

Re: Request for Religious Accommodation Under Title VII of The Civil Rights Act of 1964

Dear

I am requesting accommodation for employer mandated covid-19 “vaccines” based on my sincerely held religious beliefs pursuant to Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000e et seq.).

My Christian world view requires me to make well informed decisions to protect and care for my mental health, spiritual health, and physical health. This requires that I utilize the intellect God has given me to do research, acquire knowledge, utilize a cost-benefit analysis and pray for wisdom in making virtually every decision in life. God is not obliged to catch me if I jump off a cliff. I am expected to use the scriptures, intellect, factual inquiry, well established science, wisdom, and prayer to make all of the decisions in my life based on my Christian world view. This necessarily includes decisions about putting drugs into my otherwise healthy body, especially when it is not necessary or prudent considering the totality of the circumstances.

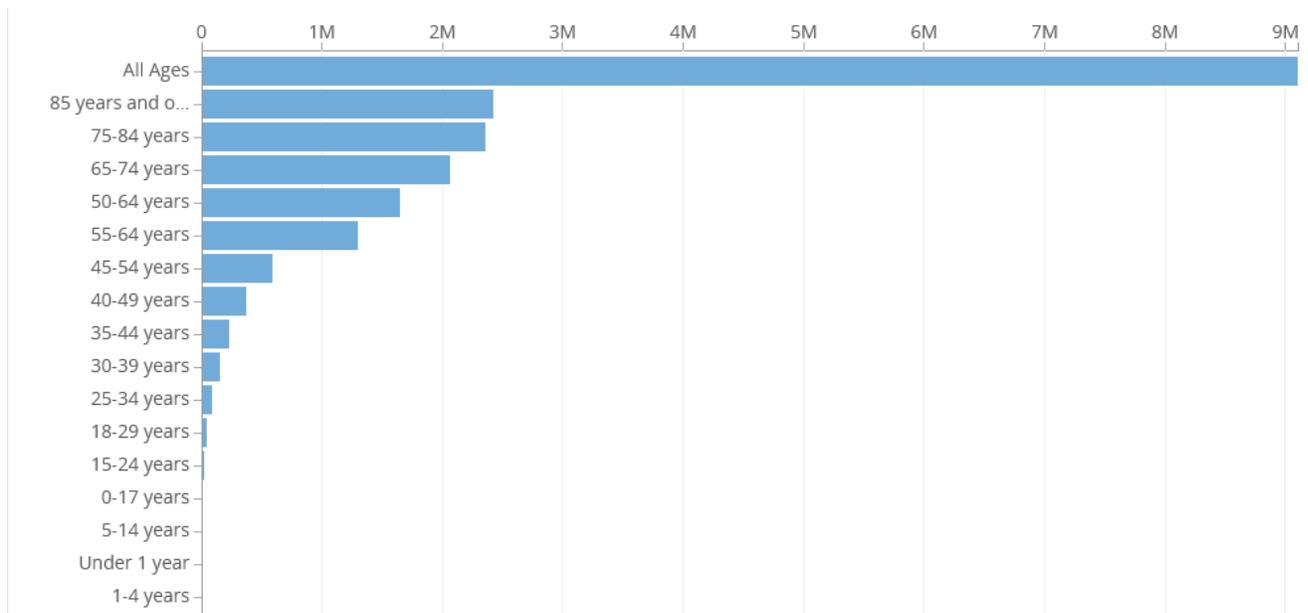
In my religion, nobody can ever force me to put anything into my body without my consent. I believe the same is true for everyone in the United States under the Constitution and federal law, whether they are religious or not. My objection is religious in nature. If I knowingly put something into my body that I have reason to believe is potentially harmful with no compelling reason to do so, then it is a sin because I have knowingly done what is wrong in violation of my conscience.¹ My scriptural and religious obligation to follow my conscience in regard to covid-19 mandated drugs is based upon many factors, including, but not limited to, the following:

