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10
 11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 **RICHARD BOWIE**, an individual
 14 Plaintiff,

15 v.

16 **KAISER FOUNDATION HEALTH**
 17 **PLAN, INC.**
 18 Defendant.

Case No.:

COMPLAINT FOR:

1. **Violation of the Civil Rights Act of 1964, Religious Discrimination-Disparate Treatment**
2. **Violation of the Civil Rights Act of 1964, Religious Discrimination-Failure to Accommodate**
3. **Violation of the Civil Rights Act of 1964, Retaliation**
4. **California’s Fair Employment and Housing Act, Discrimination and Retaliation**
5. **California’s Fair Employment and Housing Act, Failure to Accommodate**

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 24 **INTRODUCTION**

25 1. This is an action for unlawful discrimination and retaliation against
 26 Plaintiff Richard Bowie in violation of Title VII of the Civil Rights Act of 1964 and
 27 California’s Fair Employment and Housing Act.

28 2. Defendant Kaiser Foundation Health Plan, Inc. failed to make any

1 reasonable attempts to accommodate Mr. Bowie’s religion after he submitted a
2 written request for a religious accommodation to be exempted from Defendant’s
3 COVID-19 vaccine policy.

4 3. Defendant failed to explore any reasonable alternative means of
5 accommodating Mr. Bowie’s religious beliefs or observations.

6 4. Defendant failed to assert, nor can it now belatedly assert, “undue
7 hardship” as an excuse for its religious discrimination and its refusal to reasonably
8 accommodate Mr. Bowie.

9 5. Rather than respecting Mr. Bowie’s religious beliefs, Defendant
10 summarily denied his reasonable accommodation request, without providing any
11 explanation, reason, or excuse for its refusal to comply with state and federal law.

12 6. Defendant granted vaccine mandate exemptions to other employees,
13 accepting in lieu of vaccinations, alternative health and safety measures such as
14 remote work, masking, symptom screening, regular testing, and social distancing.

15 7. There is no reason why Defendant could not have also accommodated
16 Mr. Bowie by providing these same vaccine accommodation options to him.

17 8. As a result of Defendant’s disregard for the rule of law, Mr. Bowie was
18 mistreated and terminated from his position.

19 **PARTIES – PLAINTIFF**

20 9. Plaintiff RICHARD BOWIE resides in Montgomery County, Texas.

21 **PARTIES -DEFENDANT**

22 10. Defendant KAISER FOUNDATION HEALTH PLAN, INC., is a
23 California non-profit corporation duly registered to conduct business in the State of
24 California, maintains its principal place of business at One Kaiser Plaza STE 10L,
25 Oakland, California 94612 and is an employer as defined by the California
26 Government Code in that it employs more than (5) employees.

27 **JURISDICTION AND VENUE**

28 11. This civil rights action raises federal questions under federal law,

1 particularly 42 U.S.C. § 2000e.

2 12. This Court has subject matter jurisdiction over the federal claims
3 pursuant to 28 U.S.C. §§ 1331 and 1343.

4 13. This Court has supplemental jurisdiction over the state claim pursuant to
5 28 U.S.C. § 1367.

6 14. This Court has authority to grant the requested declaratory relief under
7 the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202, implemented through
8 Rule 57 of the Federal Rules of Civil Procedure.

9 15. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because a
10 substantial part of the events or omissions giving rise to Plaintiff's claims occurred in
11 this district.

12 STATEMENT OF FACTS

13 A. MR. BOWIE'S RELIGIOUS BELIEFS

14 16. At all times material to this Complaint, Plaintiff Richard Bowie was, and
15 continues to be a devout and practicing Christian. His Christian religious faith was,
16 and continues to be, a central part of his life and identity.

17 17. During the COVID-19 pandemic, his Christian faith did not weaken, but
18 his religious beliefs and practices became stronger.

19 18. In accordance with Mr. Bowie's religious beliefs, he believes that his
20 body is a temple of the Holy Spirit as referenced in 1 Corinthians 6:19-20, and that he
21 is commanded to take care of his body, not to defile his body, and not to introduce
22 something into it that could potentially harm his body.

