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14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 MEGAN ROHRER, individually;
 17
 18 Plaintiff,

19 v.

20 EVANGELICAL LUTHERAN CHURCH IN
 21 AMERICA; SIERRA PACIFIC SYNOD, and
 22 DOES 1 through 25, inclusive;
 23
 24 Defendants.

CASE NO.

COMPLAINT FOR:

1. **HOSTILE WORK ENVIRONMENT
SEXUAL HARASSMENT – 42 U.S.C.
§ 2000(e) et seq.**
2. **WHISTLEBLOWING
RETALIATION – CAL. LAB. CODE
§ 1102.5**
3. **DEFAMATION**
4. **INTENTIONAL INFLECTION OF
EMOTIONAL DISTRESS**
5. **NEGLIGENT INFLECTION OF
EMOTIONAL DISTRESS**
6. **BREACH OF CONTRACT**

DEMAND FOR JURY TRIAL

COMPLAINT

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1 The Rev. Dr. Megan Rohrer (“Rohrer,” or “Plaintiff”) brings this action for damages and relief
2 against the Evangelical Lutheran Church in America (“ELCA” or “Church”) and the Sierra Pacific
3 Synod (“the Synod” or “Sierra Pacific”) for violations of federal and state law. Plaintiff is ignorant of
4 the names and identities of Doe Defendants 1-25 and will move to amend this complaint at a later date
5 once ascertained.

6 **I. INTRODUCTION**

7 1. This case is about the significant obstacles that LGBTQIA+ individuals face in
8 workplace and religious institutions across the country. Megan Rohrer is a transgender person. He was
9 terminated and scapegoated for following the directive of his superiors. The Church publicly cast him
10 as racist for following that directive. As a result of the Church’s actions (and animus), Megan Rohrer’s
11 career and reputation are permanently marred. He was a pioneer for LGBTQIA+ rights in the Church,
12 and a bridge for other members of his (historically excluded) community to experience God’s love; his
13 life’s mission. He is also a pioneering, courageous individual who broke significant cultural barriers to
14 penetrate an environment that had never historically accepted people like him. His goal has always been
15 inclusion and equality for all historically excluded groups. The Church’s termination of him, and
16 defamatory statements about him, violate the law.

17 2. The Rev. Dr. Megan Rohrer was terminated as Bishop of the Sierra Pacific Synod on or
18 about June 4, 2022 after suffering harassment and engaging in whistleblowing.

19 3. Rohrer was the first transgender person to be elected as a synodical Bishop in the history
20 of the ELCA. The highest levels of Church leadership did not choose for Rohrer to be appointed as
21 Bishop; his congregants did. His election brought significant fanfare and was covered in both local and
22 national press, so when Rohrer was elected to office, the Church had no choice but to publicly laud
23 Rohrer in outward facing sentiments. But literally his first day on the job, the Church demonstrated its
24 lack of acceptance of LGBTQIA+ people. As a figurehead for that community, the Church's animus
25 was taken out on him when they terminated him. Before his termination, Rohrer also opposed and
26 refused to participate in the Church's violations of California labor laws.

27 4. The Church’s justifications for terminating Rohrer were blatantly pretextual. For two
28 years before Rohrer was even employed by the Church, the Evangelical Lutheran Church in America

1 (“ELCA”) had been investigating a pastor, Nelson Rabell-González, who credibly threatened multiple
2 congregants at a local church over a longstanding time period. Rev. Rabell-González reported to
3 Rohrer. As such, Rohrer inherited a Synod in internal turmoil over which he was required to act.

4 5. Rohrer first recommended a plan of rehabilitation, in consultation with the ELCA’s
5 governing office. Rabell-González rejected it, and refused to comply with any manner of discipline. As
6 such, as would be the case with any employee under similar circumstances particularly after such a
7 longstanding pattern of misconduct and a multi-year investigation, Rohrer consulted with the Church,
8 and the Church directed Rohrer to terminate the pastor. Leading up to that decision, Rohrer did an
9 extraordinary amount of research, and consulted with dozens of victims, witnesses, and stakeholders.

10 6. The Synod Council, which oversaw Rohrer and the Synod, voted to remove Rabell-
11 González on December 11, 2021. Rohrer delivered the news to the pastor and his congregation on the
12 exact date the Presiding Bishop, ELCA and Synod Council directed him to.

13 7. Members of this pastor’s worshipping community, not having the full scope of
14 information leading to the termination, were outraged by the termination and timing, believing it to be a
15 vestige of the Church’s history of racial discrimination and colonization. In response, rather than quell
16 tempers and reflect the truth, the ELCA publicly blamed Bishop Rohrer for the termination, accused
17 him of being racist, and publicly opened an “investigation” against him for “racial motivations.”

18 8. The Church’s “investigation” of Rohrer’s actions were purely pretextual and resulted in
19 a publicly disclosed report containing numerous inaccuracies, and again, case Rohrer as racist.

20 9. One thing is true: the Church does have a tragic and utterly unjustifiable history of
21 colonization and racism, the imprints of which exist to this day. Also true is that the Church’s treatment
22 of Rohrer as alleged herein, evidences discrimination against him as a transgender person. The
23 Church’s history of prejudice far predated Megan Rohrer's entry into the Church, and the notion he was
24 motivated by racial animus in any personnel decisions is an outright falsehood propagated by the
25 Church to deflect blame. It has also had the tragic effect of turning marginalized communities against
26 each other.

27 10. Throughout his employment, the ELCA and Synod fostered an environment that was
28 openly hostile to Rohrer. Among other conduct, head leaders of the Church intentionally, repeatedly,

1 and publicly misgendered him, making a mockery of his gender identity and the respect he should
2 receive as Bishop. The very Presiding Bishop of the ELCA, the highest position of the nationwide
3 Church body, and his predecessor minimized Rohrer’s gender identity and complained about his
4 presence in leadership.

5 11. During his tenure as Bishop, Rohrer reported to ELCA and Synod officials that the
6 Synod was categorizing employees as independent contractors in an attempt to avoid paying them
7 salary, a violation of federal and California labor laws which on information and belief, continue to this
8 day. Similarly, when Rohrer separately revealed the transgender harassment he had been suffering since
9 beginning his job, the Church terminated him, and falsely accused him of “weaponizing” his own
10 identity as a trans person to “avoid being held accountable.”

11 12. While religious institutions enjoy significant latitude over personnel decisions, the
12 Church’s actions in this context are unlawful under now-established employment protections in this
13 country requiring all employees to enjoy a workplace free from harassment.

14 13. After being terminated from his role Rohrer can no longer work as a Bishop of any
15 Synod in the entire ELCA, can no longer work as a pastor in the ELCA, nor in any other church in the
16 Lutheran tradition. Worse than being simply fired, the Church has maliciously ruined his public
17 reputation by casting him as a racist. He has become a pariah in his own faith community, due to the
18 Church’s actions.

19 14. Rohrer has received near-daily hate mail, death threats, and overtly hateful vitriol from
20 congregants and members of the public. The backlash against Rohrer as a result of the Church’s
21 conduct has been nothing short of egregious.

22 15. This lawsuit seeks monetary damages to compensate Rohrer for ELCA and the Sierra
23 Pacific Synod’s egregious conduct.

24 **II. THE PARTIES**

25 **A. Rev. Dr. Megan Rohrer**

26 16. Plaintiff Rev. Dr. Megan Rohrer is a resident of San Francisco, California.

27 17. Rohrer has broken significant, unparalleled barriers to become a minister in the ELCA.
28 He was born and raised Sioux Falls, South Dakota. He knew early in his life that he had a strong

1 connection to faith, but also that he was a queer person. He struggled within the strictures of traditional
2 Christian teachings, yet found resolve and comfort in the openness and warmth of the ELCA.

3 18. After receiving his Bachelor of Arts from Augustana University, a Master of Divinity
4 and Doctorate of Ministry degree from the Pacific School of Religion, Rohrer was extraordinarily
5 ordained as a minister in 2006. At that time, the ELCA still forbade the ordination of LGBTQIA+
6 pastors. Following ELCA’s reversal of that policy in 2009, Rohrer was one of seven Bay Area
7 individuals received into ELCA as pastors in 2010. Though Rohrer did not officially have a “call”¹ to a
8 particular church, he ministered at four different churches, which all called him to care for the homeless
9 of San Francisco as their pastor.

10 19. From 2002 to 2014, Rohrer served in a number of roles at an organization called
11 Welcome, a non-profit interfaith coalition of congregations in San Francisco, eventually becoming its
12 Executive Director. Welcome fostered close relationships with both Lutheran and Episcopalian bishops,
13 and provided one on one care with homeless and marginally housed populations, in an effort to address
14 poverty in the city. Rohrer obtained specialized training in non-violence, PTSD care, fundraising, and
15 was asked to teach on these topics across the country.

16 20. Rohrer spearheaded a number of initiatives while at Welcome to further assist those that
17 suffered from the effects of poverty. He helped start the Homeless Vision Project, a program that
18 provides free eye exams and eyeglasses to unhoused individuals, serving thousands of people in the
19 Bay Area. Welcome also supported the Singers of the Street Choir, a group of unhoused and formerly
20 unhoused individuals who performed throughout the community. Rohrer was instrumental in teaching
21 the group social skills and community engagement. He thrived in that environment, empowering and
22 giving voices to those who struggle to be heard and seen.

23 21. In 2014, in recognition of his community work and presence within the greater Lutheran
24 sphere, Rohrer was unanimously called, or asked to serve, as Pastor of Grace Lutheran Church in San
25 Francisco, where he remained until his election as Bishop of the Synod in 2021. While at Grace
26

27 _____
28 ¹ A “call” is a formal letter from a congregation or other division of the Church to have a rostered
minister lead that particular division. *See* ELCA Constitution, Chapter 7.

1 Lutheran, Rohrer helped grow his congregation, establish a firmer financial footing, and continued his
2 public advocacy work.

3 22. In 2018, he became Community Chaplain Coordinator for the San Francisco Police
4 Department (“SFPD”). During his time at the SFPD, Rohrer continued the work he began at Welcome,
5 caring for first responders, employees of the department, but also for community members, especially
6 those suffering a loss or a tragedy. Rohrer would go to crime scenes, consoling family members
7 affected by such an event. Rohrer took pride in providing trauma care, especially to marginalized
8 communities and people of color, who often lacked resources to locate or obtain grief services.

