

NOTE: All responses, in all its parts, must entirely reflect your sincere religious beliefs. If any portion does not match your particular beliefs, you must delete it or modify it to make it conform.

According to Toni Garza's email of October 28, 2021, to U.S. Sirius Team staff, because Sirius is a federal contractor, recently enacted federal rules mandate that I either be vaccinated or seek a medical or religious accommodation if I believe I am exempt on those grounds. To the extent this federal mandate is lawful, as explained below, I am entitled to a religious exemption under Title VII of the Civil Rights Act of 1964 and the Religious Freedom Restoration Act. Upon advice of counsel, I have been informed that Title VII and relevant Supreme Court precedent holds that I am not required to provide "a letter or note from a religious leader letting [you] know that [my] religion prevents [me] from receiving the COVID-19 vaccination," when seeking an accommodation. Because the federal government does not require such a note for *its own employees*, there is no basis to impose such a requirement on federal contractors. The inquiry is limited to my own truthful statements of belief and information that may be necessary for the interactive process of accommodating those beliefs, which I provide fully below.

As I am in receipt of the federal government's most up to date religious accommodation form, I am relying on its questions verbatim for my religious accommodation request. In short, if the federal government form is legally sufficient for federal employees, it is legally sufficient for federal contractors, thereby rendering anything more intrusive or burdensome legally suspect.

1- Please describe the nature of your objection to the COVID-19 vaccination requirement

I have strongly held religious beliefs against the unjust termination of human life through abortion, as well as use of aborted fetal cell lines in the development, manufacture, or testing of vaccines. My religious beliefs are rooted in the religious principle that all humans being created in the image and likeness of God and thus granted an inviolable dignity that begins with a right to life. It is thus a grave evil to intentionally kill innocent life, and because human life begins at conception, abortion is a grave evil as it is the intentional killing of innocent life. This belief extends to the respect for the remains of victims of abortion and recognizes as a grave evil the use of body parts and tissues of aborted children for dissection and research, including for vaccine development.

It is undisputed that all COVID-19 vaccines currently available in the U. S. were either developed with, or tested on, HEK-293 or PER.C6 which are abortion derived fetal cell lines. The cell line HEK-293, for example, came from an aborted child's kidney. I am firmly against being a beneficiary of that child's death by receiving a vaccine that used such fetal cell lines.

2- Would complying with the COVID-19 vaccination requirement substantially burden your religious exercise or conflict with your sincerely held religious beliefs, practices, or observances? If so, please explain how.

Based on all the relevant circumstances applied to my religious principles and beliefs described above, being forced or pressured to take any of the currently available COVID-19 vaccines would clearly conflict with my sincerely-held religious beliefs and would substantially burden my religious exercise. The contours of the conflict is explained above. Additionally, having to violate my beliefs in this manner would create a crisis of conscience with attendant spiritual and emotional distress that I would likely carry with me to some degree for the rest of my life. Being punished by adverse employment actions, including retaliation, demotion, termination, isolation, stigmatization, or any form of discrimination for following my religious beliefs would impose a clear and substantial burden on my religious exercise as well.

As such, I request a religious accommodation from the COVID-19 vaccination requirement under Title VII of the Civil Rights Act of 1964 and the Religious Freedom Restoration Act.

3- How long have you held the religious belief underlying your objection?

I have been believed in the sanctity of life and have been against abortion and fetal bodily desecration for many years.

4- Please describe whether, as an adult, you have received any vaccines against any other diseases (such as flu vaccine or a tetanus vaccine) and, if so, what vaccines you most recently received and when, to the best of your recollection.

Because I am not religiously opposed to all vaccination, this question is irrelevant.

5- If you do not have a religious objection to the use of all vaccines, please explained why your objection is limited to particular vaccines.

See above descriptions.

6- Please provide any additional information that you think may be helpful in reviewing your request.

I have been able to discharge my duties without having been vaccinated for COVID-19 without issue since the beginning of the pandemic and will be able to continue to fulfill my duties after the accommodation is granted. I am willing to [continue] to work remotely as part of the requested accommodation.