

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

THE PREGNANCY CARE CENTER
OF ROCKFORD; THE DIOCESE OF
SPRINGFIELD IN ILLINOIS,

Case No.: 1:25-cv-02983

Plaintiffs,

v.

JAMES BENNETT, in his official capacity as Director of the Illinois Department of Human Rights; **KWAME RAOUL**, in his official capacity as Illinois Attorney General,

VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Defendants.

INTRODUCTION

1. This case challenges an Illinois law that forbids religious employers from speaking and acting consistent with their mission-critical religious beliefs about reproductive issues like abortion, sterilization, and contraception.

2. For millennia, the Christian tradition has marveled in reflection upon a profound mystery: the Creator of the universe endowed men and women with the power to *participate* in His work of creation. Imitating the Trinity as a union of persons joined by love, God empowers the marital union to reproduce human life.

See Catechism of the Catholic Church (“CCC”) § 372 (citing Gen. 1:28 & 2:24).

3. Proclaiming that God became man as an unborn child in the context of a human family, Christians affirm the inestimable dignity of the human person, unborn children, marriage, and family.

4. Like most religious traditions, the Christian tradition recognizes moral responsibilities in matters of reproduction. For example, for nearly 2,000 years the Catholic Church has taught that anti-reproductive decisions like abortion, sterilization, and contraception violate the sanctity of human life and the nature of the sexual act. While vigorously encouraging reproductive assistance by licit means, the Church opposes actions that discard human life or undermine marital union.

5. Plaintiff The Pregnancy Care Center of Rockford (“PCC of Rockford”) affirms, proclaims, and strives to live out Christian beliefs about the dignity of human life and the nature of marriage by sharing the Gospel, promoting Christian beliefs on reproduction, opposing abortion, and providing free resources.

6. Plaintiff The Diocese of Springfield in Illinois (“Diocese of Springfield”) affirms, proclaims, and strives to live out the teachings of the Catholic Church, including indispensable teachings about reproduction and marriage.

7. Plaintiffs employ individuals who represent their organizations and advance their religious missions through word and deed.

8. Plaintiffs have open positions that they seek to fill immediately with individuals who affirm and abide by their beliefs about reproduction and marriage.

9. But the Illinois Human Rights Act (“Act”), as recently amended by H.B. 4867 (“New Bill”), dictates how religious employers must speak and act about employees’ voluntary reproductive decisions like abortion, contraception, and sterilization. *See 775 ILL. COMP. STAT. ANN. § 5/1-102(A); H.B. 4867, 103rd General Assemb. (2024).*

10. The Act prohibits employers from disciplining or refusing to hire employees based on reproductive decisions. *Id.* § 5/2-102(A) (“Employment Clause”). But Plaintiffs’ policies require them to discipline and refuse to hire employees who make reproductive decisions that violate their religious beliefs.

11. The Act prohibits employers from engaging in speech and conduct that some may deem “unwelcome” and “offensive.” *Id.* §§ 5/2-102(A) & 5/2-101(E-1) (“Offensive Speech Clause”). But Plaintiffs frequently express their religious beliefs on reproduction in a manner that violates the Act.

12. The Act requires employers to grant employee accommodations related to reproductive decisions. *Id.* § 5/2-102(J) (“Accommodation Clause”). But Plaintiffs’ policies prohibit them from accommodating reproductive decisions that violate their religious beliefs.

13. The Act prohibits employers from providing unequal employee benefits based on reproductive decisions. *Id.* § 5/102(A) (“Benefit Clause”). Plaintiffs offer benefits for employees who make reproductive decisions they condone while denying benefits for employees who make reproductive decisions that violate their beliefs.

14. The Act requires employers to broadcast all of these requirements in employee handbooks and workplace posters. *Id.* § 5/2-102(K)(1) (“Notice Clause”). But Plaintiffs do not—and will not—lie to their employees by saying that employees can make sinful reproductive decisions without facing adverse action and with the blessing of ministry benefits and accommodations.

15. Thus, the Act renders Plaintiffs powerless to control deeply theological internal matters and to separate themselves from conduct that fatally undermines their mission and message.

16. By dictating Plaintiffs' response to voluntary reproductive decisions, the Act goes far beyond protecting immutable characteristics and enters a "religious thicket" of profound theological significance. *Demkovich v. St. Andrew the Apostle Par.*, *Calumet City*, 3 F.4th 968, 981 (7th Cir. 2021) (quoting *Serbian E. Orthodox Diocese for United States and Canada v. Milivojevich*, 426 U.S. 696, 619 (1976)).

17. Indeed, Lieutenant Governor Juliana Stratton publicly admitted that by enacting the New Bill, "Illinois is not just protecting a right; it is championing fundamental principles" about reproduction contrary to Plaintiffs' Christian beliefs. Office of Gov. J.B. Pritzker, *New Law Expands Reproductive Rights*, <https://perma.cc/6TCW-SDWS>.

18. The Act violates Plaintiffs' rights to expressive association, free exercise of religion, religious autonomy, free speech, and equal protection. Plaintiffs are entitled to declaratory and injunctive relief to stop these violations.

JURISDICTION AND VENUE

19. This action arises under 42 U.S.C. § 1983 et seq. ("Civil Rights Act") and the First and Fourteenth Amendments to the United States Constitution.

20. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343.

21. This Court has the authority to grant the requested declaratory relief under 28 U.S.C. §§ 2201 and 2202, and Federal Rule of Civil Procedure 57.

22. This Court has the authority to grant the requested injunctive relief under 28 U.S.C. § 1343(a)(3), and Federal Rule of Civil Procedure 65.

23. This Court has the authority to award the requested costs and attorneys' fees under 42 U.S.C. § 1988(b).

24. Venue lies in this district under 28 U.S.C. § 1391(b) because Defendants operate and reside in the Northern District of Illinois, a Plaintiff operates and resides in this district, and a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this district.

25. Because the U.S. District Court for the Northern District of Illinois has no divisional venue requirement, Plaintiffs can file this case in either the Western Division or the Eastern Division. *Graham v. United Parcel Serv.*, 519 F. Supp. 2d 801, 809 (N.D. Ill. 2007). The Western Division is an appropriate divisional venue because a Plaintiff operates and resides in this Division, and the Attorney General maintains an office in this Division.

PARTIES

26. Plaintiff PCC of Rockford is a religious nonprofit corporation duly incorporated under the laws of the State of Illinois, with its principal place of business at 4108 Morsay Drive, Rockford, IL 61107.

27. Plaintiff Diocese of Springfield is a religious nonprofit corporation duly incorporated under the laws of the State of Illinois, with its principal place of business at 1615 W. Washington St, Springfield, IL 62702.

28. Defendant James Bennett is the Director of the Illinois Department of Human Rights (“Department”). He is sued in his official capacity only.

29. The Department is charged with enforcing the Illinois Human Rights Act. *See* 775 ILL. COMP. STAT. ANN. § 5/7-101. The Department can directly initiate charges of discrimination. *Id.* § 5/7A-102(A)(1); 56 ILL. ADMIN. CODE 2520.10. The Department can also solicit, receive, investigate, and adjudicate charges of discrimination under the Act, including with the use of compulsory process. 775 ILL. COMP. STAT. ANN. §§ 5/7A-102(C)–(D), 5/7-101(B)–(C). The Department can file discrimination complaints with the Illinois Human Rights Commission (“Commission”) and intervene in complaints pending before the Commission. *Id.* §§ 5/2-101(D), 5/7A-102(D)(4). The Department can seek judicial enforcement of the Act by seeking temporary and permanent relief to enforce orders of the Commission. *Id.* §§ 5/7-101(E) & 5/7A-104.

30. The Department has an office in the Northern District of Illinois at 555 West Monroe Street, Ste. 700, Chicago, IL 60661.

31. On information and belief, Defendant Bennett resides in the Northern District of Illinois.

32. Defendant Kwame Raoul is the Illinois Attorney General. He is sued in his official capacity only.

33. The Attorney General can also enforce the Act. 775 ILL. COMP. STAT. ANN. § 5/10-104. The Attorney General can directly investigate patterns and

practices of discrimination, including with the use of compulsory process. *Id.* The Attorney General can also file civil lawsuits to enforce the Act. *Id.* § 5/10-104(A)(1).

34. The Attorney General has multiple offices in the Northern District of Illinois, including an office in the Western Division at 200 S. Wyman St., Ste. 307, Rockford, IL 61101.

35. On information and belief, Defendant Raoul resides in the Northern District of Illinois.

FACTUAL ALLEGATIONS

I. Plaintiffs' religious beliefs and open employment positions.

A. PCC of Rockford

36. Founded in 1982, PCC of Rockford has served the Rockford community for more than 40 years by providing help and hope to women and families facing unplanned pregnancies.

37. PCC of Rockford is an Illinois nonprofit corporation organized and operated exclusively for charitable, religious, educational, and scientific purposes.

See PCC of Rockford Amended Articles of Incorporation, attached as Exhibit 1.

38. Animated by its religious beliefs, PCC of Rockford provides pro-life services and resources free of charge. PCC of Rockford offers lab-quality pregnancy testing, ultrasounds, and tests for sexually transmitted infections (STI). It also provides families with material resources, including diapers, clothing, blankets, cribs, car seats, and other essential items to care for children.

39. But the heart of PCC of Rockford's ministry involves communicating the Gospel, educating, counseling, and guiding women and families.

40. In person, on the telephone, on its website, on its online blog, and through social media accounts, PCC of Rockford engages in speech and expression to educate women and families about their options and resources when facing an unplanned pregnancy.

41. PCC of Rockford counsels pregnant women and their families about their options to parent, choose adoption, or end a child's life through abortion.

42. PCC of Rockford also offers mentoring programs, which provide women and families with help to develop the skills, education, relationships, and confidence needed to parent their children.

43. PCC of Rockford's Articles of Incorporation specify its religious mission and purposes:

In the name of Jesus Christ, to restore hope, offer emotional and spiritual healing, and empower people to make informed pregnancy related choices that value the sanctity of human life. To share by word and deed the Gospel of Jesus Christ with all who seek our services. To offer pregnancy tests, ultrasound exams, care, education and material assistance. To offer sexual risk avoidance programs, including abstinence-based presentations to school and youth groups. To render all services free of charge.

Id.

44. PCC of Rockford's bylaws articulate its statement of religious beliefs on the sanctity of human life:

We believe that all human life is sacred and created by God in His image (Genesis 1:27). Human life is of inestimable worth in all its dimensions, including pre-born babies, the aged, the physically or mentally

challenged, and every other state or condition from conception to natural death. We are therefore called to defend, protect, and value all human life (Psalm 139). We believe and affirm that life begins at conception, at which time the full genetic blueprint for life is in place. Accordingly, we believe that our expression of love and service to God requires that we work to protect and honor life in all stages of creation. As well, we believe and affirm that God's calling upon us commands that we make special efforts to protect the most vulnerable among us. As such, we view life from conception through birth to be uniquely vulnerable, and therefore work to protect and defend life in these early stages. We do not recommend, provide, or refer for abortion or abortifacient contraceptive medications.

PCC of Rockford Bylaws, **attached as Exhibit 2** at 3.

45. PCC of Rockford maintains an Employee Handbook, which confirms that it is a "ministry with the mission to offer compassionate help and hope to those experiencing an unplanned pregnancy, to present sexual abstinence as a positive lifestyle for singles, to provide opportunity for healing and restoration to those who have been hurt by abortion, and to present an opportunity for all to enter into a life-changing relationship with Jesus Christ." PCC of Rockford Employee Handbook, **attached as Exhibit 3** at 3.

46. According to its mission statement, "The Pregnancy Care Center of Rockford offers help and hope in the name of Jesus Christ to those facing pregnancy decisions. It is our vision to see God glorified through loving, empowering, and supporting all those facing unplanned pregnancy decisions, so that choosing abundant life today and for future generations is celebrated." *Id.* at 3.

47. PCC of Rockford adopted the ancient Apostles' Creed as its Christian Statement of Faith. *Id.*; *see also* PCC of Rockford Bylaws, Ex. 2 at 2.

48. PCC of Rockford adopted a Statement of Principle, which articulates the organization's fundamental principles, including:

- “The Pregnancy Care Center of Rockford is an outreach ministry of Jesus Christ through His Church. Therefore, The Pregnancy Care Center, embodied in its staff and volunteers, is committed to presenting the Gospel to women with crisis pregnancies — both in word and in deed. Therefore, those who serve as The Pregnancy Care Center directors, staff, volunteers, and Board members are expected to walk in a personal relationship with Jesus Christ and seek to live a lifestyle that reflects Him.”
- “The Pregnancy Care Center is committed to assisting women carry to term by providing emotional support and practical assistance.”
- “The Pregnancy Care Center does not refer for or perform abortions.”
- “The Pregnancy Care Center does not recommend, provide, or refer single women for contraceptives.”