23 19. As such, he takes great care to ensure that no unknown or untested
24 substances enter his body.

25 20. He also believes that what he puts into his body is a personal decision
26 driven by the convictions of the Holy Spirit and the Holy Bible.

27 B. MR. BOWIE'S EMPLOYMENT HISTORY

28 21. In or around August 2015, Mr. Bowie began working for Defendant as a

1 Senior Manager of Clinical Technology of Southern California.

2 22. In or around June 2017, Mr. Bowie was promoted to Executive Director
3 of Clinical Technology Service Delivery where he continued until Defendant
4 terminated his employment in January 2022.

5 23. In this position, Mr. Bowie managed a team of over 400 Kaiser
6 Permanente team members. Mr. Bowie's team was responsible for managing
7 maintenance on an inventory of approximately \$4 billion in assets which equated to
8 greater than \$160 million annual operating budget.

9 24. Mr. Bowie and his team were responsible for onboarding Kaiser
10 Permanente medical equipment, responding to requests for maintenance of medical
11 equipment, as well as scheduling planned equipment maintenance, managing
12 manufacturer recalls, and decommissioning of equipment at the end of its life cycle.
13 Mr. Bowie ensured that all responsibilities were covered by the appropriate team
14 members.

15 25. From approximately August 2017 to December 2018, Mr. Bowie
16 maintained a part-time residence near his office in Oakland, California in order to go
17 into the office in-person.

18 26. From January 2019 until his termination in January 2022, Mr. Bowie
19 worked remotely from his home in Murrieta, California with occasional travel to
20 meetings in administrative areas.

21 **C. DEFENDANT'S COVID-19 VACCINE POLICIES**

22 27. In or around August 2021, Defendant announced its COVID-19 vaccine
23 mandate policy, which required that employees obtain a COVID-19 vaccine or an
24 exemption to be completed by September 30, 2021.

25 28. Mr. Bowie has sincerely held religious beliefs that prevent him from
26 receiving the mandated COVID-19 vaccines.

27 29. Specifically, Mr. Bowie objected to receiving the COVID-19 vaccines
28 because he believes that his body is the temple of the Holy Spirit, and as such, he is

1 to care for his body, not to defile his body, and must not introduce something into it
2 that could potentially harm his body.

3 30. He also objected to receiving the COVID-19 vaccines because what he
4 puts into his body is a personal decision driven by the convictions of the Holy Spirit
5 and the Holy Bible. His religious beliefs prohibited him from receiving the COVID-
6 19 vaccines.

7 **D. DEFENDANT’S DENIAL OF MR. BOWIE’S REQUEST FOR A**
8 **RELIGIOUS ACCOMMODATION**

9 31. On August 19, 2021, Mr. Bowie submitted a written request for a
10 religious accommodation to be exempted from Defendant’s vaccine mandates. In his
11 written request, he explained his religious reasons for conscientiously objecting.

12 32. Mr. Bowie stated that he is a “Christian and a firm believer in the Bible.”
13 He reiterated that he believes his body is a temple of the Holy Spirit, referencing 1
14 Corinthians 6:19-20.

15 33. On September 28, 2021, Defendant provisionally approved Mr. Bowie’s
16 religious accommodation request.

17 34. On Friday, October 8, 2021, at 10:08 p.m., Defendant sent Mr. Bowie an
18 email to his work address requesting additional information regarding the sincerity of
19 his religious beliefs. Defendant gave Mr. Bowie three calendar days to respond to the
20 email.

21 35. On October 11, 2021, Mr. Bowie responded to the questions and again
22 referenced his religious belief that his body is a temple of the Holy Spirit and that
23 what he puts into his body is a decision governed by God.

24 36. Defendant did not receive any additional communication from
25 Defendant regarding his religious accommodation request or an invitation to enter
26 into an interactive process to determine reasonable accommodations.

27 37. On or about October 22, 2021, Defendant, without any notice to Mr.
28 Bowie, revoked Mr. Bowie’s access to company systems, including email and work

1 applications.

