

# CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

EEOC

Kentucky Commission on Human Rights \_\_\_\_\_ and EEOC  
State or local Agency, if any

Name (indicate Mr., Ms., Mrs., Miss, Dr., Hon., Rev., etc.)

Ms. Paige Rogers

Home Phone

Year of Birth

Street Address, City State and ZIP Code

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

Heine Brothers Coffee

No. Employees, Members

+200

Phone No.

Street Address, City State and ZIP Code

3541 Outer Loop Louisville, KY 40219

Name

No. Employees, Members

Phone No.

Street Address, City, State and ZIP Code

DISCRIMINATION BASED ON

Religion; Hostile work environment

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

10/1/2025

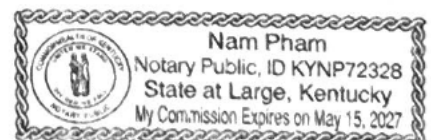
10/13/2025

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

See attached Statement in Support.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.



## **Religious Beliefs & Background**

I am a sophomore at Boyce College, a private Christian college in Louisville, Kentucky. I am pursuing a major in Humanities, with a concentration in History, and a minor in Communications. I am a Christian, and my faith informs all aspects of my life. As a Christian, I take joy in God's saving grace, the truth found in the Bible, and God's transformative work in my own life.

## **Former Employment**

I was hired at Heine Brothers Coffee ("Heine Brothers") on or about November 11, 2024. Heine Brothers has multiple locations throughout Louisville and the surrounding area, and I started at its Gardiner Lane location. I started as a barista and was promoted to Shift Lead, working approximately 12 to 15 hours per week during the school year. Heine Brothers' policy required me to quit at the end of my spring semester, before summer break, and then be re-hired at the start of a new fall semester. I worked at Heine Brothers, without incident, for the 2024-2025 school year.

Upon returning for fall semester of the 2025-2026 school year, my manager at the time rehired me without an interview. I began work again at Heine Brothers on or around September 11, 2025.

On October 1, 2025, I worked a shift at Heine Brothers' Outer Loop location in Louisville, KY during my fall break. I worked a 4-hour closing shift with two coworkers who I had not worked with before. During this shift, my co-workers asked me about my religious beliefs, and I answered respectfully and honestly.

One of my two coworkers, [REDACTED], asked if I was a student and where I attended college. I replied that I attend Boyce College, a local Bible college. In response, she asked, "so you're waiting till marriage then?" I was surprised by this question and felt uncomfortable but replied "yes," assuming that she understood it was an aspect of my religious practice, and I also explained some personal reasons that informed this decision. [REDACTED], in reply, seemed distressed, sharing that she had just broken up with her "ex." I replied that I was very sorry for her, and that I was unaware of the situation. Later in the shift, [REDACTED] continued to ask me more questions about my religious beliefs. In response, I respectfully shared about God's design for marriage and sex, and that while I don't judge anyone for their decisions, my faith plays a huge role in how I approach the topic, and that I seek to honor God with my decisions.

Later in the shift, the second coworker, [REDACTED], mentioned that a former co-worker had given her a Bible. She shared that she'd been reading through the Book of Genesis, hadn't gotten far yet, and expressed interest in reading more. She then mentioned that another coworker said in a separate conversation that all Christians should share the gospel without judgment, and I agreed. After this, I shared my own testimony with her. I shared how God had saved me and changed my life, and that it is God who changes your heart when you become saved. In response, [REDACTED],

who indicated that she was in a relationship with two partners, asked if she became a Christian whether she would have to stop loving her partners. I respectfully shared my belief that homosexuality is a sin but that we are all sinners, and it is never our place to judge someone else.

Later in the shift, after [REDACTED] left, [REDACTED], and I discussed our thoughts on what happens after death. I shared my belief about the afterlife based on the Bible, and that everyone who puts their hope and faith in God will be saved and go to heaven.

### **My Former Employer's Discrimination Against My Religious Beliefs**

After working a few more shifts following the October 1 shift, I received notice of my termination from Heine Brothers via text message on October 13, 2025. (See attached). I had a shift scheduled on October 13, but was unexpectedly directed not to come in. I was given no warning and no further explanation. At no time prior to this was I interviewed or informed that there was an investigation or any allegations against me. The text message I received informed me that I "violated Heine Bros' policies regarding respectful workplace conduct and anti-discrimination." It also said that I had "engaged in conversations in the workplace where [I] expressed religious beliefs in a manner that was unwelcome and offensive to others," and that "these conversations created discomfort among team members." I was never questioned whether communications by others had offended me or made me feel unwelcome, nor was I given a chance to respond to any complaints or offer my perspective.

