

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

DAVID SAMBRANO, individually and on  
behalf of all others similarly situated, *et al.*,

*Plaintiffs,*

v.

UNITED AIRLINES, INC.,

*Defendant.*

Civil Action No.: 4:21-01074-P

**APPENDIX IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S  
MOTION FOR PARTIAL DISMISSAL OF THE SECOND AMENDED COMPLAINT**

Plaintiffs file this Appendix in Support of Plaintiffs' Opposition to Defendant's Motion for Partial Dismissal of the Second Amended Complaint and, in support thereof, show the Court as follows:

**APPENDIX**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>APP. RANGE</b>
1	EEOC Inquiry Form of David Sambrano, Number: 524-2021-01651, Sept. 19, 2021	1–7
2	EEOC Inquiry Form of Genise Kincannon, Number: 550-2021-01800, Sept. 17, 2021	8–12
3	EEOC Inquiry Form of Kimberly Anne Hamilton, Number: 450-2021-06274, Sept. 20, 2021	13–18
4	EEOC Inquiry Form of Debra J. Thal Jonas, Number: 450-2021-06256, Sept. 20, 2021	19–23
5	EEOC Inquiry Form of Charles Burk, Number: 550-2022-00363, Nov. 12, 2021	24–27
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7	EEOC Inquiry Form of Alyse Medlin, Number: 450-2022-03320, Mar. 12, 2022	33–37

April 24, 2023

Respectfully submitted,

/s/ Mark R. Paoletta

Mark R. Paoletta\*

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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing has been served via the Court's electronic filing system upon all counsel of record.

/s/ Mark R. Paoletta  
Mark R. Paoletta

# **EXHIBIT 1**

## **EEOC (INQUIRY) NUMBER: 524-2021-01651**

### **Inquiry Information**

#### **REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** 09/09/2021

**Reason for Complaint:** Religion

**Pay Disparity:**

**Location of Incident:** Texas

**Submission (initial inquiry) Date:** 09/19/2021

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:** N/A

**Charge Number:** N/A

**Claim previously filed as complaint with another Agency?** No

**Agency Name:** N/A

**Approximate Date of Filing:** N/A

**Nature of Complaint:** N/A

#### **INQUIRY OFFICE**

**Receiving:** Newark Area Office

**Accountable:** Dallas District Office

#### **APPOINTMENT**

**Appointment Date and time:**

**Interview Type:**

**APPROXIMATE DEADLINE FOR FILING A CHARGE:** 07/07/2022

#### **POTENTIAL CHARGING PARTY**

**First Name, Middle Initial:** David, E

**Last Name:** Sambrano

**Street or Mailing Address:** [REDACTED]

**Address Line 2:**

**City, State, Zip:** COLLEYVILLE, TX, 76034

**Country:**

**Year of Birth:**

**Email Address:** [REDACTED]

**Home Phone Number:**

**Cell Phone Number:** [REDACTED]

**RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Street or Mailing Address:** 233 S WACKER DR FL 11

**Address Line 2:**

**City, State, Zip Code:** CHICAGO,IL, 60606

**County:** Cook

**Phone Number:** (872) 825-7608

**RESPONDENT CONTACT**

**First and Last Name:** Kate Gebo

**Email Address:** kate.gebo@united.com

**Phone Number:**

**Title:** Human Resources Director or Owner

**LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Street or Mailing Address:** United Airlines

**Address Line 2:** 1 Terminal C Gate 107 Newark Liberty Int'l Airport

**City, State, Zip Code:** NEWARK, NJ, 07114

**County:** USA

**POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:** M

**Disabled:** I do not have a disability

**Are you Hispanic or Latino?** hispanic or latino

**Ethnicity:** White,

**National Origin:** American(U.S.)

**Adverse Action(s)**

In consideration of United Airlines vaccine mandate for all employees, I filed for a religious exemption in good faith, using the protected activity process under Title VII, by stating my faith based objections. To date, United has failed to engage in the interactive process, and has effectively terminated my employment by providing one option, an indefinite leave of absence. I believe this was done to retaliate against me because I requested a reasonable accommodation due to my sincerely held religious beliefs. All the vaccines being offered currently use aborted fetal cells in the development or current manufacturing process, thus it is against my sincerely held religious beliefs.