- Medical facts, expert opinions, and well established science, much of which has been censored, hidden, banned or rewritten, which means there is a deliberate intent to hide information and misinform.
- The truthfulness and reliability of those enticing and coercing people to inject covid-19 drugs into their healthy bodies (Pharmaceutical companies, the CDC, FDA, and many health care professionals) has been proven to be lacking by way of numerous, blatant, and purposeful misrepresentations.
- Pharmaceutical companies are completely immune from liability for harm or death caused by “vaccination.” History has documented well that profits come before safety where there is no liability, extraordinary monetary gain, and lack of ethics for the sake of ethics alone.
- The CDC redefined “vaccination” in Sept. 2021 from:
 “The act of introducing a vaccine into the body to produce immunity to a specific disease”
 to
 “The act of introducing a vaccine into the body to produce protection to a specific disease.”
 Instead of requiring covid-19 drugs to produce *immunity* the CDC changed the definition of “vaccine” to accommodate covid-19 drugs which do not produce immunity to covid-19.
- Covid-19 drugs also do not provide protection which is why millions of fully vaccinated people have contracted covid-19 and spread it to others. Drug manufacturers initially

¹ James 4:17 “So whoever knows the right thing to do and fails to do it, for him it is sin.” (one of numerous scriptures confirming the same)

claimed a 93% efficacy rate, then admitted “breakthrough” cases, then were forced to admit covid-19 drugs fail within 4-6 months requiring countless boosters continuing indefinitely.

- There is no “informed consent” regarding the expected adverse effects which are now well known and often serious, causing irreparable harm and death. The list is long.
- The MRC-5, HEK-293 and PER.C6 are synthetic human cells used in the covid-19 drugs. These man-made synthetic human cells were made from a diploid cell culture line composed of fibroblasts, originally developed from the lung tissue of a 14-week-old aborted Caucasian male fetus. It is a sin and a direct violation of my sincerely held religious beliefs to usurp God’s creative authority by making a synthetic human cell from a dead baby’s lung tissue and then injecting it into my body, no matter how many times removed and even if the synthetic cell was made by other means.
- The overall survival rate for covid-19 in the U.S. is 99.8% according to John Hopkins University.² A death rate of <1% is clearly not an emergency, let alone good cause to inject my healthy body with any drug as this would violate my sincerely held religious beliefs.
- The CDC has confirmed that 80% of covid-19 related deaths are over the age of 70 and those in that group had an average of 2.6 other serious medical conditions. Only 6% of those deaths occurred in persons without known serious problems. The average age of death of a COVID-19 patient exceeds the average national life expectancy. Thus, most of the reported COVID-19 deaths died with COVID-19 not from it.³



In summary, taking cells from a dead baby to make a synthetic human cell in a lab which is then injected into my body with mRNA instructions to create covid-19 spike proteins which do not provide immunity or protection against covid-19 (a virus with an overall survival rate of 99.8%) is not only insane, it is reckless, dangerous, morally and ethically objectionable, and a clear violation of my sincerely held religious beliefs.

Please note that an employer is prohibited from making its own determination of whether a religious belief is right or wrong, rational or irrational, or supported or unsupported by some recognized religious

² <https://coronavirus.jhu.edu/map.html>

³ <https://thecovidbusters.com/2021/04/24/10-medical-facts-regarding-covid-19-experimental-vaccines/>

authority, church, or denomination. An employer may not question the sincerity of the religious belief nor attempt to illicit answers to predatory and unlawful questions about a religious belief by asking for declarations from religious leaders, questions about where I attend religious services, how often, how long one has held a particular religious belief, etc. whether by way of Title VII submission forms or by way of subsequent questionnaires. I decline to participate in this unlawful and predatory process and instead have stated clearly herein my Title VII request for accommodation, fully satisfying federal law.

Title VII of the Civil Rights Act of 1964 (hereinafter “Title VII”). 42 U.S.C. §§ 2000e et seq.

Title VII has extremely wide jurisdiction. It applies to the federal government, as well as state and local governments. *Id.* at §§ 2000e-16, 2000e(a)-(b). In addition, it also applies to private employers. *Id.* at § 2000e(b). In fact, it defines an employer as “a person engaged in an industry affecting commerce who has fifteen or more employees...” *Id.* This applies to both public and private employers. Employees do not forfeit their constitutional rights upon entering the public workplace. *Perry v. Sindermann*, 408 U.S. 593, 597 (1972).³⁹

In addition to government workplaces, private workplaces are also constrained by federal law. The law prohibiting religious discrimination in the workplace has been codified under Title VII of the Civil Rights Act of 1964 (hereinafter “Title VII”). 42 U.S.C. §§ 2000e et seq. Title VII makes it unlawful for an employer:

- (1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, *religion*, sex, or national origin; or
- (2) to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, *religion*, sex or national origin. *Id.* at § 2000e-2 (emphasis added).

