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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JAMIE ZIMMERMAN, et al,

Plaintiffs,

v.

PEACEHEALTH,

Defendants

CASE NO: 3:22-cv-05960

DECLARATION OF JOY HOKSBERGEN

I, Joy Hoksbergen, declare as follows:

1. This Declaration is based upon personal knowledge and belief, and I am competent to testify to the information set forth herein.
2. I am over 18 years old.
3. I am from Whatcom County, Washington.
4. I worked at PeaceHealth from on or about May 19, 2008, until September 1, 2021, as a General Diagnostic Sonographer.
5. I have performed my job satisfactorily and have never been disciplined. Over my twenty year career as an ultrasound professional, healthcare work and serving my patients is one of the most fulfilling parts of my life. I still look forward to coming to work and have

DECLARATION

Silent Majority Foundation 5238 Outlet Dr. Pasco, WA 99301
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1 always striven to be a dedicated employee and gracious caregiver. I willfully worked  
2 through the pandemic and am appreciative that I found a job nearby that would  
3 accommodate my religious beliefs and allow me to continue to work in the profession.  
4

5 6. I worked throughout the pandemic using required personal protection equipment, which  
6 included surgical masks, with homemade masks over top when available – though we  
7 could not change them between patients. We used goggles, gloves, and surgical caps on  
8 all the non-COVID floors, including emergency. When we went into a known COVID  
9 patients’ room, we used PAPRS.

10 7. On August 3, 2021, PeaceHealth announced they would be requiring vaccination against  
11 COVID-19.  
12

13 8. On August 6, 2021, I submitted a religious accommodation request to the COVID-19  
14 vaccine and was denied.

15 9. As part of my request, I was willing to adhere to recommended personal protection  
16 equipment including N95 mask, PAPRS, goggles, any additional PPE they requested,  
17 frequent testing, or any other job in the PeaceHealth institution that I could do at home or  
18 remotely.  
19

20 10. The work environment at PeaceHealth was extremely divisive, threatening, and toxic. I  
21 experienced coworkers pressuring me to get the vaccine, HR pressuring me to get the  
22 vaccine to the point of coercion, and coworkers mocking those of us that have requested  
23 religious exemptions. For example, while working on Saturday, August 28, 2021, I  
24 witnessed a male Emergency Department staff member in the Emergency South core  
25 boisterously joking to other coworkers about those given religious exemption and that  
26 “they (management) should just call it Jesus juice and make them (coworkers granted  
27  
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1 exemptions) take it.” The coworkers listening all laughed and chimed in. Surely all  
2 patients in the relative vicinity heard this mockery. It was a disgraceful representation of  
3 PeaceHealth, yet management’s policy had created this environment. I have had a variety  
4 of coworkers seek me out to express their concerns of feeling alone in the workplace and  
5 experiencing offensive and threatening mockery due to their religious beliefs. After the  
6 Jesus juice mockery, I immediately called house management to report the incident.  
7

8 11. On September 1, 2021, PeaceHealth informed me that I was given the exemption but  
9 could not be accommodated.

10 12. On September 02, 2021, I was locked out of my work email.

11 13. They required that I go on administrative leave and then would be on unpaid leave to be  
12 determined on a 3-month interval.

13 14. I remained on administrative leave indefinitely and have never been sent any kind of  
14 termination letter. The vaccine mandate was lifted in April 2022, at which time we were  
15 required to wear N-95 masks in order to return, and could not eat or drink unless we went  
16 to our car to do so.  
17

18 15. As a result of my leave of absence I now have to drive further for work, causing more  
19 wear and tear on my vehicle, and more time commuting. I have been essentially demoted  
20 because I now work at a smaller hospital and have to do aspects of work that I do not  
21 like, unlike my job at PeaceHealth. I also have to work overnight, unlike PeaceHealth.  
22 The emotional damage from this experience will never be undone. I will never forget  
23 how they treated us when we worked throughout the COVID pandemic. I have lost many  
24 relationships because of the attitude promoted at PeaceHealth. Overall this has been a  
25 difficult and humiliating experience.  
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I SWEAR UNDER PENALTY PERJURY OF THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED AT Skagit County , WA this 29th day of April 2024.

  
\_\_\_\_\_  
Joy Hoksbergen

DECLARATION

Silent Majority Foundation  
5238 Outlet Dr.  
Pasco, WA 99301






# Hoksbergen Joy DECLARATION

Final Audit Report

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