PCC of Rockford Employee Handbook, Ex. 3 at 3–4.

49. PCC of Rockford’s Employee Handbook provides that “[a] personal relationship with Jesus Christ is a requirement for any employee, as well as believing that abortion is never a morally acceptable option.” *Id.* at 6.

50. PCC of Rockford’s Employee Handbook emphasizes that its expectations for pro-life beliefs, advocacy, and conduct are “implemented on all

levels of operations including client counsel, school presentations, and the expected lifestyle of all volunteers and staff.” *Id.* at 6.

51. PCC of Rockford also adopted a Policy for Employee and Volunteer Moral Conduct (“Conduct Policy”), which covers both professional and personal conduct: “The PCC seeks to be an organization that is ‘Christian’ in every sense of the word; therefore, all staff, volunteers, and Board Members represent The PCC—and more importantly, the Gospel of Jesus Christ—in their work as well as in their private lives.” *Id.* PCC of Rockford Conduct Policy, **attached as Exhibit 4**, at 1.

52. PCC of Rockford’s Conduct Policy also covers both words and deeds: “Words clarify the meaning of our deeds, deeds verify the integrity of our words about Jesus Christ, and signs are the acts of God in the midst of what we do and say.” *Id.* “Throughout all of life, in word and deed, The PCC’s staff must be committed to glorifying God and witnessing His love in the person of His Son Jesus Christ.” *Id.* “We desire to model behavior that is consistent with our Christian commitment and witness, calling others to a life-changing commitment in the name of Christ.” *Id.* Representatives of the PCC of Rockford “are Christian 24/7, not just while we are at the PCC.” *Id.* at 3. “As a Christian organization, The PCC expects biblically-faithful conduct both inside and outside the workplace” because “[s]uch conduct reinforces the center’s core mission, instead of distracting from it.” *Id.*

Open Positions at PCC of Rockford

53. PCC of Rockford regularly maintains about 14 employees.

54. On average, the PCC of Rockford hires 2-4 employees each year.

55. It is common for PCC of Rockford to receive multiple applications for a single open position.

56. Some applicants for open positions are not aligned with PCC of Rockford's mission but apply out of a need for employment. PCC of Rockford does not hire such individuals, but their applications show that PCC of Rockford does not only receive applications from those already aligned with its mission.

57. The PCC of Rockford currently seeks to fill two employee positions: (1) Staff Nurse; and (2) Receptionist.

58. According to its position description, the Staff Nurse will provide "nursing care, client education, perform limited OB ultrasounds, and related administrative duties." PCC of Rockford Staff Nurse Position Description, **attached as Exhibit 5** at 1.

59. To advance PCC of Rockford's mission, the Staff Nurse must be "a committed Christ-follower who demonstrates a personal relationship with Christ," one who "[e]xhibits a strong pro-life commitment and upholds a lifestyle of sexual purity," and one who is "[w]illing to uphold the Statement of Principle, Statement of Faith, and policies of The Pregnancy Care Center of Rockford." *Id.*

60. The Staff Nurse engages in both internal and external expressive activity to promote a pro-life message. The Staff Nurse directly communicates with clients to "[p]rovide education on client options and risks involved," and serves as the first person to announce the joy of new life to clients in intimate moments while performing ultrasounds and pregnancy tests. *Id.*

61. The Staff Nurse also engages in internal communications to advance the organization's mission, including meeting with the Director of Nursing to "communicate any medical or client related issues," and participating in nurse meetings, staff meetings, and an annual ministry retreat. *Id.* at 1–2.

62. The Staff Nurse represents PCC of Rockford when communicating with the community in "public relations" roles, including participating in all fundraising events and giving facility tours for donors and community members. *Id.* at 2.

63. PCC of Rockford also seeks to immediately hire a Receptionist. According to its position description, the Receptionist serves as the first point of contact for the PCC of Rockford, greeting clients and other visitors, answering phones, scheduling client appointments, and receiving material donations. PCC of Rockford Receptionist Position Description, **attached as Exhibit 6** at 1–2.

64. To advance PCC of Rockford's mission, the Receptionist must be a "[c]ommitted Christ-follower who demonstrates a personal relationship with Christ," who "[e]xhibits a strong pro-life commitment and upholds a lifestyle of sexual purity," and "[u]phold the Statement of Principle, Statement of Faith, and policies of The Pregnancy Care Center of Rockford." *Id.*

65. The Receptionist engages in both internal and external expressive activity to promote a pro-life message. The Receptionist "[m]ust be comfortable speaking with women facing pregnancy decisions and providing empathetic support," makes "quality first impressions of the center for clients walking through

the door,” engages with external stakeholders to receive donations or give facility tours, and participates in internal meetings and retreats. *Id.*

66. PCC of Rockford believes that individuals in *any* of its employment positions—including current and future open positions—would fatally undermine its pro-life mission and message by participating in a decision to obtain an abortion.

67. PCC of Rockford believes that it cannot credibly and effectively counsel families to forego objectionable reproductive decisions through employees who made those same unrepentant decisions themselves.

68. Regardless of whether a particular employee directly counsels families, PCC of Rockford believes that maintaining employees who make objectionable (and unrepentant) reproductive decisions undermines its public and internal message that it is sincerely committed to its mission.

69. PCC of Rockford also believes that its employees would find it more difficult to speak freely and persuasively on sensitive topics like reproduction with coworkers who made those objectionable decisions.

B. The Diocese of Springfield

70. Plaintiff the Diocese of Springfield was established in 1923.

71. The Diocese of Springfield is an Illinois nonprofit corporation organized for religious purposes.

72. The Diocese of Springfield serves around 120,000 Catholics in western Illinois through 129 parishes.

73. The Diocese of Springfield’s mission is “to build a fervent community of intentional and dedicated missionary disciples of the Risen Lord and steadfast

stewards of God's creation who seek to become saints. Accordingly, the community of Catholic faithful in the Diocese is committed to the discipleship and stewardship way of life as commanded by Christ Our Savior and as revealed by Sacred Scripture and Tradition." Diocese of Springfield Standards of Conduct, Book II, Part I § 503, **attached as Exhibit 7** at 1.

74. The Diocese of Springfield proclaims, teaches, and encourages individuals to live out all the teachings of the Catholic Church, including the Church's indispensable beliefs supporting the sanctity of life and the Christian view of marriage while opposing abortion, contraception, sterilization, and certain reproductive technologies that discard and destroy human life or that undermine the marital union, including IVF, ZIFT, ICSI, ovum donation, and surrogacy.

75. The Diocese of Springfield engages in speech and expressive activity in various contexts to promote and live out the Church's beliefs about reproduction and marriage.

76. Through its employees, the Diocese of Springfield makes statements affirming the Church's beliefs about reproduction and marriage in many contexts, including in homilies during Mass, encouragement during confession, spiritual counseling, marriage counseling, religious conferences and programs, internal leadership discussions, internal staff meetings, and in its print and social media.

77. To live out and promote such beliefs, the Diocese of Springfield has ministries that support and promote the dignity of human life.

78. For example, the Diocese of Springfield has an Office of Marriage and Family Life that offers marriage preparation and family support services.

79. The Diocese of Springfield also has an Office for Pro-Life Activities and Special Ministries, with a mission to “carry out the ministry of Jesus Christ and the gospel values of dignity for all life from conception to natural death.” Diocese of Springfield, *Office for Pro-Life Activities*, <https://dio.org/plasm/>. “Through prayer, education, outreach and advocacy we provide the resources necessary to bring social change in light of catholic social teaching.” *Id.*

80. The Diocese of Springfield organizes and hosts an annual Mass for Life, which celebrates the sanctity of life and opposes anti-reproductive decisions like abortion, sterilization, and contraception.

81. The Diocese of Springfield helps organize the annual Illinois Pro-Life March. The march includes a rally with pro-life speakers, a march to support pro-life beliefs and oppose objectionable reproductive decisions, and lobbying lawmakers to support pro-life legislation. The march and related events are expressive, and the Diocese of Springfield notes that its participants are “being a joyful witness to life and raising [their] voice for the voiceless at the Illinois Pro-Life March.” Diocese of Springfield, *Illinois Pro-Life March*, <https://dio.org/event/illinois-pro-life-march/>.

82. The Diocese of Springfield’s Standards of Conduct explains that “[a]s employees of the Diocese of Springfield in Illinois, our employees are reminded that to the faithful and to the outside world, they represent the Catholic Church.” Diocese of Springfield Standards of Conduct, Ex. 7 at 1.

83. The Diocese of Springfield's Standards of Conduct states:

Every employee of the Diocese and Diocesan agencies shall act in an honest and forthright manner in all workplace concerns; treat co-workers, supervisors, volunteers, parishioners, students, and visitors with respect; and *conduct themselves in a moral and ethical manner consistent with Catholic principles*. Every employee, as a representative of the Catholic Church to the faithful and to the outside world, has a ministerial calling. Every position has a ministerial aspect. *Personnel must, therefore, conduct themselves in a way that does not contradict the doctrine and moral teaching of the Catholic Church.*

Id. (emphasis added).¹

84. The Diocese of Springfield believes that it would undermine its very mission to hire and retain employees who violate its religious beliefs and policies by making unrepentant reproductive decisions that violate its faith, including abortion, contraception, sterilization, or certain reproductive technologies that discard and destroy human life or that undermine the marital union, including IVF, ZIFT, ICSI, ovum donation, and surrogacy.

85. The Diocese of Springfield believes that it cannot credibly and effectively counsel families to forego objectionable reproductive decisions through employees who made those same unrepentant decisions themselves.

86. Regardless of whether a particular employee directly counsels families, the Diocese of Springfield believes that maintaining employees who make objectionable (and unrepentant) reproductive decisions undermines its message that it is sincerely committed to its mission.

¹ While the Diocese of Springfield believes that all of its employees have a ministerial role, the Diocese understands that not all of its positions may meet the current legal standard to satisfy the Religion Clauses' ministerial exception.

87. The Diocese of Springfield also believes that its employees would find it more difficult to speak freely and persuasively on sensitive topics like reproduction with coworkers who made those objectionable decisions.

Open Positions at the Diocese of Springfield

88. The Diocese of Springfield regularly maintains about 125 employees.

89. On average, the Diocese of Springfield hires about 15 employees each year.

90. It is common for the Diocese of Springfield to receive multiple applications for a single open position.

91. Some applicants for open positions are not aligned with the Diocese of Springfield's mission but apply out of a need for employment. The Diocese of Springfield does not hire such individuals, but their applications show that the Diocese does not only receive applications from those already aligned with its mission.

92. The Diocese of Springfield seeks to immediately hire two employee positions: (1) Respect Life Advocate; and (2) Associate General Counsel.

93. According to its position description and job posting, the Respect Life Advocate "plays a crucial role in fostering awareness and education among stakeholders within the Diocese of Springfield in Illinois," mainly focusing on issues of the sanctity of human life, reproductive issues in alignment with Church teaching, outreach on behalf of the Pontifical Mission Society, as well as promoting

principles of Catholic Social Teaching. Diocese of Springfield, Respect Life Advocate Position Description, **attached as Exhibit 8** at 1.

94. The Respect Life Advocate “collaborates on the planning and execution of impactful events and strategizes educational initiatives that highlight the value of human dignity. By engaging the community and facilitating discussions, this position seeks to create a culture that respects and uplifts every individual, promoting a deeper understanding of these vital matters.” *Id.*

95. The Respect Life Advocate must be a “[p]racticing Catholic in full communion with the teachings of the Church.” *Id.* at 2.

96. The Respect Life Advocate engages in expressive activity to promote the Diocese of Springfield’s mission and message on reproduction. Among other things, the Advocate “[p]rovides educational information, materials, and training to parishes, clergy, deacons, and school staff on issues of life, charity, and justice.” *Id.* at 1. The Respect Life Advocate also “develops effective communication methods to inform parish and school staff of services, resources, and advocacy opportunities available.” *Id.*

97. The Respect Life Advocate serves as the primary contact for the Diocese of Springfield’s pro-life ministries and programs with “internal and external” audiences. *Id.*

98. The Respect Life Advocate also works closely with the Office of Communications to ensure a “consistent” pro-life message. *Id.*

99. The Diocese of Springfield also immediately seeks to hire an Associate General Counsel. According to its position description and job posting, the Associate General Counsel “serves in the capacity of an associate legal officer supporting the Chancellor and General Counsel in his role as chief legal advisor for the Diocesan Bishop, other officials of the Diocesan Curia, Diocesan pastors, and parochial administrators in basic matters of civil and canon law regarding routine Diocesan and parish activities.” Diocese of Springfield Associate General Counsel Position Description, **attached as Exhibit 9** at 1.

100. The Associate General Counsel provides advice and guidance to internal stakeholders, provides legal education to related Catholic entities, develops Diocesan policies and procedures, and represents the Diocese before courts and administrative bodies. *Id.* at 1–2.