9 **B. ELCA**

10 23. Defendant ELCA (the “Evangelical Lutheran Church in America”) is a Minnesota
11 corporation. Its principal place of business is 8765 W. Higgins Road, Chicago, Illinois.

12 24. ELCA was formed on January 1, 1988, as a merger of three Lutheran churches: the
13 American Evangelical Lutheran Church, the Lutheran Church in America, and the Association of
14 Evangelical Lutheran Churches. ELCA has three million members, and administers to over 8,700
15 congregations in the United States, Canada, and the Caribbean, and Europe.

16 25. ELCA directly administers and governs its congregants through an organizational
17 structure based on geography, dividing up territory into Synods, as described *infra*.

18 **C. Sierra Pacific Synod**

19 26. Defendant Sierra Pacific Synod (“the Synod”) is a California nonprofit corporation. Its
20 principal place of business is 1800 55th Avenue, Oakland, California.

21 27. The Synod is one of 64 regional divisions of congregations in the United States and the
22 Caribbean, and one non-geographical synod, which are in turn part of nine regions. Each Synod is
23 headed by a Bishop. A Synod Council is elected at a Synod Assembly, and is considered the Board of
24 Directors of the Synod.

25 28. The Synod employs the Bishop, who serves on the executive committee with a volunteer
26 vice president, a secretary, and a treasurer.

27 29. The Synod and the ELCA are referred to collectively herein as “the Church.”

28 ///

1 **D. ELCA and the Synod Are Joint Employers**

2 30. Both the ELCA and Synod were Rohrer’s joint employers at all times relevant herein.

3 31. The ELCA oversees and controls the Synod. ELCA’s synods are the “points of
4 connection for them and the churchwide organization.” The ELCA Constitution, Chapter Ten, names
5 the SPS, dictates its role within ELCA, requires each Synod to have a constitution. ELCA wrote a
6 model “Constitution for Synods,” containing mandatory provisions “that incorporate and record therein
7 provisions of the [ELCA] constitution and bylaws.” SPS’s Constitution largely mirrors ELCA’s.

8 32. The Synod is formally called the Sierra Pacific Synod of the Evangelical Church in
9 America. The Synod, like its sister synods, is required to present a parochial report to the ELCA as part
10 of their financial obligations, SPS contributes financially to the ELCA, and vice versa. The Synod
11 Constitution acknowledges that the Synod is one of three expressions of the Church: synods being the
12 first, congregations the second, and lastly, the churchwide organization. The Synod Constitution also
13 acknowledges that discipline of ministers follows ELCA constitutional provisions. The Synod also
14 follows the ELCA Constitution’s requirements for electing members of the Churchwide Assembly,
15 ELCA’s triennial gathering where the Church elects general officers such as the Bishop, vice president,
16 secretary, and others. Each Synod is required to maintain a roster of its ministers, and any changes to
17 that list must be reported to the ELCA secretary. Synods are also required to report discipline to ELCA,
18 and the ELCA constitution governs discipline at Synod leadership levels.

19 33. Partly as a result of this co-extensive relationship, the ELCA controls the Synod’s
20 activities, and managed Rohrer’s activities specifically. Rohrer directly reports to the Presiding Bishop
21 of the ELCA, per his compensation agreement. That agreement contains a statement of responsibilities
22 mirroring those in the ELCA Constitution. The ELCA provided Rohrer’s health and pension benefits.
23 Pursuant to their express employment relationship, the ELCA made all material employment decisions
24 concerning Rohrer relevant to this dispute. The Synod issued Rohrer’s paychecks.

25 34. The ELCA and the Synod are also inextricably financially linked. The ELCA
26 Constitution’s “Fiscal Policy” requires each individual Synod to remit to the ELCA a portion of “all
27 donor-unrestricted receipts” contributed to it by the Synod’s congregants, the amount of which is
28 determined through discussion between the ELCA and the Synod. The ELCA website details “four

1 primary financial communications” with it, including “mission intent,” “annual operating budgets and
 2 year-end results,” “audited financial statements,” and “Synod monthly remittances.” ELCA provides all
 3 employees with benefits through a single benefit manager, whether they work for the Churchwide
 4 office, a Synod, or a seminary. For example, the Traditional Benefits Program offered to Rohrer
 5 includes the “ELCA Medical and Dental Benefits Plan,” “ELCA Retirement Plan,” “ELCA Survivor
 6 Benefits Plan,” and the “ELCA Disability Benefits Plan.”

7 35. The level of control exerted by ELCA over the Synod is evident from founding
 8 documents like their constitutions, the requirements the ELCA has imposed on the Synod over the
 9 roster of ministers that work within the Synod, the mandatory contribution of money from congregants
 10 using the Synod as a conduit, as well as the fact that the Synod *simply would not exist* outside the
 11 greater ELCA, and has existed from the very date of the creation of the ELCA. The Synod and the
 12 ELCA are, in the ELCA’s own words, expressions of the greater Church.² The ELCA and Synod
 13 council voted to remove Rohrer from his Bishop position. The two entities are both inextricably
 14 connected to each other, as well as oversaw and were responsible for Rohrer’s employment. Defendants
 15 are Rohrer’s joint employers.

16 **III. JURISDICTION**

17 36. This court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343(a)(4).
 18 This action arises under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*

19 37. In the alternative, this court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332
 20 as the parties are diverse and the minimum amount in controversy is met.

21 38. This court has personal jurisdiction because ELCA and the Synod operate in this
 22 District. ELCA and the Synod employ numerous individuals in this District. Additionally, the Synod
 23 oversees the operations of over 150 churches that are located in this District.

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27 ² Constitution of the Evangelical Lutheran Church in America, Ch. 1, para. 01.01. “The name,
 28 Evangelical Lutheran Church in America, as used herein, refers, in general references, to this whole
 church, including its three expressions: congregations, synods, and the churchwide organization.”

1 **IV. VENUE**

2 39. Venue is proper in this District under 28 U.S.C. § 1391(b), because a substantial part of
3 the events giving rise to Plaintiff's claims occurred in this District.

4 **V. FACTUAL ALLEGATIONS**

5 **A. Rohrer Extraordinarily and Historically Becomes Bishop**

6 40. Rohrer's path to becoming Bishop has been remarkable, and demonstrates he was
7 extraordinarily well-qualified for that post.

8 41. As Pastor, and Community Chaplain Coordinator, among other service-driven work,
9 Rohrer has built his career, and his centered his life, on promoting inclusivity of all people, both in the
10 secular and non-secular world. Rohrer's advocacy and visibility were instrumental in helping ELCA
11 increase its outreach to younger, more diverse voices previously intentionally or unintentionally
12 excluded by the Church. Buoyed by the positive response to his activism, he made the decision in 2021
13 to stand for election to the position of Bishop in the Sierra Pacific Synod, the geographical division of
14 ELCA that covers Northern California and most of Nevada.

15 42. On May 8, 2021, Rohrer was elected as Bishop of the Synod during the annual 2021
16 Synod Assembly, which hosted over 400 people from across the Synod's congregations, and was
17 comprised of more than 60 percent lay people. The Assembly was supportive of Rohrer. He was
18 formally installed as Bishop of the Synod in a ceremony at Grace Cathedral in San Francisco on
19 September 11, 2021, but assumed the duties of Bishop as of July 1, 2021. The installation was moved to
20 Grace Cathedral from its originally planned site due to the outpouring of support from congregants and
21 the public following Rohrer's election, as the original location could not accommodate the number of
22 people who wished to attend.

23 43. Once a Bishop is installed, they can only be removed through a written petition signed in
24 one of four ways: (1) by a two-thirds vote of the Synod Council; (2) by a two-thirds vote of the Synod
25 Assembly; (3) by at least ten Synod bishops; or (4) by the ELCA's Presiding Bishop. Such a petition is
26 filed directly with the ELCA's Committee of Appeals, in the care of the Secretary of the ELCA. (See
27 Synod Constitution, § 8.57). While the Synod Assembly, comprised of majority lay people, voted him
28 into his Bishop position, it soon became clear that the Church leadership was extremely displeased that

1 he would assume that role, as set forth below. And in order to oust him, it would need to garner
2 significant support.

3 **B. The ELCA and the Synod Immediately and Throughout, Demonstrates Their**
4 **Anti-LGBTQIA+ Animus Towards Rohrer**

5 **1. Heightened Employment Protections for Transgendered Individuals After**
6 **Bostock**

7 44. Recently, the U.S. Supreme Court in a case entitled *Bostock v. Clayton County, Georgia*
8 (2020) 590 U.S. ___, 207 L.Ed.2d 218 [140 S.Ct. 1731] (“*Bostock*”) enacted a fundamental sea change
9 in the rights of transgender people in the workplace. In one of three consolidated cases, the employer, a
10 funeral home, fired a transitioning, transgender employee based on gender stereotypes. The *Bostock*
11 court held that an employer violates Title VII³ by firing an individual for being homosexual or being a
12 transgender person. *Id.* at 1737 (“An employer who fires an individual for being homosexual or
13 transgender fires that person for traits or actions it would not have questioned in members of a different
14 sex.”)

15 45. *Bostock* held that “is impossible to discriminate against a person for being homosexual
16 or transgender without discriminating against that individual based on sex,” and therefore violating
17 Title VII. *Id.* at 1741 (emphasis added). The Church itself harassed Rohrer and failed to prevent
18 harassment, on the basis of Rohrer’s transgender status.

19 **2. The Church’s Harassment Included Intentionally Misgendering Rohrer Ad**
20 **Nauseam**

21 46. Among the most basic ways to respect the dignity of transgender people in the
22 workplace are to reference them using appropriate pronouns. The Church’s frequent, intentional
23 misgendering of Rohrer are a blatant example of the harassment he suffered.

24 47. Using a person’s appropriate pronouns is critical to respecting their gender identity.
25 Transgender, gender nonconforming, gender-fluid, non-binary, and other LGBTQIA+ people use a
26 variety of pronouns that affirm who they are. Using someone’s self-defined pronouns acknowledges
27

28 ³ 42 U.S.C. § 2000e-2(a)(1).

