

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

KATIE KIRN, ALLISON SLEEZER,)
ANGELA CARR, ANGELA OTIS,)
CAROL CRONK, CATHERINE)
TOMLINSON, CHARLES LEROY,)
CHRISTINA COTE, CHRISTINA)
GRUBE-RHINES, CORI GARDNER,)
DAVID VELLA, DEANNA BROWN,)
DIANE DECLERK, DONETTA LOWE,)
DOROTHY PEYROLO, ELAINE ALLEN,)
JACQUELINE DONBROSKY, JANELLE)
BALANGNA, JAROSLAW BUDA, JENNI)
PALENCIK, JESSICA VEENSTRA,)
JILLIAN CURNOW, JOHN SOPER,)
KAREN NELSON HEA, KELLIE)
ERBSKORN, KELLY BOROM-)
JOHNSON, KIETH A. MCCONNELL,)
KIMBERLY BROWN, KIMBERLY)
JAQUISH, KRISTEN NOBLE, LAURYN)
SWIACKI, LISA ALLEN, LUMINITA)
WEIDE, LYNN KUEPPERS, LYNNSEY)
MCCOY, MARIE GALDES, MARLENE)
RANKIN, MARTHA BUCK, MELISSA)
MURPHY, MICHELE WILSON,)
MICHELLE LOCKHART, MOEHANID)
TALIA, NATHAN MIKLUSAK, NICOLE)
BAYONES, NICOLE COLLINS,)
PATRICIA ANDERSON, PAULA)
LOCKHART, ROBERT KUSZA,)
SHERRY KAHARI, STEVEN)
CROSSLEY, TIFFANY LONG,)
))
Plaintiffs,)
v.)
))
HENRY FORD HEALTH SYSTEM,)
WRIGHT LASSITER III, ROBERT G.)
RINEY, AND ADNAN MUNKARAH,)
))
Defendants.)
))

Case No.

COMPLAINT AND JURY DEMAND

COMPLAINT AND JURY DEMAND

NOW COME Plaintiffs, by and through counsel, Kyle J. VonAllmen, and Thomas Renz, and bring this action against the above listed Defendants, **HENRY FORD HEALTH SYSTEM, (“HFHS” or Defendant) WRIGHT LASSITER III, ROBERT G. RINEY, and ADNAN MUNKARAH. (“Defendants”)** on the grounds set forth herein:

I. FACTUAL BACKGROUND

1. On June 29, 2021, HFHS distributed its Mandatory Vaccines Policy (“The Mandate”) document (ExhibitA, attached hereto). As the Policy states:

*The purpose of this policy is to establish guidelines for compliance with mandatory Tetanus, Diphtheria, and Pertussis (Tdap); Measles, Mumps, and Rubella (MMR); Seasonal Influenza; and COVID-19 vaccinations for all HFHS employees and volunteers **to ensure thehealth and safety of HFHS employees, patients, visitors, and others** (emphasis added).*

2. It was further communicated to all contractors and employees of HFHS that they must become compliant with the directive to receive the COVID-19 vaccine on or before September10, 2021.

3. It was further communicated by HFHS management that those who are not compliant withing the stated timeframe will be suspended, and given until October 1, 2021, to remediate their non-compliance. This essentially gave those subject to the Mandate until September 1, 2021, to receive the first of a two-dose COVID-19 vaccine—or face imminent termination.

4. Defendants’ policy document contains a stated goal of protecting the health of their employees and others, but actually subjects its employees to injury based on expert testimony attached hereto as Exhibit (B), and injury statistics compiled by the Centers for Disease Control’s (“CDC”) Vaccine Adverse Event Reporting System (“VAERS”).

5. Mass-promoted COVID-19 injections have already killed and seriously injured hundreds of thousands of people according to the government's own VAERS database. The 'vaccines' from Moderna, Johnson & Johnson, and Pfizer have killed more than twice as many people in less than a year than all other vaccines combined since the government set up its VAERS reporting system in 1990.

