

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Frisse v. Geodis Logistics, LLC

Frisse · No. 25-cv-1189-SMY · Decided June 3, 2026

SUMMARY

The United States District Court for the Southern District of Illinois granted Geodis Logistics, LLC’s motion for judgment on the pleadings as to Count III of Sarah E. Frisse’s complaint. The court held that Frisse had not exhausted the Illinois Human Rights Act’s administrative remedies before filing suit and dismissed the IHRA claim without prejudice.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Staci M. Yandle
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	June 3, 2026
DOCKET	25-cv-1189-SMY
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c), seeking dismissal of Count III, the Illinois Human Rights Act claims.
STANDARD OF REVIEW	A Rule 12(c) motion is reviewed under the same standard as a Rule 12(b)(6) motion for failure to state a claim. The court may consider the pleadings, attached exhibits, and matters of public record not subject to reasonable dispute.
PRECEDENTIAL VALUE	nonprecedential district court memorandum order

TOPICS

- motion for judgment on the pleadings
- employment discrimination
- civil procedure
- affirmative defenses
- civil rights

PRACTICE AREAS

- employment law
- civil procedure
- civil rights
- employment discrimination

QUESTIONS PRESENTED

1. Whether Frisse's Illinois Human Rights Act claims should be dismissed because she had not filed an administrative charge with the Illinois Department of Human Rights or the Equal Employment Opportunity Commission before filing suit.
2. Whether the later filing of an IDHR charge could cure the failure to satisfy the IHRA's pre-suit administrative-exhaustion requirements.
3. Whether an IDHR complainant information sheet constitutes a formal charge sufficient to begin the statutory administrative process.

HOLDINGS

1. A plaintiff may not bring an Illinois Human Rights Act civil action unless the statutory administrative prerequisites have been satisfied, including filing a charge with the IDHR or EEOC and receiving a right-to-sue notice, or proceeding after the applicable statutory period without an IDHR report.
2. The later filing of an administrative charge did not cure Frisse's failure to satisfy the IHRA's pre-suit requirements, and Count III was properly dismissed without prejudice.
3. An IDHR complainant information sheet is not a formal charge and does not initiate IHRA administrative proceedings.

KEY QUOTATIONS

“No suit may be brought under the Act unless these procedural requirements are satisfied.” (Page 4)

“[A] CIS is just a pre-charge screening form, which does not prompt IDHR to notify the employer, launch an investigation, or sponsor mediation between the parties—filing a charge form does.” (Page 4)

“This is not a “gotcha” rule – it is the law.” (Page 4)

FACTUAL BACKGROUND

Sarah E. Frisse, a former Geodis Logistics employee, asserted Illinois Human Rights Act claims among other employment-related claims. She filed an Illinois Department of Human Rights charge on October 10, 2025, approximately five months after filing suit, and the IDHR proceedings remained ongoing without a right-to-sue letter. An earlier April 9, 2025 document was only a complainant information sheet expressly stating that it was not a formal charge.

PROCEDURAL HISTORY

Plaintiff filed suit in Illinois state court on April 25, 2025, asserting Illinois Whistleblower Act, retaliatory-discharge or wrongful-termination, and Illinois Human Rights Act claims. Defendant removed the action to the Southern District of Illinois on June 5, 2025. The district court granted Defendant's Rule 12(c) motion and dismissed Count III without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Buchanan-Moore v. County of Milwaukee*, 570 F.3d 824, 827 (7th Cir. 2009)
- *Wolf v. Riverport Insurance Co.*, 132 F.4th 515, 518 (7th Cir. 2025)
- *South Branch LLC v. Commonwealth Edison Co.*, 46 F.4th 646, 648 (7th Cir. 2022)
- *Garcia v. Village of Mount Prospect*, 360 F.3d 630, 640 (7th Cir. 2004)
- *Hill v. Potter*, 352 F.3d 1142, 1145 (7th Cir. 2003)
- *Perkins v. Silverstein*, 939 F.2d 463, 471 (7th Cir. 1991)
- *Cora v. Tootsie Roll Industries, LLC*, 2024 U.S. Dist. LEXIS 57785, at *26 (N.D. Ill. Mar. 29, 2024)
- *Carlson v. Christian Brothers Services*, 840 F.3d 466, 467 (7th Cir. 2016)

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