

Daniel Reinke

December 17, 2021

Equal Employment Opportunity Commission
330 South Second Avenue, Suite 720
Minneapolis, MN 55401

RE: Charge of Discrimination: Daniel Reinke v. Brookdale Senior Living Inc.

My name is Daniel Reinke. I am an employee of Brookdale Senior Living Inc. (“Brookdale”), a corporation with about 62,000 employees based in Brentwood, Tennessee. Brookdale violated my rights under Title VII of the Civil Rights Act when it denied my request for an exemption, due to my sincerely held religious beliefs, from Brookdale’s vaccine mandate for employees, suspended me from work without pay, and threatened to fire me—while allowing exemptions for other employees with different religious beliefs.

Brief Summary of Brookdale’s Illegal Actions

I had been, until Brookdale’s illegal actions, an employee in good standing with the corporation. After Brookdale announced its Mandatory Associate Vaccination Policy (“Policy”) for the COVID-19 vaccination, I recognized that I would need to seek an exemption from the vaccine mandate because of my understanding that the COVID-19 vaccination involves the use of fetal cell lines from an aborted fetus.

Thus, in my request for an exemption, I explained to Brookdale my sincere religious beliefs discussed in detail below. Brookdale denied my request for religious exemption without explanation or ability to appeal, resulting in suspension of my employment and threatened termination from employment unless I comply with the Policy. Brookdale has granted the request for a religious exemption to at least one other similarly situated employee in the same department with similar client contact and interfacing, but with different religious beliefs. This is religious discrimination and violates Title VII and Minnesota law.

**My Request for Religious Accommodation
Was Based on My Sincere Religious Beliefs**

I am a devout Catholic and in good standing with the Catholic Church. I attend a local parish in Minnesota, I have been baptized and married in the Catholic Church, and I regularly attend Mass each week consistent with the Catholic Church’s doctrinal requirement of the same. I also attend Adoration each week, where I pray and meditate on God and His Word.

Many faithful Catholics like me are concerned about the use of fetal cell lines in both the development and production phases of the COVID-19 vaccines.¹ Consistent with these concerns,

¹ 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> (last visited October 5,

Archbishop Hebda, the Archbishop of Minnesota, has stated, “it is an individual and personal decision whether to receive a COVID vaccine, and although the Church does support the right of a person to seek an exemption from vaccine requirements on the basis of their conscience, that is an individual decision that should not be dependent upon an attestation by a member of the clergy.”²

I sincerely believe that receiving an injection produced, developed, or tested using human cell lines derived from direct abortions is sinful. All three available vaccines in the United States were tested, developed, or produced using these cell lines. I believe that abortion is a mortal sin, and any act supporting it, such as receiving the COVID-19 injection, would make me complicit in the act of abortion. I explicitly communicated this to Brookdale. I sincerely believe, similar to other employees at Brookdale, that I cannot in good conscience receive the COVID-19 vaccination. It would require me to act inconsistent with my sincerely held religious beliefs grounded in my commitment to God in accordance with the Catholic Church.

**I Informed Brookdale of My Sincere Religious Objection to the COVID-19 Vaccine,
and Brookdale Refused to Exempt Me From Its Policy**

In late July 2021, I was informed of Brookdale’s Policy requiring all employees to get a COVID-19 vaccination or submit a request for religious or medical accommodations as applicable. Under the Policy, approved vaccinations include Johnson & Johnson, Pfizer, and Moderna.³ Brookdale informed employees of three options in response to the Policy via its Mandatory Vaccination Disclosure Form. Those options were as follows: “Any individuals who have either (1) a medical condition or disability that prevents taking the vaccine, or (2) a sincerely held religious belief, practice, or observance that prevents them from taking the vaccine may be entitled to reasonable accommodation. In addition, associates working in locations where state or local law prohibits Brookdale from instituting a vaccine mandate will also be exempt.”⁴

On August 3, 2021, after much prayer and communion with God, I submitted a comprehensive vaccine declination letter to Brookdale, explaining how the corporation’s new Policy is in direct conflict with my sincerely held religious beliefs based on Catholic teachings and the Catechism.⁵ Because I had never been in this position before, I spent a significant amount of time researching Catholic teachings related to my personal convictions, grounded in my devout Catholic faith, my relationship with God, and my understanding of the Bible. While researching, I found a letter

2021). See also *8 Key Findings About Catholics and Abortion*, Pew Research Center, <https://www.pewresearch.org/fact-tank/2020/10/20/8-key-findings-about-catholics-and-abortion/> (last visited October 5, 2021) (finding 67% of Catholics who attend Mass weekly or more often said abortion should be illegal in all or most cases).