1 their identity and dignity, and intentionally misgendering a person is one of the clearest possible
2 indicators of disrespect.⁴

3 48. Countless studies have directly linked repeated misgendering in the workplace with
4 higher rates of depression and suicide in transgender employees. *See e.g.*, *Suicide Attempts Among*
5 *Transgender and Gender Non-Conforming Adults, Findings of the National Transgender*
6 *Discrimination Survey, Suicide Attempts and Stressors Related to Anti-Transgender Bias*, available at
7 <https://williamsinstitute.law.ucla.edu/wp-content/uploads/Trans-GNC-Suicide-Attempts-Jan-2014.pdf>,
8 at p. 11 (directly correlating transgender adults who were referred to by the wrong pronoun, with
9 suicide attempts).⁵

10 49. Rohrer’s pronouns are he/them/they. Upon assuming the role of Bishop, Rohrer made
11 his pronouns clear to everyone he came into contact with. He quickly observed how unprepared the
12 Church was to accommodate him. For example, the Synod’s internal *database* did not even use his
13 proper pronouns, because the database didn’t allow them as options. Indeed, the Synod’s own internal
14 system paved the way for his proper pronouns to be minimized and disregarded.

15 50. Rohrer recognized this likely affected all other transgender ministers when he discovered
16 that the ELCA Community portal, at the national level, which contains copies of all Rostered Minister
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20 ⁴ Many jurisdictions have even made failure to use proper pronouns a punishable offense. *See e.g.*, 47
21 N.Y.C.R.R. § 2–06(a) (2020) (stating that a “deliberate refusal to use an individual’s self-identified
22 name, pronoun and gendered title” is a violation of N.Y.C. Admin. Code § 8–107 “where the refusal is
23 motivated by the individual’s gender”); see also N.Y.C. Admin. Code §§ 8–107(1), (4), (5) (2020)
24 (making it unlawful to discriminate on the basis of “gender” in employment, housing, and public
25 accommodations); cf. D.C. Mun. Regs., tit. 4, § 801.1 (2020) (making it “unlawful ... to discriminate ...
26 on the basis of ... actual or perceived gender identity or expression” in “employment, housing, public
27 accommodations, or educational institutions” and further proscribing “engaging in verbal ...
28 harassment”).

⁵ And more generally, data in countless studies indicate that transgender and gender non-conforming
individuals have extremely high rates of depression and suicide *See* *Suicidality Among Transgender*
Youth: Elucidating the Role of Interpersonal Risk Factors, available at
<https://pubmed.ncbi.nlm.nih.gov/32345113/> (“data indicate that 82% of transgender individuals have
considered killing themselves and 40% have attempted suicide, with suicidality highest among
transgender youth.”)

1 Profiles across the country, included the “dead names” of transgender ministers in the church, rather
2 than the names they chose after transitioning.⁶

3 51. During his time as Bishop-elect and Bishop, the Church constantly misgendered him,
4 and permitted him to be misgendered by others.

5 52. For example, on May 8, 2021, mere minutes after the election announcing Rohrer as
6 Bishop, then-Synod Bishop Mark Holmerud, with full knowledge of Rohrer’s appropriate pronouns,
7 misgendered him before the entire Synod Assembly while smiling, in announcing Rohrer would be
8 appointed as Bishop.

9 53. As Rohrer worked in his role as Bishop, the misgendering did not stop. ELCA General
10 Counsel misgendered Rohrer in an email on February 23, 2022, and after being corrected, admitted he
11 knew Rohrer’s preferred pronouns. During a May 2022 speech to an assembly of the Delaware-
12 Maryland Synod, the Bishop of that Synod, Bp. William Gohl misgendered Rohrer in front of his
13 congregants while spreading falsehoods about Rohrer.⁷ At the Synod Assembly in June 2022, clergy
14 and congregation members alike misgendered Rohrer **44 separate times**. *A Synod seminary student*
15 *attempted to address the gathering and explicitly asked speakers to use Rohrer’s appropriate pronouns.*
16 Church leadership, including Bp. Eaton and ELCA Vice President Carlos Peña, had traveled to the
17 Synod Assembly, were present in person, and did nothing to address the issue. As a result, the Church’s
18 silence and refusal to defend Rohrer caused him to be misgendered an additional fifteen times at this
19 event alone.

22 ⁶ “Deadnaming” is referring to someone by a name the person no longer uses. Transgender individuals
23 often choose to not use their birth name, and instead choose a name that better aligns with their identity.
24 See Cleveland Clinic, *Why Deadnaming Is Harmful*, November 18, 2021, available at
25 <https://health.clevelandclinic.org/deadnaming/>.

26 ⁷ Delaware-Maryland Synod, *2022 Delaware-Maryland Synod Assembly* (May 14, 2022), available at
27 <https://www.youtube.com/watch?v=NHq2d9KMhR4>. Gohl misgendered Rohrer just three minutes into
28 his speech (“her predecessor”) and later stated, at 1:36:40, falsely, that “Rohrer moved to remove Pastor
Rabell-González from his call.” This was false. Later, at 1:50:08, he claimed if Rohrer “were a pastor
serving in this place, that they would come under the Church’s discipline for their actions. . . I will be
one of the people that [calls] for the discipline and removal of Bishop Rohrer if the presiding Bishop
fails to act.” In so doing, Bp. Gohl propagated further falsehoods, and spread further anger, against
Rohrer to his entire congregation and beyond.

1 54. Various members of Church and Synod leadership, intentionally and repeatedly refused
2 to use Rohrer's appropriate pronouns (he/them/they), despite knowing what they were. This dynamic
3 was one of many displays of disrespect that contributed to the environment of harassment created by
4 the Church. Because it started and continued at the top, the Church gave license to folks lower in the
5 Church hierarchy to perpetuate it. To be clear: these were not unintentional slips of the tongue, but
6 *intentional* misgendering that sought to minimize and discredit Rohrer, and perpetuate the hostile work
7 environment he endured.

8 55. Every time a transgender person is misgendered, it is a small stab to their integrity. Even
9 so, Rohrer recognized that patience is often required with folks who are not intentionally or maliciously
10 misgendering him. But constant and repeated misgendering, after being politely corrected by Rohrer
11 and others, demonstrates complete disregard, disrespect, and animus towards him for his gender
12 identity and sexual orientation. When the highest levels of Church leadership modeled publicly that
13 using Rohrer's proper pronouns was not important, the problem got worse.

14 56. Rohrer alone was often responsible for policing the hostile work environment he was
15 subjected to. In November of 2021, Rohrer participated in First Call Theological Education, a program
16 for new called ELCA leaders, along with Pastor Hazel Salazar-Davidson, the Assistant to the Bishop
17 for Authentic Diversity, Inclusive Community and Service. During the retreat, Rev. Salazar-Davidson
18 repeatedly misgendered Rohrer while addressing the crowd. Rohrer politely texted her to correct the
19 error. But again, Rev. Salazar-Davidson misgendered him repeatedly thereafter, including on December
20 10, 2021 in front of others. This is the individual appointed by the Church to be responsible for
21 diversity and inclusion. And members of Church leadership were well aware of the problem. The
22 Church appeared to hold a myopic view of which categories of people should be granted respect under
23 a diversity and inclusion lens.

24 57. And misgendering aside, the Church's general animus was demonstrated almost
25 immediately upon becoming Bishop. On July 1, 2021, seven weeks after beginning as Bishop, Rohrer
26 participated in a Zoom meeting with the ELCA Conference of Bishops. As the first call with his Bishop
27 colleagues, this should have been a major milestone moment in Rohrer's career. Upon entering the
28 Zoom room, Presiding Bishop Rev. Elizabeth Eaton, the leader of the ELCA and Rohrer's direct

1 supervisor, openly mocked the ordination ceremony of a different ELCA transgender pastor, because
2 there were in her words, so many “drag queens” in attendance. And Bp. Eaton called Rohrer on
3 September 8, 2021, to express “concern” about the possibility that “drag queens” might attend his
4 installation service, because according to Bp. Eaton, photos of her with drag queens would “not be good
5 for global ecumenical conversations.” Comments like these are but one example of the Church’s
6 animus towards the LGBTQIA+ community at the highest level.

7 58. Rohrer’s complaints about this treatment fell on deaf ears. For example, Rohrer
8 participated in a separate program on July 7, 2021, organized by ELCA for new bishops, called Bishop
9 Formation Training. At that training session, ELCA General Counsel Thomas Cunniff presented on
10 legal issues. Rohrer raised the Synod and ELCA’s inequitable and discriminatory “handling” of
11 transgender employees. Cunniff heard Rohrer’s report, but did not acknowledge it, nor take any action
12 to make any changes to ELCA policies. Cunniff told Rohrer, explicitly, that discrimination against
13 LGBTQIA+ people is allowed by Church policy. This apparently justified him minimizing Rohrer’s
14 reports.

15 59. As another example, following December 12, the ELCA Conference of Bishops met to
16 review issues regarding Rev. Rabell-González (as detailed further below). During that meeting, Rohrer
17 asked his fellow bishops when the Church would have a real conversation about the anti-LGBTQIA+
18 animus running rampant and follow through with its gender violence policies that deemed such
19 behavior to be contrary to the mission of the Church. Several bishops responded that was
20 “inappropriate” and said they “did not believe [Rohrer] was experiencing discrimination.”

21 60. For Rohrer, this was not just about his own gender identity. It was about fostering an
22 inclusive environment for transgender or non-binary congregants and employees. If the Church could
23 not respect a most basic, foundational aspect of one’s gender identity (the pronoun to use when
24 addressing them), then how would anyone from the LGBTQIA+ ever meaningfully participate in the
25 Church?

26 61. ELCA and the Synod cultivated and allowed to fester without correction an environment
27 that was openly hostile to Rohrer, a transgender person, far exceeding the boundaries of common
28

1 decency and reasonable behavior. The Church benefited by using Rohrer as a token for outside PR
2 when he was elected, but could not extend even the most basic respect once he began work.

3 **C. Rohrer Blows the Whistle on the Synod’s Unlawful Employee Classification**
4 **Practices**

5 62. Following his election as Bishop of the Synod, Rohrer became privy to internal Synod
6 documents and personnel files. He began a review of those files, both to familiarize himself with the
7 operation of the Synod, but also to identify any problems or issues that could have gone unnoticed
8 under prior leadership.

9 63. Rohrer learned that the Synod had employed a longstanding policy and practice of
10 misclassifying certain employees as independent contractors, with express intention of avoiding
11 payment of payroll taxes. In doing so, the Synod intentionally paid these employees significantly less
12 than they would have earned had they been properly classified, and without benefits.