101. The Associate General Counsel provides advice and guidance on employment issues and disputes, including the Diocese of Springfield’s response to employee reproductive decisions that undermine its mission and message.

102. To advance the Diocese of Springfield’s mission, the Associate General Counsel must be a “[p]racticing Catholic in full communion with the teachings of the Church,” with the “[a]bility to display appropriate conduct as it pertains to the values of the Diocesan mission and the teachings of the Catholic Church.” *Id.* at 2.

103. The Diocese of Springfield thus believes that individuals serving in the Respect Life Advocate and Associate General Counsel positions would undermine its religious mission and message by participating in sinful reproductive decisions.

II. The Act's requirements and Plaintiffs' faith-based violations.

A. The Illinois Human Rights Act

104. The Illinois Legislature enacted the Illinois Human Rights Act in 1979, and the law became effective in 1980. *See* Pub. Act 81-1216 (effective July 1, 1980).

105. Article 1 of the Act contains general provisions, including definitions and the Act's Declaration of Policy. 775 ILL. COMP. STAT. ANN. § 5/1-101, et seq.

106. The Declaration of Policy provides that the Act applies in several contexts, including employment (Article 2), real estate (Article 3), financial credit (Article 4), public accommodations (Article 5), and education (Article 5A). *See id.* § 5/1-102(A). This lawsuit concerns the Act's application in employment (Article 2).

107. Before the New Bill, the Declaration of Policy prohibited "unlawful discrimination" based on 14 protected characteristics: "race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, physical or mental disability, military status, sexual orientation, pregnancy, or unfavorable discharge from military service . . ." *Id.* §§ 5/1-102(A), 5/1-103(Q).

108. Plaintiffs face a credible threat and substantial risk that they will be investigated or prosecuted for their faith-based policies, speech, and conduct.

109. The State frequently and vigorously enforces the Act. The State solicits members of the public to report alleged violations of the Act through telephone and online helplines that assist callers in filing charges. *See* 775 ILL. COMP. STAT. ANN. § 5/7-101(K); *id.* § 5/2-107(a)–(d).

110. In its Annual Report for fiscal year 2024, the Department boasted that it "received **2,906** total charges of discrimination, a 29% increase over 2,252 charges

filed in FY 2023" ILL. DEP'T OF HUM. RTS., 2024 Annual Report, **attached as Exhibit 10** at 12 (emphasis in original).

111. Of these 2,906 charges of discrimination in fiscal year 2024, “[t]he majority of charges were filed in employment (80.59%).” *Id.*

112. Beyond formally filed charges, the Department received 11,587 intake inquiries and 7,439 public contacts during fiscal year 2024. *Id.* at 14.

113. The Department boasts that during fiscal year 2024, it “secured” \$3,116,059 in settlements to resolve claims of discrimination and harassment. *Id.*

114. The State punishes violations harshly. Employers who violate the Act are subject to actual damages, cease-and-desist orders, orders to hire employees with backpay, orders to provide employee accommodations, paying complainants’ costs and attorneys’ fees, and any other action that the State considers necessary to make the complainant whole. *See* 775 ILL. COMP. STAT. ANN. § 5/8A-104.

115. As if these penalties weren’t enough, in January 2025, the Illinois Legislature introduced H.B. 1154 to amend the Act’s remedial statute to allow for the recovery of “punitive damages” and “all forms of relief available in tort actions, including but not limited to, emotional distress, pain and suffering, and loss of normal life.” H.B. 1154, 104th General Assemb. (2025).

B. The New Bill amends the Act to expand its application to reproductive decisions.

116. Governor J.B. Pritzker approved the New Bill in August 2024, and it became effective in January 2025.

117. The New Bill amends the Act’s Declaration of Policy to create “reproductive health decisions” as a new protected characteristic. *See* 775 ILL. COMP. STAT. ANN. § 1-102(A).

118. The New Bill defines “reproductive health decisions” to mean “a person’s decisions regarding the person’s use of: contraception; fertility or sterilization care; assisted reproductive technologies; miscarriage management care; healthcare related to the continuation or termination of pregnancy; or prenatal, intranatal, or postnatal care.” *Id.* § 1-103(O-5).

119. The New Bill amends the Act’s definition of “unlawful discrimination” to include “discrimination against a person because of his or her actual or perceived . . . reproductive health decisions.” *Id.* § 1-103(Q).

120. The legislative history of the New Bill reveals that pro-life groups were the likely targets for enforcement, showing hostility toward pro-life groups that are guided by religious beliefs but are not formally “affiliated” with a denomination. During a debate of the New Bill at the House of Representatives, Representative Patrick Windhorst asked “specifically referencing crisis pregnancy centers, whether they would be subject to liability under [sic] this Act if it’s amended?” Bill sponsor Representative Anna Moeller responded that only organizations with certain religious or denominational “affiliation[s]” would be exempt. Trans. of Ill. House of Rep. Debate, **attached as Exhibit 11** at 75–76.

121. A similar colloquy occurred during a debate at the Illinois Senate when Senator Jil Tracy expressed concern that the Act’s exemption for religious

employers would not protect “crisis pregnancy centers” that were “religious” or “Christian” but were not “affiliated with any particular denomination.” Bill sponsor Senator Laura Fine responded that religious or Christian pregnancy centers that were not formally affiliated with a particular denomination would “unfortunately not” qualify for any religious protection.

122. Far from disavowing enforcement, Defendants cheered the New Bill and expressed their intention to zealously enforce the Act’s provisions on reproductive decisions.

123. Defendant Raoul issued public remarks praising the Legislature for enacting the New Bill, affirming his zeal for enforcement, and revealing his preference for particular anti-reproductive decisions that Plaintiffs must oppose: “My office is proud to continue to partner with Gov. Pritzker’s administration to draft legislation and identify new avenues to ensure Illinois is a safe haven for patients to access comprehensive abortion and gender-affirming care. I am committed to using the authority of my office to continue to defend against legal challenges to our laws that preserve Illinois as an oasis of reproductive health care.”

Office of the Governor, Gov. Pritzker Signs Landmark Legislation Further Expanding Reproductive Rights in Illinois, <https://perma.cc/K868-PRC2>.

124. Defendant Bennett similarly praised the New Bill in a way that reveals his preference for anti-reproductive decisions that Plaintiffs oppose: “The Supreme Court decision to overturn *Roe vs. Wade* in 2022 made clear that we cannot take any reproductive rights for granted.” *Id.* “We have worked diligently

with the Pritzker Administration and leaders in the General Assembly to strengthen protections for reproductive rights.” *Id.*

125. The Attorney General’s Office has a history of targeting pro-life groups. This Court recently issued a preliminary injunction blocking the Attorney General from enforcing S.B. 1909, which threatened pro-life groups with large fines for the Orwellian charge of making statements that the Office doesn’t deem “truthful.” *Nat'l Inst. of Fam. & Life Advocs. v. Raoul*, 685 F. Supp. 3d 688, 701 (N.D. Ill. 2023). Although the Attorney General had not yet initiated an enforcement action on this new law, this Court held that the plaintiffs had standing and suffered a threat of prosecution: “Only fools would not have their First Amendment rights chilled under these circumstances.” *Id.* at 699.

C. Plaintiffs violate the Act’s Employment Clause.

126. The Act’s Employment Clause provides that it is a civil rights violation for any employer to “refuse to hire . . . or to act with respect to recruitment, hiring, promotion, renewal of employment, selection for training or apprenticeship, discharge, discipline, [or] tenure [. . .] on the basis of unlawful discrimination, citizenship status, or work authorization status.” 775 ILL. COMP. STAT. ANN. § 5/2-102(A).

127. In non-regulatory guidance jointly issued by the Department and the Attorney General, Defendants interpret the Employment Clause to prohibit employers from taking “adverse action against an employee for choosing to use or not use contraception, terminating an unplanned pregnancy, or seeking treatment

for fertility issues, and an employer may not require an employee to engage in any of the above to obtain or retain employment.” ILL. ATT’Y GEN. & ILL. DEP’T OF HUM. RTS., *Non-Regulatory Guidance* at 5 (March 2023), **attached as Exhibit 12**

(“Defendants’ Guidance”). Defendants say that prohibited adverse actions include (1) “[t]hreatening a pregnant employee with termination” related to a decision to “terminate their pregnancy,” and (2) “[d]ischarging a pregnant employee because they requested a reasonable accommodation” to attend “appointments.” *Id.* at 6.

128. PCC of Rockford violates the Employment Clause because it refuses to hire employees based on their decisions to obtain or facilitate an abortion. PCC of Rockford Employee Handbook, Ex. 3 at 6 (“referring, assisting in the procurement of, providing, or receiving an abortion . . . is cause for refusal to hire”); *id.* at 14 (same); PCC of Rockford Conduct Policy, Ex. 4 at 3 (same).

129. PCC of Rockford violates the Employment Clause because it conditions hiring upon employees signing an Employee Commitment form promising that they will refrain from “referring, assisting in the procurement of, providing, or receiving an abortion.” PCC of Rockford Conduct Policy, Ex. 4 at 4.

130. PCC of Rockford violates the Employment Clause because its policies subject employees to discipline—up to and including termination—based on their decisions to obtain or facilitate an abortion. PCC of Rockford Employee Handbook, Ex. 3 at 6 (“referring, assisting in the procurement of, providing, or receiving an abortion” is cause for “discipline up to and including termination”); *id.* at 14 (same); PCC of Rockford Conduct Policy, Ex. 4 at 3 (same).

131. PCC of Rockford violates the Employment Clause because its policies threaten employees with discipline, discharge, and termination if they obtain or facilitate an abortion. PCC of Rockford Employee Handbook, Ex. 3 at 6, 14; PCC of Rockford Conduct Policy, Ex. 4 at 3.

132. PCC of Rockford violates the Employment Clause because it imposes different requirements on individuals based on whether they have obtained or facilitated an abortion. Some of the most powerful pro-life advocates are those who repent from past reproductive decisions, but PCC of Rockford does not hire, retain, train, or apprentice any individual who has obtained or facilitated an abortion unless they complete an abortion recovery program, express repentance, and assure the PCC that the affiliation will not adversely affect its mission and message. PCC of Rockford does not impose these requirements on other employees. PCC of Rockford has imposed this requirement on volunteer apprentices covered by the Act. *See 775 ILL. COMP. STAT. ANN. § 5/2-101(A)(1)(b)* (defining “employee” to include an apprentice, an applicant for any apprenticeship, and unpaid interns).

133. PCC of Rockford violates the Employment Clause because it will only recruit applicants who have not—and will not—make an unrepentant decision to obtain or facilitate an abortion.

134. PCC of Rockford chills its speech and refrains from speaking because of the Employment Clause. In light of the Act’s purported prohibitions, PCC of Rockford wishes to immediately include the following statement in job postings for its current open positions: “Consistent with the Pregnancy Care Center of

Rockford's faith-based mission to promote life and avoid abortion, the Center cannot hire or retain individuals who obtain an abortion during their employment or who have obtained an abortion in the 5 years preceding their application for employment." But PCC of Rockford refrains from making this statement because the Employment Clause prohibits it from taking action in recruitment and hiring based on reproductive decisions.

135. The Diocese of Springfield violates the Employment Clause because it refuses to hire employees based on their decisions to obtain or facilitate an abortion.

136. The Diocese of Springfield violates the Employment Clause because its policies subject employees to discipline—up to and including termination—based on their decisions to obtain or facilitate an abortion. Springfield Standards of Conduct, Ex. 7 at 1 (“disciplinary action, up to and including termination” for employees failing to “conduct themselves in a moral and ethical manner consistent with Catholic principles”). *Id.* The Diocese of Springfield believes that a person violates this policy by espousing or participating in abortion, contraception, sterilization, or certain reproductive technologies that discard and destroy human life or that undermine the marital union, including IVF, ZIFT, ICSI, ovum donation, and surrogacy.

137. The Diocese of Springfield violates the Employment Clause because its policies threaten employees with discipline, discharge, and termination if they participate in reproductive decisions that violate their religious beliefs. *Id.*

138. The Diocese of Springfield violates the Employment Clause because it will only recruit applicants who have not—and will not—make an unrepentant decision to obtain or facilitate an abortion. The Diocese of Springfield encourages interviewers to ask whether applicants will “avoid actions and lifestyles that are contrary to the teachings and values of the Catholic Church,” noting that “living contrary to the teachings of the Catholic Church can be grounds for dismissal.” *See* Diocese of Springfield Interview Questions for Parishes & Ministries, **attached as Exhibit 13** at 1; Diocese of Springfield Interview Questions for Schools, **attached as Exhibit 14** at 1–2. These questions violate the Employment Clause because they are actions taken in recruitment and hiring that distinguish applicants based on reproductive decisions.