² *Archbishop Hebda to Clergy on Vaccine Exemptions*, <https://www.archspm.org/archbishop-hebda-to-clergy-on-vaccine-exemptions/> (last visited December 9, 2021).

³ Exhibit 1 (COVID-19 Mandatory Vaccination Disclosure Form). All exhibits are numbered in consecutive order with the prefix “Reinke” for ease of reference.

⁴ *Id.* at Reinke 001.

⁵ Exhibit 2 (Vaccine Declination Letter).

encapsulating my ardent beliefs and their relationship to mandatory COVID-19 vaccinations.⁶ I submitted this letter to Brookdale in further support of my request for exemption from Brookdale's mandatory vaccine policy, as Brookdale had no prohibition on drawing from other sources which aptly explain my beliefs in supporting my request for an exemption.⁷ After all, Catholics believe the teachings of the Bible and the Church, and all of our beliefs are thus derived from writings by others, in some way, shape, or form.

My letter was consistent with Catholic teaching, and, moreover, consistent with the public statement and position of Minnesota Archbishop Hebda that "...vaccination must always be voluntary,...[and] is an individual and personal decision whether to receive a COVID vaccine...that should not depend on the attestation by [anyone else, including] a member of the clergy."⁸ I also informed my on-site supervisor, [REDACTED], and one other employee, that I would be submitting a request for religious accommodation and exemption. My supervisor was very respectful and shared with me her own concerns about the vaccine as well as her intent to submit a religious exemption from Brookdale's Policy based on her sincerely held religious beliefs about Buddhism and Karma.

It is my understanding that my request for religious accommodation was one of the first in a series of requests submitted to Brookdale's corporate offices and personnel. It is also my understanding that between mid to late August, my on-site supervisor, [REDACTED], also submitted a request for religious accommodation and exemption from Brookdale's Policy, based on her sincerely held religious beliefs, which are different from mine.

On August 16, 2021, prior to Brookdale's denial of my request for accommodation, company morale began to decline, as other employees (both vaccinated and unvaccinated) in the North Oaks Senior Living Community, where I worked, expressed frustration with the corporation's mandatory vaccination policy. My colleague, [REDACTED], and I sent a letter to the North Oaks Community HR Representative, [REDACTED], and Community Site Manager, [REDACTED], expressing concern about Brookdale's Policy, specifically its disregard for conscience protections.⁹ On August 16, 2021, Mr. [REDACTED], responded, thanking me and Mr. [REDACTED] for respectful and professional communications, and further stated that he would share the correspondence with appropriate personnel.¹⁰

On August 24, 2021, about three weeks after submitting my request, I followed up with Mr. [REDACTED] as directed, inquiring about the status of my request for an exemption from Brookdale's Policy.¹¹ At the end of the day on August 27, 2021, Mr. [REDACTED] replied that he had no further updates.¹² Within a week or two after submitting my request for an exemption from the Policy,

⁶ *Id.* at Reinke 003-004.

⁷ Exhibit 3 (ServiceNow correspondence between Daniel Reinke and [REDACTED].) at Reinke 009-010; Exhibit. 2.

⁸ See note 2, *supra*.

⁹ Exhibit 4 (Reinke and [REDACTED] letter to Brookdale community).

¹⁰ Exhibit 5 (Reinke emails with Human Resources) at Reinke 017.

¹¹ *Id.* at Reinke 018.

¹² *Id.* at Reinke 019.

around the beginning of September, ██████████ contacted me via the ServiceNow online portal about my request.¹³ It is not clear to me if Brookdale engaged a third-party service to review all requests for religious accommodation, or if Mr. ██████████ and ServiceNow are internal to Brookdale. Interaction and follow up regarding my request was solely conducted via an online portal called ServiceNow.