The process has not been interactive as I have not received any phone calls or held any conversations with United to discuss any accommodation. All communication has been via email. I feel this is discrimination against me.  
(Continued in supplemental info)

**Supplemental Information**

**What Reason(s) were you given for the action taken against you?**

In consideration of United Airlines vaccine mandate for all employees, I filed for a religious exemption in good faith, using the protected activity process under Title VII, by stating my faith based objections. To date, United has failed to engage in the interactive process, and has effectively terminated my employment by providing one option, an indefinite leave of absence. I believe this was done to retaliate against me because I requested a reasonable accommodation due to my sincerely held religious beliefs. All the vaccines being offered currently use aborted fetal cells in the development or current manufacturing process, thus it is against my sincerely held religious beliefs.

The process has not been interactive as I have not received any phone calls or held any conversations with United to discuss any accommodation. All communication has been via email. What they have done is question my religious beliefs, asked wrongly for a third party validation, and threatened separation of employment with the leave of absence option. United has not negotiated in good faith as they have given a predetermined outcome, as well as have the process be very restricting, with responses due in short order and outside the norm for such significant decisions. As an example, they asked for a response to third party validation within three days, and this was over Labor Day weekend.

There is no allowable choice to not accept the accommodation and continue negotiating. There have been no negotiations or discussions of the unique capabilities that I may have and how these might benefit United, or whether I was interested in changing jobs or planes, as I am a pilot. United has made a unilateral decision to keep all unvaccinated employees out of the workforce for safety. Though I have approval for my religious exemption, United has not considered my background or other options for accommodation and I feel this is discriminatory.

United's accommodation response is stated in part, "Operational customer-facing roles?(e.g. - Pilots, Flight Attendants, Customer Service Agents and their M&A support teams): If you work in one of these roles that routinely includes personal interactions with a large volume of people, you will be put on temporary unpaid personal leave effective October 2. Once the pandemic meaningfully recedes, you will be welcomed back to the team on active status, which may include other, safety-related workplace measures that do not exist today.?"

I affirmed my religious beliefs on August 26, 2021, when I applied for the Reasonable Accommodation Process (RAP) that United dictated we follow.

On August 29, 2021, United requested answers to questions relating to previous vaccinations and how they impacted my current decision, and gave 3 days to comply. On September 1, 2021, I responded to the questions and also cited why these questions were not in compliance with current law and had no bearing on my religious beliefs.

On September 3, 2021 United asked for third party validation of my religious beliefs, and gave 3 days to comply. On September 6, 2021, I sent the third party letter along with another one for validation, knowing that the request was not legal, but willing to comply.



On September 9, 2021, United granted my religious exemption and requested within 5 days a response. As there was no option to negate the terms and negotiate, on September 15, 2021, I received notification and the terms of the accommodation. By not responding, United indicated it would be the same terms as if responding YES, which is a forced leave of absence. Again, I state that no phone call or conversation took place, and no interactive process or discussion of what options that both parties could agree on. There are many different options available and yet, United dictated the terms and had a predetermined outcome for a class of employees.

As a pilot, financially, the forced separation will cause a reduction in pay of on average \$30,000 per month, an increase in health insurance premiums to a non-sustainable level, loss of contribution to the 401K retirement account, loss of accrual of seniority during the time off, loss of pass benefits for myself and my dependents, loss of vacation accrual, and loss of sick leave accrual. At the current income level, if I am fired, it will cost \$2.52 million until my retirement date. This is a significant burden to be placed on me at this time with seven years before retirement. I also have one child in college and twin boys who will be going to college next year. This significantly impacts all of them. I am also financially preparing for my father who will need long term memory care and this decision also will impact what care we can provide. The accommodation offered by United is a significant impact on my family and not the Company.