139. The Diocese of Springfield chills its speech and refrains from speaking because of the Employment Clause. To clarify its religious beliefs and policies in light of the New Bill, the Diocese of Springfield prepared the following statement for immediate publication on the job posting section of its website:

Every employee, whether employed by the Diocese, a parish within the diocese, or a Catholic School, shall act in an honest and forthright manner in all workplace concerns; treat co-workers, supervisors, volunteers, parishioners, students, and visitors with respect; and conduct themselves in a moral and ethical manner consistent with Catholic principles, including but not limited to the Church’s teaching on sexual ethics, human dignity, contraception, sterilization, abortion, and certain reproductive technologies that discard and destroy human life or that undermine marital union. Failure to adhere to these standards is grounds for discipline, up to and including termination.

140. But the Diocese of Springfield refrains from publishing this statement on its website—chilling and self-censoring its religious speech—because it

reasonably fears that the statement will invite investigations and complaints under the Act.

D. Plaintiffs violate the Act’s Offensive Speech Clause.

141. The Act’s Offensive Speech Clause provides that it is a civil rights violation for any employer to engage in “harassment,” which is defined to include “any unwelcome conduct on the basis of an individual’s actual or perceived [protected characteristics] that has the purpose or effect of [1] substantially interfering with the individual’s work performance or [2] creating an intimidating, hostile, or offensive working environment.” 775 ILL. COMP. STAT. ANN. §§ 5/2-102(A), 5/2-101(E-1).

142. Defendants’ Guidance states that the Act prohibits “harassment based on a person’s reproductive decisions, such as whether to use contraception, fertility treatments, or abortion care.” Ex. 12 at 3. “Either one extremely serious act of harassment, or a series of less severe acts, could be severe or pervasive enough to constitute actionable harassment.” *Id.* at 4. Defendants say that employers violate the law by using “[a]ddressing a pregnant employee with derogatory terms after learning the pregnant employee plans to have an abortion.” *Id.* at 6.

143. PCC of Rockford violates the Offensive Speech Clause by engaging in pervasive and severe speech and conduct to express its message that all life is sacred and that sex should be reserved for marriage.

144. PCC of Rockford’s expression is pervasive because it occurs daily and in many contexts, including counseling meetings, telephone calls with clients and

community members, educational presentations, internal leadership meetings, internal staff meetings, internal emails, internal conferences and retreats, on its website, and through digital and print media.

145. PCC of Rockford's expression is severe because it communicates a message that a person's decision to obtain or facilitate an abortion is immoral, sinful, unjustified, and is murder of a human life—terms that are generally considered unwelcome, offensive, hostile, or derogatory.

146. PCC of Rockford's Staff Nurse engages in expressive activity that violates the Act's Offensive Speech Clause through pervasive and severe communications with clients and internal stakeholders to advance the PCC of Rockford's pro-life message. PCC of Rockford Staff Nurse Position Description, Ex. 5 at 1–2; *see supra* ¶¶ 58–62.

147. PCC of Rockford's Receptionist engages in expressive activity that violates the Act's Offensive Speech Clause through pervasive and severe communications with clients and internal stakeholders to advance the PCC of Rockford's pro-life message. PCC of Rockford Receptionist Position Description, Ex. 6 at 1–2; *see supra* ¶¶ 63–65.

148. The Diocese of Springfield violates the Offensive Speech Clause by engaging in pervasive and severe speech and conduct to express its message that all life is sacred and that the marital act must be open to life.

149. The Diocese of Springfield's expression is pervasive because it occurs daily and in many contexts, including homilies, encouragement during confession,

spiritual counseling, marriage counseling, religious conferences and programs, Respect Life events, life marches, internal meetings and conversations among diocesan leadership, internal staff meetings, internal emails, internal conferences and retreats, on its website, and through digital and print media.

150. The Diocese of Springfield's expression is severe because it communicates a message that a person's objectionable reproductive decisions are mortally sinful, immoral, unreasonable, unjust, unloving, contrary to eternal salvation, and comparable to committing murder by hiring hitmen and contract killers—terms and comparisons that are generally considered unwelcome, offensive, hostile, or derogatory.

151. The Diocese of Springfield's Office of Marriage and Family Life violates the Offensive Speech Clause through its frequent statements that marriage and the conjugal act must be open to life, such that contraception, sterilization, abortion, and objectional reproductive treatments are sinful, immoral, and unjust.

152. The Diocese of Springfield's Office for Pro-Life Activities violates the Offensive Speech Clause through its frequent statements that abortion, contraception, sterilization, IVF, and other reproductive technologies are sinful, immoral, and unjust.

153. The Diocese of Springfield's Respect Life Advocate engages in expression that violates the Act's Offensive Speech Clause through pervasive and severe speech and conduct to express the message that all life is sacred and that the

marital act must be open to life. Diocese of Springfield Respect Life Advocate Position Description, Ex. 8 at 1–2; *see supra* ¶¶ 95–100.

154. The Diocese of Springfield’s Associate General Counsel also engages in expression that violates the Act’s Offensive Speech Clause through pervasive and severe speech and conduct to express the message that all life is sacred and that the marital act must be open to life. Diocese of Springfield Associate General Counsel Position Description, Ex. 9 at 1–2; *see supra* ¶¶ 101–04.

155. Both Plaintiffs address their pro-life message to their employees, and their employees are surrounded by pro-life expression toward external audiences.

E. Plaintiffs violate the Act’s Accommodation Clause.

156. The Act’s Accommodation Clause provides that it is a civil rights violation “for an employer to not make reasonable accommodations for any medical or common condition of a job applicant or employee related to pregnancy or childbirth, unless the employer can demonstrate that the accommodation would impose an undue hardship on the ordinary operation of the business of the employer.” 775 ILL. COMP. STAT. ANN. § 5/2-102(J)(1). In this context, “reasonable accommodations” include “time off to recover from conditions related to childbirth and leave necessitated by pregnancy, childbirth, or medical or common conditions resulting from pregnancy or childbirth.” *Id.* § 5/2-102(J).

157. Defendants’ Guidance provides that employers violate the Accommodation Clause by (1) “[d]enying a pregnant employee’s request to use time off for abortion care,” and (2) “denying a person a request for scheduled medical

time off when that person is seeking fertility treatments, while permitting those not seeking fertility treatments to take medical time off for a dental appointment.”

Defendants’ Guidance, Ex. 12 at 6–7.

158. Plaintiffs violate the Accommodation Clause because they do not—and will not—grant employee requests for accommodations related to reproductive decisions that violate their religious beliefs.

159. PCC of Rockford provides up to two weeks of paid medical leave in connection with pregnancy, childbirth, or any major medical condition, but consistent with its religious beliefs, it does not grant leave or other accommodations related to abortion. *See* PCC of Rockford Employee Handbook, Ex. 3 at 11–12.

160. The Diocese of Springfield also denies requests for accommodation—including time off—for employees to obtain an abortion, sterilization, contraception, or certain reproductive treatments that discard and destroy human life or that undermine the marital union, including IVF, ZIFT, ICSI, ovum donation, and surrogacy.

F. Plaintiffs violate the Act’s Benefit Clause.

161. The Act’s Benefit Clause provides that it is a civil rights violation for any employer “to act with respect to . . . terms, privileges or conditions of employment on the basis of unlawful discrimination.” 775 ILL. COMP. STAT. ANN. § 5/2-102(A).

162. Defendants’ Guidance provides that employers violate the Benefit Clause “[d]enying a pregnant employee’s request to use time off for abortion care,”

and (2) “denying a person a request for scheduled medical time off when that person is seeking fertility treatments, while permitting those not seeking fertility treatments to take medical time off for a dental appointment.” Defendants’ Guidance, Ex. 12 at 6–7.

163. Plaintiffs violate the Benefit Clause because they offer employees benefits in the form of time off from work, but they do not provide or allow time off related to objectionable reproductive decisions. *See supra ¶¶ 158–60.*

164. The Diocese of Springfield also violates the Benefit Clause because its employee health plans cover reproductive services that it condones, but the Diocese of Springfield does not—and will not—cover abortion, contraception, sterilization, or certain reproductive technologies that discard and destroy human life or that undermine the marital union, including IVF, ZIFT, ICSI, ovum donation, and surrogacy.

G. Plaintiffs violate the Act’s Notice Clause.

165. The Act’s Notice Clause provides that it is a civil rights violation for any employer to “[1] fail to post or keep posted in a conspicuous location on the premises of the employer where notices to employees are customarily posted, or [2] fail to include in any employee handbook information concerning an employee’s rights under this Article, a notice, to be prepared or approved by the Department, summarizing the requirements of this Article and information pertaining to the filing of a charge, including the right to be free from unlawful discrimination, the

right to be free from sexual harassment, and the right to certain reasonable accommodations.” 775 ILL. COMP. STAT. ANN. § 5/2-102(K)(1).

166. Defendants’ Guidance clarifies that employers must provide notice of the Act’s requirements in *both* workplace posters *and* employee handbooks. Defendants’ Guidance, Ex. 12 at 7.

167. Both Plaintiffs maintain employee handbooks.

168. Both Plaintiffs have workplaces where notices are customarily posted.

169. But Plaintiffs do not—and will not—broadcast or include the Act’s requirements about reproductive decisions in their employee handbooks or on workplace posters.

170. Plaintiffs believe that such a notice would communicate a lie that their employees may make objectionable reproductive decisions free from adverse action, without encountering pervasive and severe pro-life communication, and assisted by ministry benefits and accommodations.

171. Plaintiffs also believe that such a notice would communicate a lie that the Constitution and relevant laws require them to comply with the Act’s requirements about reproductive decisions.

III. Defendants refuse to accommodate Plaintiffs’ religious beliefs.

A. Defendants refuse to apply a statutory religious exclusion to religious employers.

172. Article 2 of the Act only applies to “employers,” which the Act broadly defines to include “[a]ny person employing one or more employees within Illinois

during 20 or more calendar weeks within the calendar year of or preceding [an] alleged violation.” 775 ILL. COMP. STAT. ANN. § 5/2-101(B)(1).

173. But the Act contains a statutory exclusion for religious organizations: “Employer’ *does not include* any place of worship, religious corporation, association, educational institution, society, or non-profit nursing institution . . . with respect to the employment of individuals of a particular religion to perform work connected with the carrying on by such place of worship, corporation, association, educational institution, society or non-profit nursing institution of its activities.” *Id.* § 5/2-101(B)(2) (emphasis added). As explained below, Defendants refuse to apply this exclusion to Plaintiffs.

174. The Act clarifies that “with respect to employers,” the word “religion” includes “all aspects of religious observance and practice, as well as belief . . .” *Id.* § 5/2-101(F).

175. Defendants should apply this religious exclusion to Plaintiffs’ conduct in matters of reproduction.

176. Defendants do not apply this religious exclusion to Plaintiffs’ conduct in matters of reproduction.

177. Plaintiffs are religious corporations and places of worship, and they wish to exercise their religion on reproductive matters “with respect to the employment of individuals of [their] particular religion” who “perform the work connected with carrying on” their religious organizations. *See id.* § 5/2-101(A)(2).

178. It is the exclusive prerogative of religious organizations like Plaintiffs—not of legislatures, courts, or executive officials like Defendants—to decide what is necessary or sufficient for an individual to be “of” their particular religion, to decide who is necessary or dispensable in “carrying on” its mission, or to decide what is necessary or sufficient to align with their religious observances, practices, and beliefs. *See e.g., Hernandez v. Comm'r*, 490 U.S. 680, 699 (1989) (“It is not within the judicial ken to question the centrality of particular beliefs or practices to a faith, or the validity of particular litigants’ interpretations of those creeds”).

179. Plaintiffs believe that individuals “of” their particular religion are those who respect and abide by their religious beliefs about reproductive matters.

180. Plaintiffs believe that the “carrying on” of their organizations includes employee speech and conduct to promote their beliefs about reproductive matters.

181. Nonetheless, Defendants do not apply the statutory exclusion to religious employers’ speech and conduct regarding reproductive matters.

182. Defendants narrowly interpret the statutory religious exclusion to only foreclose charges of discrimination based on religion when religious organizations limit positions to people who identify as adherents to the same denomination. For example, Attorney General Kwame Raoul joined an amicus brief to argue that Title VII’s identical statutory religious exemption allows religious organizations to give preference to coreligionists, but does not authorize religious organizations to discriminate against employees based on any other protected ground—like

reproductive decision-making—“even if such discrimination is consistent with (or mandated by) religious tenets” *See Brief of Amici Curiae Virginia, Illinois, et al., Our Lady of Guadalupe*, at 8, <https://perma.cc/FP8L-EKFR>.

183. Defendants’ narrow interpretation of the religious exemption ignores the plain text of the statute and substitutes *the government’s* conception of what is needed to be “of” a particular religion in place of religious organizations, showing suspicion and hostility toward religion.

B. Defendants reject requests for religious exemptions and confirm that they will enforce the Act against Plaintiffs.

184. Along with its refusal to apply the statutory religious exemption above, the State rejected multiple requests for religious exemptions and expressly stated its intention to apply the New Bill against religious organizations.