13 64. Rohrer believed this practice was unlawful under California labor laws, and potentially
14 other laws. For example, 26 U.S.C. § 7434 also deems it unlawful for an employer to misclassify
15 employees as independent contractors to avoid paying appropriate payroll taxes.

16 65. After completing his review of the relevant records, Rohrer wrote of his concerns to the
17 Synod Council, the governing body of Synod. In an email written on June 25, 2021, Rohrer expressed
18 his belief that the practice was unlawful, subjected the Synod to potential liability, and needed to
19 change. He wrote, “When [independent contractor] staff take on extra projects and end up working
20 more than 960 hours a year there are additional legal requirements that we have to follow - and I don’t
21 think this has been happening in the past.”

22 66. Rohrer also wrote a memorandum, completed in June 2021, containing a
23 recommendation that the Synod “update its employee handbook to ensure the Synod is meeting the
24 minimal labor code standards required by law[.]” Rohrer also recommended the Synod emphasize
25 hiring only full-time staff, which would provide benefits and health insurance, recognizing that contract
26 positions “disproportionately impact communities with diverse skin color, sexual orientation[,] and
27 gender identities.” Rohrer wrote, “[p]rioritizing positions with benefits and health care should be a part
28

1 of our Synod’s anti-racism efforts.” Rohrer shared the memorandum with Synod staff and the Synod
2 Council.

3 67. When Rohrer’s memorandum and whistleblowing activity would not relent, the Synod
4 Council reluctantly changed its employee classification policy. Rohrer’s whistleblowing was a
5 motivating factor behind the Church’s termination of him. Indeed, on information and belief, shortly
6 after terminating him, the Church reverted to its previous unlawful policy.

7 **D. Rohrer is Publicly Maligned by the Church After Carrying out What the Church**
8 **Told Him to Do, And the Harassment Continues**

9 68. Well before Rohrer’s election as Bishop, at least as of June 2019, ELCA and the Sierra
10 Pacific Synod knew that one particular pastor in Lodi, California, Rev. Nelson Rabell-González, was
11 exhibiting serious and dangerous behaviors giving rise to several complaints from congregants and staff
12 alike, including verbal harassment of a Latina pastor. At least 15 victims raised complaints against
13 Rabell-González in the years 2019 through 2021.⁸ The vast majority referred to Rabell-González’s
14 “bullying” and intimidating behavior towards staff and congregants at his then-Church in Lodi,
15 California, causing many to be outright fearful of him. There were also allegations of physical abuse.

16 69. Both Rabell-González and Rohrer were pre-nomination candidates for Bishop. During a
17 phone call, Rabell-González told Rohrer “if I weren’t a pastor, I would be a serial killer.” He added that
18 if Rohrer were elected Bishop and did not share his agenda for the position, he would ensure “the next
19 Bishop would have no agenda at all.”

20 70. The Bishop at the time, Bp. Mark Holmerud, fielded the original series of complaints
21 issued against Rev. Rabell-González. He urged leadership at the church where Rev. Rabell-González
22 was a called leader to end his “call,” and begin working on a separation agreement. Rev. Rabell-
23 González left that particular church on February 28, 2021, but continued working at the ELCA, leading
24 a separate worshipping community located in Stockton, California, called Misión Latina Luterana
25 which was referred to as a Synodically Authorized Worshipping Community (“SAWC”). Bp.
26 Holmerud, the Synod Council, the Synod, and the ELCA all oversaw the SAWC, which was being run

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28 ⁸ While 15 is the number of alleged victims who complained, the total number of victims is expected to be larger.

1 by Rabell-González, who agreed to “be subject to ELCA discipline,” pursuant to Policy 95-001 of the
2 Synod Constitution. This was all effected before Rohrer was even hired as Bishop.

3 71. In June 2021, Bp. Holmerud convened an advisory panel that listened to 15 people,
4 including Rev. Rabell-González. The panel’s report recommended discipline for “hateful speech or
5 actions” and “abusive activity.” The report recommended “compassionate steps” to “assist” Rev.
6 Rabell-González in continuing his work as pastor for other concerns. Essentially, this was a
7 performance improvement plan.

8 72. Having reviewed many complaints and investigated fully, Bp. Holmerud called Rev.
9 Rabell-González on June 27, 2021 and asked for his resignation. When he did not receive it, Bp
10 Holmerud informed him there would be a disciplinary hearing to determine the appropriate level of
11 discipline to administer to him.

12 73. ELCA was well-aware of the issues regarding Rev. Rabell-González and his harassing
13 conduct towards congregants and clergy. On July 21, 2021, ELCA General Counsel Thomas Cunniff
14 directed Rohrer to implement a Synod Call for Rev. Rabell-González directing his discipline, consistent
15 with the recommendations of the advisory panel. If Rabell-González was non-compliant with its terms,
16 per Mr. Cunniff, Rohrer and the Synod Council would be authorized to terminate the call, i.e., exit him
17 from his role at the Church. Mr. Cunniff, the ELCA’s general counsel, made it clear to Rohrer that this
18 was ELCA’s directive.

19 74. When Rohrer became Bishop, he informed Rev. Rabell-González he would be willing to
20 forego a disciplinary hearing and instead, undertake a restorative approach: if he were willing to agree
21 to a “wellness plan” and show progress in working with a chosen professional counselor, he could
22 continue as the called pastor to his SAWC. He would also have to assist in organizing listening sessions
23 and pastoral care for his congregants. On July 29, 2021, the Synod Council approved a Synod call for
24 Rabell-González. The very next day, Rohrer made it clear to Rev. Rabell-González that he would need
25 to abide by specific terms developed with the advisory panel and approved by the Synod Council in
26 order to remain in good standing with the Church.

27 75. Rev. Rabell-González’s harassing, intimidating conduct towards others continued, and
28 the Church continued to receive complaints from new victims. The complaints mirrored the same type

1 of allegations that had been leveled at Rabell-González in years prior. In August 2021, a male pastor
2 came forward to the Synod to allege that he had a personal fear of Rev. Rabell-González. Rev. Rabell-
3 González often spoke of “suing everyone,” made “implied threats” towards him, and that his level of
4 anger is “high and worrisome.” Rohrer emailed Thomas Cunniff on September 3 to inform him of the
5 new allegations. On September 10, Mr. Cunniff told Rohrer to “continue investigating” and “field more
6 complaints.”

7 76. Through the rest of 2021, Rohrer tried repeatedly to liaise with Rev. Rabell-González,
8 offering him the chance to defend the allegations made against him by numerous staff and congregants.
9 Rev. Rabell-González refused, and immaturely deflected while taking no accountability. It was clear he
10 was not taking any of this seriously, even after having been repeatedly reprimanded.

11 77. Rohrer spoke to Presiding Bishop Elizabeth Eaton on the phone on December 10, 2021
12 about Rev. Rabell-González, and Bp. Eaton told Rohrer “you must go as soon as possible,” to call for a
13 vote of the Synod Council to terminate Rabell-González. In the wake of this longstanding continuing
14 pattern of misconduct, an utter refusal to change, and concerns for the safety of the Latiné community,
15 the Synod Council⁹, unanimously voted to end Rev. Rabell-González’s call on December 11, 2021,
16 thus terminating his employment as Pastor of the SAWC.

17 78. Per ELCA rules, protocols, and directives from his superiors and risk assessment
18 professionals, Rohrer was required to inform Rev. Rabell-González of the result as soon as he possibly
19 could after the Synod Council vote.

20 79. Synod staff acknowledged that the timing of the vote to exit Rev. Rabell-González was
21 problematic: the rules required Rohrer to notify him of his termination on December 12, 2021, the Feast
22 of the Virgin of Guadalupe, and an enormously important cultural event for their largely Latinx
23 congregation.¹⁰ The Council discussed and considered the timing specifically.

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25 ⁹ In this case, the Synod Council is the body responsible for meting out the discipline required by the
ELCA for a pastor.

26 ¹⁰ The Feast of the Virgin of Guadalupe, December 12, is a key celebration in the Christian faith,
27 particularly for those of Mexican and Latiné heritage. The Virgin of Guadalupe symbolizes support and
28 protection from oppression to those communities. *See* The Virgin of Guadalupe, National Museum of
Mexican Art, *available at* [https://www.terraamericanart.org/wp-
content/uploads/2015/09/MySymbolsMyIdentity_VirgenHandout.pdf](https://www.terraamericanart.org/wp-content/uploads/2015/09/MySymbolsMyIdentity_VirgenHandout.pdf).

1 80. However, after much discussion and weighing the public safety risk that Rev. Rabell-
2 González posed, the Synod Council decided there was no other appropriate date to vote to end his call
3 and notify him, given the upcoming holiday season. Waiting another week would conflict with Posadas,
4 another critically important holiday for the Latiné community. Public safety professionals agreed he
5 was a risk to safety and his termination and notice needed to happen as soon as possible.
6 Misinformation regarding the vote had already leaked – the highest echelons of Church leadership
7 decided that the more time that passed between the vote and notifying the congregation, the higher the
8 safety risk. Rohrer and the Church collectively decided on the day he would personally deliver the news
9 to Rev. Rabell-González’s congregants.

10 81. Rohrer contacted ELCA officials for guidance, recognizing the sensitivity required to
11 deliver this message. Someone well-attuned to the experience of marginalized communities, and
12 compassion towards the victims, Rohrer wanted to be intentional and reverted to his ELCA Bishop
13 Formation Training, which directed that advice about issues of misconduct are to be handled by ELCA.

14 82. Accordingly, ELCA’s highest ranking officers, including Presiding Bp. Eaton and ELCA
15 General Counsel Tom Cunniff, who exchanged countless emails and telephone conversations with
16 Rohrer about Rabell-González advising him that terminating Rabell-González on December 12 was the
17 correct thing to do. ELCA Leadership was clear and decisive that Rabell-González must leave the
18 Church. They were also aware of each circumstance surrounding Rabell-González’s conduct, past
19 efforts to “restore and rehabilitate” him, and the two-year detailed investigation undertaken by the
20 Church to get to the point of exiting him.