2 38. Mr. Bowie contacted his immediate supervisor, Andy Ulvenes, and
3 Human Resources Representative Redonha Means via text to inquire about why he
4 could not access his email or company systems.

5 39. Mr. Ulvenes told Mr. Bowie that this issue was a “total surprise” to him.

6 40. Ms. Means attempted to pull Mr. Bowie’s name up in the company
7 system to determine his status, but told Mr. Bowie that she could not see his name in
8 the company system. She told Mr. Bowie that she escalated the issue to her manager.

9 41. Mr. Bowie called the HelpDesk for further assistance, and was told that
10 his account had been placed on hold “due to the Covid stuff.”

11 42. On or about November 3, 2021, Ms. Means informed Mr. Bowie that his
12 access to his email and company systems had been reinstated.

13 43. From October 11, 2021 until November 4, 2021, Mr. Bowie did not
14 receive any communication from Defendant regarding his religious accommodation
15 request or any interactive process to determine reasonable accommodation.

16 44. On November 4, 2021, Defendant sent Mr. Bowie an email informing
17 him that it was denying his religious accommodation request and that he had five days
18 to comply with its COVID-19 vaccine mandate. If he failed to comply, he faced
19 termination of his employment. **EXHIBIT A.**

20 45. Defendant did not provide Mr. Bowie with any explanation for denying
21 his religious accommodation request other than that his request did “not meet the
22 standards necessary for granting an exemption from obtaining any COVID-19
23 vaccine.” *Id.*

24 46. Upon information and belief, Defendant did not have any objective
25 factual basis to question the validity, sincerity, or consistency of Mr. Bowie’s
26 religious beliefs or observance.

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1 **E. DEFENDANT’S TERMINATION OF MR. BOWIE’S**
2 **EMPLOYMENT**

3 47. At no time after receiving Mr. Bowie’s religious accommodation request
4 did Defendant acknowledge or address Mr. Bowie’s religious objections to the
5 COVID-19 vaccine.

6 48. At no time after receiving Mr. Bowie’s religious accommodation request
7 did Defendant make any attempt to engage in an interactive process with Mr. Bowie
8 to explore “any available reasonable alternative means of accommodating the
9 religious belief or observance” (Gov. Code § 12940, subd. (l)(1)).

10 49. At no time after receiving Mr. Bowie’s religious accommodation
11 requests did Defendants explain to Mr. Bowie that his religious accommodation
12 request would pose an undue hardship (i.e. significant difficulty or expense) for
13 Defendant.

14 50. The Defendant had the ability to accommodate Mr. Bowie. Defendant
15 safely accommodated approximately 2/3 of the 16,000+ religious accommodation
16 requests it received.

17 51. At no time after receiving Mr. Bowie’s religious accommodation
18 requests did Defendant explain to Mr. Bowie why his religious beliefs or practices
19 did not merit religious accommodation.

20 52. At no time during his employment with Defendant did Mr. Bowie refuse
21 to wear a mask at work, either generally or specifically, as an accommodation in lieu
22 of receiving the mandated COVID-19 vaccine.

23 53. Upon information and belief, Defendant was not aware of any lawful
24 reason why Mr. Bowie’s religious beliefs did not merit religious accommodation.

25 54. Other employees of Defendant received medical and religious
26 accommodations to the COVID-19 vaccine mandates and were not subject to the
27 discriminatory treatment that Mr. Bowie received of being terminated from their
28 positions.

1 55. Defendant would have suffered no undue hardship (significant burden or
2 expense) by granting Mr. Bowie a religious accommodation, as it did so for other
3 employees. Mr. Bowie could have worn a face covering to minimize and prevent
4 exposure to COVID-19, or been subject to symptom screening, regular testing and
5 other precautionary measures, which other exempted employees were allowed to do
6 even after the vaccine mandates were implemented.

7 56. Mr. Bowie even confirmed with Defendant that he would be willing to
8 wear a face covering or comply with any other safety requirements deemed necessary,
9 other than vaccination.

