because it determined that Youth for Christ Club was a "Church or Religious Institution," rather than a secular "club," and therefore could not use the North Lake Street property for these gatherings.

29. As a result, Youth for Christ Club remains unable to use the North Lake Street property for the prayer, Bible study, Christian fellowship, and religious activities for which the VanSteenhouse family made the property available.

30. The Township's prohibition directly interferes with my religious exercise and Youth for Christ's ministry. The very activities the Township has prohibited—gathering with young people to pray, study Scripture, discuss the Christian faith, and proclaim the Gospel—are themselves exercises of our Christian faith.

31. The inability to conduct these gatherings cannot be remedied by money. Every meeting that does not occur at this property is a lost opportunity for the ministry I am called to and the students to engage in prayer, Bible study, and fellowship in the building that we feel the Lord has blessed us with.

32. Students have told me they want to continue meeting for prayer, Bible study, and fellowship at the North Lake Street property.

33. I personally desire and intend to continue meeting with students at the North Lake Street property for prayer, Bible study, Christian fellowship, and Youth for Christ ministry.

34. But for Leland Township's prohibition and the threat of enforcement and penalties, Youth for Christ and I would be conducting these religious gatherings at the North Lake Street property now.

35. If this Court enters a preliminary injunction preventing Leland Township from enforcing its prohibition against these gatherings, Youth for Christ and I intend to resume Youth for Christ meetings at the North Lake Street property.

36. Unless the Court grants preliminary injunctive relief, Youth for Christ, the students who wish to participate, and I will continue to be denied the opportunity to assemble at this private property for prayer, Bible study, Christian fellowship, and the exercise of our faith while this litigation proceeds.

37. I respectfully ask the Court to enter a preliminary injunction permitting Youth for Christ and those participating in its ministry to resume their religious gatherings at the North Lake Street property without threat of enforcement or punishment by Leland Township.

AFFIRMATION

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

MICAH CRAMER