21 83. As the events leading up to terminating Rabell-González’s call unfolded, Rohrer updated
22 Bp. Eaton and ELCA staff regularly as to the timing of each step in the investigation. In fact, after the
23 Synod Council voted to end the call, **Bp. Eaton texted Rohrer the morning of December 12 on his**
24 **way to deliver the news: “Prayers for you this morning.”** Bp. Eaton, Rohrer’s boss, knew he was
25 being sent to deliver difficult news that could have consequences.

26 84. Rohrer, Rev. Salazar-Davidson, and Pastor Tita Valeriano, Sierra Pacific’s Director for
27 Evangelical Mission, travelled to Zion Lutheran Church in Stockton on December 12, 2021 (where
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1 Misión Latina Luterana worshipped) after Rohrer met with Rev. Rabell-González to deliver news of his
2 departure.

3 85. Rohrer wore a bulletproof vest to the Church at the recommendation of the Synod's Vice
4 President, who was a risk assessment professional. Individuals from the Synod, Presiding Bishop Eaton,
5 and local law enforcement were all aware of what was happening that day, and all participated in the
6 creation of a safety plan because of each of their reasonable belief that Rev. Rabell-González could act
7 in a way that risked public safety.

8 86. Highlighting the level of hatred against Rohrer due to the Church's participation, and
9 failure to publicly quell it, Rohrer was seriously physically threatened before even announcing the
10 departure. While alone in a church room preparing for the service, a male congregant entered the room,
11 blocked the only exit, and yelled at Rohrer angrily for at least 15 minutes, threatening him with
12 violence. There was no explanation for the hostility and vitriol this person demonstrated towards
13 Rohrer, which was terrifying as there was no one to come to Rohrer's aid. After several attempts to
14 escape this aggressive confrontation, Rohrer was finally able to safely exit the room and maneuver
15 around the man, to an audiovisual area at the back of the congregation. This began an extremely
16 distressing series of events that day for Rohrer.

17 87. Amidst this palpable anger and hostility, it still fell to Rohrer alone to inform the
18 congregation after the service that Pastor Nelson's call had ended, and he would step down as mission
19 developer of Misión Latina Luterana. Rohrer waited until the end of the service, and remained stoic and
20 professional in the face of an extremely hateful and vitriolic scene.

21 88. People yelled and screamed at Rohrer, accusing him of lying, called him "evil" and "the
22 devil" and asked where Pastor Nelson was. Rohrer attempted to calm the situation, but there was no
23 way to for him to effectively communicate with a group of people who were demanding he explain all
24 of the reasons for Nelson's absence at the service (which, due to the presence of members of the general
25 public who were not regular participants of the congregation, he was precluded under governing
26 confidentiality rules from doing). Congregants shouted at Rohrer in English and Spanish, cursed at him,
27 and refused to let him speak. Eventually, the members and guests of Misión Latina Luterana stormed
28 out of the church, and congregated elsewhere with Rabell-González.

1 **E. The Church’s Pretextual “Investigation” of Rohrer**

2 89. The public expressed extreme anger and hostility towards Rohrer. In the aftermath of
3 December 12, the Synod held a listening session to hear the response of the public. It was clear that the
4 public did not have the pertinent facts surrounding Rabell-González’s longstanding pattern of
5 misconduct, and the investigation leading up to his exit. The “Listening Session” only further angered a
6 misinformed crowd against Rohrer, and the Church did nothing to quell it or defend him. The Church’s
7 actions are particularly egregious given it voted for Rohrer to terminate Rev. Rabell-González, and
8 required Rohrer to present the message on the day and in the manner that he did. Indeed, if he did not
9 carry out what the Synod Council voted on, he would have been disciplined and potentially terminated
10 anyway. Rohrer, as the messenger, was being harassed and violently threatened for simply carrying out
11 what the Synod voted for him to do.

12 90. Seeing the public’s anger about the Church’s decision to terminate Rev. Rabell-
13 González, on February 22, 2022, Bp. Eaton told Rohrer she planned to convene an additional “listening
14 panel” to “investigate” Rohrer’s actions in connection with the events of December 12. This was
15 obviously pretextual and outrageous, given the *Church itself* directed Rohrer to terminate him.
16 “Investigation” of this action was illusory. Moreover, the ELCA has only ever used a three person panel
17 instead of their elected discipline committee for a listening panel, when it suspects a bishop of medical
18 or *mental health issues*. Nonetheless, Bp. Eaton told Rohrer: “discipline was possible.”¹¹

19 91. Meanwhile, Rohrer desperately pled to the Church for help. The harassment against him
20 from the public, congregants, and fellow clergy was out of control, and the Church still did nothing to
21 stop it. On March 16, 2022, Rohrer emailed Bp. Eaton notifying her the Synod could no longer share its
22 public calendar due to ongoing harassment and retaliation being directed at him and Synod staff. He
23 explicitly requested, as a rostered leader in the Church, that Bp. Eaton take action to stop the
24 harassment and hateful rhetoric being directed at him from other bishops and pastors in the church.
25 Eaton did nothing.

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28 ¹¹ Bp. Rohrer was allowed to select one of the persons chosen for the panel, but the Church stacked the panel with two other pastors. One was selected by Bp. Eaton, and the other selected by Latiné leaders who already had called for Rohrer to be disciplined.

1 92. In fact, even worse, the ELCA published the Listening Panel report on its public website
2 on May 31, 2022. Noticeably absent was anything regarding Rev. Rabell-González, or the reasons for
3 terminating him, despite the Panel’s full knowledge of the entire background. Among the list of
4 defamatory and damaging statements made against Rohrer were that he committed “A racist verbal
5 assault against a child of the Community”; and he exercised “Poor judgment in high-stake situations.”

6 93. Other false statements included that: "Bishop Rohrer was repeatedly made aware of the
7 potentially devastating effects of implementing that action on such an important day for this
8 community” and that he created “a growing feeling of fearfulness and uncertainty, and a sense of
9 unwelcomeness for any opinions apart from those of the Bishop.” The Church also falsely accused
10 Rohrer of “Refus[ing] to seek and accept counsel,” among many other fabrications.

11 94. Adding insult to injury, the ELCA accused Rohrer of refusing “to accept personal blame
12 – everything seen through the lens of the persecution of 2SLGBTQIA+ people[.]” Further, the writers
13 of the report claimed he did so to avoid being held accountable for “racist misconduct” against “an
14 entire BIPOC community.”

15 95. The document outrageously claimed that Rohrer committed a “**racist verbal assault**
16 **against a [Latiné] child**” before worship on December 12, 2021 (emphasis added). It claimed
17 congregants walked out of the church “as a way to protect themselves,” implying that Rohrer was
18 threatening them with violence. None of these claims were true; all of them caused significant harm.
19 The above statements imputed that Rohrer “fired” Rev. Rabell-González out of racial animus. The
20 report purported to be investigating Rohrer’s “decision” to terminate Rev. Rabell-González, but instead
21 served as a list of grievances, ignoring the fact that the Church made the decision to terminate Rev.
22 Rabell-González.

23 96. The portrayal of Rohrer as racist is nothing short of absurd. In fact, as Bishop, Rohrer
24 made concerted efforts to cure the Church’s systemic inequalities, by for example, fixing a system of
25 pay that disproportionately disadvantaged employees of color, and by drafting and passing anti-racism
26 protocols for all employees, and instituting ways the Church can be more open and accessible to a more
27 racially diverse congregation.

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1 **F. The Church Doubles Down on Its Claims Rohrer is Racist**

2 97. Rohrer immediately became the target of a concerted hate campaign from Bishops
3 across the country and Church congregants alike after the events of December 12. Rohrer, who lives
4 with his partner and two children, received violent threats sent to him and his family, amidst an
5 onslaught of other offensive and rage-filled messages.

6 98. He received numerous hate emails, posts denigrating him on Facebook, and all over
7 other social media channels from people accusing him of being a racist and operating with ill intent
8 towards Rev. Rabell-González and Misión Latina Luterana. These messages, which are a direct result
9 of the Church’s actions, are truly beyond the pale. Examples of some of the hateful messages are
10 attached as **Exhibit 1**.

11 99. Even now, the Church has acknowledged inaccuracies in the Listening Report, but has
12 issued no correction to the false statements contained therein. Worse, it has publicly stated that it will
13 further investigate Rohrer *even though he has been terminated, and will never be able to seek*
14 *employment at the Church again*. The Church, rather than defend its leader, who was following explicit
15 instructions from the Presiding Bishop and other key decisionmakers in the highest levels of Church
16 leadership, decided instead to make him a scapegoat. There is no legitimate reason to “investigate” a
17 former employee, the way the Church is doing. There is no additional personnel action to be taken
18 against him. Indeed, highlighting the Church’s unlawful harassing motivations, it has never, in its entire
19 history, made a confidential personnel matter a public affair.

20 100. Not only was Rohrer defamed by the Listening Panel report, the public dissemination of
21 this report fanned the flames of hate amongst some of the worst transphobic members of our society,
22 seeking a target for their anger and bigotry. During the Church’s (intentionally) public investigation
23 into his actions, Rohrer received an extraordinary volume of online hateful, vitriolic and disgusting
24 harassment. *See Exhibit 1*.

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1 101. Clergy, with full knowledge of Church, contributed to the hate. For example, a fellow
2 ELCA pastor, Leah Schade, wrote a series of blog posts that sought to further the online furor. Schade
3 described “egregious, racist actions of Bishop Rohrer” in one particular post.¹²

4 102. Rev. Hazel Salazar-Davidson, the Church-appointed leader on diversity, equity, and
5 inclusion, wrote a blog post blaming Rohrer for the aftermath and casting him as racist in several false
6 recitations portrayed as “facts.”¹³ On information and belief, neither employee (nor any of the others)
7 received any discipline or other action for spewing hateful rhetoric towards Rohrer. Presumably, a
8 written directive from the Church correcting falsehoods would have gone a long way to quell the lies
9 coming from its congregants and employees, and calmed the vitriol that was the Church’s own making.

10 103. Rev. Salazar-Davidson also wrote a letter to the Church in or about February 2022, in
11 which she cast Rohrer as an emblem of white supremacy. She wrote, in part, "Bishop Megan Rohrer of
12 the Sierra Pacific Synod has violated their oath to serve their flock and has neglected to provide not
13 only adequate care for their flock but *any*. They have emotionally and spiritually abused those in their
14 care.”¹⁴ These statements were false, and extremely damaging.

