

1 ADVOCATES FOR FAITH & FREEDOM
Robert H. Tyler (SBN 179572)
2 btyler@faith-freedom.com
25026 Las Brisas Road
3 Murrieta, California 92562
4 Telephone: (951) 304-7583

5 Attorneys for Plaintiffs

6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

9 SARAH PLATH, an individual;

10 **Plaintiff**

11 v.

12 KAISER PERMANENTE, a California
13 Registered Corporate Agent;

14 **Defendant(s)**

Case No.:

COMPLAINT FOR:

- 1) **TITLE VII: DISPARATE TREATMENT**
- 2) **TITLE VII: FAILURE TO ACCOMMODATE**
- 3) **TITLE VII: RETALIATION**
- 4) **FEHA: DISCRIMINATION AND RETLATION**
- 5) **FEHA: FAILURE TO ACCOMMODATE**

DEMAND FOR JURY TRIAL

18 **INTRODUCTION**

19 1. This is an action for unlawful discrimination, retaliation, and failure to explore the
20 availability of reasonable accommodations by Defendant Kaiser Permanente (Kaiser) against
21 Plaintiff Sarah Plath in Violation of Title VII of the Civil Rights Act of 1964 (Title VII) and
22 California’s Fair Employment and Housing Act (FEHA).

23 2. Specifically, Kaiser failed to make a reasonable attempt to accommodate Mrs.
24 Plath’s religious beliefs after she submitted a written request for a religious accommodation to
25 Kaiser’s mandatory Covid-19 vaccination policy.

26 3. Rather than respecting Mrs. Plath’s religious beliefs, Kaiser summarily denied her
27 religious accommodation request without providing any explanation or reason for doing so and
28 otherwise failed to comply with state and federal law.

1 14. Venue is proper in this Court under 28 U.S.C. section 1391(b)(2) because a
2 substantial part of the events or omissions giving rise to Mrs. Plath’s claims occurred in this District.

3 **STATEMENT OF FACTS**

4 **A. PLAINTIFFS’ BACKGROUND**

5 (i) Mrs. Plath’s Religious Beliefs as a Devout Christian

6 15. Mrs. Plath is, and was at all times material to this Complaint, a devout and practicing
7 Christian. Her religious faith was, and continues to be, the central part of her life and identity.

8 16. Mrs. Plath is guided by her religious beliefs and tries to live conscientiously
9 according to them.

10 17. As part of her faith, Mrs. Plath believes that abortion is a sin akin to murder. This
11 belief, like all her beliefs, is based on special revelation as laid forth in the Bible and personal
12 revelation through prayer and communion with God. *See e.g.* 1 Corinthians 6:15–20; John 14:13.

13 18. The Bible states that all life is precious and that the unwarranted taking of innocent
14 life is murder and, as such, a sin. And that human life is known and loved by God at conception.
15 Moreover, that life begins at conception and that abortion is wrong are both traditional Christian
16 beliefs that have long been established.

17 19. Another traditional Christian belief Mrs. Plath lives in accordance with is that her
18 body is the Temple of the Holy Spirit. *See e.g.* 1 Corinthians 6:15–20. As such, Mrs. Plath abstains
19 from introducing anything into her body that she determines could harm or defile it.

20 20. Mrs. Plath also believes that she must be guided by her conscience in her daily
21 Christian faith. Romans 14:23 states, “But whoever has doubts is condemned if they eat, because
22 their eating is not from faith; and everything that does not come from faith is sin.” Mrs. Plath
23 understands this passage, and it is traditionally understood, to mean that it is a sin to take an act that
24 one believes is wrong – even if the Bible does not explicitly forbid such an act. In essence, it is a sin
25 to live hypocritically, even if certain acts are not directly proscribed.

26 21. Mrs. Plath believes that the COVID-19 vaccines “utilize the aborted fetal cell lines
27 during” their production and testing and are therefore unethical and immoral to take. To voluntarily
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1 take them would make her complicit in the sinful act and, as such, violates her sincerely held
2 religious beliefs.

3 22. This belief pre-dates the pandemic as demonstrated by the fact that, in 2014, Mrs.
4 Plath signed a document declining to take part in any medical procedures that involved abortion
5 because of her religious beliefs. She had never taken part in medical procedures that involved
6 abortion prior to that either.

7 23. Mrs. Plath also believes that taking the COVID-19 vaccines would violate her belief
8 that her body is the Temple of the Holy Spirit by introducing potentially harmful substances, of
9 which many are unknown and untested, into her body.

10 24. Finally, Mrs. Plath prayed and sought God's will regarding whether to take a
11 COVID-19 vaccine and felt convicted by God not to, meaning that to take them would be a sin.

12 (ii) Plaintiffs' Employment History and Duties as a Medical Assistant

13 25. Mrs. Plath was certified as a medical assistant from Boston Heart College in 2010.

14 26. In or around 2010, Mrs. Plath began working as a medical assistant at Kaiser.

15 27. In her position as medical assistant, Mrs. Plath was responsible for getting patients
16 from the waiting areas to the doctor's office; disinfecting, inventorying and organizing instruments;
17 doing patient interviews and taking vitals; preparing the doctor to see patients; and filling in for
18 other departments which included numerous responsibilities.

19 (iii) Kaiser Permanente's COVID-19 Vaccination Policy

20 28. On July 28, 2021, Kaiser emailed employees, including Mrs. Plath, stating that it had
21 implemented a policy requiring employees to provide proof of COVID-19 vaccination or proof of
22 regular testing beginning August 23, 2021.

23 29. On August 5, 2021, Kaiser sent another email regarding the policy and requiring
24 employees get vaccinated or obtain a religious exemption.

25 30. On August 19, 2021, Kaiser emailed Mrs. Plath stating all employees must be fully
26 vaccinated for COVID-19 by September 30, 2021, or to have submitted proof of a qualifying
27 religious or medical exemption. Depending on which vaccine was used, first doses were to be done
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1 by as early that day—August 19. Failure to do so would result in an employee being placed on
2 unpaid administrative leave until he or she came into compliance with the vaccination requirement.

3 (iv) Kaiser Permanente’s Unjustified Denial of Mrs. Plath’s Religious Accommodation
4 Request, Failure to Engage in any Interactive Process, and Subsequent Unlawful
5 Termination of Mrs. Plath

6 31. On or about August 22, 2021, Mrs. Plath abided by Kaiser’s truncated procedures
7 for submitting a religious exemption request to the COVID-19 policy. The procedure required a
8 religious exemption request be submitted on the company’s website portal, which was only open
9 for a short period of time, meaning the religious exemption request was required to be written and
10 submitted in that abbreviated period. [**Attachment A.**] It was preliminarily approved on August 29,
11 2021.

12 32. In her religious exemption request, Mrs. Plath stated she is an evangelical Christian
13 who is guided by the Holy Spirit. She stated her body is the Temple of the Holy Spirit as laid forth
14 in 1 Corinthians 6:15–20; that the Holy Spirit resides in her, guides her; and teaches her how to obey
15 the law of the Lord.

16 33. Mrs. Plath’s exemption request further laid forth the specific doctrines and teachings
17 that prevent her from receiving the COVID-19 vaccine. Mrs. Plath stated that her body is the Temple
18 of the Holy Spirit and that the Holy Spirit guides her daily decisions. *See* 2 Corinthians 5:10 (“For
19 we must all appear before the judgment seat of Christ, so that each of us may receive what is due us
20 for the things done while in the body, whether good or bad”); 2 Corinthians 7:1 (“Therefore, since
21 we have these promises, dear friends, let us purify ourselves from everything that contaminates body
22 and spirit, perfecting holiness out of reverence for God.”). As such, she is called to take good care
23 of her body and not defile it or introduce substances that could harm it. Because each of the available
24 vaccines utilized aborted fetal cells in their development or production, taking them would violate
25 her faith. To take one of these vaccinations would be disobeying God and is a sin.

