

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Tyler P. Parrent v. Solvay Fluorides, LLC

Parrent · No. 3:24-cv-01370-GCS · Decided March 17, 2026

SUMMARY

The United States District Court for the Southern District of Illinois denied Solvay Fluorides, LLC’s motion to dismiss Count V of Tyler P. Parrent’s amended complaint. The court held that although the complaint did not adequately allege a religious-accommodation claim because it identified no conflicting employment requirement, it sufficiently pleaded an alternative religious-harassment claim under the Illinois Human Rights Act.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Gilbert C. Sison
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 17, 2026
DOCKET	3:24-cv-01370-GCS
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss Count V of Plaintiff's amended complaint, which asserted religious discrimination, failure to accommodate, and religious harassment under the Illinois Human Rights Act.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts the complaint's allegations as true and determines whether the complaint states a plausible claim for relief. The complaint must provide fair notice and allegations that plausibly suggest entitlement to relief above a speculative level.
PRECEDENTIAL VALUE	Unknown

TOPICS

- religious discrimination
- hostile work environment
- motions to dismiss
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the amended complaint adequately pleaded a religious-accommodation claim under the Illinois Human Rights Act.
2. Whether the amended complaint adequately pleaded an alternative religious-harassment claim under the Illinois Human Rights Act.
3. Whether Federal Rule of Civil Procedure 8 permits Plaintiff to plead religious harassment in the alternative without using explicit either-or language.

HOLDINGS

1. The amended complaint failed to state a religious-accommodation claim because it did not allege an employment requirement that conflicted with Plaintiff's religious observances or practices.
2. The amended complaint stated a viable religious-harassment claim under the IHRA, so Count V could not be dismissed in its entirety.
3. Rule 8 permits alternative pleading when the complaint uses language from which an alternative legal theory can reasonably be inferred; explicit either-or wording is not required.

KEY QUOTATIONS

“Rather, a complaint must use language from which it can be reasonably inferred that there is an alternative pleading.” (at 5)

“Taking the allegations in the Amended Complaint as true, as the Court must at this stage, Plaintiff has stated a viable harassment claim under the IHRA.” (at 6)

FACTUAL BACKGROUND

Plaintiff worked as a technical services specialist for Solvay Fluorides from October 24, 2022, until his termination on October 12, 2023. He observed the Jewish tradition of kashrut and raised his children in the Jewish faith, and he informed Defendant of those religious preferences. Plaintiff alleged that employees questioned and harassed him about his religious beliefs and decisions, including his choice to raise his daughter in the Jewish faith, and emphasized that his religious preferences differed from those of other employees.

PROCEDURAL HISTORY

Plaintiff filed an amended complaint alleging, among other claims, that Solvay Fluorides violated the Illinois Human Rights Act by discriminating against him based on religion. Defendant moved to dismiss Count V for failure to state a claim. The court denied the motion, concluding that the failure-to-accommodate theory was inadequately pleaded but that the complaint sufficiently pleaded an alternative religious-harassment claim.

DISPOSITION

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Pugh v. Tribune Co., 521 F.3d 686, 699 (7th Cir. 2008)
- Ashcroft v. Iqbal, 129 S. Ct. 1937, 1949 (2009)
- Mattice v. Memorial Hospital of South Bend, Inc., 249 F.3d 682, 684 (7th Cir. 2001)
- Volling v. Kurtz Paramedic Services, Inc., 840 F.3d 378, 383 (7th Cir. 2016)
- Rabé v. United Air Lines, Inc., 971 F. Supp. 2d 807, 821 (N.D. Ill. 2013)
- Zaderaka v. Illinois Human Rights Commission, 545 N.E.2d 684, 687 (Ill. 1989)
- Tate v. Dart, 51 F.4th 789, 793 (7th Cir. 2022)
- Adeyeye v. Heartland Sweeteners, LLC, 721 F.3d 444, 449 (7th Cir. 2013)
- Holman v. Indiana, 211 F.3d 399, 407 (7th Cir. 2000)

OPINION

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS
TYLER P. PARRENT,)) Plaintiff,)) vs.) Case No. 3:24-cv-01370-GCS)) SOLVAY
FLUORIDES, LLC,)) Defendants.) MEMORANDUM & ORDER SISON, Magistrate Judge:
Now before the Court is Defendant Solvay Fluorides, LLC's Motion to Dismiss Count V of Plaintiff's Amended Complaint and supporting memorandum.