6. Data reported through the VAERS system, as of August 20, 2021, indicates that 13,627 deaths have occurred in the U.S. as a result of COVID-19 'vaccines.' Additionally, 2,826,646 injuries, 17,794 permanent disabilities, 74,369 emergency room visits, 55,821 hospitalizations, and 14,104 life threatening events have been reported to VAERS through August 20,20210. (vaers.hhs.gov/)

7. Attached hereto (Exhibit D) is a declaration of a federal employee who has calculated that the morbidity figures captured by VAERS are underreported by a factor of 5. VAERS has traditionally underreported 'vaccine' events, lending credibility to this claim. Based on this testimony, at least 65,000 Americans have lost their lives to these 'vaccines'. (This individual has chosen to remain anonymous at this point, due to a fear of reprisal for revealing this information)

8. Plaintiffs are employed in an industry that requires high levels of education, training, and experience. The Mandate requires that Plaintiffs choose between exposing themselves to potential harm or death or abandon their careers in health care.

9. Defendants' actions to implement compulsory COVID-19 vaccine shots as a condition of continuing employment is both unconstitutional and has caused money damages to Plaintiffs. Additionally, the actions of Defendants subjects Plaintiffs to a significant likelihood of bodily harm.

II. PARTIES

10. Plaintiff KATIE KIRN is a registered nurse and unit educator ostensibly employed by Defendants at Henry Ford West Bloomfield Hospital. Ms. Kirn has been repeatedly harassed by HFHS management for participating in local government exchanges. To date she has not been advised of her employment status, but if she has been terminated, it is because of the Mandate that is the subject of this case.

11. Plaintiff ALLISON SLEEZER is employed by Defendants as a registered nurse working in the communicable disease response unit at the Henry Ford Health System Main Campus.

12. Plaintiff ANGELA CARR is currently employed by Defendants as a registered nurse and quality education coordinator at Henry Ford Allegiance Hospital Hospice.

13. Plaintiff ANGELA OTIS is currently employed by Defendants as a registered nurse at Henry Ford Macomb Hospital.

14. Plaintiff CAROL CRONK is currently employed by Defendants as a registered nurse at Henry Ford West Bloomfield Hospital.

15. Plaintiff CATHERINE TOMLINSON is currently employed by Defendants as a post-acute registered nurse case manager at Henry Ford hospital Main Campus.

16. Plaintiff CHARLES LEROY is employed by Defendants as a cardiology stepdown nurse at Henry Ford Health System Main.

17. Plaintiff CHRISTINA COTE is employed by Defendants as a contingent registered nurse at Henry Ford Health System Wyandotte.

18. Plaintiff CHRISTINA GRUBE-RHINES is currently employed by Defendants as a registered nurse at Henry Ford Wyandotte and Main Campus.
19. Plaintiff CORI GARDNER is currently employed by Defendants as a pharmacy technician at Henry Ford Health System Brownstown.
20. Plaintiff Dr. DAVID VELLA is a physician employed by Defendants at Henry Ford Health System Commerce Township.
21. Plaintiff DEANNA BROWN is currently employed by Defendants in case management at Henry Ford West Bloomfield Hospital.
22. Plaintiff DIANE DECLERK is currently employed by Defendants as a contingent respiratory therapist at Henry Ford Macomb Pulmonary Rehab Center.
23. Plaintiff DONETTA LOWE is currently an employee of Henry Ford Health System.
24. Plaintiff DOROTHY PEYROLO is currently employed by Defendants as a certified pharmacy technician at Henry Ford Health System Sterling Heights.
25. Plaintiff ELAINE ALLEN is currently employed by Defendants as a medical assistant at Henry Ford Allegiance Hospital Jackson.
26. Plaintiff JACQUELINE DONBROSKY is currently employed by Defendants as a registered nurse at Henry Ford Hospital Main Campus.
27. Plaintiff JANELLE BALANGNA is employed by Defendants as a contingent registered nurse at Henry Ford Hospital West Bloomfield.
28. Plaintiff JAROSLAW BUDA, is currently employed by Defendants as a registered nurse at Henry Ford Health System Brownstown.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.