The stress that this has caused has been incredible. I would say that the stress has prolonged my healing from covid and can be a contributor my Long Covid symptoms. It has made it difficult to sleep It has caused undue stress for my family as they look at a much bleaker future before them, which is forced due to standing for my religious beliefs.

As a Christian, I believe the Bible is the inspired and infallible Word of God. The Bible also states that man is created in the image of God in Genesis 1:27. It also says that we are the temple of God in 1 Corinthians. I believe that life begins at conception and ends in natural death. I believe in the healing nature of man when he follows the Word of God. In Psalms, it is definitive for me to believe that life begins at conception.

The Christian Church has condemned abortion since the earliest days and it is considered murder of innocent blood. The Covid-19 vaccines were developed or tested using cell lines that were generated or derived from tissues of aborted fetuses. The Johnson and Johnson vaccine used an aborted fetal cell line in manufacturing its COVID-19 vaccine, while Pfizer and Moderna used aborted fetal cell lines in testing the efficacy of their vaccines. (See James Lawler, MD, You asked, we answered: Do the COVID-19 vaccines contain aborted fetal cells? Nebraska Medicine, August 4, 2021, <https://www.nebraskamed.com/COVID/you-asked-we-answered-do-the-covid-19-vaccines-contain-aborted-fetal-cells>).

I feel that United has discriminated against me for my religious beliefs and has not complied with the laws governing reasonable accommodation. They have not negotiated in good faith and had a predetermined outcome, as noted in their response for a forced leave of absence.

**Was anyone in a similar situation treated the same, better, or worse than you?**

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

**Please tell us any other information about your experience?**

# **EXHIBIT 2**

## **EEOC (Inquiry) Number: 550-2021-01800**

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### **Inquiry Information**

#### **INQUIRY OFFICE**

**Receiving:** Chicago District Office

**Accountable:** Chicago District Office

#### **POTENTIAL CHARGING PARTY**

**Name:** Mrs. Genise Kincannon

**Address:** [REDACTED]  
FT WORTH, TX 76119

**Year of Birth:**

**Email Address:** [REDACTED]

**Phone Number:** [REDACTED]

#### **POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:** F

**Disabled?** I do not have a disability

**Are you Hispanic or Latino?** not hispanic or latino

**Ethnicity:** White,

**National Origin:** Irish

#### **RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Address:** San Francisco International Airport Terminal 3  
San Francisco, CA 94128

**County:** San Mateo

**Phone Number:**

#### **LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Address:** United Airlines Terminal 3 San Francisco International Airport

**County:**

**RESPONDENT CONTACT**

**Name:** Megan Detzner

**Email Address:** megan.detzner@united.com

**Phone Number:** (872) 825-7608

**Title:** Sr. Manager, EEO Compliance

**REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** 09/09/2021

**Reason for Complaint:** Religion

**Pay Disparity:**

**Location of Incident:** Texas

**Submission (initial inquiry) Date** 09/17/2021

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:**

**Charge Number:** 550-2021-01800

**Claim previously filed as complaint with another Agency?** No

**Agency Name:**

**Approximate Date of Filing:**

**Nature of Complaint:**

**Adverse Action(s)**

I submitted my reasonable accommodation on August 18, 2021 based on my firm religious beliefs against using the vaccine. The vaccines were tested using fetal cell cultures or abortion derived cell lines. Therefore taking any of these vaccines would be a violation of both my faith that opposes abortion and my moral conscience. On September 9, my request for an accommodation had been approved, but that the accommodation would be unpaid furlough. The unpaid leave is absolutely unacceptable. It attempts to make me choose between my religious beliefs and my livelihood. The financial hardship of making my house payment, daughters' college payment, and day to day bills is putting me in such a state of depression, I can hardly function. I cry constantly, my stomach is in knots and my head is spinning 24 hours a day. I am being discriminated against because of my religious beliefs and it is a violation of my rights under Title VII to both work and live by my religious convictions.