I corresponded with Mr. ██████████ for about one week, near the beginning of September.¹⁴ Mr. ██████████ accused me of insincerity because of Mr. ██████████'s determination that I used an internet template for my declination letter.¹⁵ Mr. ██████████ provided me with a link to that letter. Like many employees, I had never submitted a request for religious accommodation and was concerned about including requisite information. While I initially submitted a letter that I did not draft myself, I very deliberately chose the letter I submitted because it was a comprehensive representation of my religious beliefs as a devout Catholic, and it included citations I carefully reviewed and researched prior to submission. I told Mr. ██████████ this. Without providing any additional clarity, Mr. ██████████ only repeated response was that I needed to answer whether “your concerns with receiving the vaccine are more related to the religion you follow, or to other concerns about the vaccine? In what way?”¹⁶

I then provided additional clarification, summarizing my position on abortion in my own words, with references to my Catholic faith, further explaining the moral conflict between my faith and Brookdale's Policy—specifically relating to abortion.¹⁷ I also made clear that my response to Mr. ██████████ was a summary, and asked that it be further considered with my prior vaccine declination letter requesting a religious accommodation.¹⁸

About two days after the online dialogue between me and Mr. ██████████, I received correspondence from Mr. ██████████ via the ServiceNow portal that my request for religious accommodation was denied, and Mr. ██████████ only provided further instructions about obtaining information with respect to Brookdale's COVID-19 protocol for employees.¹⁹ I sent two different responses to Mr. ██████████ within a few days apart, asking for further clarification and reasons for the denial, but did not receive a reply.²⁰

Around September 10, 2021, my co-worker, ██████████, informed me that her request for religious accommodation and exemption from Brookdale's Policy, based on her beliefs in Buddhism and Karma, was granted.

On September 14, 2021, as a follow up to the ServiceNow correspondence, I received an email from Mr. ██████████ confirming that my request for religious accommodation was denied. Mr.

¹³ Exhibit 3 at Reinke 009.

¹⁴ *Id.* at Reinke 008-009.

¹⁵ *Id.*

¹⁶ *Id.* at Reinke 008.

¹⁷ *Id.* at Reinke 007.

¹⁸ *Id.*

¹⁹ *Id.* at Reinke 006-007.

²⁰ *Id.* at Reinke 006.

█████ further requested a Zoom meeting with me and my on-site supervisor, █████, to discuss. I took notes during the meeting and emailed those notes to myself.²¹ During the meeting, I asked Mr. █████ to explain why my request for religious accommodation was denied. Mr. █████ informed me that he did not have an answer, and that it his job was to notify me that I had two options—either submit a resignation, effective September 30, 2021, or Brookdale would proceed to terminate my employment.²²

During the meeting, Mr. █████ stated that, pursuant to company directives, I could reopen my ServiceNow ticket seeking additional clarification about Brookdale’s denial of my request for religious accommodation. The next morning, I sent a follow up email to Mr. █████ asking about my accrued benefits and employment status in the case Brookdale decided to terminate me.²³ Mr. █████ responded that my refusal to get vaccinated was considered insubordination with Brookdale’s Policy, resulting in termination, and did not answer whether there was any causal relationship between my request for religious accommodation and future employment status at Brookdale.²⁴ Mr. █████ did not provide clarification as to why my religious exemption request was denied.²⁵

On September 21, 2021, having received no clarification as to the reason for denial, I again reached out Mr. █████, seeking more information about Brookdale’s decision not to grant my request for accommodation.²⁶ On September 24, 2021, Mr. █████ replied that he did not have any additional information, was not involved in the process or determinations, and that in some instances, employees’ requests were denied if the employee did not submit information requested.²⁷

I continued to attend work and perform daily job duties without any additional direction or updates. Being concerned about my potential employment status, I once again inquired of Mr. █████ for further details about my denial and communications with Mr. █████.²⁸ I received no further explanation.

On September 30, 2021, I received a notice of corrective action from Brookdale for failure to comply with the corporation’s Policy, threatening suspension up to termination of employment unless I agreed to be vaccinated by October 7, 2021.²⁹

I then retained legal counsel, Renee K. Carlson, True North Legal, and James V. F. Dickey, Upper Midwest Law Center. On October 6, 2021, Ms. Carlson sent a demand letter to Brookdale’s Corporate Office and other respective personnel at the North Oaks Senior Living Community,

²¹ Exhibit 5 at Reinke 020.