26 34. On August 5, 2021, Mrs. Plath supplemented her exemption request with a religious
27 exemption letter provided for her by Alin Bob, the pastor at her Church, Emmanuel Romanian
28 Pentecostal Church, which she regularly attends. [**Attachment B.**] The letter discussed Mrs. Plath

1 and her family's regular attendance at the Church as well the Christian religious beliefs that conflict
2 with receiving the COVID-19 vaccine. The letter also included discussion regarding how taking the
3 COVID-19 vaccine contravenes Christian beliefs related to autonomy and safety and undermines
4 the value of human life.

5 35. On September 21, 2021, Kaiser emailed Mrs. Plath provisionally approving her for
6 a religious exemption.

7 36. On October 23, 2021, Kaiser Permanente emailed Mrs. Plath stating that additional
8 information was needed to evaluate whether she had a sincerely held religious belief that precluded
9 her from taking the COVID-19 vaccine. The email included eight questions about Mrs. Plath's
10 religious beliefs.

11 37. On October 27, 2021, Mrs. Plath responded, providing answers to each of the
12 questions describing in detail her religious opposition to receiving the COVID-19 vaccination.
13 [Attachment C.] Mrs. Plath's answers further detailed her belief that the vaccinations were derived
14 using aborted fetal cells and that she never has, or would, knowingly take any medication developed
15 in such a manner because to do so would violate her religious beliefs.

16 38. During this time and up until Kaiser terminated Mrs. Plath's employment, Mrs. Plath
17 underwent regular COVID-19 testing, each test came back negative, and she provided proof of all
18 testing to Kaiser Permanente.

19 39. Prior to her termination, Mrs. Plath voiced her concerns with her managers that her
20 religious beliefs were not being taken seriously and that she was being discriminated against.

21 40. During this time numerous other Kaiser employees made derogatory statements
22 regarding Mrs. Plath's religious beliefs. Mrs. Plath reported this harassment to management but, to
23 the best of her knowledge, no remedial action was taken.

24 41. This included a doctor loudly stating so that all employees in the room could hear,
25 that everyone who did not get vaccinated and who applied for a religious exemption should be
26 terminated. Early in the pandemic, Mrs. Plath was also told she was scaring people by wearing a
27 mask. Mrs. Plath reported the harassment to her managers, but no actions were ever taken to remedy
28 the situation.

1 42. On November 30, 2021, Kaiser emailed Mrs. Plath to inform her that her religious
2 exemption request was denied. The email did not provide a basis for the change and stated only that
3 “it has been determined that your request does not meet the standards necessary for granting an
4 exemption from obtaining any COVID-19 vaccine” and put her on unpaid leave. What standard was
5 used or how it was determined Mrs. Plath’s request failed to meet this standard was not provided.

6 43. On December 15, 2021, Kaiser emailed Mrs. Plath stating that she needed to provide
7 proof of vaccination by January 3, 2022, to avoid being terminated on January 10, 2022.

8 44. On January 10, 2022, Kaiser terminated Mrs. Plath’s employment for failing to get
9 vaccinated in accordance with the company’s policy.

10 45. Upon information and belief, Kaiser granted religious exemptions to other similarly
11 situated employees who had analogous, if not identical, job titles and duties as Mrs. Plath.

12 46. Furthermore, at no time did Kaiser engage in any interactive process with Mrs. Plath
13 to explore “any available reasonable alternative means of accommodating the religious belief or
14 observance” *See* Gov. Code § 12940(l)(1).

15 47. At no time after receiving Mrs. Plath’s religious accommodation requests did Kaiser
16 explain to her that her religious accommodation request would pose an undue hardship on the
17 company.

18 48. At no time after receiving Mrs. Plath’s religious accommodation requests did Kaiser
19 explain to her why her religious beliefs or practices did not merit an accommodation.

20 49. At no time during her employment did Mrs. Plath refuse to wear a mask or refuse to
21 abide by any other accommodation or safety measure proposed by Kaiser.

22 50. Other employees of Kaiser received medical and religious accommodations to the
23 COVID-19 vaccine mandates and were not subject to the discriminatory treatment or termination.

24 51. Kaiser would have suffered no undue hardship by granting Mrs. Plath’s religious
25 accommodation, as it did so for other employees. Mrs. Plath could have worn a face covering to
26 minimize and prevent exposure to COVID-19, or been subject to symptom screening, regular
27 testing, and other precautionary measures, which other exempted employees were allowed to do
28 even after the vaccine mandates were implemented.

1 (v) Mrs. Plath’s Charge of Religious Discrimination with the EEOC and CRD, the
2 EEOC’s Finding of Reasonable Cause to Believe a Violation of Statute has Occurred,
3 and the Issuance of Mrs. Plath’s Right to Sue Letters

4 52. On April 22, 2022, Mrs. Plath filed a charge of discrimination with the Equal
5 Employment Opportunity Commission (EEOC) and requesting it be dual filed with California’s
6 Civil Rights Division (CRD) alleging religious discrimination for terminating her for failing to get
7 the COVID-19 vaccine in accordance with her religious beliefs and in retaliation for engaging in
8 protected activity.

9 53. On April 2, 2026, the EEOC issued Mrs. Plath a Right to Sue (RTS) letter. The letter
10 further stated the “EEOC found reasonable cause to believe that violations of the statute(s) occurred
11 with respect to some or all of the matters alleged in the charge” but that settlement could not be
12 obtained. [**Attachment D.**]

13 54. On May 29, 2026, Mrs. Plath also filed with the CRD individually within the statute
14 of limitations – as it tolled during the pendency of the EEOC investigation – and received an
15 immediate RTS letter. [**Attachment E.**]

16 **FIRST CAUSE OF ACTION**
17 **(Violation Of The Civil Rights Act Of 1964)**
18 **(42 U.S.C. § 2000e et seq.)**

19 **Religious Discrimination-Disparate Treatment**

20 55. Mrs. Plath realleges and incorporates by reference the allegations in the preceding
21 paragraphs 1-54, as fully set forth herein.

22 56. Title VII of the Civil Rights Act of 1964 prohibits an employer from discriminating
23 against an employee because of the employee’s sincerely held religious beliefs. *See* 42 U.S.C. §
24 2000e-2(a).

25 57. Religion is defined to include “all aspect of religious observance and practice, as well
26 as belief.” *See* 42 U.S.C. § 2000e-(J).

27 58. A plaintiff alleging disparate treatment under Title VII must first establish a prima
28 facie case of discrimination. *McDonnell Douglas Corp. v. Green*, 411 U.S. 792, 802 (1973).

1 59. Specifically, the plaintiff must show: (1) she belongs to a protected class; (2) she was
2 qualified for the position; (3) she was subject to an adverse employment action; and (4) similarly
3 situated individuals outside her protected class were treated more favorably. *Id.* The burden of
4 persuasion then shifts to the employer to articulate a legitimate, nondiscriminatory reason for the
5 adverse act. *Id.*

6 60. Mrs. Plath was, at all relevant times, an employee covered by 42 U.S.C. section
7 2000e, prohibiting discrimination based on her Christian religion. Kaiser was, at all relevant times,
8 an employer for purposes of 42 U.S.C. section 2000e.

9 61. Kaiser's termination of Mrs. Plath constitutes an adverse employment action. *See*
10 *Villiarimo v. Aloha Island Air, Inc.*, 281 F.3d 1054, 1063 (9th Cir. 2002).

11 62. Kaiser's denial of Mrs. Plath's religious exemption request, when simultaneously
12 granting accommodation requests of other, similarly situated employees outside of her protected
13 class constitutes discrimination and disparate treatment under Title VII of the Civil Rights Act of
14 1964.

15 63. As a direct and proximate result of Kaiser's violation of Title VII, Mrs. Plath has
16 suffered, and will suffer further harm, in the loss of her employment and employment benefits,
17 entitling her to backpay, front pay, compensatory damages, punitive damages, attorneys' fees, costs,
18 reinstatement of her prior position, a declaration that Kaiser Permanente violated her rights under
19 Title VII and state law, and any other remedies the Court determines to be necessary.