185. On March 26, 2024, Robert Gilligan, Executive Director of the Catholic Conference of Illinois, emailed Jason Rosenweig, the Department’s Director of Legislative Affairs and Policy, asserting that the First Amendment prohibits the government from applying the Act’s provisions about reproductive decisions to religious organizations’ faith-based speech, conduct, and exercise of religious autonomy. Email from Robert Gilligan to IDHR, **attached as Exhibit 15**.

186. In that email, the Catholic Conference urged that “to impose the reproductive health care decision claims on actual religious [organizations]” would mean “entering a ‘religious thicket,’ in the words of the *Milivojevich* case.” *Id.* (referencing *Serbian E. Orthodox Diocese for U. S. of Am. & Canada v. Milivojevich*, 426 U.S. 696, 719 (1976)). “The very process of trying to figure what is, and what is

not religious in sifting claims arising from that venue would violate the anti-entanglement provisions of the establishment clause (per *NLRB v. Catholic Bishop*) and/or interfere with our internal doctrinal speech in violation of the free exercise clause.” *Id.* (referencing *N.L.R.B. v. Cath. Bishop of Chicago*, 440 U.S. 490 (1979)).

187. To address these constitutional concerns, the Catholic Conference offered two recommendations to amend the New Bill. *Id.* The first would have clarified that the statutory exclusion to the definition of “employer” applies to the reproductive health decisions of any individuals employed to perform work connected with the carrying on of religious organizations. *Id.* The second would have added language to the “exemption” section of Article 2 of the Act, 775 ILL. COMP. STAT. ANN. § 5/2-104, to clarify that nothing in the Act would prohibit an employer that is an expressive association from considering the reproductive decisions of its employees or applicants. *Id.*

188. On March 29, 2024, the Department official responded in an email summarily rejecting all of the Catholic Conference’s recommendations. *Id.* The Department clarified that “[w]e think that the application of these protections, existing and new, to religious organizations has been and will continue to be appropriate . . .” *Id.* “[O]ur view is that the harms or concerns you expressed are not reasons to exempt religious organizations, with a principal reason being that religious organizations must already contend with the issues and scenarios you mentioned around gender identity and sexual orientation, which are already fully protected classes in the [Act] that do not carry exemptions like your proposals.” *Id.*

LEGAL ALLEGATIONS

189. Plaintiffs are subject to and must comply with the Act's requirements concerning reproductive decisions.

190. The Act's provisions concerning reproductive decisions violate Plaintiffs' constitutional rights, and chill and deter them from exercising their constitutional rights.

191. As a direct and proximate result of Defendants' violations of Plaintiffs' constitutional rights, Plaintiffs have suffered and will suffer ongoing irreparable harm, entitling them to declaratory and injunctive relief.

192. Plaintiffs do not have an adequate monetary or legal remedy for the loss of their constitutional rights.

193. Unless Defendants are enjoined, Plaintiffs will continue to suffer irreparable harm.

CLAIMS FOR RELIEF

COUNT I **First Amendment – Expressive Association** **(42 U.S.C. § 1983)**

194. Plaintiffs incorporate by reference paragraphs 1–193.

195. The First Amendment protects the freedom to associate.

196. The First Amendment also protects the right to *not* associate with those who negatively affect one's mission or message.

197. Plaintiffs engage in expressive activity when they associate with their employees, decline to associate with prospective employees, communicate and

interact with the public, provide counseling and other services, and advocate for their pro-life mission and message.

198. Because they wish to carry out their respective missions and spread their pro-life messages successfully, Plaintiffs hire and retain employees who avoid reproductive decisions that undermine their identity, mission, and message. For Plaintiffs, the credibility of their messengers is as important as the message.

199. The Act's Employment, Offensive Speech, and Notice Clauses severely burden Plaintiffs' freedom of expressive association by forcing them to form associations and assemblies with employees whose reproductive decisions undermine their mission and message, by denying them the right to organize their employees to promote their desired message, by restricting their ability to communicate that message to prospective and current employees, by restricting their ability to require prospective employees and employees to act consistent with their values, by restricting their ability to take adverse actions against prospective and current employees who do not share and speak and act consistent with their mission and message, by restricting their ability to effectively promote their mission and message, and by compelling them to alter their employee handbooks and other documents that describe objectionable reproductive decisions as gravely sinful.

200. The Act's Accommodation and Benefits Clauses also severely burden Plaintiffs' freedom of expressive association by forcing them to cooperate in and associate with activities through their provision of accommodations and benefits that violate their mission and message.

201. The Employment, Offensive Speech, Accommodation, Benefit, and Notice Clauses regulate expressive association based on content, viewpoint, and speaker identity.

202. By forcing Plaintiffs to hire and retain employees who make reproductive decisions that undermine their fundamental mission and message, the Act threatens and undermines the very mission of Plaintiffs' organizations.

203. The Act's requirements also chill Plaintiffs' intended speech and ability to immediately advertise and fill employment positions with individuals that abide by their organizations' beliefs.

204. The application of the Act to Plaintiffs does not advance any compelling governmental interest.

205. The Act is not narrowly tailored to advance any compelling governmental interest, and the Act is not the least restrictive means of achieving any such interest.

COUNT II
Violation of the First Amendment—Free Exercise Clause
(42 U.S.C. § 1983)

206. Plaintiffs incorporate by reference paragraphs 1–193.

207. The First Amendment provides that “Congress shall make no law . . . prohibiting the free exercise of religion.”

208. Plaintiffs exercise their religion in their provision of pro-life counseling, advocacy, material resources, medical services, and the communication of information about reproduction and marriage. Plaintiffs also exercise their

religion by employing individuals who share and live out their beliefs about reproduction and marriage.

209. The Act substantially burdens Plaintiffs' right to the free exercise of religion by prohibiting faith-based speech and conduct related to reproduction, interfering with their faith-based employment decisions, and forcing Plaintiffs to revise their statements of faith, positional statements, codes of conduct, employee handbooks, and other policy documents.

210. The Act also infringes on the hybrid of Plaintiffs' free exercise, free speech, expressive association, and assembly rights.

The Act is not neutral or generally applicable

211. The Act is not neutral and generally applicable for at least seven reasons.

212. *First*, while Plaintiffs must discharge the Act's obligations toward all of their employees, the Act exempts other employers from complying with the Act because their workers are carefully carved out of the definition of "employee."

213. The Act broadly defines "employee" to include "any individual performing services for remuneration within this State for an employer." 775 ILL. COMP. STAT. ANN. § 5/2-101(A)(1). But the Act's definition of "employee" contains special exclusions for some workers. "Employee" does not include: (1) individuals "employed by persons who are not 'employers' as defined by this Act"; (2) elected public officials or the members of their immediate personal staffs; (3) principal administrative officers of the State or of any political subdivision, municipal

corporation or other governmental unit or agency; and (4) a person in a vocational rehabilitation facility certified under federal law who has been designated an evaluatee, trainee, or work activity client. *Id.*

214. Thus, the State allows exceptions to the Act's application by excluding certain workers from the definition of "employee," yet the State refuses to extend a similar exclusion for Plaintiffs.

215. *Second*, the Act contains dozens of special exemptions that limit the Act's application, appearing in multiple statutes appropriately titled, "exemptions." 775 ILL. COMP. STAT. ANN. § 5/2-104 ("exemptions" for employment); *id.* § 5/3-106 ("exemptions" for real estate); *id.* § 5/4-104 ("exemptions" for financial credit); *id.* § 5/5-103 ("exemption" for public accommodations).

216. The "exemptions" statute in Article 2 (employment) includes at least 14 exemptions, providing that "[n]othing contained in this Act shall prohibit an employer, employment agency, or labor organization from" hiring or selecting between persons for bona fide occupational qualifications (BFOQ), refusing to hire or retain firefighters/paramedics based on age, refusing to hire or retain employees based on ability tests, giving preferential treatment to veterans, and considering unfavorable military discharge. 775 ILL. COMP. STAT. ANN. § 5/2-104(A).

217. The "exemptions" statute in Article 2 (employment) also provides a complete exemption to the application of the Act for all employees who were subject to a collective bargaining agreement before the Act's enactment. *Id.* § 5/2-104(B).

218. The “exemptions” statute in Article 2 (employment) also allows employers to adopt and enforce policies to prohibit the use of drugs or alcohol in the workplace, yet the Act forbids Plaintiffs from adopting and enforcing policies prohibiting the use of abortion drugs and procedures tantamount to murder under their religious beliefs. *Id.* § 5/2-104(C)(3).

219. The “exemptions” statute in Article 2 (employment) also provides an exemption from employers’ obligation to make accommodations or modifications—including leave, scheduling, and attendance—to reasonable workplace rules or policies for an employee based on “family responsibilities.” *Id.* § 5/2-104(E).

220. The “exemptions” statute in Article 3 (real estate) includes at least 14 exemptions, providing that “[n]othing contained in [the statute listing civil rights violations in real estate] shall prohibit” restricting the rental of rooms to persons of one sex, refusal to rent owner-occupied property based on a person’s sexual orientation, refusal to sell or rent property by using arrest records and immigration status, refusal to sell or rent property based on child sex offender status, private sales of single-family homes, rental of small owner-occupied apartments, rental of rooms in owner-occupied homes, and religious organizations’ sale of property to coreligionists, among others. 775 ILL. COMP. STAT. ANN. § 5/3-106.

221. The “exemptions” statute in Article 4 (financial credit) includes three wholesale exemptions, providing that “nothing contained in this Article shall prohibit” financial institutions from (1) considering sound underwriting practices, including discretionary determination of “the willingness and the financial ability of

the borrower to repay the loan”; (2) determining credit-worthiness by asking about age, immigration status, or “any additional information” and using credit systems to determine credit-worthiness; and (3) denying credit under credit assistance programs. *See 775 ILL. COMP. STAT. ANN. § 5/4-104.*

222. The “exemption” statute in Article 5 (public accommodations) includes three wholesale exemptions, providing that “nothing in this Article shall apply to” (1) private clubs; (2) distinctly private facilities (as to discrimination based on sex); and (3) inns, hotels, and rooming houses (as to discrimination based on sex). *See 775 ILL. COMP. STAT. ANN. § 5/5-103.*

223. For public accommodations—but not for employers—the Act exempts the expression of religious views. “With respect to a place of public accommodation defined in paragraph (11) of Section 5-101, the exercise of free speech, free expression, free exercise of religion or expression of religiously based views by any individual or group of individuals that is protected under the First Amendment to the United States Constitution or under Section 3 of Article I, or Section 4 of Article I, of the Illinois Constitution, shall not be a civil rights violation.” 775 ILL. COMP. STAT. ANN. § 5/5-102.1(b).

224. Thus, the Act contains dozens of special exemptions, but the State refuses to grant a religious exemption to Plaintiffs.

225. *Third*, the Act is not neutral and generally applicable because it involves a system of individualized assessments on whether an employer’s conduct constitutes “harassment.” Defendants must make individualized, discretionary, and

subjective assessments on whether each employer's speech and conduct related to reproductive decisions are "unwelcome" and whether they give rise to an "intimidating, hostile, or offensive" working environment. 775 ILL. COMP. STAT. ANN. § 5/2-101(E-1). The Act does not define these terms and Defendants exercise unbridled discretion in deciding whether Plaintiffs violate the Act.

226. *Fourth*, the Act is not neutral and generally applicable because it involves a system of individualized assessments on whether an employer's hiring qualification—here, avoiding objectionable (and unrepentant) reproductive decisions—is a "bona fide occupational qualification" (BFOQ) exempt from the Act. As explained above, Plaintiffs believe that their missions depend upon only hiring and retaining employees who avoid objectionable reproductive decisions, but the BFOQ exemption "is a narrow one," and "is available only when the employer can show that no one in the excluded class is capable of performing the duties essential to the job." *River Bend Cmt. Unit Sch. Dist. No. 2 v. Hum. Rts. Comm'n*, 232 Ill. App. 3d 838, 844 (1992). Defendants have unbridled discretion to determine whether avoiding objectionable reproductive decisions is religious or "essential" enough to Plaintiffs' work, a determination which itself intrudes on Plaintiffs' religious autonomy.

227. *Fifth*, the legislative history of the New Bill reveals the targeting of pro-life groups and hostility toward religious organizations that are guided by religious beliefs but are not formally "affiliated" with a particular denomination.

228. *Sixth*, the application of the Act to Plaintiffs shows religious hostility because Defendants could—but don’t—apply a readily available statutory religious exemption to Plaintiffs’ employment conduct. As explained above, the Act does not apply to religious organizations “with respect to the employment of individuals of a particular religion to perform work connected with the carrying on . . . its activities.” 775 ILL. COMP. STAT. ANN. § 5/2-101(B)(2). The Act clarifies that “with respect to employers,” the word “religion” includes “all aspects of religious observance and practice, as well as belief . . .” 775 ILL. COMP. STAT. ANN. § 5/2-101(F). Plaintiffs satisfy the plain language of this exemption, and Defendants show religious hostility and skepticism by refusing to apply it to Plaintiffs’ religious speech and conduct about reproduction.