²² *Id.*

²³ *Id.* at Reinke 021.

²⁴ *Id.* at Reinke 022-023.

²⁵ *Id.*

²⁶ *Id.* at Reinke 024.

²⁷ *Id.* at Reinke 025.

²⁸ *Id.* at Reinke 026.

²⁹ Exhibit 6 (Notice of Corrective Action)

seeking my reinstatement and relief based on Brookdale’s blatant religious discrimination against me.³⁰

Brookdale’s Associate General Counsel, Ms. Bahar Azhdari, responded on October 7, 2021, seeking additional time to consult her clients and agreeing not to terminate me while she reviewed.³¹ Ms. Carlson, on my behalf, agreed to allow additional time in the hopes of resolving this matter outside of litigation.

Over one week later, on October 15, 2021, Brookdale doubled down on its accusations against me, accusing me of copying and pasting my additional response, even though I provided a summary of my beliefs about the relationship between abortion and vaccines in my own words in addition to the letter I provided with my original submission (with which I did and still do agree).³² Brookdale also referenced the letter I and another employee wrote about Brookdale’s Policy two weeks after I submitted my request for religious accommodation. Brookdale claimed that the later-in-time letter related to other additional problems with a vaccine mandate somehow disqualified my exemption request and casted doubt on the sincerity of my religious beliefs. Further, Brookdale claimed that it was relevant to the discrimination against me that Mr. [REDACTED] is also a Christian and shares the same beliefs about abortion.³³ This is completely irrelevant; there is no support for Brookdale’s apparent belief that if one Christian in its employment believes COVID-19 vaccines are not sinful, another Christian’s belief to the contrary is not sincere.

Finally, Brookdale offered to “accommodate” my religious beliefs by ***requiring me to get the Pfizer vaccination***—despite my clear statement that I believe that getting any of the COVID-19 vaccines would be sinful.³⁴ This is not an accommodation. Brookdale claimed that I should agree with their view of my religious beliefs and accept their faux-“accommodation” since the Pfizer vaccine was not “produced using human cell lines derived from direct abortions.”³⁵ Thus, Brookdale was again challenging the legitimacy of my religious beliefs by deconstructing them and arguing that only beliefs about “production” of vaccines using fetal cells, as opposed to “testing” using fetal cells, raise legitimate religious concerns. Brookdale concluded its offer by reminding me that I am subject to a mandatory arbitration agreement should I pursue a legal challenge, and attached a copy for my reference.³⁶

On October 18, 2021, Ms. Carlson provided a comprehensive response to Ms. Azhdari, again explaining that both state and federal law prohibit employers from engaging in religious discrimination, which I experienced at Brookdale. Ms. Carlson pointed out that Brookdale’s attempt to deconstruct and delegitimize my religious beliefs is prohibited by federal law, as recognized by the Fourth Circuit in its recent *EEOC v. Consol Energy* case.³⁷

³⁰ Exhibit 7 (Carlson Demand Letter to Brookdale, October 6, 2021)

³¹ Exhibit 8 (Azhdari email October 7, 2021)

³² Exhibit 9 (Azhdari email October 15, 2021)

³³ *Id.* at Reinke 037.

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*; Exhibit 10 (Arbitration Agreement)

³⁷ Exhibit 11 (Carlson email and letter October 18, 2021)

On October 19, 2021 Brookdale responded, remaining firm that they would require me to take the Pfizer vaccine as a faux-“accommodation” based on Brookdale’s belief that the Pfizer vaccine is morally distinguishable from the other two vaccines.³⁸ Brookdale even took it a step further by challenging the sincerity of my beliefs, questioning my decisions about other medical treatment in an attempt to discredit the sincerity of my response, making causal connections about other medical interventions that I may or may not have received, all based on mere conjecture without any evidence and entirely outside the scope of my request for accommodation.³⁹

Despite Brookdale’s discrimination against me and disrespect of my religious beliefs and sincerity, I attempted to resolve this matter without litigation. Brookdale at least appeared to indicate some interest in resolving the matter outside of litigation, but it failed to provide a reasonable offer in discussions lasting nearly two-and-a-half months. Throughout the process, Brookdale has doubled down on its characterization of my request for religious exemption, repeatedly subjecting my beliefs to a microscope while exempting other Brookdale employees who profess different religious beliefs. Brookdale’s settlement correspondence simply doubled down on its violations of my Title VII rights and refused to take responsibility for the wrongness of its actions.