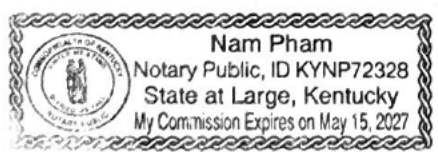
In an email I received from an individual in management on October 16, 2025, the reasons for my termination changed. I was told that the termination was based on "concerns regarding communication, frequent call-ins, and limited availability that impacted scheduling needs." I sent a long text message outlining religious discrimination against me (attached), but I received no response and no indication of any intention to investigate my complaint.

I believe that Heine Brothers discriminated against me and failed to investigate potential harassment based on my Christian beliefs and practices in violation of Title VII of the Civil Rights Act.

[REDACTED]

Sworn to, acknowledged and subscribed before me via communications technology by Paige Rogers on this 24 day of March, 2026.

[REDACTED]



Notary Public, State at Large - Kentucky  
I.D. No.: [REDACTED]  
My Commission Expires: [REDACTED]

1:14



67

< 69



iMessage  
Monday 3:02 PM

Hello Paige Roger's, my name is [REDACTED]  
After careful review and investigation, we have determined that your behavior has violated Heine Bros' policies regarding respectful workplace conduct and anti-discrimination. It was reported and confirmed that you engaged in conversations in the workplace where you expressed religious beliefs in a manner that was unwelcome and offensive to others. These conversations created discomfort among team members and contributed to a work environment inconsistent with our company values and code of conduct. We take all complaints of inappropriate conduct seriously. As per our internal policies and after a thorough investigation, we have decided to terminate your employment with Heine Bros effective immediately. Your final paycheck will be provided to you as usual. I wish you the best in your future endeavors. You do not need to come into the rest of your shifts.

Does this apply even if I didn't start the conversation and they were asking me questions

It does, I'm sorry. It's a big deal and has made several people uncomfortable and offended. We investigated this and watch the footage of all interactions. We have a



iMessage



1:14



67

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It does, I'm sorry. It's a big deal and has made several people uncomfortable and offended. We investigated this and watch the footage of all interactions. We have a zero tolerance for discrimination at Heine bros.

Would you mind sending me the footage because I'm not clear on how what I said was discriminatory

I cannot send you the footage, it's at more than one location and not permitted per company policy. I'm sorry you are within your first 60 days and we have to do what's best for everyone and their safety.

Was anyone made aware that [REDACTED] asked me an inappropriate question about "waiting till marriage." That's how the conversation was started and it's not fair that I'm being fired for a conversation that was started by a question about my sexual life.

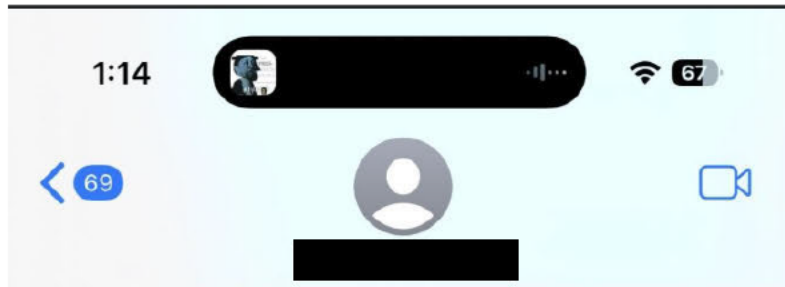
Also I was an employee since November last year and only left this summer for college. I would like to get some more details on the terms of this if you are able to.