Prima Facie Case for a Title VII A Title VII Request for Accommodation may be asserted when the employee is being forced to comply with a mandate that violates the employee’s sincerely held religious beliefs, and failure to comply will result in discrimination which includes demotion, layoff, transfer, failure to promote, discharge, harassment, intimidation, or the threat of these adverse employment actions. See Gregory Sarno, *Harassment or Termination of Employee Due to Religious Beliefs or Practices*, 35 Am. Jur. P.O.F. 2d 209, 222 (1983); *EEOC v. Townley Eng’g and Mfg.*, 859 F.2d 610, 614 n.5 (9th Cir. 1988), cert. den., 489 U.S. 1077 (1989).

Once the employee establishes a prima facie case by asserting a request for religious accommodation to the employer, the burden of proof shifts to the employer. To avoid liability, the employer must then show that the employee's religious beliefs cannot be accommodated without causing an undue burden to the employer. *Heller v. EBB Auto Co.*, 8 F.3d 1433, 1440 (9th Cir. 1993); *Protos*, 797 F.2d at 134; *Turpen v. Missouri-Kansas-Texas R. Co.* 736 F.2d 1022, 1026 (5th Cir. 1984).

“When making the request, employees do not need to use any “magic words,” such as “religious accommodation” or “Title VII.” However, they need to notify the employer that there is a conflict between their sincerely held religious beliefs and the employer’s COVID-19 vaccination requirement.” EEOC Guidelines for Title VII and Religious Objections to covid-19 vaccine mandates.

Religion is broadly defined under Title VII as including "all aspects of religious observance and practice, as well as belief." 42 U.S.C. §2000e(j). The courts and the EEOC have interpreted this provision very liberally. See Donald T. Kramer, Annotation, Valieti64, Construction, and Application of

Provisions of Title VII of the Civil Rights Act of 1964 (42 USCA gg 2000e, et seq.), and Implementing Regulations, Making Religious Discrimination in Employment Unlawful, 22 A.L.R. Fed. 580 5 4 (1975).

Religious practices include “moral or ethical beliefs as to what is right and wrong which are sincerely held with the strength of traditional views. The fact that no religious group espouses such beliefs or the fact that the religious group to which the individual professes to belong may not accept such belief will not determine whether the belief is a religious belief of the employee.” Guidelines On Discrimination Because of Religion, 29 C.F.R. § 1605.1. Emphasis added

The Supreme Court has held that Title VII prohibits employers from discriminating on the basis of religion "regardless of whether the discrimination is directed against a majority religion or a minority religion. Trans World Airlines, Inc. v. Hardison, 432 U.S. 63, 71-72 (1977).

Employer neutrality toward an employee's religious beliefs is not enough. Riley v. Bendix Corp., 464 F.2d 1113, 1115 (5th Cir. 1972); Reid v. Memphis Publg Co., 468 F.2d 346, 350-51 (6th Cir. 1972).

The employee's religious belief does not need to coincide with the tenets of his church: "Title VII protects more than the observance of Sabbath or practices specifically mandated by an employee's religion." Heller, 8 F.3d at 1438; see also id. at 1438-39 (summarizing authorities); Redmond v. GAF Corp., 574 F.2d 897, 900-01 (7th Cir. 1978) ("**We conclude that conduct which is "religiously motivated," i.e., "all forms and aspects of religion, however eccentric" is protected.**"); 22 A.L.R. Fed. 580 § 4.

The employer may not question the sincerity of the request.

The employer cannot delve into an inquiry to make its own determination of whether the employee's religious beliefs are right or wrong, rational or irrational, or supported or unsupported by some recognized religious authority, church, or denomination. If the employer is aware of objective facts that call into question the sincerity of the request, it may . Employer may not engage in a witch hunt or fishing expedition to illicit such information from the employee without first having objective facts to support a limited inquiry. Otherwise, the employer must provide reasonable accommodation.

If the employee risks termination because of his religious beliefs, then his sincerity is virtually unquestionable. As one court observed, sincerity of religious belief can scarcely be doubted when the [p]etitioner is willing to jeopardize [his] job in support of that belief." McGinnis v. U.S. Postal Sen., 512 F. Supp. 517, 520 (N.D. Cal. 1980).