229. *Seventh*, Defendants showed religious hostility toward religion when they rejected multiple requests for religious exemptions from the Catholic Conference of Illinois, which represents the Diocese of Springfield. As explained above, in March 2024, the Catholic Conference of Illinois requested exemptions to avoid violation of Plaintiffs’ constitutional rights. *See Email from Robert Gilligan, Ex. 15.* The Department rejected the requests without even addressing the constitutional concerns, stating that “the harms or concerns you expressed are not reasons to exempt religious organizations” because the Department already imposes *even more* regulations without exemptions governing religious employers’ conduct related to gender identity and sexual orientation. *Id.* Thus, Defendants also evinced religious hostility by ignoring Plaintiffs’ constitutional concerns and refusing a

religious exemption simply because the State has already heaped burdens upon Plaintiffs' religious exercise.

230. In sum, the Act is not neutral and generally applicable because it allows exemptions and more favorable treatment to similar secular conduct, involves mechanisms for individualized assessments, and reflects religious hostility.

231. The Act thus triggers strict scrutiny, but the Act is not narrowly tailored to advancing a compelling governmental interest.²

COUNT III
Violation of the First Amendment—Religion Clauses
Religious Autonomy, Ministerial Exception, Co-religionist Doctrine
(42 U.S.C. § 1983)

232. Plaintiff incorporates by reference paragraphs 1–193.

233. The Religion Clauses of the First Amendment protect the right of religious institutions “to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine.” *Kedroff v. St. Nicholas Cathedral of Russian Orthodox Church in N. Am.*, 344 U.S. 94, 116 (1952).

234. The religious autonomy doctrine (or “church autonomy” doctrine) ensures that religious organizations retain “independence in matters of faith and doctrine and in closely linked matters of internal government.” *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 591 U.S. 732, 747 (2020).

² In the alternative, this case demonstrates that *Smith* should be overruled because its test “provides no protection” from laws that have “a devastating effect on religious freedom” *Fulton v. City of Philadelphia, Pennsylvania*, 593 U.S. 522, 545 (2021) (Alito, J., joined by Thomas & Gorsuch, JJ., concurring). Plaintiffs preserve this argument for appeal.

235. This right to religious (or “church”) autonomy safeguards a religious organization’s decision about which officers, board members, employees, and volunteers are best suited to advance its religious mission and purpose.

236. This freedom extends to Plaintiffs’ ability to hire and employ only those who believe—and live out—the beliefs of their organizations about reproductive health decisions such as abortion, sterilization, and contraception.

237. The ministerial exception is one component of this autonomy and “ensures that the authority to select and control who will minister to the faithful . . . is the church’s alone.” *Hosanna-Tabor Evangelical Lutheran Church and School v. EEOC*, 565 U.S. 171, 194–95 (2012).

238. The ministerial exception forbids the government from interfering with Plaintiffs’ employment decisions about its “ministerial” employees.

239. Defendants cannot second-guess Plaintiffs’ decisions about its ministerial employees (whatever the reason), nor can they penalize Plaintiffs for those decisions. *See Our Lady of Guadalupe*, 140 S. Ct. at 2060.

240. Many of Plaintiffs’ employees qualify as “ministerial” employees under Supreme Court precedent because they must counsel pregnant women and their families, and they must teach others—through word and deed—about Christian doctrines, including teachings about reproduction. In other words, they are ministerial employees because they are responsible for “transmitting the [Christian] faith” to others. *Our Lady of Guadalupe*, 140 S. Ct. at 2063 (quoting *Hosanna-Tabor*, 565 U.S. at 192).

241. For those employees of Plaintiffs who do not qualify as “ministerial” employees, the First Amendment still protects Plaintiffs’ ability to require adherence to religious teachings and standards of conduct on reproduction because doing so is rooted in the ministry’s religious beliefs and practices. *See, e.g., Bryce v. Episcopal Church in the Diocese of Colo.*, 289 F.3d 648, 660 (10th Cir. 2002) (religious institution has right to make “personnel decision[s] based on religious doctrine” even when the decision does not involve a ministerial employee).

242. Plaintiffs have determined that they must hire and retain individuals who do not undermine their mission and message through objectionable reproductive decisions.

243. The Act interferes with Plaintiffs’ religious autonomy by preventing them from only hiring and retaining employees who abide by their religious beliefs.

244. The Act interferes with Plaintiffs’ religious autonomy by preventing them from enforcing their statements of faith, standards of conduct, and other policies consistent with their religious beliefs.

245. The Act interferes with Plaintiffs’ religious autonomy to separate themselves from individuals who commit acts that they believe to be immoral, which causes scandal and fatally undermines their mission and message.

246. The Act interferes with Plaintiffs’ religious autonomy to decide the extent to which prospective and current employees must adhere to religious beliefs.

247. The Act interferes with Plaintiffs' religious autonomy to decide what messages to foster in the workplace—and how pervasively and severely—by subjecting such speech and conduct to charges of “harassment.”

248. The Act interferes with Plaintiffs' religious autonomy to decide whether to grant or deny requests for accommodations consistent with their religious beliefs.

249. The Act interferes with Plaintiffs' religious autonomy to decide whether to provide or withhold employment benefits—like coverage for abortion—consistent with their religious beliefs.

250. The Act interferes with Plaintiffs' religious autonomy by forcing Plaintiffs to speak the government's message by requiring them to broadcast the Act's requirements on reproductive health decisions in their employee handbooks.

251. The Act interferes with the Plaintiffs' religious autonomy to proclaim and advocate for many integrated teachings, of which Christian teachings about reproduction are one indispensable part.

252. The Act imposes severe coercive pressure on Plaintiffs—including state enforcement actions and crippling private lawsuits—to change how they order and manage their internal affairs.

253. As applied to Plaintiffs, the Act violates the right to religious autonomy, the ministerial exception, and the co-religionist doctrine.

254. The Act does not advance any compelling governmental interest.

255. The Act is not narrowly tailored to advance any compelling governmental interest, and the law is not the least restrictive means of achieving any such interest.

COUNT IV

**Violation of the First Amendment—Free Speech Clause
Chilled Speech; Compelled Speech; Content and Viewpoint Restrictions
(42 U.S.C. § 1983)**

256. Plaintiffs incorporate by reference paragraphs 1–193.

257. The First Amendment provides that “Congress shall make no law . . . abridging the freedom of speech.”

258. The Act, as amended by the New Bill, unconstitutionally restricts Plaintiffs’ right to free speech because it forbids them from maintaining and communicating employment standards of conduct according to their organizational beliefs about reproduction.

259. The Act also restricts Plaintiffs’ right to free speech because it compels them to speak a message contrary to their beliefs not only to their current employees but also to prospective employees and the public in general.

260. The speech prohibitions in the Act require Plaintiffs to limit and censor their constitutionally guaranteed speech about the impropriety of abortion and other reproductive decisions.

261. In addition, the Act unconstitutionally compels Plaintiffs’ speech by requiring them to broadcast “information concerning an employee’s rights under [the Act]” in their employee handbooks and in a conspicuously placed poster on in Plaintiffs’ workplaces. 775 ILL. COMP. STAT. ANN. § 5/2-102(K)(1).

262. To clarify their religious beliefs and employee requirements under the Act's recent amendment, Plaintiffs have prepared statement for publication in their job postings and on their websites, clarifying that applicants and employees must adhere to their religious beliefs about reproductive decisions.

263. Plaintiffs have refrained from publishing these statements explaining their religious requirements because Plaintiffs fear invasive investigations and charges of discrimination under the Act.

264. By requiring this speech in Plaintiffs' employee handbooks and workspaces, the Act unconstitutionally compels Plaintiffs to encourage their employees to use the statute.

265. Plaintiffs have employee handbooks that articulate employee requirements.

266. Plaintiffs wish to include a statement in their employee handbooks and job postings that all employees must agree to adhere to their religious beliefs on reproductive choices, but they refrain from including these statements due to fear of investigation and charges under the Act.

267. Plaintiffs refuse to broadcast the Act's purported requirements about reproductive decisions in their employee handbooks, workplace posters, or otherwise.

268. The Act is also a content-based regulation of speech because its application is based on the topic discussed or the idea or message expressed—here, the reproductive decisions of employees.

269. The Act is also a content-based regulation of speech because it alters the speech and message that Plaintiffs would otherwise engage in.

270. The Act also unconstitutionally discriminates against Plaintiffs' speech based on their viewpoint because it permits speech communicating the idea that reproductive choices should have nothing to do with employment, while it prohibits speech communicating the idea that employees must personally abide by pro-life codes of conduct to be employed by pro-life organizations.

271. The Act triggers strict scrutiny because it chills speech, compels speech, and restricts speech based on content and viewpoint.

272. The Act fails strict scrutiny because it is not narrowly tailored to advance any compelling governmental interest.

COUNT V
Violation of the Fourteenth Amendment
Equal Protection Clause
(42 U.S.C. § 1983)

273. Plaintiffs incorporate by reference paragraphs 1–193.

274. The Equal Protection Clause of the Fourteenth Amendment protects against invidious discrimination.

275. Plaintiffs are similarly situated to secular employers whose employment relationships are exempt from the application of the Act.

276. Defendants have treated other employers more favorably than Plaintiffs.

277. The Act provides many exemptions to its application for favored secular employers and employment arrangements.

278. Defendants summarily rejected multiple requests for religious exemptions to the Act's provisions about reproductive decisions.

279. Defendants refuse to apply a readily available statutory religious exemption to Plaintiffs' faith-based employment speech and conduct related to reproductive decisions.

280. Because Defendants' disparate treatment of Plaintiffs infringes on Plaintiffs' First Amendment rights, discriminatory intent is presumed.

281. Defendants' application of the Act's provisions about reproductive decisions to Plaintiffs' religious speech and conduct violates the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.

PRAYER FOR RELIEF

Plaintiffs respectfully ask this Court to enter judgment against Defendants and provide the following relief:

A. A preliminary and permanent injunction to stop Defendants and any person acting in concert with them from investigating or otherwise enforcing the Act against Plaintiffs in connection with Plaintiffs' speech and conduct related to reproductive decisions;

B. A declaration that the application of the Act to Plaintiffs' speech and conduct related to reproductive decisions, violates the First and Fourteenth Amendments.

C. Retain jurisdiction of this matter for the purpose of enforcing its orders;

D. Award Plaintiffs' costs and expenses in this action, including reasonable attorneys' fees, in accordance with 42 U.S.C. § 1988;

E. Award any other relief this Court deems equitable, just, and proper.

Dated: March 20, 2025

s/ David A. Cortman

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Attorneys for Plaintiffs
**Pro Hac Vice Application Pending*

VERIFICATION OF COMPLAINT

I, Nicole Tibbetts, a citizen of the United States and a resident of Illinois, declare under penalty of perjury under 28 U.S.C. § 1746 that I have read the foregoing Verified Complaint and the factual allegations in it, and the facts as alleged as to Plaintiff The Pregnancy Care Center of Rockford are true and correct.

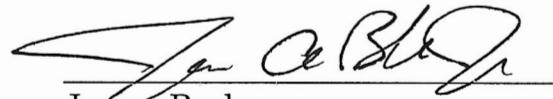
Executed on March 18, 2025, in Rockford, Illinois.


Nicole Tibbetts
Executive Director

VERIFICATION OF COMPLAINT

I, James Bock, a citizen of the United States and a resident of Illinois, declare under penalty of perjury under 28 U.S.C. § 1746 that I have read the foregoing Verified Complaint and the factual allegations in it, and the facts as alleged as to Plaintiff The Diocese of Springfield in Illinois are true and correct.

Executed on March 17, 2025, in Springfield, Illinois.



James Bock
Chancellor and General Counsel

EXHIBIT 1

FORM NFP 110.30 (rev. Dec. 2003)
ARTICLES OF AMENDMENT
General Not For Profit Corporation Act

Secretary of State
Department of Business Services
501 S. Second St., Rm. 350
Springfield, IL 62756
217-782-1832
www.ilsos.gov

Remit payment in the form of a
check or money order payable
to Secretary of State.

FILED

JAN 13 2025

ALEXI GIANNOULIAS
SECRETARY OF STATE

File # **5288-776-3**

Filing Fee: \$25 Approved: 

----- Submit in duplicate ----- Type or Print clearly in black ink ----- Do not write above this line -----

1. Corporate Name (See Note 1 on back.): **ROCKFORD AREA PREGNANCY CARE CENTER**

2. Manner of Adoption of Amendment:

The following amendment to the Articles of Incorporation was adopted on January 3, 2025, in the manner indicated below (check one only):

By affirmative vote of a majority of the directors in office, at a meeting of the board of directors, in accordance with Section 110.15. (See Note 2 on back.)