**APPOINTMENT**

**Appointment Date and time:**

**Interview Type:** \_

**APPROXIMATE DEADLINE FOR FILING A CHARGE:** 07/07/2022

**Supplemental Information**

**What Reason(s) were you given for the action taken against you?**

No reason given, United just told everyone with a religious or medical exemption that they would be put on unpaid leave for an undetermined time. That is punishment for those you wish to live by their religious values and for those that have medical reasons

**Was anyone in a similar situation treated the same, better, or worse than you?**

The RAP process was all done through United's Help Hub app. The process was the same for all employees as far as I know. It was very robotic and wording was the same on most people's emails. It was a blanket response for all.

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

**Please tell us any other information about your experience?**

Hire date 1/21/1990, Flight Attendant

Unpaid leave of absence as of 11/12/2021

Religion is Baptist

Learned to file with EEOC thru AE4HF

I am aware of others filing thru AE4HF and social media

Vaccine mandate was 8/6/2021

Deadline to file RAP was 8/31/2021

Deadline to receive vaccine 9/27/2021 then moved to 10/25/2021

I applied for my accommodation 8/18/2021

I was asked if I was aware of any vaccines I have taken involved skin cells. I answered no, then I was asked for a written document in 3 days from a third party who can support my religious belief. My friend of 37 yrs wrote a letter.

I requested religious exemption

The exemption was approved, however, the accommodation was an unpaid leave without benefits for an indefinite time.

My exemption was approved on 9/9/21

# **EXHIBIT 3**



**EEOC (INQUIRY) NUMBER: 450-2021-06274**

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**Inquiry Information**

**INQUIRY OFFICE**

**Receiving:** Chicago District Office

**Accountable:** Chicago District Office

**POTENTIAL CHARGING PARTY**

**Name:** Mrs. Kimberly A. Hamilton

**Address:** [REDACTED]  
COLLEYVILLE, TX 76034

**Year of Birth:**

**Email Address:** [REDACTED]

**Phone Number:** [REDACTED]

**POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:**

**Disabled?**

**Are you Hispanic or Latino?**

**Ethnicity:**

**National Origin:**

**RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Address:** 233 S.Wacker Drive  
CHICAGO, IL 60606

**County:** Cook

**Phone Number:**

**LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Address:** United Airlines DFW Terminal E  
DFW AIRPORT, TX 75261

**County:** Tarrant

**Name:** Megan Detzner

**Email Address:** megan.detzner@united.com

**Phone Number:** (872) 825-7608

**Title:** Sr. Manager, EEO Compliance

**REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** Thu Sep 09 00:00:00 EDT 2021

**Reason for Complaint:** Religion

**Pay Disparity:**

**Location of Incident:** Texas

**Submission (initial inquiry) Date:** 09/20/2021

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:**

**Charge Number:** 450-2021-06274

**Claim previously filed as complaint with another Agency?** No

**Agency Name:**

**Approximate Date of Filing:**

**Nature of Complaint:** Religion

**Adverse Action(s)**

I requested a religious accommodation not to be COVID vaccinated for 2 reasons. 1. my sincere belief that abortion is murder & using fetal tissue for medical or other test or product is a sin. Thou shalt not Kill is a Commandment from God. There may be people who believe taking the vaccination is an act of Charity, the Catechism of the Catholic Church dictates that "A human being must always obey the certain judgment of his conscience. ?2, I believe my body is a temple of God, as 1 Corinthians teaches. I am to honor God with my body. I do not smoke or do drugs and rarely drink. I must not put things into my body that do not honor God. If I took the vaccine, I would place myself in a morally corrupt position in direct opposition to the Word of God and would relinquish my glorious afterlife in Heaven. I am being discriminated against since my coworkers are not being required to violate their religious beliefs as a condition of receiving pay and benefits to provide for their family.