With regard to sincerity, a plaintiff is *not* held "to a standard of conduct which would have discounted his beliefs based on the slightest perceived flaw in the consistency of his religious practice." EEOC v. Univ. of Detroit, 701 F. Supp. 1326, 1331 (E.D. Mich. 1988), rev'd on other grounds 904 F.2d 331 (6th Cir. 1990). See also EEOC v. Ilona of Hungary, Inc., 108 F.3d 1569, 1575 (7th Cir.1997) (request of vacation to observe Yom Kippur by Jewish employee was sincere, even though she had not asked for vacation in the previous eight years).

An employer should not assume that an employee is insincere simply because some of the employee's practices deviate from the commonly followed tenets of the employee's religion, or because the employee adheres to some common practices but not others. No one factor or consideration is determinative." EEOC Guidelines for Title VII and Religious Objections to covid-19 vaccine mandates. Emphasis added

The fact that a religious belief was only recently acquired does not render it insincere. See Cooper v. Oak Rubber Co., 15 F.3d 1375, 1378-79 (6th Cir. 1994) (working on the Sabbath for seven months after her baptism did not establish her faith was insincere as it was growing during this time).

The right of conscience for government employees to refuse injection of drugs into one's body is also protected by the Nuremberg Code, the U.S. Constitution, the Religious Freedom Restoration Act (RFRA) and State Constitutions.

Dated

Employee Signature

NOTICE TO EMPLOYER - PLEASE RESPOND TO ALL OF THE FOLLOWING QUESTIONS

Please read and respond to the following questions as they relate to the covid-19 mandate as a condition to maintain employment. Your signature below will acknowledge and affirm the accuracy of the information provided below.

1. If I agree to receive an EUA Covid-19 injection, does my employee health insurance plan provide complete coverage should I experience an adverse event, or even death?
2. As an employee, does my **life insurance policy** provide any coverage in the event that I die from receiving an EUA Covid-19 injection?
3. As an employee, will you be providing **Workers' Compensation on, disability insurance, or other resources** if I have an adverse event to an EUA Covid-19 injection and am unable to come to work for days, weeks, or months, or if I am disabled for life?
4. **The Food and Drug Administration on (FDA) requires that EUA vaccine recipients be provided with certain vaccine-specific information on to help them make an informed decision about vaccination.**⁴ The EUA fact sheets that must be provided are specific to each authorized Covid-19 injection and are developed by the manufacturers of the injections (Pfizer/BioNTech, Moderna, Oxford/AstraZeneca, and the Johnson & Johnson subsidiary Janssen). The fact sheets must provide the most current and up-to-date information on the injections and vaccine recipients must also receive information on about adverse events. Have you read, understood, and provided me (and all other employees) with these fact sheets and with current information on adverse events so that I/we can make an educated decision?
5. **Have you reviewed the available databases of material adverse events reported to date for people who have received Covid-19 injections?**⁵ Potential and reported adverse events include death, anaphylaxis, neurological disorders, autoimmune disorders, other long-term chronic diseases, blindness and deafness, infertility, fetal damage, miscarriage, and stillbirth.

⁴ Centers for Disease Control and Prevention. COVID-19 Vaccine Emergency Use Authorization (EUA) Fact Sheets for Recipients and Caregivers. <https://www.cdc.gov/vaccines/covid-19/eua/index.html>.

⁵ UK Medical Freedom Alliance. COVID-19 Vaccine Info. <https://www.ukmedfreedom.org/resources/covid-19-vaccine-info>; Vaccine Adverse Event Reporting System. <https://vaers.hhs.gov>; CDC WONDER. About the Vaccine Adverse Event Reporting System (VAERS). <https://wonder.cdc.gov/vaers.html>; National Vaccine Information Center. Search the U.S. Government's VAERS Data. <https://www.medalerts.org/>.

