

EXHIBIT I

ALVARADO, et al., v. AUSTIN, et al.

Declaration of

Army Chaplain (Captain) Jacob Lawrence

5. I began my military service on 18 September, 2000, when I became a ROTC cadet at Southwest Missouri State University. I was commissioned on 22 May, 2004, and entered reserve duty on 22 May, 2004, and active duty on 17 November, 2014.

6. My promotions were as follows: Captain 6 July, 2010. I have approximately 9 years of service as of March 1, 2022.

7. During my military career, I have had the following deployments: Jordan 08/2019-09/2019 in support of Operation Iraqi Freedom.

8. I have received the following: 2 Army Commendation Medals.

9. I submitted my Religious Accommodation Request (RAR) asking to be excused from the Army's COVID-19 vaccine mandate based on my sincerely held religious beliefs. A summary of those reasons follows: I learned that many vaccines are developed using abortion derived cell lines which runs counter to God's command comprehended in the 6th Commandment, "Thou shalt not kill." Anything that tends to the taking away human life unjustly is thus forbidden. Further, the hazardous compounds found in vaccines run counter to God's command to care for the body as a temple of the Holy Spirit. I view accepting the COVID vaccine as a religious rite I am unwilling to undergo. It represents a binding of my conscience and a public renunciation of my faith.

10. My RAR is still pending as of 10 August, 2022.

11. The following punitive, and career damaging actions have been taken against me for refusing the COVID vaccine and requesting a religious accommodation request: My RAR was submitted in August of 2021, and the prolonged mental distress caused by the Army's failure to furnish a timely response has taken a toll on my family and myself. The Air Force, Navy and

Marines have processed these requests promptly—the Army has lingered for 12 months. Though not desiring to separate from the service, I have had to pass on several meaningful job offers simply because I don't know when the Army is going to provide a decision on my request (a request that seems unlikely to be approved). I don't have any indication an answer will come soon as requests for updates through the technical channel have gone unanswered—the process has been drawn-out and unnecessarily opaque. I believe this stonewalling represents intentional intimidation on the part of Army leaders.

12. Despite stellar evaluations, I was passed over for promotion in March of 2022. In an email received on 9 August, 2022 from Foster S. Chandler, (Human Resources Assistant/Board Support Specialist) I was told that the identifier “I4-PEND COVID-19 VACC ACTION” was visible to the promotion board on my Officer Record Brief (the document that represents me to the board). Bringing this to the attention of the 8TSC Deputy Command Chaplain, CH (LTC) Joseph Kilonzo, his reply was that the presence of this on my ORB was a “serious discriminator” (a showstopper for promotion).

13. In a briefing for the 8th STB Planning Conference in August of 2021, the 8th TSC Deputy Commanding Officer, informed those in attendance that objectors to the COVID vaccine were operating under “misinformation” and needed to get with the program. The 8th TSC Inspector General, MAJ Sven London, privately asserted my request would not be approved. He said he was privy to conversations at “high levels” and confirmed “none of these are being approved.” The message was that blanket denials were all RAR seekers could expect from the 8th TSC Command and Army leadership.

14. The ambiguity, discriminatory treatment in promotion, forbidding nature of this process and disposition of Army leadership has caused much mental distress for my family and myself as we labor under the tension of this open question unable to make necessary future plans—we are unable to even change assignments under current policy as required for career progression.

15. On 13 July 2022, I was told by the 8STB Battalion Commander that owing to my RAR and current policies, I would not be allowed to travel to coordinate religious support. Our unit manages Army Logistical Support Vessels with crews all over the world and immediately 5 of my trips had to be cancelled with deleterious effect on my mission as a chaplain. My inability to travel also negatively impacts my unit's mission impacting my ability to receive a favorable evaluation.

16. On 21 September, 2021, I was counseled by 8th STB HHC Company Commander, CPT Kerry Horan, regarding my vaccine declination. The counseling threatened separation and/or punitive UCMJ action enumerating the conditions under which I might be separated including General Under Honorable and a Other than Honorable discharge with detrimental effect on my ability to obtain further employment. This threat is especially damaging for a chaplain seeking new ministry employment as it casts a disparaging light on my integrity and past ministry. The counseling also outlined I would have a mere 3 business days to organize and submit an appeal to the Assistant Secretary of the Army should the request be denied.

17. The counseling further asserted I was “hereby ordered to become fully vaccinated with a COVID-19 vaccine that has received full licensure from the Food and Drug Administration (FDA) in accordance with FDA-approved labeling and guidance...” Soon after the counseling, a “vaccine rodeo” was conducted at Triple Army Medical Center for our unit. As the unit chaplain,

I attended to support any who might have questions about religious accommodation options.

While talking privately to a medic administering the vaccines, I was told that the shot provided was not an FDA approved version, and there was not FDA approved supplies available on Oahu.

The medic himself expressed reservations about the effort as it was spurious but was following orders. This is contrary to what we as soldiers were led to believe by Army leadership, the command and the terms provided in my counseling statement.

18. For declining the vaccine, other RAR petitioners and myself were singled out for testing twice a week. This took place in the morning and interfered with our ability to conduct physical readiness training. At a time when test kits were in short supply on the island it was senseless to allocate kits away from determining actual cases to an intimidation campaign against those with RAR's.

19. At a time when the U.S. Army Chaplaincy is struggling with manning issues separating a chaplain who has served many different units with distinction for over 12 years seems counterproductive and agenda driven. Being mandated to publicly renounce my faith via this vaccine and being punished for my declination is un-American.

20. I make this declaration under penalty of perjury, it is true and accurate to the best of my ability, and it represents the testimony I would give if called upon to testify in a court of law.

August 10, 2022



/S/ Jacob Lawrence
Jacob Lawrence