20 **SECOND CAUSE OF ACTION**

21 **(Violation Of The Civil Rights Act Of 1964)**

22 **(42 U.S.C. § 2000e et seq.)**

23 **Religious Discrimination-Failure To Accommodate**

24 64. Mrs. Plath realleges and incorporates by reference the allegations in the preceding
25 paragraphs 1-63, as fully set forth herein.

26 65. Title VII requires that an employer make a reasonable accommodation for the
27 religious practice of its employees short of having to undergo an undue hardship. *See* 42 U.S.C.
28 2000e(j); *Trans World Airlines, Inc. v. Hardison*, 432 U.S. 63, 74 (1976).

1 66. A plaintiff can establish a prima facie case by demonstrating (1) she had a bona fide
2 religious belief, the practice of which conflicted with an employment duty; (2) she informed her
3 employer of the belief and the conflict; and (3) the employer threatened her with or subjected her to
4 discriminatory treatment because of her inability to fulfill the job requirements. *See Heller v. EBB*
5 *Auto Co.*, 8 F.3d 1433, 1438 (9th Cir. 1993).

6 67. Section 2000e(j) further states that it is an unlawful employment practice for an
7 employer to fail or refuse to accommodate the religious beliefs and practices of an employee.

8 68. Mrs. Plath is a devout Christian, and the practice and observance of her faith
9 conflicted with Kaiser's policy requiring employees receive a COVID-19 vaccination. Specifically,
10 her beliefs that conflicted with the policy are that (1) her body is the Temple of the Holy Spirit which
11 would be desecrated by taking the vaccine; (2) that abortion is a sinful act and taking the vaccine
12 would constitute complicity with that act because the vaccine was derived from aborted fetal cells;
13 and (3) through personal prayer Mrs. Plath felt convicted by God to abstain from taking the vaccine.

14 69. Mrs. Plath timely informed Kaiser of these beliefs and how they conflicted with
15 Kaiser's vaccination policy using the company's website portal, by supplementing her request with
16 a personalized letter from her pastor, and by answering Kaiser's follow up questions about her
17 beliefs. She was then terminated for not receiving the vaccination after her exemption request was
18 denied.

19 70. Kaiser had several reasonable accommodations available that the company offered
20 other exempted employees which it could have offered Mrs. Plath, including symptom screening,
21 regular testing, and other precautionary measures such as wearing a face covering and social
22 distancing. Furthermore, Mrs. Plath had previously been testing and abiding by precautionary
23 measures prior to the Kaiser's vaccination policy and during her provisional approval without issue.

24 71. Kaiser never alleged or demonstrated that providing Mrs. Plath an accommodation
25 would cause the company undue burden.

26 72. Upon information and belief, Kaiser has accommodated other accommodation
27 requests to its vaccination policy for similarly situated employees.

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1 73. By failing and refusing to provide an accommodation for Mrs. Plath, the company
2 unlawfully discriminated against her.

3 74. As a direct and proximate result of Kaiser Permanente’s violation of Title VII, Mrs.
4 Plath has suffered, and will suffer further harm in the loss of her employment and employment
5 benefits, entitling her to backpay, front, pay, compensatory damages, punitive damages, attorneys’
6 fees, costs, reinstatement of her prior position, a declaration that Kaiser Permanente violated her
7 rights under Title VII and state law, and any other remedies the Court determines to be necessary.

8 **THIRD CAUSE OF ACTION**
9 **(Violation Of The Civil Rights Act Of 1964)**
10 **(42 U.S.C. § 2000e et seq.)**

11 **Retaliation**

12 75. Mrs. Plath realleges and incorporates by reference the allegations in the preceding
13 paragraphs 1-74, as fully set forth herein.

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

19 77. The EEOC takes “the position that requesting a religious accommodation is a
20 protected activity under the provision of Title VII.” U.S. Equal Emp. Opportunity Comm’n, Section
21 12: Religious Discrimination, EEOC-CVG2021-3, as reprinted in EEOC Compliance Manual on
22 Religious Discrimination (Jan. 15, 2021), [https://www.eeoc.gov/laws/guidance/section-12-](https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#_ftn321)
23 [religious-discrimination#_ftn321](https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#_ftn321) (last visited June 3, 2026).

24 78. “Informal complaints to management about discriminatory employment practices are
25 considered sufficient opposition to trigger the prohibition against retaliation” *California Fair*
26 *Employment & Housing Com. v. Gemini Aluminum Corp.*, 122 Cal.App.4th 1004, 1015 (2004).

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1 79. Mrs. Plath engaged in a protected activity by requesting a religious accommodation
2 from Kaiser's vaccine policy. She engaged in further protected activity by voicing her complaints
3 that her religious beliefs were not being taken seriously, and she was being discriminated against.

4 80. Kaiser's termination of Mrs. Plath's employment is an adverse employment action.

5 81. Kaiser terminated Mrs. Plath because she engaged in protected activity when she
6 refused to get the COVID-19 vaccination due to her religious beliefs and complaint about the
7 discrimination she was facing.

8 82. Kaiser did not enter into an interactive process with Mrs. Plath when she submitted
9 her religious accommodation request but granted and accommodated the medical and religious
10 requests of other similarly situated employees.

11 83. Instead of beginning an interactive process and accommodating her, Kaiser
12 terminated Mrs. Plath's employment.

13 84. As a direct and proximate result of Kaiser Permanente's violation of Title VII, Mrs.
14 Plath has suffered, and will suffer further harm in the loss of her employment and employment
15 benefits, entitling her to backpay, front pay, compensatory damages, punitive damages, attorneys'
16 fees, costs, reinstatement of her prior position, a declaration that Kaiser Permanente violated her
17 rights under Title VII and state law, and any other remedies the Court determines to be necessary.

18 **FOURTH CAUSE OF ACTION**

19 **(Violation Of California's Fair Employment And Housing Act)**

20 **(Cal. Gov'n't Code § 12940(a))**

21 **Religious Discrimination and Retaliation**

22 85. Mrs. Plath realleges and incorporates by reference the allegations in the preceding
23 paragraphs 1-84, as fully set forth herein.

24 86. To bring a FEHA claim, a plaintiff must first exhaust her administrative remedies.
25 *McCarthy v. R.J. Reynolds Tobacco Co.*, 819 F.Supp.2d 923, 935 (E.D. Cal. 2011). To do so, she
26 must file a complaint with CRD, formerly the Department of Fair Housing and Employment
27 (DFEH), within one year from the date which the conduct occurred. *Id.*

1 87. In *McConnell v. General Telephone Co. of California*, the Ninth Circuit held that the
2 filing of a charge with either the EEOC or the CRD is deemed to be a filing with both. 814 F.2d
3 1311, 1315 (9th Cir. 1987). When a claimant files with the EEOC, that filing is constructively treated
4 as a filing with CRD for the purposes of the initial filing requirement. See *McCarthy*, 819 F.Supp.2d
5 at 923; *Gamble v. Kaiser Foundation Health Plan, Inc.*, 348 F.Supp.3d 1003 (2018).

6 88. The one-year statute of limitations for filing a FEHA civil action is tolled during the
7 pendency of the EEOC's investigation. See e.g. *Downs v. Dept. of Water & Power*, 58 Cal.App.4th
8 1093, 1102–03 (9th Cir. 1997).

9 89. Mrs. Plath filed her EEOC charge of discrimination on April 22, 2022—102 days
10 after she was terminated on January 10, 2021. Mrs. Plath's FEHA claim was tolled until she received
11 her RTS letter from the EEOC, which she received on April 26, 2026, meaning she had until January
12 10, 2027, to file her charge of discrimination with the CRD.

13 90. Mrs. Plath received her Right to Sue letter from the CRD on May 29, 2026, making
14 the filing of the present complaint timely.