6. The FDA’s guidance⁶ on emergency use authorization of medical products requires the FDA to “ensure that recipients are informed to the extent practicable given the applicable circumstances **“[t]hat they have the op on to accept or refuse the EUA product....”** Are you aware of this statement? Have you informed all employees that they have the op on to refuse?
7. With respect to the emergency use of an unapproved product, the Federal Food, Drug and Cosmetic Act, Title 21 U.S.C. 360bbb-3(e)(1)(A)(ii)(I-III)⁷ reiterates that individuals be informed of **“the option to accept or refuse administration of the product, [and] of the consequences, if any, of refusing administration of the product, and of the alternatives to the product that are available and of their benefits and risks.”** If EUA Covid-19 investigational vaccines are ever approved by the FDA, state legislation would be required to allow companies to mandate the Covid-19 injections. Are you aware of these facts?
8. EUA products are unapproved, unlicensed, and experimental. Under the Nuremberg Code—the foundation of ethical medicine—no one may be coerced to participate in a medical experiment. The individual’s consent is absolutely essential. No court has ever upheld a mandate for an EUA vaccine. In *Doe #1 v. Rumsfeld*⁸ a federal court held that the U.S. military could not mandate **EUA vaccines for soldiers: “...[T]he United States cannot demand that members of the armed forces also serve as guinea pigs for experimental drugs”** (Id. at 135). Are you aware of this?
9. The United States Code of Federal Regulations⁹ and the FDA require the informed consent of human subjects for medical research. The EUA Covid-19 injections are unapproved, unlicensed, investigational vaccines that are still in their experimental stage. It is unlawful to conduct medical research on a human being, even in the event of an emergency, unless steps are taken to secure the informed consent of all participants. Are you aware of this?
10. According to Federal Trade Commission (FTC) Guidelines¹⁰ and the FTC’s “Truth In Advertising,”¹¹ promotional material—and especially material involving health-related products—cannot mislead consumers, omit important information, or express claims. All of this falls under the rubric of “deceptive advertising” (whereby a company is providing or **endorsing a product**), whether presented in the form of an ad, on a website, through email, on a poster, or in the mail. For example, statements such as “all employees are required to get the Covid-19 vaccine to make the workspace safe” or “it’s safe and effective” leave out critical information. Critical information includes the facts that Covid-19 injections are unapproved EUA vaccines that “may” or “may not” prevent Covid, won’t necessarily make the workspace safer, and could in fact cause harm. Not providing links or attachments of the manufacturers’ fact sheets and current information on adverse events is omitting safety information. Are you aware of this?
11. Since the Covid lockdowns began over one year ago, there have been over 178 reported breaches of unsecured protected health information (PHI), incidents investigated by the Office for Civil Rights (OCR). These breaches exposed millions of people’s personal health information. Although many of these incidents were attributed to hacking, some of the breaches to PHI fell directly under the 1996 Health Insurance Portability and Accountability Act (HIPAA), such as sharing a parent’s or person’s information with an unauthorized individual or incorrectly handling PHI.¹² **Can you please explain**

⁶ U.S. Department of Health and Human Services. Emergency Use Authorization of Medical Products and Related Authorities: Guidance for Industry and Other Stakeholders. January 2017. <https://www.fda.gov/media/97321/download>

⁷ 21 U.S. Code § 360bbb-3 – Authorization for medical products for use in emergencies. <https://www.law.cornell.edu/uscode/text/21/360bbb-3>

⁸ Doe #1 v. Rumsfeld, 297 F. Supp. 2d 119 (2003). <https://www.courtlistener.com/opinion/2326816/doe-v-rumsfeld/>

⁹ https://www.govregs.com/regulations/expand/ title21_chapterI_part50_subpartB_section50.24#regulation_2

¹⁰ Federal Trade Commission. Advertising FAQ’s: A Guide for Small Business. <https://www.ftc.gov/tips-advice/business-center/guidance/advertising-faqs-guide-small-business>.

¹¹ Federal Trade Commission. Truth in Advertising. <https://www.Yc.gov/news-events/media-resources/truth-advertising>

¹² U.S. Department of Health and Human Services. Office for Civil Rights. Breach Portal: Notice to the Secretary of HHS Breach of

your obligations to me, under HIPAA law, and how you are going to protect my personal information both with respect to your requirement that I receive this injection?

- 12. Whereas pharmaceutical companies that manufacture EUA vaccines have been protected from liability related to injuries or deaths caused by experimental agents since the PREP Act was enacted in 2005, **companies and all other institutions or individuals who mandate experimental vaccines on any human being are not protected from liability.** Are you aware that you do not enjoy such liability protection?
- 13. Are you aware that employees could file a **civil lawsuit** against you should they suffer an adverse event, death, or termination from their place of employment?

As the legally authorized representative for employer _____, I have read all of the above information, have provided my employees with all of the information that the FDA requires be provided to recipients of the Covid-19 injections, and do hereby agree to assume 100% financial responsibility for covering any and all expenses from adverse events, including death, through insurance coverage or directly. In addition, I affirm that the employee will not be subjected to the loss of their job should they decline to receive a Covid-19 injection.

Dated

Authorized Representative for Employer