



June 30, 2026

Aditi Shah
Staff Attorney
American Civil Liberties Union Foundation
of the District of Columbia
529 14th Street NW Ste 722
Washington, DC 20045
By email: ashah@acludc.org

Dear Ms. Shah:

I have reviewed your Pre-Suit Settlement Demand Letter on behalf of your client Dr. Sohayla Horani. You write that when Dr. Horani transferred her driver license from Oregon, she was forced to show her hair, in violation of her religious beliefs, in order to obtain a District of Columbia license. In order to resolve the matter without Dr. Horani filing suit for a violation of the Religious Freedom Restoration Act of 1993 ("RFRA"), you propose that Dr Horani be issued a replacement license without her hair showing; that all copies, both electronic and paper, of the license issued on March 25, 2026 be destroyed; and DMV provide additional training on the issuance of credentials that do not violated the RFRA, including forcing individuals to show their hair when it violates an individual's religious belief.

Thank you for bringing this matter to the agency's attention. The DC Department of Motor Vehicles ("DC DMV") never wants a customer to feel as if their rights have been violated and want to work with Dr. Horani to provide her with a credential that she can use. DC DMV would like to schedule an appointment at her convenience for her to return to a DMV Service Center to obtain a duplicate credential free of charge that does not show her hair or hairline. Additionally, once the new photograph has been taken, DC DMV will ensure that all digital and paper copies of the previously issued license are destroyed.

DC DMV takes this matter seriously and will require additional training on the issuance of credentials without violating an individual's religious beliefs.

Please have Dr. Horani contact my Executive Assistant, Jeanette Pinnix on 202-729-7005 or by email, jeanette.pinnix@dc.gov, to schedule the appointment for the issuance of the new credential. Please note that due to the upcoming Independence Day Holiday, DC DMV will be closed on July 3rd and 4th.

Sincerely,

Gabriel Robinson
Director

Cc: Brian L. Schwalb
Attorney General