10 57. Additionally, Mr. Bowie's position did not require that he be onsite at
11 any Kaiser Permanente facility. He was able to fulfill his role and responsibilities
12 remotely.

13 58. Consistent with his sincerely held religious beliefs, Mr. Bowie did not
14 comply with Defendant's COVID-19 vaccine mandate.

15 59. After denying his religious accommodation request on November 4,
16 2021, on or about December 10, 2021, Defendant, without any notice to Mr. Bowie,
17 again revoked Mr. Bowie's access to his company emails and programs.

18 60. On or about January 10, 2022, Defendant terminated Mr. Bowie from his
19 position.

20 61. In his position as Defendant's Executive Director of Clinical Technology
21 Service Delivery, as of December 31, 2021, Mr. Bowie was on track to earn
22 approximately \$296,000 in salary and annual incentive pay. Mr. Bowie was also on
23 track to earn \$30,000 as part of Defendant's long-term incentive plan, which fully
24 vested December 31, 2021, and would have been paid out to Mr. Bowie on or about
25 April 2022.

26 62. On or about January 31, 2022, Memorial Hermann Health System hired
27 Mr. Bowie as a full-time employee, wherein Memorial Hermann Health System
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1 granted Mr. Bowie’s religious accommodation request from its COVID-19
2 vaccination policy.

3 **F. MR. BOWIE’S CHARGE OF RELIGIOUS DISCRIMINATION**
4 **WITH THE EEOC**

5 63. On January 11, 2022, Mr. Bowie filed a complaint of religious
6 discrimination with the Equal Employment Opportunity Commission (“EEOC”).

7 64. On October 6, 2023, the EEOC issued Mr. Bowie a “Notice Of Your
8 Right To Sue.” **EXHIBIT B.**

9 65. California’s Department of Fair Employment and Housing issued Mr.
10 Bowie a right-to-sue letter on January 11, 2022. **EXHIBIT C.**

11 **FIRST CAUSE OF ACTION**

12 **Violation of Title VII of the Civil Rights Act of 1964**

13 **(42 U.S.C. § 2000e, et seq.)**

14 **Religious Discrimination-Disparate Treatment**

15 66. Plaintiff re-alleges and incorporates by reference the allegations in the
16 preceding paragraphs 1 through 65, as if fully set forth herein.

17 67. Title VII of the Civil Rights Act of 1964 prohibits Defendant from
18 discriminating against its employees because of their sincerely held religious beliefs.
19 *See* 42 U.S.C. § 2000e-2(a).

20 68. Plaintiff was, at all times relevant herein, an employee and applicant
21 covered by 42 U.S.C. § 2000e, et seq., prohibiting discrimination based on religion.
22 Defendant was, at all times relevant herein, an employer for purposes of 42 U.S.C.
23 § 2000e, et seq.

24 69. Defendant’s decision to revoke Mr. Bowie’s access to his email and
25 company systems without notice after he submitted a valid religious accommodation
26 request constitutes discrimination and disparate treatment under Title VII of the
27 Civil Rights Act of 1964.

28 70. Defendant’s decision to reject Mr. Bowie’s accommodation request

1 while also granting the accommodation requests of other similarly situated
2 employees constitutes discrimination and disparate treatment under Title VII of the
3 Civil Rights Act of 1964.

4 71. Defendant's decision to terminate Mr. Bowie's employment for his
5 religious objections to its COVID-19 vaccine mandate while also accommodating
6 other similarly situated employees constitutes discrimination and disparate treatment
7 under Title VII of the Civil Rights Act of 1964.

8 72. Defendant also directly discriminated against Mr. Bowie on the basis
9 of his religion. Defendant questioned the sincerity of Mr. Bowie's religious beliefs
10 despite lacking an objective basis for questioning the sincerity of his religious
11 beliefs.

12 73. Defendant's conduct constitutes discrimination on the basis of religion
13 under 42 U.S.C. § 2000e-2.

14 74. As a direct and proximate result of Defendant's violation of Title VII,
15 Plaintiff has suffered, and will suffer harm in the loss of his employment and/or
16 employment benefits, entitling him to backpay, front pay, compensatory damages,
17 punitive damages, attorneys' fees, costs of suit, and a declaration that Defendant
18 violated his rights under Title VII.