15 91. FEHA makes it unlawful “[f]or an employer, because of the ... religious creed ... of
16 any person, to refuse to hire or employ the person or to refuse to select the person for a training
17 program leading to employment, or to bar or to discharge the person from employment or from a
18 training program leading to employment, or to discriminate against the person in compensation or
19 in terms, conditions, or privileges of employment.” Cal. Gov't Code § 12940(a).

20 92. To establish a prima facie case of retaliation under FEHA, a Plaintiff must show
21 “(1) he or she engaged in a ‘protected activity,’ (2) the employer subjected the employee to an
22 adverse employment action, and (3) a causal link existed between the protected activity and the
23 employer's action.” *Yanowitz v. L'Oreal USA, Inc.*, 36 Cal.4th 1028, (2005) (citations omitted).

24 93. FEHA also prohibits and employer from discriminating against a person because of
25 their religious creed. Cal. Gov't Code § 12940(a)

26 94. FEHA defines religious creed broadly to include all aspects of observance and
27 practice. See Cal. Gov't Code § 1296(q).

28 95. Mrs. Plath was, at all relevant times, an employee for purposes of FEHA.

1 96. As a practicing Christian, Mrs. Plath was, at all relevant times, a member of a
2 protected religious class.

3 97. Kaiser is an employer for purposes of FEHA.

4 98. Mrs. Plath's religious beliefs are protected and her filing a request for a religious
5 exemption to Kaiser's COVID-19 vaccination policy was a protected activity.

6 99. Upon information and belief, Kaiser accommodated the religious and medical
7 accommodation request of other similarly situated employees.

8 100. However, Kaiser discriminated against Mrs. Plath's Christian beliefs and terminated
9 her for her refusal to get vaccinated.

10 101. Kaiser Permanente retaliated against Mrs. Plath by terminating her employment for
11 failing to get vaccinated in accordance with its vaccination policy.

12 102. As a direct and proximate result of Defendants' violation of FEHA, Plaintiff has
13 suffered loss of employment and employment benefits, entitling him to declaratory relief and
14 damages against Defendant.

15 103. As a direct and proximate result of Kaiser Permanente's violation of FEHA, Mrs.
16 Plath has suffered, and will suffer further harm in the loss of her employment and employment
17 benefits, entitling her to backpay, front, pay, compensatory damages, punitive damages, attorneys'
18 fees, costs, reinstatement of her prior position, a declaration that Kaiser Permanente violated her
19 rights under FEHA and state law, and any other remedies the Court determines to be necessary.

20 **FIFTH CAUSE OF ACTION**

21 **(Violation Of California's Fair Employment And Housing Act)**

22 **(Cal. Govn't Code § 12940(I))**

23 **Failure to Accommodate Religious Beliefs**

24 104. Mrs. Plath realleges and incorporates by reference the allegations in the preceding
25 paragraphs 1-103, as fully set forth herein.

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

1 accommodation of the religious beliefs or observance. Cal. Govn't Code § 12940(1); *California Fair*
2 *Employment & Housing Com. v. Gemini Aluminum Corp.*, 122 Cal.App.4th 1004 (2004).

3 106. Mrs. Plath is a devout Christian and committed to living a life consistent with the
4 Holy Bible. Her beliefs prohibit her from participating in any way in the abortion industry. Mrs.
5 Plath also believes that the COVID-19 vaccine could be harmful to her body, which is the Temple
6 of the Holy Spirit. She further believes that to take the vaccine would be in direct contradiction to
7 the will of God for her life.

8 107. Mrs. Plath notified Kaiser of these beliefs on multiple occasions prior to her
9 termination.

10 108. Kaiser failed to engage in any reasonable, interactive process with Mrs. Plath
11 regarding her religious objections to the COVID-19 vaccine mandate. Indeed, Mrs. Plath
12 specifically referenced her religious convictions concerning abortion and injecting unknown
13 substances into his body, but Kaiser ignored her objections terminated her employment for failing
14 to get the vaccine.

15 109. Kaiser failed to offer Mrs. Plath reasonable accommodations. Defendant did not, and
16 cannot, demonstrate that providing any accommodations would impose an undue burden.

17 110. Kaiser's refusal to accommodate or even explore any kind of accommodation of Mrs.
18 Plath's religious beliefs.

19 111. As a direct and proximate result of Kaiser Permanente's violation of FEHA, Mrs.
20 Plath has suffered, and will suffer further harm in the loss of her employment and employment
21 benefits, entitling her to backpay, front, pay, compensatory damages, punitive damages, attorneys'
22 fees, costs, reinstatement of her prior position, a declaration that Kaiser Permanente violated her
23 rights under FEHA and state law, and any other remedies the Court determines to be necessary.

24 **PRAYER FOR RELIEF**

25 **WHEREFORE**, Plaintiff prays for relief against Defendant as follows:

- 26 1. Declare that Kaiser Permanente has violated Title VII of the Civil Rights Act and
27 FEHA;
- 28 2. Compensatory and actual damages in an amount to be proven at the time of trial;

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- 3. Punitive damages;
- 4. All costs associated with bringing suit;
- 5. Attorneys' fees;
- 6. Pre-judgment and post-judgment interest at the prevailing statutory rates; and
- 7. All further relief that the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

DATED: June 24, 2026

ADVOCATES FOR FAITH & FREEDOM

By: /s/ Robert H. Tyler
Robert H. Tyler, Esq.
Attorneys for Plaintiffs

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VERIFICATION

I have read the foregoing **VERIFIED COMPLAINT** and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except for those matters which are stated on information and belief, and as to those matters, I believe them to be true.

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

Executed on June 24, 2026, at 12:00 PM, California.


Sarah Plath Jun 24, 2026 12:00:37 PDT

Sarah Plath

SARAH V. PLATH DID NOT MEET THE STANDARDS TO RECEIVE AN APPROVED RELIGIOUS EXEMPTION FOR RECEIVING ANY OF THE 3 COVID-19 VACCINATION REQUIREMENT OF THE KAISER PERMANENTE COVID-19 VACCINATION POLICY.

Instructions

- You have 15 minutes to complete this form before timing out. We recommend using "Save As Draft", if needed, while completing the form before 'submitting.
- After Submitting this form, you will receive a successfully submitted message in a green box at the top of the page and the request will be visible on your My Cases dashboard. If you do not see this message, please refresh your screen, enter the information, and submit again.
- If you are fully vaccinated, please return to HRconnect for other options.
- Please download and use this form to gather a physician or other licensed medical professional signature and upload when submitting a Vaccination Exemption.
- The option to upload a document is available after clicking the "Save As Draft" button (jpg, jpeg, .pdf, .tiff, .doc(x), .xls(x) and .txt are the file types available for upload) and is required for a medical exemption.

Vaccination Exemption

*Action:

New/Revise Request Cancel Previous Request

*I have not been fully vaccinated because – choose all that apply:

I have a documented medical condition or a contraindication to getting a vaccine that prevents me from receiving any COVID-19 vaccine I have a sincerely held religious belief, practice, or observance that prevents me from receiving any COVID-19 vaccine

Religious Belief/Practice

Simply being against vaccinations or having concerns about the safety of a vaccine is not sufficient to meet this exemption.

*

I understand the personal and public health benefits of COVID-19 vaccinations and the risks associated with not receiving the COVID-19 vaccine

*

I understand that I may be required to take additional education on COVID-19 vaccines and safety training, routinely show proof of negative COVID-19 test results and wear a mask during work hours if I am not vaccinated

*

To be eligible for this exemption, I understand that I must disclose below the religion and identify the specific doctrine or teaching that prevents me from receiving any COVID-19 vaccine

***My religion is as follows:**

I am a committed evangelical Christian that is guided through the Holy Spirit. My body is a Holy Temple (1 Corinthians 6:15-20) that the Holy Spirit resides in and guides me, and teaches me in understanding how to obey the law of the Lord. (John 14:13).

