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8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF COLORADO**

10 BREND A SANDER,  
11 Plaintiff,  
12 v.  
13 SANOFI U.S.,  
14 Defendant.

) 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.]; VIOLATION OF**  
) **RIGHTS UNDER THE COLORADO ANTI-**  
) **DISCRIMINATION ACT**  
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**OVERVIEW**

1. The Plaintiff, Brenda Sander (“Ms. Sander”), brings this action against Sanofi U.S. (“Sanofi”) or (“Defendant”), a corporation operating in Colorado. This action is based on violations of Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.).

2. Defendant refused to accommodate, otherwise discriminated against, and subsequently terminated Ms. Sander because of her religious beliefs.

3. Defendant knew that Ms. Sander had sincerely held religious beliefs because she requested a religious accommodation. Defendant nevertheless failed to accommodate and terminated Ms. Sander’s employment.

**JURISDICTION AND VENUE**

4. Sanofi is located within this judicial district and division. All of the events and omissions giving rise to the claims alleged herein occurred in this judicial district and division. Therefore, this Court has personal jurisdiction over Sanofi.

5. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, as it arises under the laws of the United States, and presents a federal question, pursuant to 28 U.S.C. § 1343(a)(3)-(4). The Court also has jurisdiction under 42 U.S.C. §2000e5(f)(3).

6. This Court has supplemental and concurrent jurisdiction to hear State claims brought before the Court pursuant to 28 U.S.C. § 1367(a).

7. Venue is proper within this judicial district and division, pursuant to 28 U.S.C. § 1391(b), because the relevant events have occurred and are threatened to occur in this jurisdictional district and division. The Defendant’s place of business is in this district.

8. Plaintiffs’ claims for damages and declaratory relief are authorized by 28 U.S.C. §2201-02, Civil Rules 57 and 65, and the general legal and equitable powers of this Court, which empower this Court to grant the relief requested.

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**PARTIES**

**Plaintiff**

9. At all times relevant herein, Ms. Sander resides in Teller County and was an employee of Defendant Sanofi.

**Defendant**

10. Sanofi is a company headquartered in Bridgewater Township, New Jersey. At the time of the events giving rise to this Complaint, Ms. Sander was employed by Sanofi as a Regional Study Manager in the state of Colorado.

11. Sanofi at all times relevant herein was an employer of Ms. Sander.

**GENERAL ALLEGATIONS**

12. Ms. Sander was hired in 2004 by Sanofi.

13. Ms. Sander is a Christian.

14. On November 12, 2021, Sanofi announced its COVID-19 vaccination policy.

15. The policy required employees to receive a COVID-19 vaccine as a condition of continued employment.

16. Ms. Sander has a sincerely held religious belief that requires her to make all decisions in her everyday life through prayer and reading the Bible.

17. Ms. Sander prayed and sought direction from the Bible regarding the COVID-19 vaccine and whether she should take it.

18. Ultimately, Ms. Sander decided that taking the COVID-19 vaccine would be a significant transgression against her beliefs.

19. For this reason, she would not take the COVID-19 vaccination that was mandated by her employer.

20. Ms. Sander submitted a religious accommodation request that clearly stated she sought God’s guidance in whether she should take the COVID-19 vaccine.

21. In relevant part, Ms. Sander’s request stated “through the Holy Spirit, God has counseled me to keep my body pure and not take the COVID-19 vaccine.”

1           22.     Ms. Sander even proposed a reasonable accommodation, stating she could continue  
2 working as she has for the past 8 years, in her home office. Her job did not require her to travel,  
3 meet with customers, or attend in person-meetings or conferences.

4           23.     Despite working from home, Ms. Sander not only performed her job duties  
5 excellently, she had been recently promoted due to her excellent work quality.

6           24.     On December 14, 2021, Sanofi denied Ms. Sander’s request, claiming “it could  
7 not substantiate the existence of a specific sincerely held religious belief, observance, or practice  
8 that is in conflict with obtaining the COVID-19 vaccine.”

9           25.     In other words, Sanofi rejected Ms. Sander’s religious beliefs as insincere.

10          26.     Defendant Sanofi terminated Ms. Sander on January 21, 2022.

11          27.     Sanofi did not properly engage in the interactive process.

12          28.     Sanofi denied the sincerity of Ms. Sander’s beliefs despite Title VII’s statutory  
13 definition including “all aspects of religious observance and practice, as well as belief.”

14          29.     An individual’s testimony about his or her belief must be given great weight and is  
15 enough to demonstrate sincerity.

16          30.     Sanofi could have reasonably accommodated Ms. Sander without incurring undue  
17 hardship.

18          31.     The fact that Ms. Sander was willing to lose her job over her belief is indication  
19 that her religious belief is sincerely held.

20          32.     Ms. Sander filed a charge with the Equal Employment Opportunity Commission  
21 (EEOC) on July 20, 2022.

22          33.     Ms. Sander’s religious beliefs were a motivating factor in her termination. The  
23 Defendant violated her federal rights under Title VII.

24          34.     Ms. Sander’s income and health insurance ceased immediately, placing a large  
25 burden on her.

26          35.     On February 26, 2024, Ms. Sander obtained a “Right to Sue” letter from the  
27 EEOC. This letter serves as Exhibit A to this complaint.

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1 **CAUSES OF ACTION**

2 **COUNT I**

3 **Violation of Title VII of the Civil Rights Act of 1964 [42 U.S.C. § 2000e et seq.]**  
4 **Failure to Provide Religious Accommodation**

5 36. Ms. Sander hereby incorporates and realleges the preceding paragraphs, as though  
6 fully set forth herein.

7 37. Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq., makes it an  
8 unlawful employment practice to fail or refuse to reasonably accommodate the religious beliefs  
9 and practices of an employee or prospective employee.

10 38. An employer is obligated to engage in interactive process, or a meaningful dialogue  
11 with an employee regarding a request for religious accommodation.

12 39. Sanofi was Ms. Sander's employer within the meaning of Title VII.

13 40. Sanofi did not engage in this interactive process.

14 41. Ms. Sander had a bona fide religious basis to refuse Sanofi's vaccination mandate.

15 42. Sanofi did not accommodate Ms. Sander's sincerely held religious beliefs.

16 43. Accommodating Ms. Sander would not have resulted in a substantial burden for  
17 Sanofi.

18 44. Sanofi's failure to provide a religious accommodation has harmed and will  
19 continue to harm Ms. Sander.

20 45. Ms. Sander is entitled to back pay, front pay, compensatory damages, punitive  
21 damages, attorney's fees, costs of suit, a declaration that Sanofi violated her rights under Title VII.

22 46. Ms. Sander is entitled to further relief as more fully set forth below in her Prayer  
23 for Relief.

24 **COUNT II**

25 **Violation of the Colorado Anti-Discrimination Act (C.R.S. § 24-34-402 et seq.) – Failure to**  
26 **Provide Religious Accommodation**

27 47. Ms. Sander hereby incorporates and realleges the preceding paragraphs as though  
28 fully set forth herein.

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