**Appointment Date and time:** 01/24/2022 08:01

**Interview Type:** Phone

**APPROXIMATE DEADLINE FOR FILING A CHARGE:**

07/07/2022



**Supplemental Information****What Reason(s) were you given for the action taken against you?**

Failure to take the covid 19 vaccine

**Was anyone in a similar situation treated the same, better, or worse than you?**

Yes! United Airlines mandated that their US based employees be vaccinated for COVID 19, which I believe was a marketing scheme so they could claim United Airlines was the first airline to be 100% vaccinated. United offered a religious accommodation and a medical accommodation, however instead of the accommodation being a custom based accommodation for each employee's specific job situation, United offered a blanket accommodation to most, if not all, employees which was indefinite unpaid leave of absence. I was one of the people out of the 2000 to 3000 that received the same notification that I was being placed on indefinite unpaid leave.

On the unpaid leave I have: No health insurance and have to purchase expensive COBRA with no income while my husband is going through expensive Cancer treatment; I don't qualify for unemployment benefits since I am technically on leave and not terminated; I unable to retire from personal leave and no path to get off personal leave to retire; I will lose my contributions and the company's contribution to my retirement account; I will lose my seniority while on unpaid leave and I will be unable to access bidding for better positions and promotions, which may only come once in a person's career, I am in a unique position today that only rarely comes available. I was with the company 12 years before the positioned opened up. If I am replaced, I may never have the opportunity to gain access to that job again and I will lose my prime bidding slot (based on seniority) for vacations and holidays.

United will also not allow me to use my skills to get a job at a competitor airline while on unpaid leave. Working for United is all I have done for close to 20 years. My skills may not apply to most jobs.

The company has also failed to observe confidentiality of my medical status. United has dictated that the unvaccinated employees must wear an KN95 mask. The only employees in the station that use KN95 masks are the unvaccinated, which calls attention to our status and encourages discrimination and lashing out from employees and supervisors and derogatory comments. The company has called us "dangerous". I am not able to list all of the 2000 plus employees, but I understand that to be the number of equally discriminated upon number.

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

There are at least 2000 other employees similarly affected system wide. Locally, at DFW where I work, there are several that can support my claim: Dana Mooney [REDACTED] Tracy Brown [REDACTED] Nancy Yanni [REDACTED]  
[REDACTED] David Castillo [REDACTED] Claudia Day [REDACTED]  
Merrick Psalms, Sean Mathieson [REDACTED]

**Please tell us any other information about your experience?**

United Airlines is discriminating against me. The 09/09/21 approval United Airlines has offered me has no accommodation and has discriminated against me by taking away my pay and benefits and has done so without any discussion in the process:

retaliated against and kept from working due to my religious beliefs. I will be

placed on an unrequested personal leave. I will be

not be paid. I will

lose my family's health insurance. I will

forced into an expensive COBRA healthcare plan. I will be

lose contributions to my 401k plan. I will

unable to retire from this position. I will be

I will

lose flight benefits.

I have

felt publicly ridiculed by others for my religious decision.

My personal religious decision has been maliciously made public both within the company and publicly, through the mail by postcard, announcing both my unvaccinated status and the date they intend to separate me from the company.

I am facing a loss of seniority. Seniority determines schedule bidding status, work schedule, work assignments, prime vacation bidding, holiday time off, flight standby status which enables your ability to fly or not, literally every aspect of work life. I have 18 years. The loss of even one day of seniority can make a big difference in where your place is in line for each aspect of work life.

The possible return to work date is a nonscientific determination.

The CEO's media statements that the company requires time to determine how to accommodate a safe working environment is misleading because I am not customer facing and working protocols have been in place since the company began dealing with the covid virus, many of which have recently become lax.