***The specific religious doctrine or teaching that prevents me from receiving a vaccine is:**

God gives me, as a believer, the Holy Spirit to personally guide me in all aspects of Life. The Holy Spirit teaches me all things, guides me into all truth, and reproves me of sin and righteousness. It is my job as a devout Christian to take good care of my body, His temple, not to defile it, and certainly not to introduce anything into it that can cause potential harm. (2 Cor. 5:10, 7:1) In Romans 14, the Bible states "But whoever has doubts is condemned if they take something into their bodies, because they are not doing it by personal conviction; and everything that does not come from conviction (Faith) is sin". I know that each of the three covid vaccines was tested, developed or produced from fetal cell lines that were obtained from elective abortions, no matter the distance from today's date. Some may find the connection between these vaccines and abortions to be permissible, I do not. Accepting any vaccine would be disobedient to the Holy Spirit.

*I have previously declined to receive other vaccines because of my religious belief, practice or observance? *I have previously declined to receive other vaccines because of my religious belief, practice or observance?

Yes No

*If yes, please identify the other vaccines you have declined

*If no, please explain what makes the COVID-19 vaccine different from the other vaccines you have not declined.

- Influenza Vaccine (Flu Shot)

Attestation

By typing in my name below, I declare under penalty of perjury under the laws of the State in which I work that the statements above are true and correct*Please type your name to confirm your agreement

Sarah Platt

Case Comments

Navigation Mode

Date:

08/29/2021, 12:26 AM "Approved"

10/23/2021, 03:17 PM

Dear Sarah Vivian Plath: After careful review of your request for an exemption under the COVID-19 Vaccination Policy, undertaken to ensure ongoing compliance with our responsibilities under public health requirements and KP policy, it has been determined that additional information is needed from you to further evaluate whether you have a sincerely held religious belief, practice, or observance that prevents you from receiving any COVID-19 vaccine. CASE NUMBER: 40994628 Additional Information Needed Within Five Calendar Days: To help us better understand the basis for your request for a religious exemption, please answer the questions below within five calendar days by replying to this email, and adding your responses immediately following each question. Please make sure your responses are in your own words and do not contain language from a template or form response you have obtained from someone else or an online source. If you quote from scripture or another resource, you must also explain in your own words what that resource means, and how you believe the resource prevents you from being vaccinated. Consequences of Not Providing Complete and Timely Information: If you do not provide complete information within five calendar days from the date of this notice: a decision will be made regarding your exemption request based on the information we have obtained to date; and you may receive a Notice of Denial. Consequences of Not Receiving An Approved Exemption: If you receive a Notice of Denial, you will be required to submit proof in HRconnect that you completed a COVID-19 vaccine series: immediately to avoid being on an unpaid leave of absence; and on or before November 30 to avoid having your employment terminated effective December 1. NOTE: Employees may continue to work and will not be placed on leave of absence if they HAVE COMPLETED their vaccine series by September 30, 2021 (i.e., one dose of J&J; second dose of either Moderna or Pfizer), except where full vaccination is required by law or public health order. Where full vaccination* is required, employees without approved exemptions must remain off work until they have completed a COVID-19 vaccine series and the 14-day waiting period. Please be assured that we respect our employees who hold sincerely held religious beliefs and are committed to thoroughly and thoughtfully reviewing all requests for religious exemption from our COVID-19 Vaccination for KP Workforce Members Policy (NATL.HR.057). Throughout this evaluation process, it is critical that we continue to keep the safety of our staff, patients, and the communities that we serve at the center of all that we do. It is also critical that our employees always uphold KP's ethical standards as outlined in our Principles of Responsibility, including throughout this religious exemption process. We appreciate all that you do to demonstrate your commitment to these important ideals. Unless required otherwise by state or local orders, until you are fully vaccinated, you must comply with the safety rules specified for those unvaccinated or not fully vaccinated individuals reporting to work at any Kaiser Permanente facility or caring for patients in person at a non-KP Facility. These rules may require masking, social distancing, additional education on COVID-19 vaccines and safety training, and routine proof of negative COVID-19 test results. Also, there will be a need to assess whether your vaccination status limits your ability to perform your job functions in a manner that is both safe and complies with legal

or public health mandates and KP policies, and if so, what the appropriate next steps are to address any such limitations. See your manager for the specific safety rules that apply to you, and to discuss any limitations your vaccination status places on your ability to continue working and safely perform your job functions. To schedule a vaccine appointment, please visit kp.org. For information on the safety and effectiveness of the COVID 19 vaccine go to kp.org/covid vaccine. If you have any questions or concerns regarding the above, please respond to this email.

ADDITIONAL QUESTIONS REGARDING YOUR REQUEST FOR RELIGIOUS EXEMPTION FROM COVID-19 VACCINATION (Maximum of Nine)

Question: Do you believe that fetal stem cells are in the COVID-19 vaccines that you would receive? Answer: Question: "If a COVID-19 vaccine contained no fetal stem cells, would you be able to receive it in light of your religious beliefs? If not, why not?" Answer: Question: Have you ever taken another vaccine or medication as an adult? (Please answer yes or no. We are not asking you to tell us what medications you have taken or why you took them.) If so: Answer: Question: If you have taken other vaccines or medications knowing that they involved the use of fetal stems in some way: Please explain why receiving them did not violate your sincerely held religious belief. Answer: Question: If you have taken other vaccines or medication but do not know whether they involved the use of fetal stem cells in any way: Answer: Question: Describe anything you did before taking them to find out whether they involved the use of fetal stem cells in any way. Did taking them violate your sincerely held religious belief? Answer: Question: "If not, why not? If so, why were you willing to violate your belief as to them but not as to the COVID-19 vaccine?" Answer: Question: What other medical practices or pharmaceutical products do you refuse based on your religious belief about fetal stem cells? Answer: Question: N/A Answer: Question: N/A Answer: If you have additional information you would like to submit in support of your request for exemption, please provide it here: "Fully vaccinated" means fully vaccinated against the virus that causes COVID-19 as defined by the CDC. As of the date of this form, this means receipt of the second dose in a 2-dose series (e.g., Pfizer and Moderna vaccines) OR receipt of a single-dose vaccine (e.g., Johnson & Johnson's Janssen vaccine) AND a 2 week period having passed since the administration of the last vaccine dose. (This definition may change to include the requirement for vaccine booster shots in the future.)

ref:_00D412j5UY._5003j1slhCH:ref

11/30/2021, 11:08 AM

Dear Sarah Vivian Plath: After thoroughly evaluating your request for a religion-based exemption from the COVID-19 vaccination requirement of the Kaiser Permanente COVID-19 Vaccination Policy, it has been determined that your request does not meet the standards necessary for granting an exemption from obtaining any COVID-19 vaccine. Therefore, your request has been **DENIED**. CASE NUMBER: 40994628 If your request for an exemption under the COVID-19 Vaccine Policy was previously approved on a provisional basis, you were notified that the decision to approve your exemption, and action taken to accommodate the exemption, are