Through all of this, since October 1, 2021, I have been indefinitely suspended from my employment with Brookdale without pay or other benefits. Brookdale’s blatant discrimination violates Title VII and Minnesota law and should be dealt with by the EEOC. Further, I think the EEOC should take this case because I am subject to an arbitration agreement and will not be able to litigate this matter in federal court, should the Commission not take up this charge.

Title VII and Minnesota Law Forbid Brookdale’s Religious Discrimination in Applying Its Employment Policy

The Civil Rights Act of 1964 (Title VII), 42 U.S.C. § 2000e, prohibits employers from discharging an employee because of his or her religion. Religion is defined under the statute to include “all aspects of religious observance and practice, as well as belief.” 42 U.S.C. §2000e(j). Further, as part of a request for exemption from a policy, employers may not require employees to “prove up” the sincerity of their religious beliefs. Requiring strict proof of sincerity squarely contradicts the Commission’s guidance:

Like the religious nature of a belief, observance, or practice, the sincerity of an employee’s stated religious belief is usually not in dispute and is “generally presumed or easily established.” Further, the Commission and courts “are not and should not be in the business of deciding whether a person holds religious beliefs for the ‘proper’ reasons. We thus restrict our inquiry to whether or not the religious

³⁸ Exhibit 12 (Azhdari October 19, 2021 email)

³⁹ *Id.* at Reinke 055.

belief system is sincerely held; we do not review the motives or reasons for holding the belief in the first place.”⁴⁰

As courts within the Eighth Circuit have explained, “In considering whether a particular practice or belief of an employee is covered by Title VII, a court may neither determine what the tenets of a particular religion are, nor determine whether a particular practice is or is not required by the tenets of the religion.” *Mial v. Foxhoven*, 305 F. Supp. 3d 984, 991 (N.D. Iowa April 4, 2018) (citing *Fowler v. Rhode Island*, 345 U.S. 67, 70 (1953) (“it is no business of courts to say . . . what is a religious practice or activity”).

Nor should an employer “assume that an employee is insincere simply because some of his or her practices deviate from the commonly followed tenets of his or her religion, or because the employee adheres to some common practices but not others. As noted, courts have held that ‘Title VII protects more than . . . practices specifically mandated by an employee’s religion.’”⁴¹

Because “the definition of religion is broad and protects beliefs, observances, and practices with which the employer may be unfamiliar,” and so “the employer should ordinarily assume that an employee’s request for religious accommodation is based on a sincerely held religious belief.”⁴²

Further, an employee establishes a prima facie case of religious discrimination when he “has shown (1) a bona fide religious belief that conflicts with an employment requirement, (2) informed the employer of such conflict, and (3) suffered an adverse employment action.” *Mohamed v. Ist Class Staffing, LLC*, 286 F.Supp.3d 884, 901 (S.D. Ohio 2017). Once the employee has attested to the sincerity of his or her religious beliefs, the burden of proof then shifts to the employer to prove that granting the request for accommodation would create an undue hardship on the employer. *Id.*

Brookdale cannot survive the Title VII analysis. Its conduct here is even worse than that of Consol Energy in the recent Fourth Circuit case, *EEOC v. Consol Energy, Inc.*, 860 F.3d 131 (4th Cir. 2017). There, the Fourth Circuit noted Consol’s attempt to essentially argue that its employee’s religious beliefs were faulty, when the company should have stopped at sincerity:

At bottom, Consol's failure to recognize this conflict—in its dealings with Butcher as well as its litigation of this case—appears to reflect its conviction that Butcher's religious beliefs, though sincere, are mistaken: that the Mark of the Beast is not, as Butcher believes, associated with mere participation in a scanner identification system, but instead manifests only as a physical mark, placed upon the right and

⁴⁰ See EEOC, Compliance Manual on Religious Discrimination, https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#h_9546543277761610748655186. (Internal citations omitted) (last visited December 9, 2021).

⁴¹ See EEOC, Compliance Manual on Religious Discrimination, https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#h_9546543277761610748655186. (Internal citations omitted) (last visited December 9, 2021).