Effectively they are terminating my employment due to my strongly held religious beliefs

# **EXHIBIT 4**

**EEOC (Inquiry) Number: 450-2021-06256**

**Inquiry Information**

**INQUIRY OFFICE**

**Receiving:** Chicago District Office

**Accountable:** Chicago District Office

**POTENTIAL CHARGING PARTY**

**Name:** Debra J. Thal Jonas

**Address:** [REDACTED]

Bedford, TX 76021

**Year of Birth:**

**Email Address:** [REDACTED]

**Phone Number:** [REDACTED]

**POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:**

**Disabled?**

**Are you Hispanic or Latino?**

**Ethnicity:**

**National Origin:**

**RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Address:** DFW Airport 2400 Aviation Dr

Dallas, TX 75261

**County:** Dallas

**Phone Number:** (872) 825-7608

**LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Address:** 2400 Aviation Dr.

**County:**



**RESPONDENT CONTACT**

**Name:** Megan Detzner

**Email Address:** megan.detzner@united.com

**Phone Number:** (872) 825-7608

**Title:** Sr. Manager, EEO Compliance

**REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** 09/15/2021

**Reason for Complaint:** Religion, Genetic information, my family medical history, or my participation in genetic services like counseling, education or testing

**Pay Disparity:**

**Location of Incident:** Texas

**Submission (initial inquiry) Date** 09/20/2021

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:**

**Charge Number:** 450-2021-06256

**Claim previously filed as complaint with another Agency?** No

**Agency Name:**

**Approximate Date of Filing:**

**Nature of Complaint:**

**Adverse Action(s)**

Aug. 6, 2021 United Airlines notified COVID19 vaccine mandatory to ensure continued employment as of Sept. 27, 2021. Applied for a Medical Exemption (tried to file a Religious Exemption-unable) believing these to be protected activities due to being medically and faith based exemptions to the vaccine mandate. Later received approval for the Medical Exemption under United's Reasonable Accommodation Process on Sept. 15, 2021. United notified me that my last day on the job will be Oct. 2, 2021. Terminating my employment in this manner is not an accommodation. This is retaliation for filing a RAP for medical issues and religious convictions. Losing my job will ruin our entire family. After 37 years of working this job, I am subjected to this inordinate stress. I am experiencing increased forgetfulness, dangerously high blood pressure, risk of stroke and/or heart attack, asthma, severe anxiety and sleep deprivation, which in turn is affecting my ability to focus and complete tasks.\_