subject to change. A further review of your exemption request occurred and resulted in this denial. As a result, You are required to comply with the Kaiser Permanente COVID-19 Vaccine Policy by submitting proof of completed COVID-19 vaccination (i.e., both doses of a 2-dose vaccine such as Pfizer or Moderna OR a single-dose vaccine such as Johnson & Johnson's Janssen vaccine) or obtaining an approved exemption. If you were previously approved for a religious exemption, your exemption will expire in five (5) calendar days. If you are currently working you may continue to do so for the next five (5) calendar days. If you submit verified proof of completed vaccination before your exemption expires you may work unless you work in a location where full vaccination (i.e., 14 days after completed vaccination) is required by law or public health order. Where full vaccination is required, employees without approved exemptions will be placed on unpaid administrative leave after their exemptions expire and are not permitted to work for or at Kaiser Permanente until they submit verified proof of completed COVID-19 vaccination and complete the 14-day waiting period. If you are currently off work for any reason, you will not be permitted to return to work until you meet the vaccination requirements. Where individuals are permitted to perform services immediately after submitting verified proof of completed vaccination, they must engage in any testing required for workers who are not fully vaccinated during the 14-day waiting period. Failure to meet the requirements of the Kaiser Permanente COVID-19 Vaccination Policy by January 7, 2022, will result in the termination of your employment on or after January 10, 2022. To ensure that your employment is not disrupted, do not wait to comply with the Vaccination Policy. As soon as possible, go to [HRconnect.kp.org](https://hrconnect.kp.org) to upload your proof of vaccination To schedule a vaccine appointment, please visit kp.org. For information on the safety and effectiveness of the COVID 19 vaccine go to kp.org/covidvaccine. Accessing HRconnect away from Kaiser Permanente You will need PingID to sign-in. If you do not have PingID currently installed, use the instructions below to download the application on your device of choice. You may be asked to reset your password due changes to KP's minimum password requirements from a minimum of 8 characters to 12 characters. Steps for Downloading PingID: Sign in to HRconnect at [HRconnect.kp.org](https://hrconnect.kp.org) and type in your NUID and password. Click the PingID setup link to begin the registration process. When the log-in screen appears, enter your NUID and password. When the ID verification screen appears. Follow instructions to complete your information. Confirm information and submit for ID check. After successful verification, a PingID set up screen will open. Follow the steps to install PingID and complete the sign-in process. Also, you may come to a KP facility and use a KP computer to access HRconnect. For more information General inquiries on the COVID-19 vaccine verification and testing process may be directed to the National HR Service Center at 1-877-457-4772. Follow the prompts for the COVID-19 Vaccine Verification support queue. If you have any questions or concerns regarding the impact this decision has on your employment, please consult your manager. v11.29.21 ref:_00D412j5UY_5003j1slhCH:ref

Existing Files

Navigation Mode

File Name

[Sarah Plath Exemption Letter 2021.pdf](#)

Title

COVID-19 Other Documentation



4141 Fell St. - Sacramento, CA. 95838, Tel./Fax: (916) 927-1835 – www.emanuel-church.com

08/05/2021

Religious Exemption Letter

To whom it may concern,

This letter is on behalf of Sarah Plath, employee of Kaiser Permanente.

It was brought to our attention that Sarah Plath was requested to provide a religious exemption letter in regards of COVID-19 vaccine.

As her pastor, I can speak of the sincerity of her faith, beliefs and conscience. A core belief of our church is that all life is sacred from the moment of conception to natural death, and abortion is a grave sin against God and against the value of human life.

We believe also that any person constrained to receive a vaccine or other substances into their body against her will, is unlawful and contrary to the bill of rights and the U.S. Constitution.

Sarah Plath comes from a devoted Christian family who regularly attends our church's services and assume the biblical teachings and practices from the Word of God.

Reasons why we are against this so called vaccine:

It contradicts our beliefs in the individual freedom and right to choose for our own bodies.

It contradicts the science and all other vaccine fabrication and testing that were developed during many years and after observing the side effects during years;

The fact is emphasized that no Pharmaceutical companies or Medical Facilities that are administrating the vaccines do no assume any legal responsibility for any severe side effects or even death from the immunizations.

There are testimonies of patients who get the vaccine and they were harm irreversible.

On another hand, being PRO LIFE, we consider immoral to receive a vaccine that is made by using aborted fetus cell lines from human aborted babies.



4141 Fell St. - Sacramento, CA. 95838, Tel./Fax: (916) 927-1835 – www.emanuel-church.com

As seen on the CDC's website, vaccines contain neurotoxins, foreign DNA, albumin from human blood, hazardous substances like carcinogens that are proven harmful to the human body.

We believe that our bodies were created by God and made with an immune system that can fight infections and viruses.

It is our Christian belief and part of our tradition to totally restrain from injecting harmful substances, drugs or unsafe vaccines into our bodies.

We, at Emanuel Romanian Church, support our active members in their personal decisions regarding the immunizations, as a God given right that sustain our liberties and freedom in our Country.

Therefore, after receiving counseling from our attorney in law regarding personal religious rights, we respectfully request that Sarah Plath be exempt from receiving any immunizations that violates their conscience and provide them alternatives like testing or wearing mask.

Emanuel Romanian Pentecostal Church is a 501 (c) (3) non profit corporation registered with the state of California (#01580108) and has the EIN 93-0927247.

Should you need any additional information, please do not hesitate to call us 916-.927-1835

Thank you very much for your understanding.

Senior Pastor

Rev. Alin Bob

**RE: Request for Addl Info Exemption-COVID-19 Vaccination Req.-Religion ref:_00D412j5UY_5003j1slhCH:ref**

1 message

Sarah V Plath <Sarah.V.Plath@kp.org>
To: hrconnect-cases <hrconnect-cases@hr.kp.org>

Wed, Oct 27, 2021 at 12:42 PM

ADDITIONAL QUESTIONS REGARDING YOUR REQUEST FOR RELIGIOUS EXEMPTION FROM COVID-19 VACCINATION (Maximum of Nine)

Question: Do you believe that fetal stem cells are in the COVID-19 vaccines that you would receive?

Answer: Based on my understanding, fetal stem cells were used in the process of creating the vaccine itself. The latest public information states that not all vaccines have the fetal stem cells included, but all vaccines available utilize the aborted fetal cell lines during the production/testing of the vaccine.

Question: "If a COVID-19 vaccine contained no fetal stem cells, would you be able to receive it in light of your religious beliefs? If not, why not?"

Answer: If any vaccine is developed that doesn't violate my sincere religious beliefs, that can provide a clear ingredient list, without limitation to information, and also proven to be effective against spreading and obtaining COVID-19, there would be no reason for me not to take the vaccine.

Question: Have you ever taken another vaccine or medication as an adult? (Please answer yes or no. We are not asking you to tell us what medications you have taken or why you took them.) If so:

Answer: Yes

Question: If you have taken other vaccines or medications knowing that they involved the use of fetal stems in some way: Please explain why receiving them did not violate your sincerely held religious belief.

Answer: I never took vaccines or medications knowing that they involved the use of fetal stem cells. I do not know of vaccines or medication I take, that utilizes fetal stem cells, which would answer to why I have not violated my religious beliefs. Why would the assumption be that I am utilizing vaccines or medications that utilize fetal stem cells in any way?

Question: If you have taken other vaccines or medication but do not know whether they involved the use of fetal stem cells in any way:

Answer: I don't understand if this is a statement or a question? Please provide a list of all medicine that includes the use of fetal stem cells and I can identify if I have taken these without my knowledge.

Question: Describe anything you did before taking them to find out whether they involved the use of fetal stem cells in any way. Did taking them violate your sincerely held religious belief?

Answer: I have researched the information I needed regarding what was in the vaccine. If anything were to violate what I sincerely believe in as a committed Christian, I refuse to take it.

Question: "If not, why not? If so, why were you willing to violate your belief as to them but not as to the COVID-19 vaccine?"

Answer: I didn't violate my sincerely held religious beliefs and am not willing to. I chose to not receive it.

Question: What other medical practices or pharmaceutical products do you refuse based on your religious belief about fetal stem cells?

Answer: I refuse any medical practice or product that is created with, or utilizes fetal stem cells. As an employee of Kaiser, I refuse to assist with elected abortions.

Question: N/A

Answer:

Question: N/A

Answer:

If you have additional information you would like to submit in support of your request for exemption, please provide it here:

Fully vaccinated means fully vaccinated against the virus that causes COVID-19 as defined by the CDC. As of the date of this form, this means receipt of the second dose in a 2-dose series (e.g., Pfizer and Moderna vaccines) OR receipt of a single-dose vaccine (e.g., Johnson & Johnson's Janssen vaccine) AND a 2 week period having passed since the administration of the last vaccine dose. (This definition may change to include the requirement for vaccine booster shots in the future.)

