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REPLY TO FLORIDA

August 4, 2021

VIA FACSIMILE and EMAIL

Pamela G. Costas
Vice President, General Counsel and Secretary
Loyola University of Chicago
820 N. Michigan Suite 750
Chicago, IL 60611
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RE: Requests for Religious Exemption from Loyola University of Chicago's
Mandatory Covid-19 Vaccination Policy

Dear General Counsel Costas:

We are writing again, this time on behalf of the following eleven students at Loyola University of Chicago ("Loyola"), who have requested religious exemptions to Loyola's COVID-19 vaccination mandate, and have been denied those exemptions:

Based on the authorities we have previously provided, including in our June 21, 2021 letter and several others since then, Loyola's denial of religious exemptions to these students is unlawful. The students have retained Liberty Counsel to file a lawsuit against Loyola to vindicate their rights. We have drafted the suit papers and are prepared to file them, but we are writing in a last attempt to avoid litigation. **If we do not receive your written response granting these students their religious exemption requests by 10:00 a.m. tomorrow (Thursday, August 5, 2021), we will proceed to filing the lawsuit that same day, seeking emergency relief, including a temporary restraining order and damages.**

These eleven students have all submitted written statements requesting a religious exemption, outlining their particular religious objections to the COVID-19 vaccines. These statements were more than sufficient under applicable law and under Loyola's own policy to apprise Loyola of its legal obligation to respect and accommodate the students' religious beliefs. Indeed, when Loyola denied these requests, Loyola did not base any of its denials on any purported procedural deficiency.

Nevertheless, we want to ensure that the forthcoming litigation will be about substance, not procedure. Lest a clever attorney attempt to argue that any of these students did not technically comply with Loyola's own procedure for requesting a religious exemption, the students are hereby restating and amplifying their religious objections one last time.

In brief, each of these students hereby advises Loyola that she or he is a Christian who believes that all life is sacred, from the moment of conception to natural death, and that abortion is a grave sin against God. Each student has a faith tradition, interprets Scripture, and understands based upon the instruction of, and personal revelation from, the Holy Spirit, that any practice or product that condones, supports, justifies, is connected with, or benefits from abortion, however remote, is sinful and must be denounced and avoided. (*See, e.g.*, Jeremiah 1:5; Psalm 139:13-16; 2 Cor. 7; Exodus 20:13).

These students are precluded by their sincerely held religious beliefs from accepting a COVID-19 vaccine, because each of the three vaccines available was either produced with, or tested upon, fetal cell lines that originated in elective abortions. (*See e.g.*, https://www.health.nd.gov/sites/www/files/documents/COVID%20Vaccine%20Page/COVID-19_Vaccine_Fetal_Cell_Handout.pdf; and http://publichealth.lacounty.gov/media/Coronavirus/docs/vaccine/VaccineDevelopment_FetalCellLines.pdf).

While other faith communities and individuals may consider the vaccines' connection to abortion to be sufficiently remote and morally acceptable, these students consider it an affront to the Biblical teaching that God values all life, and that abortion – in all of its manifestations and with all of its so called “benefits,” is a grave sin. As a matter of non-negotiable religious conviction and doctrine, each of these students believes that no product connected to abortion – however remote – can be morally justified, in their view and reading of the Holy Scriptures.

These students hereby advise Loyola that they do not necessarily object to all immunizations. There are many immunizations that do not originate in abortion, as the COVID-19 vaccines do, and the students do not object to them. However, the students would object to all immunizations that are developed from, or tested upon, fetal cell lines obtained from abortion. The students would not knowingly accept into their bodies – which they believe to be temples of God – any vaccine that is shown to them to have the same or similar connection to abortion as the COVID-19 vaccines. (*See* 1 Cor. 6:19-20).

Additionally, each of these students hereby advises Loyola that she or he is willing to abide by all reasonable requests and protective measures (*e.g.*, wearing a facial covering, self-monitoring for symptoms, self-reporting of symptoms, and compliance with Loyola's surveillance testing protocols) that are deemed necessary to facilitate the accommodation of their sincerely held religious objections to the COVID-19 vaccine.

Finally, each of these students hereby advises Loyola that he or she (and, in the case of minor students, each parent) is aware of Loyola's admonition that they will be prohibited from attending classes and dorms in the case of a vaccine preventable outbreak or exposure.

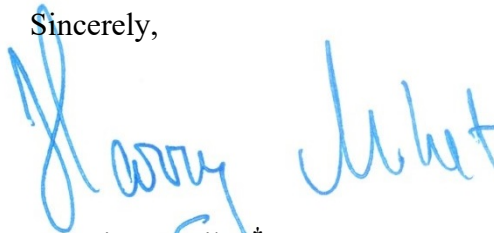
Each student is hereby electronically signing this letter, to indicate their approval of its content:

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Consistent with these students' previous written requests for a religious exemption, Liberty Counsel's previous letter dated June 21, 2021, Liberty Counsel's subsequent communications to Loyola, and the above confirmations from the students, Loyola must grant each of these students a religious exemption from its mandatory COVID-19 vaccination policy.

Time is of the essence. Loyola has threatened to expel these students as of this Friday, August 6, 2021. In the absence of a written confirmation from Loyola granting these religious exemptions and received by us **prior to 10:00 a.m. on August 5, 2021**, we will file on that same day the lawsuit we have already drafted, seeking emergency relief from the court.

Sincerely,



Horatio G. Mihet[†]
Chief Legal Counsel
Liberty Counsel

[†] Licensed in Florida and Ohio