By written consent, signed by all the directors in office, in compliance with Sections 110.15 and 108.45. (See Note 3 on back.)

By members at a meeting of members entitled to vote by the affirmative vote of the members having not less than the minimum number of votes necessary to adopt such amendment, as provided by this Act, the Articles of Incorporation or the bylaws, in accordance with Section 110.20. (See Note 4 on back.)

By written consent signed by members entitled to vote having not less than the minimum number of votes necessary to adopt such amendment, as provided by this Act, the Articles of Incorporation, or the bylaws, in compliance with Sections 107.10 and 110.20. (See Note 5 on back.)

3. Text of Amendment:

(a.) When an amendment affects a name change, insert the new corporate name below. Use 3(b.) below for all other amendments. *Article 1: The Name of the Corporation is:

The Pregnancy Care Center of Rockford 

New Name

(b.) All amendments other than name change.

If the amendment affects the corporate purpose, the amended purpose is required to be set forth in its entirety. If there is not sufficient space to add the full text of the amendment, attach additional sheets of this size.

See Attached Pages 2-3.

4. The undersigned Corporation has caused these Articles to be signed by a duly authorized officer who affirms, under penalties of perjury, that the facts stated herein are true and correct.

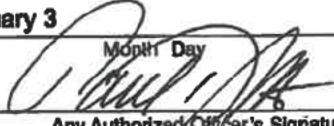
All signatures must be in BLACK INK.

Dated January 3 , 2025 **ROCKFORD AREA PREGNANCY CARE CENTER**

Month Day

Year

Exact Name of Corporation


Any Authorized Officer's Signature

Paul Loner, President

Name and Title (type or print)

5. If there are no duly authorized officers, the persons designated under Section 101.10(b)(2) must sign below and print name and title.

The undersigned affirms, under penalties of perjury, that the facts stated herein are true.

Dated _____
Month Day Year

Signature

Name and Title (print)

NOTES

1. State the true and exact corporate name as it appears on the records of the Secretary of State BEFORE any amendment herein is reported.
2. Directors may adopt amendments without member approval only when the corporation has no members, or no members entitled to vote pursuant to §110.15.
3. Director approval may be:
 - a. by vote at a director's meeting (either annual or special), or
 - b. by consent, in writing, without a meeting.
4. All amendments not adopted under Sec. 110.15 require that:
 - a. the board of directors adopt a resolution setting forth the proposed amendment, and
 - b. the members approve the amendment.

Member approval may be:

- a. by vote at a members meeting (either annual or special), or
- b. by consent, in writing, without a meeting.

To be adopted, the amendment must receive the affirmative vote or consent of the holders of at least two-thirds of the outstanding members entitled to vote on the amendment (but if class voting applies, also at least a two-thirds vote within each class is required).

The Articles of Incorporation may supersede the two-thirds vote requirement by specifying any smaller or larger vote requirement not less than a majority of the outstanding votes of such members entitled to vote, and not less than a majority within each class when class voting applies. (Sec. 110.20)

5. When member approval is by written consent, all members must be given notice of the proposed amendment at least five days before the consent is signed. If the amendment is adopted, members who have not signed the consent must be promptly notified of the passage of the amendment. (Sec. 107.10 & 110.20)

FORM NFP 110.30
ARTICLES OF AMENDMENT
General Not for Profit Corporation Act

January 3, 2025

ROCKFORD AREA PREGNANCY CARE CENTER
Now known as THE PREGNANCY CARE CENTER OF ROCKFORD

Illinois Secretary of State File No. 5288-776-3

ARTICLES OF AMENDMENT
SECTION 3(b):

Section 5 of the Articles of Incorporation, namely "The purpose or purposes for which the corporation is organized," is amended by striking the same and replacing it with the following:

In the name of Jesus Christ, to restore hope, offer emotional and spiritual healing, and empower people to make informed pregnancy related choices that value the sanctity of human life. To share by word and deed the Gospel of Jesus Christ with all who seek our services. To offer pregnancy tests, ultrasound exams, care, education and material assistance. To offer sexual risk avoidance programs, including abstinence-based presentations to school and youth groups. To render all services free of charge.

The Corporation is organized exclusively for charitable, religious, educational, and scientific purposes within the meaning of section 501(c)(3) of the Internal Revenue Code of 1954 and the Illinois Not For Profit Corporation Act of 1986, 805 ILCS 105, *et seq.*

The property of the Corporation is irrevocably dedicated to non-profit purposes. No part of the net earnings or assets of the Corporation shall inure to the benefit of, or be distributed to its Directors, Trustees, Officers or other persons involving themselves with the Corporation, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the Corporation.

No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in, or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office.

Upon dissolution of the Corporation, assets shall be distributed for one or more exempt charitable, religious, educational, or scientific purposes within the meaning of section 501(c) (3) of the Internal Revenue Code, or the corresponding section of any future federal tax code. Any such assets not disposed of shall be disposed by a Court of Competent Jurisdiction of the county in which the principal office of the Corporation is then located, exclusively for such purposes or to such organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

EXHIBIT 2

BYLAWS
of
THE PREGNANCY CARE CENTER OF ROCKFORD

Article 1: Name

The name of the Corporation shall be The Pregnancy Care Center of Rockford.

Article 2: Offices

The registered office and the registered agent at such office for the transaction of the activities and affairs of the Corporation shall be located at 4108 Morsay Drive in the City of Rockford, County of Winnebago, and State of Illinois. The Board of Directors by resolution may change the principal office from one location to another. Also, the Corporation may, as deemed necessary and proper, have other offices at such places as the Board of Directors may from time to time determine.

Article 3: Members

The Corporation shall have no members or membership requirements as such. Individuals may involve themselves with the Corporation for the purpose of furthering the objectives of the Corporation.

Article 4: Purposes and Limitations

A) GENERAL PURPOSES: The Corporation is organized exclusively for charitable, religious, educational, and scientific purposes within the meaning of section 501(c)(3) of the Internal Revenue Code of 1954 and the Illinois Not For Profit Corporation Act of 1986, 805 ILCS 105 et seq.

B) SPECIFIC PURPOSES: The Pregnancy Care Center of Rockford is committed, in the name of Jesus Christ, to restore hope, offer emotional and spiritual healing, and empower people to make informed pregnancy related choices that value the sanctity of human life. We are also committed to sharing by word and deed the Gospel of Jesus Christ with all who seek our services. We offer pregnancy tests, ultrasound exams, care, education and material assistance. Additionally, our sexual risk avoidance programs offer abstinence-based presentations to school and youth groups. All services offered are provided free of charge.

C) LIMITATION ON PRIVATE INUREMENT: The property of the Corporation is irrevocably dedicated to non-profit purposes. No part of the net earnings or assets of the Corporation shall inure to the benefit of, or be distributed to its Directors, Trustees, Officers or other persons involving themselves with the Corporation, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the Corporation.

D) LIMITATION ON POLITICAL ACTIVITIES: No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in, or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office.

E) LIMITATION UPON DISSOLUTION: Upon dissolution of the Corporation, assets shall be distributed for one or more exempt charitable, religious, educational, or scientific purposes within the meaning of section 501(c) (3) of the Internal Revenue Code, or the corresponding section of any future federal tax code. Any such assets not disposed of shall be disposed by a Court of Competent Jurisdiction of the county in which the principal office of the Corporation is then located, exclusively for such purposes or to such organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

F) OTHER LIMITATIONS: Notwithstanding any other provision of these bylaws, the Corporation shall not carry on any activities not permitted to be carried on (a) by a Corporation exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future tax code, or (b) by a Corporation, contributions to which are deductible under section 170(c)(2) of the Internal Revenue Code, or the corresponding section of any future federal tax code.

Article 5: Statements of Position

STATEMENT OF FAITH: We believe in God the Father Almighty, Maker of heaven and earth. And in Jesus Christ, His only Son, our Lord who was conceived by the Holy Ghost, born of the Virgin Mary, suffered under Pontius Pilate, was crucified, dead, and buried. He descended into hell. The third day He rose again from the dead. He ascended into heaven and sits at the right hand of God the Father Almighty. From thence He shall come to judge the living and the dead. We believe in the Holy Spirit, the holy Christian Church, the communion of saints, the forgiveness of sins, the resurrection of the body, and the life everlasting.

STATEMENT ON MARRIAGE, GENDER AND SEXUALITY: We believe that God wonderfully and immutably creates each person male or female. These two distinct, complementary genders together reflect the image and nature of God (Genesis 1:26-27). Rejection of one's biological sex is a rejection of the image of God within that person. We believe that the term "marriage" has only one meaning; the uniting of one man and one woman in a lifelong, exclusive union, as delineated in Scripture (Genesis 2:18-25, Mark 10:6-9, Ephesians 5:22-23). We believe that God intends sexual intimacy to occur only between a man and a woman who are married to each other (1 Corinthians 6:18, 7:2-5, Hebrews 13:4). We believe that God has commanded that no intimate sexual activity be engaged in outside of marriage between a man and woman (Exodus 20:14). We believe that any form of sexual immorality (including but not limited to adultery, fornication, homosexual behavior, bisexual conduct, pornography, or any attempt to change one's gender) is sinful and offensive to God (Matthew 15:18-20, 1 Corinthians 6:9-11, Galatians 5:19-21). We believe that in order to preserve the function and integrity of our organization, and to provide a biblical role model to the clients we serve and members of the community,

it is imperative that all persons employed by the organization in any capacity, or who serve as volunteers agree to and abide by this Statement on Marriage, Gender and Sexuality and conduct themselves accordingly (Matthew 5:16, Philippians 2:14-16, 1 Thessalonians 5:22). We believe that God offers redemption and restoration to all who confess and forsake their sin, seeking His mercy and forgiveness through Jesus Christ (Acts 3:19-21, Romans 10:9-10, 1 Corinthians 6:9-11). In the spirit of Christ, every person deserves to be treated with compassion, love, kindness, respect and dignity (Mark 12:28-31, Luke 6:31). Hateful and harassing behavior or attitudes directed toward any individual are inconsistent with the Gospel of Christ and should be repudiated, as they are not in accord with the mission of this organization.

STATEMENT ON THE SANCTITY OF HUMAN LIFE: We believe that all human life is sacred and created by God in His image (Genesis 1:27). Human life is of inestimable worth in all its dimensions, including pre-born babies, the aged, the physically or mentally challenged, and every other state or condition from conception to natural death. We are therefore called to defend, protect, and value all human life (Psalm 139). We believe and affirm that life begins at conception, at which time the full genetic blueprint for life is in place. Accordingly, we believe that our expression of love and service to God requires that we work to protect and honor life in all stages of creation. As well, we believe and affirm that God's calling upon us commands that we make special efforts to protect the most vulnerable among us. As such, we view life from conception through birth to be uniquely vulnerable, and therefore work to protect and defend life in these early stages. We do not recommend, provide, or refer for abortion or abortifacient contraceptive medications. We believe that in order to preserve the function and integrity of our organization, and to provide a biblical role model to the clients we serve and members of the community, it is imperative that all persons employed by the organization in any capacity, or who serve as volunteers, agree to and abide by this statement on the Sanctity of Human Life.

STATEMENT OF FINAL AUTHORITY FOR MATTERS OF FAITH AND CONDUCT: The statements in this article do not exhaust the extent of our beliefs. For the purpose of this organization's faith, doctrine, practice, policy and discipline, our Executive Director and Board of Directors is the organization's final interpretive authority on the meaning and application of our faith.

Article 6: Board of Directors

A) GENERAL POWERS: The business and affairs of the Corporation shall be managed and controlled by the Board of Directors. The Board shall have the power to elect, appoint, or employ such Officers, Agents, and other Representatives, as it may deem necessary or prudent to carry out the purposes of the Corporation.

B) NUMBER AND CLASSES OF DIRECTORS: The Corporation shall have one class of Directors. The Board of Directors shall consist of at least five but no more than twelve Directors until changed by amendment to these bylaws. The exact number of Directors shall be fixed, within those limits, by resolution adopted by the Board of Directors from time to time, but no decrease shall have the effect of shortening the term of an incumbent Director.

C) QUALIFICATIONS OF DIRECTORS: Each member of the Board of Directors shall be at least 21 years of age and shall exhibit characteristics of a God-fearing Christian who affirms his or her full agreement with the corporation's Statements of Position as articulated in Article V.

D) ELECTION AND TERM OF OFFICE: Each Director shall be elected by a two-thirds majority vote of the Board of Directors at a regular meeting of the Corporation. No Director can serve for more than two (2) consecutive terms. Each term shall be three (3) years. At the expiration of the first term, the Director may be elected for a second term. After serving two terms, a person is not eligible for service on the Board of Directors for one (1) year but may reapply after a period of one (1) year.