(Doc. 35, 35- 1). Count V of Plaintiff's Amended Complaint alleges that the Defendant "interfered with and/or harassed the Plaintiff's exercise" of his religious observances and preferences in violation of the Illinois Human Rights Act ("IHRA"), 775 ILL. COMP. STAT. § 5/1-101, et seq. (Doc. 31, p. 11-12). Defendant argues that the Amended Complaint fails to allege facts that support a religious discrimination claim under the IHRA.

(Doc. 35-1, p. 1). Plaintiff filed a Response to Defendant's Motion to Dismiss on May 5, 2025; Defendant filed a Reply on May 9, 2025. (Doc. 37, 38). For the reasons given below, the Court DENIES Defendant's Motion to Dismiss Count V of Plaintiff's Amended Complaint. FACTUAL AND PROCEDURAL BACKGROUND On April 14, 2025, Plaintiff filed an Amended Complaint against Defendant alleging, inter alia, that Defendant discriminated against him based on religion in violation of the IHRA.

(Doc. 31). Plaintiff alleges he was employed as a technical services specialist by Defendant, where he provided maintenance services from October 24, 2022, until his termination on October 12, 2023. (Doc. 31, p. 1). At some point prior to his termination, Plaintiff reported to unspecified government officials that Defendant's trucks were unsafe and not fit for the road.

Id. at p. 1-2. He also told his management that the trucks were unsafe, that a recently deceased trucker's death should have been reported, and that he would not participate in Defendant's illegal activities. Id. at p. 2. Following Plaintiff's conversations with the government and Defendant's management, he experienced "conduct designed to result in [his] termination." Id. at p. 2.

This included inquiries and harassment from other employees about his religious beliefs and preferences. Id. Plaintiff observes the Jewish tradition of kashrut, which prohibits the mixing of meat and dairy products, and he raises his children in the Jewish faith. Id. at p. 11. Plaintiff told Defendant about these religious preferences and observances. Plaintiff claims that Defendant discriminated against him by i) serving only lasagna, which Plaintiff cannot eat, at a Christmas celebration or celebrations, ii) interrogating/harassing Plaintiff about raising his daughter in the Jewish faith, and iii) indicating that Plaintiff's religious preferences were not the same as those of other employees.

Id. at p. 11-12. LEGAL STANDARDS A motion to dismiss under Federal Rule of Civil Procedure 12(b)(6) challenges the sufficiency of a complaint for failure to state a claim upon which relief may be granted. See FED. R. CIV. PROC. 12(b)(6). When considering a Rule 12(b)(6) motion to dismiss, the Court must accept all allegations in the complaint as true. See *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007).

The federal system of notice pleading requires only that a plaintiff provide a "short and plain statement of the claim showing that the pleader is entitled to relief." FED. R. CIV. PROC. 8(a)(2). However, the allegations must be "more than labels and conclusions." *Pugh v. Tribune Co.*, 521 F.3d 686, 699 (7th Cir. 2008) (citation omitted). This requirement is satisfied if the complaint: (1) describes the claim in sufficient detail to give the defendant fair notice of what the claim is and the grounds upon which it rests; and (2) plausibly suggests that the plaintiff has a right to relief above a speculative level.

See *Twombly*, 550 U.S. at 555; see also *Ashcroft v. Iqbal*, 129 S.Ct. 1937, 1949 (2009). "A claim has facial plausibility when the plaintiff pleads actual content that allows the court to draw the reasonable inference that defendant is liable for the misconduct alleged." *Iqbal*, 129 S. Ct. at 1949 (citing *Twombly*, 550 U.S. at 556).

However, if "it appears beyond a doubt that plaintiff can prove no set of facts in support of his claim which would entitle [him] to relief[.]" the Court must dismiss the claim. *Mattice v. Memorial Hosp. of South Bend, Inc.*, 249 F.3d 682, 684 (7th Cir. 2001) (citation omitted). DISCUSSION As a preliminary matter, Illinois courts evaluating discrimination claims under the IHRA apply the same standards as those in Title VII of the Civil Rights Act of 1964 and the Americans with Disabilities Act ("ADA").