**APPOINTMENT**

**Appointment Date and time:**

**Interview Type:** \_

**APPROXIMATE DEADLINE FOR FILING A CHARGE:** 07/13/2022

**APP.22**

**Supplemental Information**

**What Reason(s) were you given for the action taken against you?**

**Was anyone in a similar situation treated the same, better, or worse than you?**

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

**Please tell us any other information about your experience?**

# EXHIBIT 5

## **EEOC (INQUIRY) NUMBER: 550-2022-00363**

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### **Inquiry Information**

#### **REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** 09/09/2021

**Reason for Complaint:** Religion

**Pay Disparity:**

**Location of Incident:** Texas

**Submission (initial inquiry) Date:** 11/12/2021

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:** N/A

**Charge Number:** N/A

**Claim previously filed as complaint with another Agency?** No

**Agency Name:** N/A

**Approximate Date of Filing:** N/A

**Nature of Complaint:** N/A

#### **INQUIRY OFFICE**

**Receiving:** San Francisco District Office

**Accountable:** Dallas District Office

#### **APPOINTMENT**

**Appointment Date and time:**

**Interview Type:**

**APPROXIMATE DEADLINE FOR FILING A CHARGE:** 07/07/2022

#### **POTENTIAL CHARGING PARTY**

**First Name, Middle Initial:** Charles

**Last Name:** Burk

**Street or Mailing Address:** [REDACTED]

**Address Line 2:**

**City, State, Zip:** FORT WORTH, TX, 76109

**Country:** UNITED STATES OF AMERICA

**Year of Birth:**

**Email Address:** [REDACTED]

**Home Phone Number:**

**Cell Phone Number:** [REDACTED]

**RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Street or Mailing Address:** 233 Wacker Dr.

**Address Line 2:**

**City, State, Zip Code:** CHICAGO,IL, 60606

**County:** Cook

**Phone Number:**

**RESPONDENT CONTACT**

**First and Last Name:**

**Email Address:**

**Phone Number:**

**Title:** Human Resources Director or Owner

**LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Street or Mailing Address:** San Fran International Airport

**Address Line 2:**

**City, State, Zip Code:** SAN FRANCISCO INTNL AIRPORT, CA, 94128

**County:**

**POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:** M

**Disabled:** I have a disability

**Are you Hispanic or Latino?** not hispanic or latino

**Ethnicity:** White,

**National Origin:** American(U.S.)

**Adverse Action(s)**

I got vaxxed, under duress and coerced by my employer, and violated my bodily autonomy and sincerely held religious belief resulting in a morally injury.stressed/anxious/difficult sleep/trouble concentrate/focus, exhausted-physical/mental. Jobloss discriminatory/retaliatory-causes \$ harm from uncertainty. Provide4 family/elderly mom. No med insure, seniority, retirement. Targeted/discriminated against by UA because of faith-based objection; marriage suffers. Harassed by co-workers.UA refused to engage in meaningful interactive process. Having taken the vaccine I believe that it may cause irreparable harm to my health. I feel I was denied informed consent. I nourish my body in alignment with my religious belief that my body is the temple of the Holy Spirit that dwells within me. Felt harassed by UA when they returned initial religious exemption, they stated it didn?t identify a specific sincerely held religious belief that prevents you from receiving the COVID-19 vaccine

**Supplemental Information**

**What Reason(s) were you given for the action taken against you?**

N/A

**Was anyone in a similar situation treated the same, better, or worse than you?**

N/A

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

N/A

**Please tell us any other information about your experience?**

N/A

# EXHIBIT 6

## **EEOC (INQUIRY) NUMBER: 440-2022-01994**

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### **Inquiry Information**

#### **REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** 09/20/2021

**Reason for Complaint:** Religion, Genetic information, my family medical history, or my participation in genetic services like counseling, education or testing