Sarah Plath
Medical Assistant
Women's Health
916-474-2406

From: hrconnect-cases@hr.kp.org <hrconnect-cases@hr.kp.org>
Sent: Saturday, October 23, 2021 3:17 PM
To: Sarah V Plath <Sarah.V.Plath@kp.org>
Cc: sarah.v.plath@gmail.com
Subject: Request for Addl Info Exemption-COVID-19 Vaccination Req.-Religion ref._00D412J5UY_5003j1slhCH:ref



Dear Sarah Vivian Plath:

After careful review of your request for an exemption under the COVID-19 Vaccination Policy, undertaken to ensure ongoing compliance with our responsibilities under public health requirements and KP policy, it has been determined that additional information is needed from you to further evaluate whether you have a sincerely held religious belief, practice, or observance that prevents you from receiving any COVID-19 vaccine. CASE NUMBER: 40994628

Additional Information Needed Within Five Calendar Days: To help us better understand the basis for your request for a religious exemption, please answer the questions below **within five calendar days** by replying to this email, and adding your responses immediately following each question. Please make sure your responses are in your own words and do not contain language from a template or form response you have obtained from someone else or an online source. If you quote from scripture or another resource, you must also explain in your own words what that resource means, and how you believe the resource prevents you from being vaccinated.

Consequences of Not Providing Complete and Timely Information: If you do not provide complete information **within five calendar days from the date of this notice**:

- a decision will be made regarding your exemption request based on the information we have obtained to date; and
- you may receive a Notice of Denial.

Consequences of Not Receiving An Approved Exemption: If you receive a Notice of Denial, you will be required to submit proof in HRconnect that you completed a COVID-19 vaccine series:

- **immediately** to avoid being on an **unpaid leave of absence**; and
- **on or before November 30** to avoid having your **employment terminated effective December 1**.

NOTE: Employees may continue to work and will not be placed on leave of absence if they **HAVE COMPLETED** their vaccine series by September 30, 2021 (i.e., one dose of J&J; second dose of either Moderna or Pfizer), **except** where full vaccination is required by law or public health

order. Where full vaccination* is required, employees without approved exemptions must remain off work until they have completed a COVID-19 vaccine series **and** the 14-day waiting period.

Please be assured that we respect our employees who hold sincerely held religious beliefs and are committed to thoroughly and thoughtfully reviewing all requests for religious exemption from our COVID-19 Vaccination for KP Workforce Members Policy (NATL.HR.057). Throughout this evaluation process, it is critical that we continue to keep the safety of our staff, patients, and the communities that we serve at the center of all that we do. It is also critical that our employees always uphold KP's ethical standards as outlined in our Principles of Responsibility, including throughout this religious exemption process. We appreciate all that you do to demonstrate your commitment to these important ideals.

Unless required otherwise by state or local orders, until you are fully vaccinated, you must comply with the safety rules specified for those unvaccinated or not fully vaccinated individuals reporting to work at any Kaiser Permanente facility or caring for patients in person at a non-KP Facility. These rules may require masking, social distancing, additional education on COVID-19 vaccines and safety training, and routine proof of negative COVID-19 test results. Also, there will be a need to assess whether your vaccination status limits your ability to perform your job functions in a manner that is both safe and complies with legal or public health mandates and KP policies, and if so, what the appropriate next steps are to address any such limitations. See your manager for the specific safety rules that apply to you, and to discuss any limitations your vaccination status places on your ability to continue working and safely perform your job functions.

To schedule a vaccine appointment, please visit kp.org.

For information on the safety and effectiveness of the COVID 19 vaccine go to kp.org/covidvaccine.

If you have any questions or concerns regarding the above, please respond to this email.

ADDITIONAL QUESTIONS REGARDING YOUR REQUEST FOR RELIGIOUS EXEMPTION FROM COVID-19 VACCINATION (Maximum of Nine)

Question:

Do you believe that fetal stem cells are in the COVID-19 vaccines that you would receive?

Answer:

Question:

"If a COVID-19 vaccine contained no fetal stem cells, would you be able to receive it in light of your religious beliefs? If not, why not?"

Answer:

Question:

Have you ever taken another vaccine or medication as an adult? (Please answer yes or no. We are not asking you to tell us what medications you have taken or why you took them.) If so:

Answer:

Question:

If you have taken other vaccines or medications knowing that they involved the use of fetal stems in some way: Please explain why receiving them did not violate your sincerely held religious belief.

Answer:

Question:

If you have taken other vaccines or medication but do not know whether they involved the use of fetal stem cells in any way:

Answer:

Question:

Describe anything you did before taking them to find out whether they involved the use of fetal stem cells in any way. Did taking them violate your sincerely held religious belief?

Answer:

Question:

"If not, why not? If so, why were you willing to violate your belief as to them but not as to the COVID-19 vaccine?"

Answer:

Question: What other medical practices or pharmaceutical products do you refuse based on your religious belief about fetal stem cells?

Answer:

Question_N/A

Answer:

Question_N/A

Answer:

If you have additional information you would like to submit in support of your request for exemption, please provide it here:

*"Fully vaccinated" means fully vaccinated against the virus that causes COVID-19 as defined by the CDC. As of the date of this form, this means receipt of the second dose in a 2-dose series (e.g., Pfizer and Moderna vaccines) OR receipt of a single-dose vaccine (e.g., Johnson & Johnson's Janssen vaccine) AND a 2 week period having passed since the administration of the last vaccine dose. (This definition may change to include the requirement for vaccine booster shots in the future.)

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NOTICE TO RECIPIENT: If you are not the intended recipient of this e-mail, you are prohibited from sharing, copying, or otherwise using or disclosing its contents. If you have received this e-mail in error, please notify the sender immediately by reply e-mail and permanently delete this e-mail and any attachments without reading, forwarding or saving them, v.173,295 Thank you.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Los Angeles District Office
255 East Temple St, 4th Floor
Los Angeles, CA 90012
(213) 785-3090
Website: www.eeoc.gov

NOTICE OF RIGHT TO SUE (CONCILIATION FAILURE)

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 04/02/2026

To: Sarah V. Plath
7605 Wooddale Way
CITRUS HEIGHTS, CA 95610
Charge No: 555-2022-00578

EEOC Representative and email: MARCO ESTRADA
EQUAL OPPORTUNITY INVESTIGATOR
MARCO.ESTRADA@EEOC.GOV

NOTICE OF RIGHT TO SUE (CONCILIATION FAILURE)

To the person aggrieved: This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

NOTICE OF YOUR RIGHT TO SUE

This is official notice that the EEOC has dismissed your charge and has issued you notice of your right to sue the respondent(s) on this charge. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of EEOC's official notice of dismissal.** You should keep a record of the date you received the EEOC's official notice of dismissal. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 555-2022-00578.

On behalf of the Commission,

Digitally Signed By: Christine Park-Gonzalez
04/02/2026

Christine Park-Gonzalez
District Director

Cc:

Babak Yousefzadeh
Sheppard, Mullin, Richter & Hampton LLP
4 EMBARCADERO CTR FL 17
San Francisco, CA 94111

Robyn A Sembenini
Kaiser
One Kaiser Plaza 5th Floor
Oakland, CA 94612

Please retain this Notice for your records.

Enclosure with EEOC Notice of Closure and Rights (05/25)

INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC

*(This information relates to filing suit in Federal or State court **under Federal law**. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)*

IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive EEOC’s official notice of dismissal**. You should **keep a record of the date you received EEOC’s official notice of dismissal**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving EEOC’s official notice of dismissal (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA, the ADEA, or the PWFA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA, the ADEA, or the PWFA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of your receipt of EEOC’s official notice of dismissal and within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a “complaint” that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

ATTORNEY REPRESENTATION

For information about locating an attorney to represent you, go to:
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS

There are two ways to request a charge file: 1) a Freedom of Information Act (FOIA) request or 2) a “Section 83” request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of EEOC’s official notice of dismissal, please submit your FOIA and/or Section 83 request for the charge file promptly to allow sufficient time for EEOC to respond and for your review.