Can you please send me the employee handbook if possible



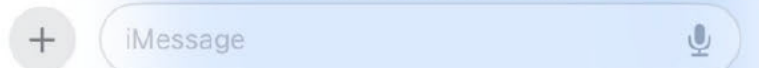
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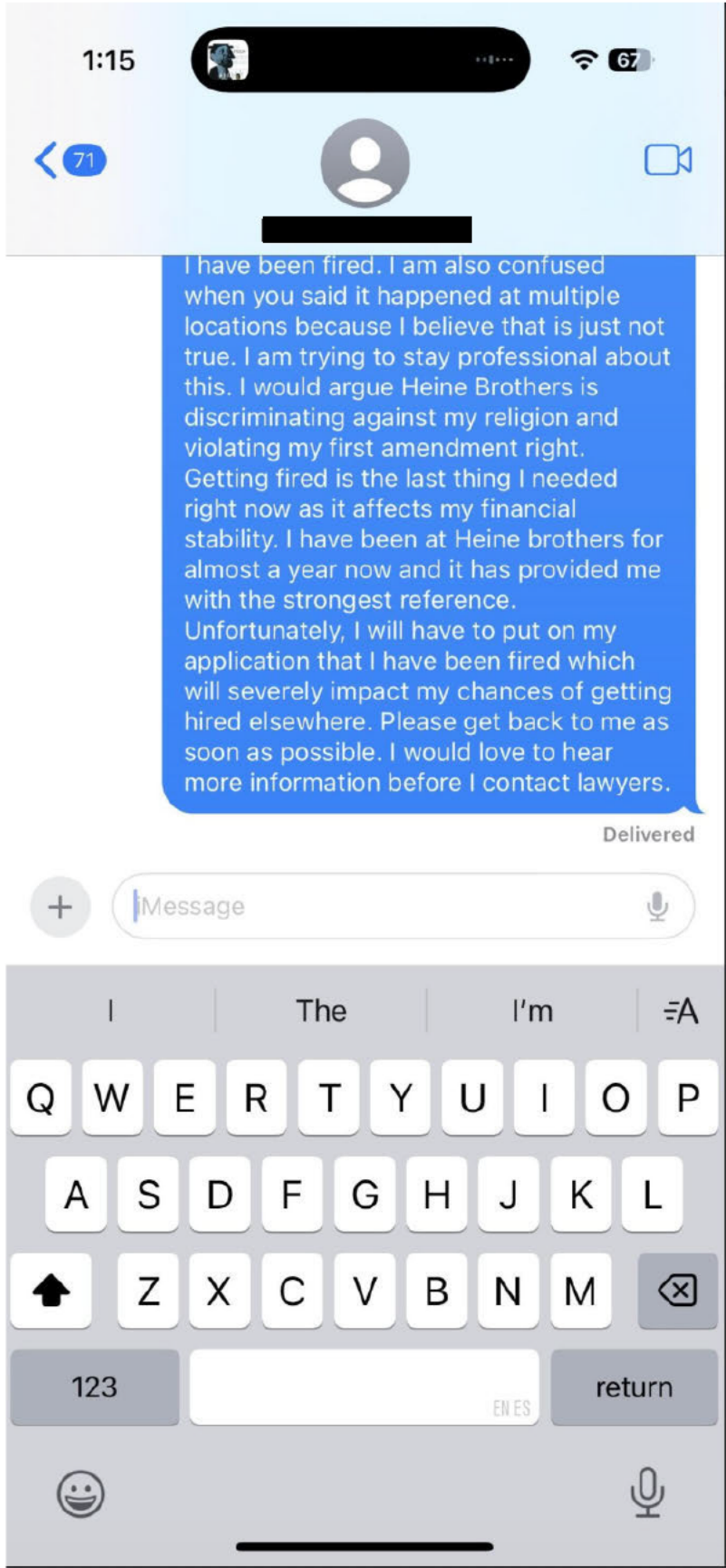




Wednesday 10:18 PM

Good evening, I went ahead and emailed the main HR email. I understand that is you. If you wouldn't mind getting back to me, I would love to get some more details and information before I take this to consult with a lawyer. If you wouldn't mind sharing with me what exactly I said that was discriminatory. I understand it is very possible for me to have forgotten what I said but I would love to know so that I can improve and keep from saying that again. From my perspective, the company has given me no valid reason for firing me so far as for the lack of evidence and clarity. Considering the fact that I clearly remember being asked about my religion before I even said anything about it, I am always extra careful to share my religious beliefs while being respectful to our differences. I clearly remember stating multiple times that I am not judging them in any way or pushing my beliefs on them. They were asking questions and from my perspective, genuinely interested in what I was saying. She said she even wanted to go to church sometime and expressed her interest in learning more about my religion. Again, I received no further explanation for anything, specifically when and where, so I can't fully understand why I have been fired. I am also confused when you said it happened at multiple locations because I believe that is just not true. I am trying to stay professional about this. I would argue Heine Brothers is discriminating against my religion and





1:15



67%

< 71



I have been fired. I am also confused when you said it happened at multiple locations because I believe that is just not true. I am trying to stay professional about this. I would argue Heine Brothers is discriminating against my religion and violating my first amendment right. Getting fired is the last thing I needed right now as it affects my financial stability. I have been at Heine brothers for almost a year now and it has provided me with the strongest reference. Unfortunately, I will have to put on my application that I have been fired which will severely impact my chances of getting hired elsewhere. Please get back to me as soon as possible. I would love to hear more information before I contact lawyers.

Delivered

+ Message