15 104. As a direct result of the Church’s outrageous actions in fomenting this campaign, Rohrer
16 has suffered severe emotional distress, mental anguish, which the Church knew would result.

17 105. Rohrer’s contract as Bishop provided he would remain in that post for a term of six
18 years, ending on June 30, 2027. The ELCA and the Synod terminated him, by forcing him to “resign”
19 as Bishop of the Synod on June 4, 2022. The Church has pointed to Rohrer’s termination of Rabell-
20 González as the reason for Rohrer’s termination.

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24 ¹² Rev. Leah Schade, *The Corporate Captivity of the ELCA*, April 19, 2022, available at
25 <https://www.patheos.com/blogs/ecopreacher/2022/04/the-corporate-captivity-of-the-elca/>.

26 ¹³ Rev. Hazel Salazar-Davidson, *Posada: A Journey of Heartbreak Through Systemic Racism*,
December 18, 2021, available at <https://revhazel.wordpress.com/2021/12/18/posada-a-journey-of-heartbreak-through-systemic-racism/>.

27 ¹⁴ Rev. Hazel Salazar-Davidson, *To the Elders of the Church*, February 2022, available at
28 [https://mcusercontent.com/32bc1324bd8d6bf3bb730e935/files/76c58166-92f1-35be-9121-02a71f241a14/To the Elders of the Church.pdf](https://mcusercontent.com/32bc1324bd8d6bf3bb730e935/files/76c58166-92f1-35be-9121-02a71f241a14/To%20the%20Elders%20of%20the%20Church.pdf).

1 **G. Any Justification Advanced By the Church for Rohrer’s Termination Is Pure**
2 **Pretext**

3 106. The Church’s narrative surrounding Rohrer’s termination is replete with falsehoods and
4 post-hoc justifications that are ungrounded in fact. The Church investigated, and disciplined, Rev.
5 Rabell-González’s before Rohrer became Bishop. Rohrer inherited this problem, and was told by his
6 superiors to terminate Rabell-González on the precise date he did so.

7 107. The concept Rohrer acted with racial motivation is entirely untethered to truth. Rabell-
8 González had over a dozen complaints against him, a long history of misconduct, and Rohrer took
9 extraordinary time conducting his own independent research, interviewing witnesses, and speaking with
10 his superiors about the appropriate action to take. The vast majority of the complaints Rohrer received
11 against Rev. Rabell-González came from called leaders in the Synod, and were from people of color.
12 Rohrer gave Rev. Rabell-González ample opportunity to rehabilitate himself and remain in the Church,
13 and he adamantly refused. Under any customary employment arrangement, an employee who refuses to
14 abide by a “performance improvement plan” would eventually be terminated.

15 108. The Church’s animus against Rohrer is further demonstrated by its differential treatment
16 of him, contrasted with Rabell-González. After dozens of reports of misconduct, spanning several
17 years, the Church afforded Rabell-González every opportunity to rehabilitate himself and stay within
18 the Church’s employ. It also investigated him confidentially. Rohrer, on the other hand, was terminated
19 immediately effectuating a decision that the Church, itself, made and directed him to effectuate. Rohrer
20 was not afforded any type of rehabilitation, treatment, assistance, or even lower-level discipline before
21 the Church ousted him. And the Church widely published its “personnel conclusions” that Rohrer acted
22 out of racial motivations – an unprecedented act for an institution known for keeping personnel
23 decisions private. Worse, the “investigation” the Church has decided to do, about Rohrer’s alleged
24 racist intent, *after* he has been terminated, is completely beyond the pale and lacks any legitimate
25 justification other than unlawful animus against him.

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1 **VI. ADMINISTRATIVE EXHAUSTION**

2 109. Rohrer filed a charge with the U.S. Equal Employment Opportunity Commission, which
3 granted Rohrer a Right to Sue Notice on December 2, 2022 which was duly served on the Defendants.

4 **VII. CAUSES OF ACTION**

5 **FIRST CAUSE OF ACTION**

6 **HOSTILE WORK ENVIRONMENT SEXUAL HARASSMENT**

7 **42 U.S.C. § 2000 *et seq.***

8 **(against all Defendants)**

9 110. Plaintiff incorporates by reference each and every allegation contained in the preceding
10 paragraphs as though fully stated herein.

11 111. Title VII prohibits Defendants from creating a hostile work environment against any
12 employee on the basis of sex.

13 112. At all relevant times, Defendants were Plaintiff's joint employers.

14 113. In perpetrating the above-described acts and omissions, Defendants, their agents,
15 servants, and/or employees, engaged in unlawful sexual harassment and discrimination in violation of
16 Title VII.

17 114. Defendants, their agents, servants, and/or employees engaged in targeted harassment
18 against Plaintiff because of his sexual orientation and/or gender identity. Defendants subjected Plaintiff
19 to unwelcome and unwanted misgendering, and harassing, differential treatment that was humiliating,
20 degrading, and harmful. Defendants also ridiculed and denigrated Plaintiff and others like him because
21 of his sexual orientation and gender presentation. Defendants' verbal comments, insults, jokes, and
22 intentional, frequent disregard of his gender identity, such as by misgendering, as alleged herein, were
23 severe or pervasive, and created a hostile work environment for Plaintiff. Defendants' conduct was also
24 unwelcome.

25 115. Plaintiff perceived his working environment to be hostile, which caused Plaintiff
26 sufficient stress and anxiety to require medical care. Defendants' concerted campaign of harassment,
27 othering, and denigration caused Plaintiff pain, stress, and anxiety. Plaintiff obtained medical care for
28 those conditions.

1 116. A reasonable person in Plaintiff's circumstances would consider the working
2 environment to be abusive or hostile.

3 117. As the working environment was made hostile by Plaintiff's supervisor, Defendants are
4 strictly liable for the sexual harassment of Plaintiff.

5 118. Additionally, Defendants knew or should have known of the sexual harassment directed
6 at Plaintiff by others and the resulting hostile work environment, but nevertheless failed to take prompt
7 and effective remedial action. Accordingly, Defendants are liable for the sexual harassment directed at
8 Plaintiff by others. Plaintiff was harmed because of the foregoing conduct of Defendants, which was a
9 substantial factor in causing Plaintiff harm.

10 119. As a direct and proximate result of the actions alleged herein, Plaintiff has and will
11 suffer damages including, but not limited to, pain, suffering, humiliation, shame, anxiety,
12 embarrassment, mortification, hurt feelings, physical harm, and emotional distress, all in an amount to
13 be proven at trial.

14 120. Plaintiff is entitled to statutory attorneys' fees and costs, and other appropriate relief as
15 determined by this Court.

16 **SECOND CAUSE OF ACTION**

17 **WHISTLEBLOWING RETALIATION**

18 **LABOR CODE § 1102.5**

19 **(against all Defendants)**

20 121. Plaintiff incorporates by reference each and every allegation in this complaint as though
21 fully set forth here.

22 122. California Labor Code Section 1102.5 makes it unlawful for an employer to retaliate
23 against an employee for disclosing conduct that he reasonably believes is a violation of the law and/or
24 for his refusal to participate in such conduct.

25 123. At all relevant times, Defendants were Plaintiff's joint employers, and Plaintiff was
26 Defendants' employee, as defined under the Labor Code.

27 124. Plaintiff reported suspected wrongdoing to his supervisors at ELCA and those who had
28 the authority to investigate the matters Plaintiff complained about, including, *inter alia*, Defendants'

1 misclassification of independent contractor employees, and the harassment and/or discrimination he
2 suffered as a transgender individual in the workplace. Plaintiff had a reasonable and good faith belief
3 that the information he reported to his supervisors and those at ELCA with authority to investigate the
4 matter disclosed a violation(s) of state or federal statute, or a violation of or noncompliance with a
5 local, state, or federal rule or regulation.

6 125. Defendants responded to Plaintiff's complaint by acquiescing to his recommendation but
7 reinstated the unlawful policy after he was no longer employed by Defendants.

8 126. Defendants threatened to discipline Plaintiff and this was motivated by his reporting of
9 the risks Plaintiff reasonably believed were unlawful.

10 127. As a direct and consequential result of the actions and failures to act by Defendants
11 alleged herein, Plaintiff has suffered monetary damages as well as injury to his mental and emotional
12 well-being, including fear, anxiety, depression, pain, humiliation, anger, despair, embarrassment, and
13 uncertainty; all of the type, nature, and extent ordinarily associated with the wrongful conduct alleged
14 against Defendants herein. The value of Plaintiff's financial damage and damages for injuries to his
15 mental and emotional well-being are in an amount in excess of the minimum jurisdictional threshold of
16 this Court, the precise amount of which will be proven at trial.

17 128. Plaintiff is therefore entitled to reasonable attorney's fees and litigation expenses,
18 including expert witness fees and costs, incurred in bringing this action.

19 **THIRD CAUSE OF ACTION**

20 **DEFAMATION**

21 **(against all Defendants)**

22 129. Plaintiff incorporates herein by reference each and every allegation in this complaint as
23 though fully set forth herein.

24 130. As alleged herein, ELCA, the Synod, and its agents, harmed Plaintiff by making
25 numerous false statements about him, some of which are set forth in ¶¶ 92- ¶¶ 103. For example,
26 Defendants implied and/or stated to the public that he was racist, was racially motivated in making
27 personnel decisions such as terminating Rabell-González, that he (alone) made the decision to terminate
28 Rabell-González, that he "directed a racist assault" at a child, and that congregants walked out of the

1 service “as a way to protect themselves” from Plaintiff, clearly portraying him as dangerous, and many
2 other false, defamatory written and oral statements.

3 131. Defendants made the foregoing statements to persons other than Plaintiff. The people
4 who read these statements reasonably understood they were being made about Plaintiff.

5 132. The people reading and/or hearing these defamatory statements reasonably understood
6 the statements to be factual assertions concerning Plaintiff’s purported racism, and that he was being
7 disciplined for his racial animus towards ELCA members.

8 133. Defendants failed to use proper care to determine the truth or falsity of these statements.

9 134. Because of the facts and circumstances know to the listeners and readers of the
10 statements, they tended to injure Plaintiff in his occupation, and expose him to hatred, contempt,
11 ridicule, and/or shame and to discourage others from associating or dealing with him.

