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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 CHRISTOPHER KEY, an individual,

13
14 Plaintiff,

15 vs.

16 CITY OF LOS ANGELES,
17 DEPARTMENT OF BUILDING
18 AND SAFETY; DOES 1-10,
19 INCLUSIVE,
20 Defendants.

Case No.:

**VERIFIED COMPLAINT FOR
VIOLATION OF RIGHTS UNDER
TITLE VII OF THE CIVIL RIGHTS
ACT OF 1964 [42 U.S.C. 2000e et
seq.]
(DEMAND FOR JURY TRIAL)**

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25 **COMES NOW, Plaintiff, CHRISTOPHER KEY (hereinafter**
26 **“PLAINTIFF”), and for his Complaint alleges as follows:**
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INTRODUCTION

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2 Plaintiff worked for Defendant as a building mechanical inspector at
3 Defendant's downtown Los Angeles, CA location. Defendant required its
4 employees to be vaccinated for SARS-CoV-2 (COVID-19). Because of the
5 Plaintiff's faith, he sought an accommodation for his sincerely held religious to be
6 exempt from taking this vaccine. Plaintiff was placed on unpaid leave prior to a
7 review of his religious accommodation request.
8

9 Notwithstanding having legitimately sought an accommodation for sincerely
10 held religious beliefs, which kept Plaintiff from taking the vaccine, he was placed
11 on unpaid leave by Defendant on December 4, 2021. The gravamen of this
12 complaint is that Defendant refused to accommodate, otherwise discriminated
13 against, and subsequently placed Plaintiff on unpaid leave from his job because he
14 asked for accommodation due to his religious beliefs. Defendant knew or should
15 have reasonably known that Plaintiff held religious beliefs because he asserted
16 them. Defendant nevertheless failed to engage in an interactive process or review
17 of Plaintiff's accommodation request, placed him on leave without pay, and
18 retaliated against him for filing a complaint with the Equal Employment
19 Opportunity Commission (EEOC).
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JURISDICTION AND VENUE

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25 1. This Court has authority over this action pursuant to 28 U.S.C. §1331,
26 in federal questions raised under Title VII of the Civil Rights Act of 1964, 42
27 U.S.C. § 2000e et seq. This court has supplemental jurisdiction over Plaintiff's
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1 related claims arising under corollary state anti-discrimination law pursuant to 28
2 U.S.C. § 1367(a).

3 2. Venue is proper in the Central District of California under 42 U.S.C. §
4 2000e-5(f)(3), in that Defendant maintains significant operations within the Central
5 District of California, and the locations of the Defendant where the alleged
6 unlawful employment practices took place are within the Central District of
7 California. This case is appropriate for assignment to the San Fernando Valley
8 Division.
9

10 **PARTIES**

11 **PLAINTIFF**

12 3. At all times relevant herein, Mr. Key was an employee of the Los
13 Angeles Department of Building and Safety as a building mechanical inspector at
14 Defendant's downtown Los Angeles location. Mr. Key resided in the county of
15 Orange at the time of the events that gave rise to this Complaint.
16

17 **DEFENDANT**

18 4. At all times relevant herein, Los Angeles Department of Building and
19 Safety was a compliance department presiding over the permit, inspection, and
20 code enforcement processes for construction in the city of Los Angeles, California,
21 and was the employer of PLAINTIFF.
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23 5. The true names and capacities, whether individual, corporate, associate,
24 or otherwise, of DOES 1-100, inclusive are unknown to PLAINTIFF at this time,
25 who therefore sues said DEFENDANTS by such fictitious names. PLAINTIFF is
26 informed and believes and thereon alleges that each of the factiously named
27 DEFENDANTS is in some way responsible for, or participated in, or contributed
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1 to, the matters and things complained of herein, and is legally responsible in some
2 manner. PLAINTIFF will seek leave to amend this Complaint when the true
3 names, capacities, and responsibilities have been ascertained.
4

5 **STATEMENT OF FACTS**

6 6. At all times relevant hereto, the PLAINTIFF was performing
7 competently in the position he held with DEFENDANT.

8 7. On or about August 18, 2021, the City of Los Angeles passed a
9 COVID-19 Ordinance No. 187134 (Ordinance). The City of Los Angeles allowed
10 its employees to submit requests for a religious exemption, as required by law, no
11 later than September 7, 2021. Employees were asked to submit their vaccine status
12 information to the third-party vendor, Bluestone.
13

14 8. On October 8, 2021, PLAINTIFF submitted a request for religious
15 accommodation to the DEFENDANT's COVID-19 vaccine requirement because
16 of his faith. Plaintiff's accommodation request explained that his beliefs conflict
17 with the COVID-19 vaccine due to the use of aborted fetal cell lines in the testing
18 and manufacturing of the vaccine. Plaintiff also stated, "it is my sincerely held
19 religious belief that abortion is murder and a violation of one of the Ten
20 Commandments ("You shall not murder." Exodus 20:13). Thus, it would violate
21 my sincerely held religious beliefs to cooperate with or be complicit in abortion in
22 any way." He further stated, "it is my sincerely held religious belief that, in being
23 vaccinated with any of the currently available COVID-19 vaccines, I would be
24 cooperating with and complicit in abortion - the terminating of an innocent human
25 life - and that such would constitute a sin against God and a violation of His
26 Commandments, for which I would be held morally accountable by God."
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1 9. Mr. Key is a follower of the Christian faith.

2 10. Mr. Key believes that his body belongs to God and is a temple of the
3 Holy Spirit.

4 11. Mr. Key believes that it is against his religion to ingest or inject his
5 body with possible harmful substances, including a vaccine where aborted fetal
6 cell lines were used in its testing and manufacturing.

7 12. Mr. Key's understanding is that the manufacturers of the COVID-19
8 vaccine use aborted fetal tissue, the lining of aborted fetal tissue, or both forms of
9 fetal tissue. Mr. Key's faith strongly opposes injecting his body with the COVID-
10 19 vaccine.

11 13. On or about November 3, 2021, PLAINTIFF learned that he had been
12 registered with the third-party vendor, Bluestone, by DEFENDANT without his
13 consent. PLAINTIFF had not yet registered with Bluestone as he did not feel
14 comfortable with or confident in providing his private and personal information to
15 a third-party vendor.

16 14. On or about December 4, 2021, PLAINTIFF was invited to
17 Defendant's Employee, Eric Jakeman's office. Mr. Jakeman issued to PLAINTIFF
18 General Form 77, which placed him on "off-duty without pay" because he would
19 not take the COVID-19 vaccine or consent to the Bluestone company's testing
20 process. PLAINTIFF requested a union representative to be present at this meeting,
21 however he was instead escorted out of the building by two security guards.

22 15. When PLAINTIFF was placed on leave, he still had not received
23 communication from DEFENDANT regarding his religious accommodation
24 request, including communication about COVID-19 testing with facilities other
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