

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Jetaime Flores v. Cook County

No. 23-CV-16260 (N.D. Ill. Dec. 19, 2025) · No. 1:23-cv-16260 · Decided December 19, 2025

SUMMARY

The United States District Court for the Northern District of Illinois granted Cook County’s motion for summary judgment in Jetaime Flores’s Title VII action challenging Cook County Health’s mandatory COVID-19 vaccination policy. The court held that Flores established a sincerely held religious objection for summary-judgment purposes, but that accommodating her by allowing her to work in person while unvaccinated would impose an undue hardship. The court also rejected her disparate-treatment claim because she did not show that an allegedly comparable employee was similarly situated in all material respects.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	April M. Perry
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	December 19, 2025
DOCKET	1:23-cv-16260
DISPOSITION	affirmed
PROCEDURAL POSTURE	Motion for summary judgment by defendant.
STANDARD OF REVIEW	Summary judgment is proper when the movant shows that there is no genuine dispute of material fact such that the movant is entitled to judgment as a matter of law. Fed. R. Civ. P. 56(a).
PRECEDENTIAL VALUE	Published

TOPICS

- employment discrimination
- religious discrimination
- title vii
- summary judgment
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Defendant violated Title VII by failing to accommodate Plaintiff's religious beliefs regarding its COVID-19 vaccination policy.
2. Whether Plaintiff was subjected to disparate treatment based on her religion under Title VII.

HOLDINGS

1. Plaintiff met her low burden at summary judgment to demonstrate she had a sincerely held religious belief that prevented her from being vaccinated, based on her written statement opposing vaccines derived from aborted fetal cell lines.
2. Allowing Plaintiff, an in-person pharmacy technician, to continue working unvaccinated would have created an undue hardship for CCH's operations, patients, and staff.
3. Plaintiff failed to establish that a similarly situated employee outside her protected class was treated more favorably, defeating her disparate treatment claim.

KEY QUOTATIONS

"Receiving a vaccine made from aborted fetuses supports an activity that offends my faith, therefore I cannot partake of this vaccine directive." (Doc. 52-6 at 2)

FACTUAL BACKGROUND

Plaintiff, a pharmacy technician at Cook County Health (CCH), sought a religious exemption from CCH's mandatory COVID-19 vaccination policy, citing her Christian beliefs opposing abortion and the use of fetal cell lines in vaccine development. CCH denied her request, finding that her in-person job duties could not be performed remotely and that granting the exemption would pose an undue hardship to patient and staff safety. Plaintiff was given 90 days of unpaid leave to find a remote position, which she did not, and was ultimately terminated for non-compliance.

PROCEDURAL HISTORY

Plaintiff filed an employment discrimination complaint against Cook County. Defendant moved for summary judgment.

DISPOSITION

affirmed

CASES CITED

- *Skiba v. Ill. Cent. R.R. Co.*, 884 F.3d 708 (7th Cir. 2018)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242 (1986)

- Celotex Corp. v. Catrett, 477 U.S. 317 (1986)
- LaRiviere v. Bd. of Trs., 926 F.3d 356 (7th Cir. 2019)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574 (1986)
- Swetlik v. Crawford, 738 F.3d 818 (7th Cir. 2013)
- Kluge v. Brownsburg Cmty. Sch. Corp., 150 F.4th 792 (7th Cir. 2025)
- Thomas v. Rev. Bd. of Indiana Emp. Sec. Div., 450 U.S. 707 (1981)
- Adeyeye v. Heartland Sweeteners, LLC, 721 F.3d 444 (7th Cir. 2013)
- Passarella v. Aspirus, Inc., 108 F.4th 1005 (7th Cir. 2024)
- Groff v. DeJoy, 600 U.S. 447 (2023)
- Henry v. S. Ohio Med. Center, 155 F.4th 620 (6th Cir. 2025)
- Hassett v. United Airlines, Inc., 23-CV-14592, 2025 WL 3268667 (N.D. Ill. Nov. 24, 2025)
- Mason v. Cook Cnty., No. 23-CV-16339, 2025 WL 2576811 (N.D. Ill. Sept. 5, 2025)
- Ortiz v. Werner Enterprises, Inc., 834 F.3d 760 (7th Cir. 2016)
- Dunlevy v. Langfelder, 52 F.4th 349 (7th Cir. 2022)
- Crain v. McDonough, 63 F.4th 585 (7th Cir. 2023)
- Jgasaki v. Illinois Dep't of Fin. & Pro. Regul., 988 F.3d 948 (7th Cir. 2021)