19 **SECOND CAUSE OF ACTION**

20 **Violation of Title VII of the Civil Rights Act of 1964**

21 **(42 U.S.C. § 2000e, et seq.)**

22 **Religious Discrimination-Failure to Accommodate**

23 75. Plaintiff re-alleges and incorporates by reference the allegations in the
24 preceding paragraphs 1 through 74, as if fully set forth herein.

25 76. Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e(j), makes
26 it an unlawful employment practice to fail or refuse to accommodate the religious
27 beliefs and practices of an employee or prospective employee.

28 77. Employers are required to engage in a good faith interactive process

1 with the employee to determine whether they can be reasonably accommodated
2 without undue hardship.

3 78. Defendant failed to engage in any meaningful interactive process with
4 Mr. Bowie to determine if a reasonable accommodation was available.

5 79. There were several reasonable accommodations available that
6 Defendant offered other exempted employees and could have also offered Mr.
7 Bowie in lieu of vaccination, including, but not limited to symptom screening,
8 regular testing, and other precautionary measures such as wearing face coverings
9 and social distancing.

10 80. Mr. Bowie demonstrated the sincerity of his religious beliefs by
11 completing Defendant's follow-up form and reiterating his religious beliefs. He also
12 demonstrated the sincerity of his belief by suffering the loss of his job rather than
13 comprising his religious beliefs and getting vaccinated.

14 81. By failing and refusing to provide Mr. Bowie a religious
15 accommodation, Defendant discriminated against him, terminating him from his
16 position.

17 82. Mr. Bowie suffered significant damages because of Defendant's
18 unlawful discriminatory actions, including emotional distress, past and future lost
19 wages and benefits, and the costs of bringing this action.

20 83. As a direct and proximate result of Defendant's violation of Title VII,
21 Plaintiff has suffered, and will suffer harm in the loss of his employment and/or
22 employment benefits, entitling him to backpay, front pay, compensatory damages,
23 punitive damages, attorneys' fees, costs of suit, and a declaration that Defendant
24 violated his rights under Title VII.

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THIRD CAUSE OF ACTION

Violation of Title VII of the Civil Rights Act of 1964

(42 U.S.C. § 2000e, et seq.)

Retaliation

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5 84. Plaintiff re-alleges and incorporates by reference the allegations in the
6 preceding paragraphs 1 through 83, as if fully set forth herein.

7 85. Title VII of the Civil Rights Act of 1964, 42 U.S.C § 2000e-3(a) makes
8 it unlawful for an employer to retaliate against its employees because the person
9 “opposes any practice made an unlawful employment practice by [Title VII] or
10 because [the employee] has made a charge, testified, assisted, or participate in any
11 manner in an investigation, proceeding, or hearing under this subchapter.”

12 86. The EEOC takes “the position that requesting a religious
13 accommodation is a protected activity under the provision of Title VII.” U.S. Equal
14 Emp. Opportunity Comm’n, Section 12: Religious Discrimination, EEOC-
15 CVG2021-3, as reprinted in EEOC Compliance Manual on Religious
16 Discrimination (Jan. 15, 2021), [https://www.eeoc.gov/laws/guidance/section-12-
17 religious-discrimination#_ftn321](https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#_ftn321) (last visited December 8, 2023).

18 87. Mr. Bowie engaged in a protected activity by requesting religious
19 accommodation from Defendant’s vaccine mandate.

20 88. Defendant’s decision to revoke Mr. Bowie’s access to his email and
21 company systems without notice after he submitted a valid religious accommodation
22 request constitutes retaliation.

23 89. Further, Defendant subjected Mr. Bowie to an adverse employment
24 action in that it terminated his employment.

25 90. Defendant did not enter into an interactive process with Mr. Bowie
26 when he submitted a religious accommodation request. Defendant granted and
27 accommodated the medical and religious requests of other similarly situated
28 employees.

1 99. FEHA broadly defines religious creed to include all aspects of
2 observance and practice.