To make a FOIA request for your charge file, submit your request online at <https://eeoc.arkcase.com/foia/portal/login> (this is the preferred method). You may also submit a

Enclosure with EEOC Notice of Closure and Rights (05/25)

FOIA request for your charge file by U.S. Mail by submitting a signed, written request identifying your request as a “FOIA Request” for Charge Number 555-2022-00578 to the District Director at Christine Park-Gonzalez, 255 East Temple St 4th Floor, Los Angeles, CA 90012.

To make a Section 83 request for your charge file, submit a signed written request stating it is a “Section 83 Request” for Charge Number 555-2022-00578 to the District Director at Christine Park-Gonzalez, 255 East Temple St 4th Floor, Los Angeles, CA 90012.

You may request the charge file up to 90 days after receiving EEOC’s official notice of dismissal. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA requests, go to <https://www.eeoc.gov/eeoc/foia/index.cfm>.

For more information on submitted Section 83 requests, go to <https://www.eeoc.gov/foia/section-83-disclosure-information-charge-files>.



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannon Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California s Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

May 28, 2026

Sarah Plath
7605 Wooddale Way
Citrus Heights, CA 95610

RE: **Notice to Complainant**
CRD Matter Number: 202605-35342227
Right to Sue: Plath / Kaiser Permanente

Dear Sarah Plath:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, CRD will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. If you do not have an attorney, you must serve the complaint yourself. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



Civil Rights Department

KEVIN KISH, DIRECTOR

651 Bannan Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | California's Relay Service at 711
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May 28, 2026

RE: Notice of Filing of Discrimination Complaint
CRD Matter Number: 202605-35342227
Right to Sue: Plath / Kaiser Permanente

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. You may contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department



Civil Rights Department

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May 28, 2026

Sarah Plath
7605 Wooddale Way
Citrus Heights, CA 95610

RE: Notice of Case Closure and Right to Sue
CRD Matter Number: 202605-35342227
Right to Sue: Plath / Kaiser Permanente

Dear Sarah Plath:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective May 28, 2026 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

This matter may qualify for CRD's Small Employer Family Leave Mediation Program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Reproductive Loss Leave, or Bereavement Leave (Government Code sections 12945.2, 12945.6, or 12945.7) has the right to participate in CRD's free mediation program. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in CRD's free mediation program. The employee is required to contact the Department's Dispute Resolution Division prior to filing a civil action and must also indicate whether they are requesting mediation. The employee is prohibited from filing a civil action unless the Department does not initiate mediation within the time period specified in section 12945.21, subdivision (b) (4), or until the mediation is complete or is unsuccessful. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from the date the employee contacts the Department regarding the intent to pursue legal action until the mediation is complete or is unsuccessful. Contact CRD's Small Employer Family Leave Mediation Pilot Program by emailing DRDOnlineRequests@calcivilrights.ca.gov and include the CRD matter number indicated on the Right to Sue notice.



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After receiving a Right-to-Sue notice from CRD, you may have the right to file your complaint with a local government agency that enforces employment anti-discrimination laws if one exists in your area that is authorized to accept your complaint. If you decide to file with a local agency, you must file before the deadline for filing a lawsuit that is on your Right-to-Sue notice. Filing your complaint with a local agency does not prevent you from also filing a lawsuit in court.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
Civil Rights Department
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Sarah Plath

CRD No. 202605-35342227

Complainant,

vs.

Kaiser Permanente
1600 Eureka Road, Building C
Roseville, CA 95661

Respondents

1. Respondent **Kaiser Permanente** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant **Sarah Plath**, resides in the City of **Citrus Heights**, State of **CA**.

3. Complainant alleges that on or about **November 30, 2021**, respondent took the following adverse actions:

Complainant was harassed because of complainant's religious creed - includes dress and grooming practices.

Complainant was discriminated against because of complainant's religious creed - includes dress and grooming practices and as a result of the discrimination was terminated, denied accommodation for religious beliefs.

Complainant experienced retaliation because complainant reported or resisted any form of discrimination or harassment, requested or used a religious accommodation and as a result was terminated, denied accommodation for religious beliefs.

Additional Complaint Details: In the beginning of August 2021, Kaiser Permanente required all employees to become fully vaccinated or submit a medical or

1 religious exemption request. I submitted a religious exemption letter with a supporting letter
2 attached from my church pastor on
3 8/23/21. I received an approved religious exemption notice on August 29th 2021. On
4 October 23rd 2021 I was required to
5 respond to 8 questions to support my religious beliefs on why I was not able to become fully
6 vaccinated under the Kaiser
7 Permanente Covid-19 Vaccination Policy. I responded to all question and all responses
8 have been submitted before the
9 deadline listed in respect. During which at that time, if you were not fully vaccinated, you
10 were required to have weekly covid
11 testing to prove you were clear to work. I complied to all tests, never once receiving a
12 positive covid test, and followed all
13 protocols on wearing full personal protective equipment provided by Kaiser Permanente.
14 During the months I was working, I
15 experienced harassment from other employees and comments made towards all who
16 applied for a religious exemption "If you
17 have a religious belief that prevents you from becoming fully vaccinated, Kaiser should just
18 fire them all!" This comment
19 occurred in the office by Dr. Catich towards a group of other staff members, loud enough for
20 bystanders to hear. I requested to
21 talk to both of my managers and reported this behavior to them in a closed door meeting. I
22 was also removed once from
23 covering another Medical Assistant who was sick and worked briefly with her provider. When
24 she arrived, knowing I was not
25 vaccinated, she closed the door behind her, called management, and Jennifer Bollenbach
26 approached me and told me I had to
27 work somewhere else. When I asked what happened, I received along the lines that she did
28 not feel safe with me working with
her that day and requested to work with someone else. On 11/30/21 I received from HR that
my religious exemption was
denied, placed on unpaid administration leave until I get fully vaccinated before January
10th 2022. I was informed I could finish
off the week, but I was not able to come back to work unless I had physical proof I was fully
vaccinated. On December 3rd, I
was putting my things in a box towards the end of my shift, removing my belongings. Dr.
Khurana had approached me telling
me I was making a big mistake, I should just get the shot and to drop this nonsense, and
then when I stating I would not change
my sincerely religious beliefs, he stated "your religion is wrong!". He had made this comment
towards my sister prior to coming
to my desk to see me leave. I worked within the same department as my aunt, Daniela I., my
mother Aurelia M. And my sister,
Cristin M. All employees (over 13 people) including my family had received approved
religious exemption accommodations.
End of November, my mother and I including a receptionist received a denial letter and later
terminated on January 10th 2022.

1 I had responded to the email I had received from HR and CC'd both of my managers- I
2 received no responses in return. I
3 contacted the Union, they did not proceed to assist me in my multiple attempts for support
4 with my denial and just hung up the
5 phone on my attempts. Having been told by my managers that they have no say in this or
6 reversing the decision by HR, stating
7 "it is above them". When speaking to HR on the phone, I was told that there were no
8 standards necessary to meet for granting
9 an exemption from obtaining any COVID-19 vaccine and that a 3rd party supplied the denial
10 response towards my religious
11 exemption request that I was already approved once and later denied.
12 Because of my sincerely held religious beliefs, there came a hostile environment towards
13 me for being unvaccinated, telling me
14 that I am making a stupid decision and my religion is wrong, and Kaiser Permanente
15 terminating me without ever responding to
16 my immediate inquiry regarding my denial letter.
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1 VERIFICATION

2 I, **Sarah Plath**, am the **Complainant** in the above-entitled complaint. I have read the
3 foregoing complaint and know the contents thereof. The matters alleged are based on
4 information and belief, which I believe to be true. The same is true of my own
5 knowledge, except as to those matters which are therein alleged on information and
6 belief, and as to those matters, I believe it to be true.

7 On May 28, 2026, I declare under penalty of perjury under the laws of the State of
8 California that the foregoing is true and correct.

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Citrus Heights, CA