See, e.g., *Volling v. Kurtz Paramedic Services, Inc.*, 840 F.3d 378, 383 (7th Cir. 2016) (stating that “Illinois courts apply the federal Title VII framework to IHRA claims.”) (citing *Rabé v. United Air Lines, Inc.*, 971 F.Supp.2d 807, 821 (N.D. Ill. 2013)); *Zaderaka v. Illinois Human Rights Com’n.*, 545 N.E.2d 684, 687 (Ill. 1989) (adopting analytical framework established in Supreme Court decisions addressing Title VII claims for employment discrimination claims under the IHRA); *Tate v. Dart*, 51 F.4th 789, 793 (7th Cir.

2022) (noting that frameworks for IHRA and ADA analysis are “practically indistinguishable.”). The Court will use these statutory frameworks to evaluate Count V of the Amended Complaint. The parties agree that the Amended Complaint must sufficiently plead the following elements of a religious accommodation claim. (Doc. 35-1, p. 2-3; Doc. 37, p. 1). These elements are “(1) the observance or practice conflicting with an employment requirement is religious in nature; (2) the employee called the religious observance or practice to the employer's attention; and (3) the religious observance or practice was the basis for the employee's discharge or other discriminatory treatment.” *Adeyeye v. Heartland Sweeteners, LLC*, 721 F.3d 444, 449 (7th Cir.

2013) (citation omitted) (internal quotations omitted). The Amended Complaint fails to sufficiently plead a conflict between Plaintiff’s religious observances and practices. The first element of a religious accommodation claim under the IHRA requires two things: an observance or practice that is religious in nature and that such observance or practice conflicts with an employment requirement.

Id. Plaintiff’s observance of kashrut and the decision to raise his daughter in the Jewish faith are plainly religious in nature. However, as Defendant correctly notes, Plaintiff has not alleged that these religious observances and practices conflict with an employment requirement. (Doc. 35-1, p. 3-4).

In *Adeyeye*, there was a conflict between the plaintiff’s religious obligation to perform burial rites and the defendant employer’s leave policy. *Id.* at 449. By contrast, the allegations in the Amended Complaint do not mention or support an inference of any employment requirement, let alone an employment requirement that conflicts with Plaintiff’s religious observances and practices.

In other words, it fails to state a claim for failure to accommodate Plaintiff’s religion. However, that is not the end of the Court’s analysis. Failure to accommodate Plaintiff’s religion is not the only cause of action pled under Count V in the Amended Complaint. While the failure to accommodate claim is Plaintiff’s primary allegation, the complaint also pleads religious harassment in the alternative.

Rule 8 of the Federal Rules of Civil Procedure permits alternative pleading, and while most alternative pleadings use “either-or” language to signal the alternative legal theories that have been

pled, there is no requirement that a complaint use that precise language. Rather, a complaint must use language from which it can be reasonably inferred that there is an alternative pleading.

See *Holman v. Indiana*, 211 F.3d 399, 407 (7th Cir. 2000). Plaintiff has done so here. Count V of the amended complaint alleges that Defendant “interrogated and/or harassed Plaintiff on his choice and reasons for Plaintiff’s desire to raise his daughter in the Jewish faith.” (Doc. 31, p. 11-12) (emphasis added). This language is sufficient for the Court to infer that Plaintiff intended to plead a religious harassment claim in the alternative.

Plaintiff’s Amended Complaint states a claim of religious harassment under the IHRA. The IHRA prohibits employers from engaging in harassment of an employee. See 775 ILL. COMP. STAT. § 5/2-102(A). The IHRA defines harassment as: any unwelcome treatment on the basis of an individual’s actual or perceived... religion... that has the purpose or effect of substantially interfering with the individual's work performance or creating an intimidating, hostile, or offensive working environment.

For purposes of this definition, the phrase “working environment” is not limited to a physical location an employee is assigned to perform his or her duties. 775 ILL. COMP. STAT. § 5/2-101(E-1). Plaintiff has asserted that Defendant, through its employees, engaged in unwelcome treatment by repeatedly questioning Plaintiff about his religious decisions and underscoring that his religious beliefs were different than those of other employees.

(Doc. 31, p. 11, 12). Taking the allegations in the Amended Complaint as true, as the Court must at this stage, Plaintiff has stated a viable harassment claim under the IHRA. Thus, the Court cannot dismiss Count V. **CONCLUSION** For the foregoing reasons, Defendant’s Motion to Dismiss Count V of the Amended Complaint is **DENIED**. **IT IS SO ORDERED**. **DATED: March 17, 2026**.
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