⁴² See EEOC, Compliance Manual on Religious Discrimination, https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#h_9546543277761610748655186 (internal citations omitted) (last visited December 9, 2021).

not the left hand; and that as a result, allowing Butcher to scan his left hand through the system would be more than sufficient to obviate any potential conflict. . . .

But all of this, of course, is beside the point. It is not Consol's place as an employer, nor ours as a court, to question the correctness or even the plausibility of Butcher's religious understandings. *See Emp't Div., Dep't of Human Res. of Or. v. Smith*, 494 U.S. 872, 887, 110 S.Ct. 1595, 108 L.Ed.2d 876 (1990) ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine ... the plausibility of a religious claim."). Butcher's religious beliefs are protected whether or not his pastor agrees with them, *cf. Thomas v. Review Bd. of Ind. Emp't Sec. Div.*, 450 U.S. 707, 715–16, 101 S.Ct. 1425, 67 L.Ed.2d 624 (1981) (protection of religious beliefs not limited to beliefs shared by religious sect), and whether or not Butcher's pastor—or Consol, or the manufacturer of Consol's scanning system—thinks that Butcher, in seeking to protect his religious conscience, has drawn the line in the right place, *see id.* at 715, 101 S.Ct. 1425 ("[I]t is not for us to say that the line [the religious objector] drew was an unreasonable one.").³ So long as there is sufficient evidence that Butcher's beliefs are sincerely held—which the jury specifically found, and Consol does not dispute—and conflict with Consol's employment requirement, that is the end of the matter.

EEOC v. Consol Energy, Inc., 860 F.3d at 142-43.

Like Consol Energy's attempt to force its employee to use a hand scanner by arguing about what violates the employee's religious beliefs, Brookdale wrongly decided it would be appropriate to fight with me over whether my religious belief that it would be sinful for me to take the Pfizer vaccine is legitimate. Brookdale should never have inserted itself into the role of determining what would or would not violate my conscience. In addition, because Brookdale has granted religious exemptions to other employees, it is impossible for Brookdale to show an undue burden if it were to grant my request.

Finally, both the Minnesota Human Rights Act and Title VII protect employees from discrimination based on, among other things, their religion or creed. Specifically, the Minnesota Human Rights Act, Minn. Stat. § 363A.08 subd. 2 forbids employers from discriminating against an employee because of his or her "creed or religion," barring "unfair employment practices...[that] discriminate against a person with respect to hiring, tenure, compensation, terms, upgrading, conditions, facilities, or privileges of employment." The Minnesota Constitution also explicitly protects Minnesotans' free exercise of religion. *See* Minn. Const. art. 1, sec. 16 ("The right of every man to worship God according to the dictates of his own conscience shall never be infringed."). In fact, Minnesotans are "afforded greater protections for religious liberties...under the state constitution than under the first amendment of the federal constitution." *State v. Hershberger*, 462 N.W.2d 393, 397 (Minn. 1990).

**Brookdale Was Wrong to Discriminate Against Me,
and I Therefore File This Formal Charge With the EEOC**

My request for an exemption was well grounded in my sincere religious beliefs. The Archbishop of Minnesota himself has, again, clearly stated that religious objections by Catholics to the COVID-19 vaccine, like mine, are sincere and well-founded. It is not for Brookdale's HR department to supersede the Archbishop of Minnesota and opine on the sincerity of Catholic beliefs grounded in moral opposition to abortion.

Brookdale has blatantly discriminated against me. It has forced me to prove up my religious beliefs with an arbitrary litmus test established by Brookdale's HR department. It has categorically disregarded my sincere profession of faith. Simultaneously, it has granted the same request for at least one if not more other employees based on a different religion.

For these reasons, I am formally bringing a charge with the EEOC against Brookdale, and I ask the Commission to take remedial action against Brookdale. The contact information for Brookdale's Assistant General Counsel is: Bahar Azhdari, Associate General Counsel—Labor and Employment, Brookdale Senior Living, [REDACTED]. Brookdale's corporate address is 111 Westwood Place, Suite 400, Brentwood, Tennessee 37027.

I look forward to your response and welcome any questions. I declare under penalty of perjury that the above is true and correct.



Daniel Reinke

Enclosures (Exhibits 1-12)