3 100. FEHA requires employers to reasonably accommodate an employee's
4 religious beliefs and practices.

5 101. Defendant discriminated and retaliated against Mr. Bowie by revoking
6 his access to his email and company systems without notice after he submitted a
7 valid religious accommodation request.

8 102. Defendant discriminated against Mr. Bowie by terminating his
9 employment.

10 103. Upon information and belief, Defendant accommodated the religious
11 and medical COVID-19 accommodation requests of other similarly situated
12 employees.

13 104. Defendant demonstrated discriminatory animus toward Plaintiff by
14 showing indifference toward his sincerely held religious beliefs and terminating his
15 employment.

16 **FIFTH CAUSE OF ACTION**

17 **Violation of California's Fair Employment and Housing Act**

18 **(Cal. Gov't Code § 12940)**

19 **Failure to Accommodate**

20 105. Plaintiff re-alleges and incorporates by reference the allegations in the
21 preceding paragraphs 1 through 104, as if fully set forth herein.

22 106. Under FEHA, it is unlawful for an employer to terminate a person's
23 employment because of a conflict between the person's religious beliefs or
24 observance and any employment requirement, unless the employer demonstrates that
25 it has explored all reasonable means of accommodation of the religious beliefs or
26 observance.

27 107. Plaintiff was, at all times relevant herein, an employee for purposes of
28 FEHA.

1 108. Defendant was, at all times relevant herein, an employer for purposes
2 of FEHA.

3 109. Mr. Bowie is a devout Christian and committed to living a life
4 consistent with the Holy Bible. His beliefs prohibit him from participating in actions
5 that may be harmful to his body. Mr. Bowie believes that the COVID-19 vaccine
6 could be harmful to his body.

7 110. Defendant failed to engage in any reasonable, interactive process with
8 Mr. Bowie regarding his religious objections to the COVID-19 vaccine mandate.
9 Indeed, Mr. Bowie specifically referenced his religious convictions concerning
10 injecting unknown substances into his body, but Defendant ignored his objections,
11 and continued to force its vaccine mandate on him.

12 111. Defendant failed to offer Mr. Bowie reasonable accommodations.
13 Defendant did not, and cannot, demonstrate that providing any accommodations
14 would impose an undue burden.

15 112. Defendant's refusal to accommodate, or even explore any
16 accommodation of Mr. Bowie's religious beliefs, was a substantial motivating factor
17 in Defendant's decision to terminate Mr. Bowie's employment.

18 113. As a direct and proximate result of Defendants' violation of FEHA,
19 Plaintiff has suffered loss of employment and employment benefits, entitling him to
20 declaratory relief and damages against Defendant.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, Plaintiff prays for relief against Defendant as follows:

- 23 1. Declare that Defendant has violated Title VII of the Civil Rights Act and
24 FEHA;
- 25 2. Compensatory and actual damages in an amount to be proven at the time
26 of trial;
- 27 3. Punitive damages;
- 28 4. Costs of suit incurred herein;

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- 5. Attorneys' fees;
- 6. Pre- and post-judgment interest at the prevailing statutory rates; and
- 7. For such other and further relief that the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Mr. Bowie hereby demands trial by jury.

DATED: December 18, 2023

ADVOCATES FOR FAITH & FREEDOM

By: *Julianne Fleischer*
Julianne Fleischer, Esq.
Attorneys for Plaintiff, Richard Bowie

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VERIFICATION

I am a party to this action. I am informed, believe, and on that ground allege that the matters stated in the foregoing **VERIFIED COMPLAINT FOR RELIGIOUS DISCRIMINATION-DISPARATE TREATMENT, RELIGIOUS DISCRIMINATION-FAILURE TO ACCOMMODATE, RETALIATION, DISCRIMINATION AND RETALIATION AND FAILURE TO ACCOMMODATE** are true. The matters stated in the foregoing document are true and based upon my own knowledge. I believe the matters based upon information and belief are also true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 19, 2023, at Murrieta, California.

Richard Bowie
Richard Bowie (Dec 19, 2023 01:03 CST)
Richard Bowie