**Pay Disparity:**

**Location of Incident:** Texas

**Submission (initial inquiry) Date:** 12/14/2021

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:** N/A

**Charge Number:** N/A

**Claim previously filed as complaint with another Agency?** No

**Agency Name:** N/A

**Approximate Date of Filing:** N/A

**Nature of Complaint:** N/A

#### **INQUIRY OFFICE**

**Receiving:** Chicago District Office

**Accountable:** Dallas District Office

#### **APPOINTMENT**

**Appointment Date and time:**

**Interview Type:**

**APPROXIMATE DEADLINE FOR FILING A CHARGE:** 07/18/2022

#### **POTENTIAL CHARGING PARTY**

**First Name, Middle Initial:** Jarrad

**Last Name:** Rains

**Street or Mailing Address:** [REDACTED]



**Address Line 2:**

**City, State, Zip:** WEATHERFORD, TX, 76087

**Country:** UNITED STATES OF AMERICA

**Year of Birth:**

**Email Address:** [REDACTED]

**Home Phone Number:**

**Cell Phone Number:** [REDACTED]

**RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Street or Mailing Address:** 233 S WACKER DR

**Address Line 2:**

**City, State, Zip Code:** CHICAGO,IL, 60606

**County:** Cook

**Phone Number:**

**RESPONDENT CONTACT**

**First and Last Name:** Kate Gebo

**Email Address:** Kate.Gebo@united.com

**Phone Number:**

**Title:** Human Resources Director or Owner

**LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Street or Mailing Address:**

**Address Line 2:**

**City, State, Zip Code:**

**County:**

**POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:** M

**Disabled:** I have a disability

**Are you Hispanic or Latino?** not hispanic or latino

**Ethnicity:** White,

**National Origin:**

**Adverse Action(s)**

On September 20, 2021 while engaging in a protected activity identifying my medical and faith based objections to United Airlines vaccine mandates. I was approved for a medical exemption but denied a religious exemption documented by an audio recording.UAL FAILED TO ENGAGEIn any REASONABLE ACCOMMODATION PROCESS and effectively terminated my employment by a forced medical leave ON NOVEMBER 16. AT THIS TIME MY EMOTIONAL PHYSICAL AND MENTAL HEALTH HAS BEEN GREATLY AFFECTED. THE STRESS, ANXIETY SLEEP DEPRIVATION HAVE EFFECTIVELY MADE ME NON-FUNCTIONAL AT TIMES. The loss of my job and all the privileges and benefits that it affords has deeply grieved me. My mental physical and emotional health have suffered greatly with anxiety stress and sleep deprivation. I often find myself complacent and dysfunctional not knowing what to do next. I believe this was an act of RETALIATION from United Airlines because I requested a reasonable accommodation for my faith and medical situation.

**Supplemental Information**

**What Reason(s) were you given for the action taken against you?**

N/A

**Was anyone in a similar situation treated the same, better, or worse than you?**

N/A

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

N/A

**Please tell us any other information about your experience?**

N/A

# EXHIBIT 7

**EEOC (Inquiry) Number: 450-2022-03320**

**Inquiry Information**

**INQUIRY OFFICE**

**Receiving:** Denver Field Office

**Accountable:** Denver Field Office

**POTENTIAL CHARGING PARTY**

**Name:** Mrs. Alyse Medlin

**Address:** [REDACTED]  
MANSFIELD, TX 76063

**Year of Birth:**

**Email Address:** [REDACTED]

**Phone Number:** [REDACTED]

**POTENTIAL CHARGING PARTY'S DEMOGRAPHICS**

**Gender:** F

**Disabled?** I do not have a disability

**Are you Hispanic or Latino?** not hispanic or latino

**Ethnicity:** Black or African American,

**National Origin:** American(U.S.)

**RESPONDENT/Employer**

**Organization Name:** UNITED AIRLINES

**Type of Employer:** Business or non-profit organization that I applied to, work for, or worked for

**Number of Employees:** 20 or more employees

**Address:** 8500 PENA BLVD  
DENVER, CO 80249

**County:** Denver

**Phone Number:**

**LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT**

**Address:** Terria Del sol Rd

**County:**

**RESPONDENT CONTACT**

**Name:** UNITED AIRLINES

**Email Address:**

**Phone Number:**

**Title:**

**REASON(S) FOR CLAIM**

**Date of Incident (Approximate):** 03/09/2022

**Reason for Complaint:** Religion

**Pay Disparity:**

**Location of Incident:** Colorado

**Submission (initial inquiry) Date** 03/12/2022

**Claim previously filed as charge with EEOC?** No

**Approximate Date of Filing:**

**Charge Number:** 450-2022-03320

**Claim previously filed as complaint with another Agency?** No

**Agency Name:**

**Approximate Date of Filing:**

**Nature of Complaint:**

**Adverse Action(s)**

I was terminated Wednesday, March 9 because it's against my belief to take a Covid vaccine.\_

**APPOINTMENT**

**Appointment Date and time:**

**Interview Type:** \_

**APPROXIMATE DEADLINE FOR FILING A CHARGE:** 01/03/2023

**Supplemental Information**

**What Reason(s) were you given for the action taken against you?**

My unwillingness to inject myself with a vaccine after providing a religion exemption.

**Was anyone in a similar situation treated the same, better, or worse than you?**

yes

**Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.**

**Please tell us any other information about your experience?**