12 135. The statements were false, and/or the implication or implications drawn convey
13 defamatory facts, not opinions, the implications are not “substantially true” and/or the reasonable
14 implication could also be reasonably deemed defamatory. For example, a reasonable interpretation of
15 Defendants’ defamatory statements was that Plaintiff was racist.

16 136. Defendants’ defamatory statements were a substantial factor in causing damage and
17 actual damage in the form of (a) harm to Plaintiff’s business, trade, profession, and/or occupation, (b)
18 harm to Plaintiff’s reputation, (c) shame, mortification, and hurt feelings, and (d) expenses Plaintiff had
19 to pay as a result of the defamatory statements. Defendants’ statements are particularly harmful to
20 Plaintiff, a person who built his reputation as a faith leader on a foundation of caring for marginalized
21 populations like his own. Defendants’ statements make it impossible for Plaintiff to work at the same
22 level as the Bishop position he was fired from.

23 137. Defendants’ aforementioned defamatory statements were made with malice. Defendants
24 knew that the statements were untrue, or had serious doubts about their truthfulness, and yet wrote them
25 and published them anyway.

26 138. Defendants’ statements concerned a limited purpose public figure, Plaintiff, on a public
27 concern.

28 ///

FOURTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(against all Defendants)

139. Plaintiff incorporates by reference each and every allegation in this complaint as though fully set forth herein.

140. Defendants' conduct towards Plaintiff, as alleged herein, was outrageous.

141. Defendants intended to cause Plaintiff to suffer emotional distress, or, acted with reckless disregard of the probability that Plaintiff would suffer emotional distress.

142. Defendants knew emotional distress would probably result from their conduct, or gave no or little thought to the probable effects of their conduct.

143. Plaintiff suffered emotional distress.

144. Defendants' conduct was a substantial factor in causing Plaintiff's severe emotional distress.

145. Plaintiff repeatedly complained to Defendants about the effect the blatant misgendering was causing him, but his warnings were ignored and the conduct continued unabated. Plaintiff made it clear that such conduct caused him distress, humiliation, and suffering.

146. When Defendants failed to take corrective action, Defendants knew that Plaintiff would continue to suffer extreme emotional distress and harm as a result of Defendants' failure to act.

147. As a direct and consequential result of Defendants' actions, Plaintiff has suffered severe emotional distress to his person. Such harm includes without limitation pain, anxiety, humiliation, anger, shame, embarrassment, frustration, and fear. Plaintiff alleges Defendants are responsible for the harm he suffered.

FIFTH CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

(against all Defendants)

148. Plaintiff incorporates by reference each and every allegation in this complaint as though fully set forth herein.

1 149. As an employee of Defendants, Plaintiff was owed a duty of due care by the Church to
2 ensure that Rohrer was not exposed to foreseeable harms.

3 150. Defendants knew or should have known that Plaintiff was being subjected to harassment
4 and retaliation based on sexual orientation and gender, and that failing to exercise due care to prevent
5 such harassing and retaliatory conduct could and would cause Plaintiff to suffer serious emotional
6 distress.

7 151. Defendants knew or should have known that Rohrer was experiencing harassment or
8 retaliation in response to his reports of Defendants' misgendering and harassment.

9 152. Defendants breached their duty of care by failing to prevent their employees, managers,
10 supervisors, and/or officers from this harassment and retaliation against Plaintiff.

11 153. As such, Defendants acted negligently. Defendants' negligence was a substantial factor
12 in causing Plaintiff's serious emotional distress.

13 154. As a direct and consequential result of Defendants' actions, Plaintiff suffered serious
14 mental and emotional distress, including without limitation, suffering, anguish, fright, nervousness,
15 grief, pain, anxiety, humiliation, anger, shame, embarrassment, frustration, and fear. Plaintiff alleges
16 that Defendants are responsible for the harm he suffered. An ordinary, reasonable person would be
17 unable to cope with the serious emotional distress Plaintiff experienced.

18 **SIXTH CAUSE OF ACTION**

19 **BREACH OF CONTRACT**

20 **(against all Defendants)**

21 155. Plaintiff incorporates by reference each and every allegation in this complaint as though
22 fully set forth here.

23 156. Plaintiff and Defendants entered into a valid written employment contract on July 4,
24 2021, for Plaintiff to act as the Bishop of the Synod for a term of six years, to end on June 30, 2027, in
25 exchange for salary, a housing allowance, pension, contributions to health insurance and Social
26 Security, as well as a cell phone plan. Plaintiff's employment contract is attached hereto as **Exhibit 2**.

27 157. Plaintiff did all, or substantially all, of the significant things that the contract required of
28 him, which was to, *inter alia*, serve the churches and congregants of the Synod as their Bishop,

1 minister, ordain and call clergy to the roster, coordinate and supervise staff, liaise with the greater
2 Churchwide organization, among other responsibilities.

3 158. Plaintiff performed all of the conditions required under the contract.

4 159. Defendants failed to do something that the contracts required them to do, which was
5 continue to employ and pay Plaintiff for his role as Bishop until the conclusion of his term on July 1,
6 2027.

7 160. As a result, Plaintiff was harmed.

8 161. Defendant’s breach of contract was a substantial factor in causing Plaintiff’s harm.

9 **VIII. PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- 11 1. For economic and non-economic damages according to proof;
- 12 2. For exemplary damages;
- 13 3. For an order imposing all applicable statutory and/or civil penalties provided for by law
14 for the wrongful conduct described in this Complaint;
- 15 4. For an award of prejudgment and post-judgment interest;
- 16 5. For costs of suit herein;
- 17 6. For an award of reasonable attorneys’ fees, as provided for by California Labor Code §§
18 1102.5, 1102.6, Title VII, and any and all other appropriate basis under the law; and
- 19 7. Such other and further relief as the court deems proper.

20 Dated: March 1, 2023

COTCHETT, PITRE & McCARTHY, LLP

21
22
23 By: /s/ Tamarah P. Prevost
TAMARAH P. PREVOST
SARVENAZ J. FAHIMI
DAVID G. HOLLENBERG

24
25 *Attorneys for Plaintiff Megan Rohrer*
26
27
28

1 **IX. JURY TRIAL DEMAND**

2 The Plaintiff demands a trial by jury on all issues so triable.

3
4 Dated: March 1, 2023

COTCHETT, PITRE & McCARTHY, LLP

5
6 By: /s/ Tamarah P. Prevost
TAMARAH P. PREVOST
SARVENAZ J. FAHIMI
7 DAVID G. HOLLENBERG

8 *Attorneys for Plaintiff Megan Rohrer*

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Exhibit 1

----- Forwarded message -----

From: **Carlos Garcia** <reply-to+5690d0577b05@crm.wix.com>

Date: Fri, Oct 7, 2022 at 5:38 PM

Subject: [meganrohrer] Contact - new submission

To: <streetvicar@gmail.com>

Carlos Garcia just submitted your form: Contact
on [meganrohrer](#)

Message Details:

Name: Carlos Garcia

Email: firedbythefatlez@aol.com

Subject: Job openings

Message: Hey, fat ugly lez, fired any Latinos recently? No? Oh, that's right - you got no job, you can't fire anyone. How does it feel to be old, fat, ugly, and NO JOB? You think the ELCA will get really desperate and recall you? Nah. You won't even pastor a church again, you fat loser.

Reply to this email directly or via your site's Inbox: Reply directly or go to your site's Inbox:

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|

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Rev. Dr. Megan Rohrer

www.meganrohrer.com

Twitter: @mmrohrer

Instagram: @mmrohrer

Facebook: Rev. Dr. Megan Rohrer

----- Forwarded message -----

From: **Erica Doyle-Windom** <reply-to+dbd4e363c48e@crm.wix.com>

Date: Wed, Dec 21, 2022 at 2:06 PM

Subject: [meganrohrer] Contact - new submission

To: <streetvicar@gmail.com>

Erica Doyle-Windom just submitted your form: Contact
on [meganrohrer](#)

Message Details:

Name: Erica Doyle-Windom

Email: ericadwindom72@wowway.com

Subject: Advent Greetings

Message: Hi there, shapeless blob of cellulite! You still unemployed, Fatty? Great career arc there - go to grad school, get a doctorate, then remain jobless for the rest of your so-called life. Creepo, ain't NOBODY gonna employ you after the ELCA kicked your fat ass to the curb. Aging lez, having to go online and beg for money like some panhandler - "Please support me, I'm special!" Keep on writing books, asshole, they'll be HUGE sellers just like your previous ones (snicker). Reverend Doctor Latino-Hating LOSER.

Reply to this email directly or via your site's Inbox: Reply directly or go to your site's Inbox:

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If you think this submission is spam, [report it as spam](#).

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Rev. Dr. Megan Rohrer, DMin

www.meganrohrer.com

Twitter, Instagram, YouTube, TikTok, & Amazon: @mmrohrer

Facebook: <https://www.facebook.com/meganrohrer>

Postal Mail: 4304 18th Street #14592 San Francisco, CA 94114

----- Forwarded message -----

From: **E. X. Bishop** <reply-to+6d1c9ebc11f9@crm.wix.com>

Date: Mon, Dec 26, 2022 at 5:27 AM

Subject: [meganrohrer] Contact - new submission

To: <streetvicar@gmail.com>

E. X. Bishop just submitted your form: Contact
on [meganrohrer](#)

Message Details:

Name: E. X. Bishop

Email: olduglyfatlez@shapelesscow.com

Subject: Latino ministries

Message: Hey, Fatty and Jobless, we have an opening for a

Minister to Latinos, you'd be perfect, just PERFECT. The ideal candidate would be some jobless loser who writes books that no one buys. The more hideous the body, the better. We'd like someone so old and ugly that even the other dykes would be turned off.

Reply directly or go to your site's Inbox:

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Rev. Dr. Megan Rohrer, DMin

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Facebook: <https://www.facebook.com/meganrohrer>

Postal Mail: 4304 18th Street #14592 San Francisco, CA 94114

----- Forwarded message -----

From: **E. X. Bishop** <reply-to+e6bd8b0592fe@crm.wix.com>

Date: Mon, Jul 25, 2022 at 1:11 AM

Subject: [meganrohrer] Contact - new submission

To: <streetvicar@gmail.com>

E. X. Bishop just submitted your form: Contact
on [meganrohrer](#)

Message Details:

Name: E. X. Bishop

Email: racistgotfired@elca.org

Subject: The Rev Dr Got No Job

Message: Hey, ugly lez with no job - how's it feel to be panhandling for money on the web? "Please take pity on me. I got fired from my job for hating Latinos, but I'm a super super super Christian, so you better support me!" Hey, with that hideous carcass and all that cellulite, you could easily go for a year or more without eating. So funny, the "inclusive" lez hates Latinos. Btw, like everyone in your "community," you're a liar. You're not trans at all. You're just one more truly repulsive lesbian, hideous body, not a clue about how to dress or wear your hair, but you're still not trans, you're just a pathologically ugly woman who figured you'd call yourself "trans" and those clucks at the ELCA would

make you a bishop. Didn't work out too well, did it, Rev. Dr.? Hope you starve, PIG.

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To edit your email settings, go to your Inbox on desktop.



--

Rev. Dr. Megan Rohrer

www.meganrohrer.com

Twitter: @mmrohrer

Instagram: @mmrohrer

Facebook: Rev. Dr. Megan Rohrer

----- Forwarded message -----

From: **Pablo Iglesias** <reply-to+fd01fcd34f4a@crm.wix.com>

Date: Fri, Aug 5, 2022 at 3:33 AM

Subject: [meganrohrer] Contact - new submission

To: <streetvicar@gmail.com>

Pablo Iglesias just submitted your form: Contact
on [meganrohrer](#)

Message Details:

Name: Pablo Iglesias

Email: pabloiglesias@lsbnbishops.org

Subject: Searching for inclusive pastor for our thriving Latino
congregatoin

Message: Hi there! I was reading the inspiring story of your dealings with Rev. Nelson Rabell-Gonzalea. You sound like the perfect fit for us! Yes, really! We know of your history with Mexicans! You'd love our mariachi bands! Fun times - the fired lez bishop frolicking with all us dark-skinned Mexicans! We don't hold it against you for hating people who are darker than you! Heck no! After all, you stated publicly that you

had been bullied and harassed - so, if you claim to be a VICTIM, well, it must be true, right! I mean, a white lez is supposed to outrank a Latino male on the woke ladder, right? Especially since Rabell-Gonzalez is only a "he" and you're a "they." So you're big stuff, and he's a greasy little nobody. That's what your actions indicate. So, you could be our pastor - or you could just whine and beg for people to support you on Venmo, like you're doing now!

Reply directly or go to your site's Inbox:

Respond Now

If you think this submission is spam, [report it as spam](#).

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--

Rev. Dr. Megan Rohrer

www.meganrohrer.com

Twitter: @mmrohrer

Instagram: @mmrohrer

Facebook: Rev. Dr. Megan Rohrer



Megan Rohrer was live.



Posted by StreamYard

1d ·

Most relevant ▾



Greg Paley

Who or what does this defrocked bishop pray to? Certainly not the God of the Bible. Wokes are not Christians, they don't worship God, they worship themselves for being so compassionate'n'concerned. The morality taught in the Bible is anathema to wokes. The good news is, the ELCA and the other post-Christian churches won't even exist in 20 years You drove the Christians away, now you've got all those empty pews and no people to pay the salaries of the post-Christian clergy. Churches shutting down, churches breaking away to join Christian denominations, seminaries shutting down. The wokes became Sunday morning clubs for white liberals mostly LGBTs. And this vile ex-bishop calls herself a "motivational speaker." LOL. What does she motivate - tell white church bureaucrats to fire their Latino ministers? The slob takes a vacation to Israel, then tells her fans "Please send me money." What Christian on earth would want to sit in the same pew with these reprobates?

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Melissa Stablein

Stage 4 cancer. Blood clots in lungs. Prayer for recovery



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Comments



Greg Paley

B, you deserve not one shred of sympathy. Here you are, with a doctorate, panhandling for cash on the web. Good, serves you right. You're a shameless liar. You claim to be "trans" and "non-binary" - neither is true. You're a dumpy, shapless, unattractive lesbian, a woman. You lied and claimed to be "trans" knowing it would land you a slot as bishop. Hasn't worked out too well, has it? I guess the left-wing Lutherans figured out that lesbians - always claiming to fight for "inclusivity" - can be just as racist and xenophobic as normal people. So, you lied about your gender status to land a job, now you have no job - that's called reaping what you sow, B. Of course, your entire church - oops, EX-church - is doomed to extinction. In 2009, ELCA began ordaining LGBTs - and in the following 2 years, lost a whopping half-million members, according to ELCA's own stats. Hey, pretty impressive - you LGBTs intended to drive away the Christians, and you did. But, driving people away makes it hard to pay the bills, doesn't it? I expect to see the ELCA, Episcopalians, UCC, and other post-Christian, anti-Christian churches completely extinct in 15 years, probably less. In the meantime, I hope you starve, you with your hatred for Latino people. One thing for sure, you sure can't make any money by selling your body. Any man who saw you unclothed would throw up. You Ls are as ugly on the inside as on the outside. You went into the ministry because you're too dumb and too lazy to make it in a real job. Of course, you're carrying enough fat that you could probably last for 3 months without food. If you slobs are Christians, Satan is a Christian, you lying hag.



Write a comment...





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Noel Weymouth

Panhandling for money, just like some bum in the park. You're sickening. You could live off your cellulite for several months. Why don't you lsbn stop eating for a few hours, we could feed several Third World countries with what you swine consume. Did you know that Christians have always considered gluttony to be a sin?

4w Like Reply Hide

4 🙄



Noel Weymouth

I don't take orders from your kind. The problem with you "equality" nerds is you have an inferiority complex, with good reason. People who run around screaming "We're just as good as you!" obviously do not believe it themselves. This reprehensible ex-bishop got fired from her job for being a racist, deservedly so. The church should not be ordaining her type in the first place. She is not a Christian. Btw, it's Aug 1, 2022. I'm still here, and this post will be here a year from now. Get mad about it and pout if you like. 😊

3d Message Unhide



Write a reply...

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Exhibit 2

Definition of Compensation, Benefits, And Responsibilities for Ministers of Word and Sacrament Under Call

Prepared by Sierra Pacific Synod
 for the Reverend Megan Rohrer
 for the period: July 1, 2021 to June 30, 2027

A. COMPENSATION

The synod will provide the following annual compensation:

1. Base Cash Salary \$ 99,502 *51,502.00*
2. Housing Allowance (if provided) \$ 48,000 *per verbal call w/BpM 7/13/21 DRB*
3. Self-employed Social Security payment allowance (if provided) \$ 7,612
4. If a parsonage or other housing is provided:
 - a. Utilities allowance \$ _____
 - b. Furnishings allowance \$ _____
 - c. Housing equity allowance \$ _____

B. PENSION AND OTHER BENEFITS

The synod will sponsor the pastor in the Pension and Other Benefits Program of the Evangelical Lutheran Church in America, which provides retirement, disability, survivor, and medical-dental coverage.

(Sponsorship will include medical-dental coverage for the individual's spouse and children unless they have other employer-provided group medical insurance coverage and the individual consents to waiving medical-dental coverage for them under the ELCA Pension and Other Benefits Program.)

1. ELCA Pension at 12 % of defined compensation
2. ELCA Medical-and-Dental Insurance (check one below):

<input type="checkbox"/> a. Member only	<input type="checkbox"/> c. Member and children	<input checked="" type="checkbox"/> e. Coverage waived
<input type="checkbox"/> b. Member and spouse	<input type="checkbox"/> d. Member, spouse, and children	

3. Other insurance or benefits: contribution toward spouse's plan on which they are covered, \$150/month \$ 1,800 *÷ 24 = 75/PP*

C. EXPENSES

The synod will provide for the following expenses related to this rostered leader's ministry.

1. Automobile and travel allowance \$ _____
2. Other professional expenses \$ 1500
3. Expenses for official meetings of the synod and churchwide, as reimbursed \$ _____
4. Continuing education (*\$1,000 recommended*) \$ 2000
5. Other (cell phone and service plan \$1200) \$ 1200
6. Pay the moving expenses to this field of service as follows: _____

D. AGREEMENT

1. Vacation time of 20 days per year, including 4 Sundays;
2. Continuing education time of 2 weeks per year (recommended minimum of two weeks per year that may be accumulated up to three years, as reflected in a continuing education agreement developed by the bishop and synod council);
3. Paid sabbatical leave of 3 months after first five years of service, then after every five years of service;
4. Ongoing care through a Mutual Ministry Committee;
5. Up to two months of continued salary and contributions to the ELCA Pension and Other Benefits Program in a 12-month period in the event that the rostered minister is physically or mentally disabled*; and

* Provision may be made for further unpaid time for disability recovery as agreed by the synod, but with the stipulation that unused accumulated sick leave will not be compensated at the end of this call.

- 6. Maternity/Paternity or Adoptive leave of 12 weeks with full salary, housing, and benefits. A paid leave of twelve weeks is recommended to care for an immediate family member with a serious health condition, and upon the death within the rostered minister's family, a paid leave of up to 3 weeks is recommended. When the specified leave period is exhausted, an unpaid leave of absence may be granted.

*A description of the particular responsibilities of this position may be attached
<or the following may be completed>*

E. OTHER PROVISIONS

Special emphases of the bishop and special encouragement by the synod:

- 1. During this time period, the bishop will give special attention to the following:

- (a) see attached job description _____
- (b) _____
- (c) _____
- (d) _____
- (e) _____

- 2. The synod will encourage and support this bishop's ministry in the following ways:

- (a) _____
- (b) _____
- (c) _____
- (d) _____
- (e) _____

F. OTHER MATTERS

(Such as accountabilities, service on synodical or churchwide boards and committees, work in church-camp programs, or other such details.)

We, the undersigned, certify that the necessary approvals of the synod and synod council have been granted for the provisions set forth above.

Gail Kiyomura Digitally signed by Gail Kiyomura
 Date: 2021.06.28 11:18:44 -07'00'
 Synod Vice President

Jeffrey A Pennington Digitally signed by Jeffrey A Pennington
 Date: 2021.08.28 11:04:45 -07'00'
 Synod Secretary

Date (if not signed electronically): _____

I certify that I accept the above statement:

The Reverend  Date of signature: 7/12/21

NOTE: Retain original in records of the synod. Make a copy for the bishop. As a matter of information, send a copy to the ELCA churchwide office. A description of the particular responsibilities of this position may be attached to this "Definition of Compensation, Benefits, and Responsibilities."