E) REMOVAL: At any meeting of the Board of Directors called for such purpose, any Director may, by a vote of two-thirds of the other Directors, be removed from office with or without cause. Good cause will exist for removing any Director who is habitually absent from meetings or violates, in word or deed, the Statements of Position as articulated in Article V.

F) VACANCIES: Any vacancy on the Board of Directors may be filled by a two-thirds vote of the remaining Directors. A Director elected to fill a vacancy shall be considered to be starting a new term. Any Director elected or appointed to the term of a vacant Director's seat shall serve the remaining term of that Director whose seat is vacant. Said Director may then be elected to a full term of his own.

G) COMPENSATION: No member of the Board of Directors shall receive any compensation for their services rendered to the Corporation. However, by resolution of the Board of Directors, expenses incurred in attending seminars or meetings other than Board meetings may be allowed reimbursement for their expenses actually and reasonably incurred on behalf of the Corporation.

H) ANNUAL MEETING: Unless otherwise provided by resolution of the Board of Directors, an annual meeting of the Board of Directors shall be held each year at such time and place as the Board of Directors may determine for the purpose of strategic planning and review of all legal documents.

I) REGULAR MEETINGS: The Board of Directors shall hold at least four regular meetings per year.

J) SPECIAL MEETINGS: Special meetings of the Board of Directors may be called by the President or at the request of a quorum of the Board of Directors.

K) NOTICE OF MEETINGS: Notice of all regular or special meetings of the Board of Directors shall be delivered at least five days prior to the scheduled meeting by written, electronic or telephonic means. The notice shall specify the date, time, and place of the meeting together with any special matters to be addressed. Any Director may waive notice of any meeting. The attendance of a Director at a meeting shall constitute a waiver of notice unless the Director appears for the sole purpose of objecting to the manner in which the meeting has been called.

L) QUORUM: A majority of the Directors then holding office shall constitute a quorum for transacting any business at any meeting of the Board of Directors, provided that if less than a majority of the Directors are present at said meeting, a majority of the Directors present may adjourn the meeting to another time without further notice.

M) MANNER OF ACTING: The act of a majority of the Board of Directors present at a meeting at which a quorum is present shall be the act of the Board of Directors, except as may otherwise be provided in these Bylaws.

N) INFORMAL ACTION: Any action of the Board of Directors may be taken without a meeting if a consent in writing setting forth the action taken is signed by all members of the Board of Directors and filed with the minutes of the Corporation. Any such consent signed by all the Directors shall have the same effect as a unanimous vote.

O) TELEPHONIC MEETINGS: At the discretion of the Board of Directors, any annual, regular, or special meeting of the Board of Directors may be conducted using a teleconference or other electronic means in which all persons participating can hear each other at the same time.

P) PRESUMPTION OF ASSENT: A Director of the Corporation who is present at a meeting of the Board of Directors at which action on any corporate matter is taken shall be conclusively presumed to have assented to the action taken unless his or her dissent shall be entered in the minutes of the meeting or unless he or she shall file his or her written dissent to such action with the person acting as Secretary of the meeting before the adjournment thereof, or shall forward such dissent by registered mail to the Secretary of the Corporation immediately after the adjournment of the meeting. Such right to dissent shall not apply to a Director who voted in favor of such action.

Article 7: Officers

A) IN GENERAL: The Officers of the Corporation shall consist of a President, a Vice-President, a Treasurer, and a Secretary. The Executive Director is a non-voting member of the Board and all committees, except as delineated in Article 8(B). All Officers of the Corporation shall be chosen from among the Directors. Other Officers, as may be deemed necessary, may be elected or appointed by the Board of Directors and shall have the authority and perform the duties as prescribed by the Board of Directors. The same person may hold any two or more offices, except that the same person shall not hold the offices of President and Secretary. All Officers shall be at least 21 years of age and shall exhibit characteristics of a God-fearing Christian who affirms his or her full agreement with the corporation's Statements of Position as articulated in Article V.

B) ELECTION AND TERM OF OFFICE: The President, Vice-President, Treasurer, and Secretary shall be elected annually by the Board of Directors and may serve consecutive terms. Vacancies may be filled or new offices created and filled at any meeting of the Board of Directors. No Director may hold the same office for more than three years during one six-year period, except for the office of secretary. Each Officer shall hold office until his or her successor shall have been duly elected and shall have been qualified, or until he or she shall resign or shall have been removed in the manner hereinafter provided.

C) REMOVAL: The Board of Directors may remove any Officer elected or appointed by the Board of Directors by a two-thirds vote of the Board of Directors. Good cause will exist for removing any Officer who is habitually absent from meetings or violates, in word or deed, the Statements of Position as articulated in Article V.

D) PRESIDENT: The President shall be elected by the Board of Directors and shall preside at all meetings of the Board of Directors and perform such other duties as the Board of Directors and these bylaws may prescribe.

E) VICE-PRESIDENT: The Vice-President shall be elected by the Board of Directors and shall perform the duties of the President in his or her absence. When so acting, the Vice-President shall have all the powers and be subject to the same limitations as the President.

F) TREASURER: The Treasurer shall be elected by the Board of Directors and shall supervise the financial affairs of the Corporation. The Treasurer shall have charge, responsibility, and custody for all funds and securities of the Corporation. The Treasurer shall be responsible for providing the Board of Directors with monthly reports concerning the financial condition of the Corporation.

G) SECRETARY: The Secretary shall be elected by the Board of Directors and shall be the custodian of the Corporation's official books and records. The Secretary shall be responsible for assuring that all notices are given in accordance with the provisions of these Bylaws. The Secretary shall also be responsible for recording the minutes of all meetings and resolutions of the Board of Directors.

H) EXECUTIVE COMMITTEE: The Executive Committee shall be composed of the President, the Vice-President, the Secretary, the Treasurer, and the Executive Director. The Executive Director shall be a non-voting member of such committee. The Executive Committee shall keep regular minutes of its proceedings and report the same to the Board. From time to time, such as when discussing personnel issues relating to the Executive Director, the Executive Committee may meet without the Executive Director present.

I) COMPENSATION: Officers, except for the Executive Director, shall serve without compensation. By resolution of the Board of Directors, expenses incurred by Officers in attending seminars or meetings other than board meetings may be allowed reimbursement for their expenses actually and reasonably incurred on behalf of the Corporation.

Article 8: Executive Director

A) EXECUTIVE DIRECTOR: The Executive Director shall be appointed by the Board of Directors and shall be the chief executive and operating officer of the Corporation and shall serve at the will and pleasure of the Board of Directors. The Executive Director shall be hired or removed by a two-thirds vote of the Board of Directors. The Executive Director is an at-will employee. The Executive Director is a non-voting member of the Board of Directors and may not vote at meetings of the Board of Directors except as delineated in Article 7(B). The Executive Director shall be a member of the Executive Committee of

the Corporation, if one is formed, for purposes of advising the members of the Executive Committee on the business operations and policies of the Corporation, pursuing the Board's authority in Article 7 (H). The Executive Director shall report to the Officers of the Corporation and to the Directors. Subject to the direction and control of the Board of Directors, he or she shall be responsible for the day-to-day business and affairs and management of the Corporation; he or she shall see that the resolutions and directives of the Board of Directors are carried into effect except in those instances in which that responsibility is assigned to some other person by the Board of Directors. The Executive Director shall be at least 21 years of age and shall exhibit characteristics of a God-fearing Christian who affirms his or her full agreement with the corporation's Statements of Position as articulated in Article V. Good cause will exist for removing any Executive Director who is habitually absent from meetings or violates, in word or deed, the Statements of Position as articulated in Article V. The Executive Director shall be the party primarily responsible for ensuring that volunteers and employees of the Corporation affirm their full agreement to the Corporation's Statements of Position as articulated in Article V and for enforcing standards of communication and conduct among volunteers and employees that reflect those Statements of Position.

B) The Executive Director shall have a vote in the case of a tie in all matters not requiring a two-thirds vote.

Article 9: Committees

A) COMMITTEES OF THE BOARD OF DIRECTORS: From time to time, the Board of Directors may designate one or more committees of the Board, each of which shall consist of not less than two Directors, to exercise such authority as may be delegated by the Board of Directors. Such committees shall submit a written report to the Board of Directors in advance of a general meeting of the Board of Directors.

B) AD HOC COMMITTEES: The Executive Director has the authority to establish such ad hoc committees as may be necessary without direct Board approval. Such committees will be established to facilitate specific events and may be disbanded once the specific event is complete.

C) EX OFFICIO MEMBER: The Board President shall be considered an ex officio member of all committees.

Article 10: Contracts, Loans, Checks, Deposits, and Gifts

A) CONTRACTS: The Board may authorize any Officer or Officers, Agent or Agents of the Corporation, in addition to the Officers so authorized by these Bylaws, to enter into any contracts or to execute and deliver any instrument in the name of and on behalf of the Corporation.

B) LOANS: No loans shall be contracted on behalf of the Corporation and no evidence of indebtedness shall be issued in its name unless authorized by resolution approved by a two-thirds majority of the Board of Directors.

C) CHECKS, DRAFTS, ETC. All checks, drafts, or other orders (including online bill pay) for payment of money, notes, or other evidence of indebtedness issued in the name of the Corporation shall be signed by such Officer or Officers, Agent or Agents, of the Corporation and in absence of such manner as shall from time to time be determined by resolution of the Board of Directors. In the absence of such determination by the Board of Directors, such instruments shall be signed by the Executive Director and countersigned by a designated Officer or Director of the Corporation. At no time shall less than two (2) Officers, Directors or Agents sign any check, draft or other order under this section.

D) DEPOSITS: All funds of the Corporation not otherwise employed shall be deposited from time to time to the credit of the Corporation in such banks and or other depositories as the Board of Directors may direct.

E) GIFTS: The Board of Directors may accept on behalf of the Corporation any contribution, gift, bequest, or devise for the general purposes, or for any special purposes, of the Corporation.

F) CORPORATE OBLIGATIONS: No employee, officer, director or member of the Corporation shall be held liable or responsible for the contracts, debts, obligations, or liabilities of this Corporation.

G) FINANCIAL AUTHORITY OF THE EXECUTIVE DIRECTOR: Each year, the Board of Directors may establish limits on the extent to which the Executive Director has authority to incur additional expenses or make payments for items not already budgeted up to \$1,000. In any event, the Executive Director is authorized to pay for expenses or items already budgeted, and Committee approval is required for any expenses or items between \$1,000 and \$5,000. Board approval is required for any non-budgeted expense or item over \$5,000. Any expenses or items not already budgeted may be approved by the Executive Director up to \$1000/\$5000 annual aggregate.

Article 11: Miscellaneous Provisions

A) INDEMNIFICATION AND INSURANCE: The Corporation shall, to the maximum extent permitted by law, indemnify each of its Directors and Officers against any costs, expenses (including reasonable attorney's fees), judgments, fines, settlement, and any other amounts actually and reasonably incurred in connection with any claim or proceeding arising by reason of the fact that any such person is or was a Director or Officer of the Corporation. The Corporation shall have the right to purchase and maintain insurance to the full extent permitted by law on behalf of its Directors and Officers against any potential liability or liability asserted against or incurred by any Director or Officer in such capacity.

B) CONFLICTS OF INTEREST: Any member of the Board of Directors who has a potential conflict of interest with respect to any proposed transaction involving the Corporation shall promptly disclose to the remaining members of the Board all material facts relating to the potential conflict of interest. The Board of Directors shall not be precluded from approving any transaction in which a member of the Board may have a conflict of interest if the following conditions are met: (1) the Board member in question refrains from

participating in any deliberations or decisions relating to the transaction, and (2) a majority of the remaining members of the Board determines after due investigation that entering into the transaction will be in the best interest of the Corporation.

C) FISCAL YEAR: The fiscal year of the Corporation shall be the calendar year unless some other fiscal year is specified by resolution of the Board of Directors.

D) AMENDMENT OF BYLAWS: These Bylaws may be amended at any regular or special meeting provided that ten days' notice of the proposed amendment is given to all Directors and the amendment is approved by a three-fourths majority vote of all members of the Board of Directors. The Bylaws may contain any provisions for the regulation and management of the affairs of the Corporation not inconsistent with law or the Corporation's Articles of Incorporation.

E) BOOKS AND RECORDS: The Corporation shall keep correct and complete books and records of account and shall also keep minutes of the proceedings of its meetings, meetings of the Board of Directors, and committees having any of the authority of the Board of Directors and shall keep at the registered or principal office a record giving the names and addresses of all Directors. All books and records of the Corporation may be inspected by any Director and by any other person who shall have any proper purpose at any reasonable time.

F) WAIVER OF NOTICE: Whenever any notice is required to be given under the provisions of the General Not-For-Profit Corporation Act of Illinois or under the provisions of the Articles of Incorporation or the By-laws of the Corporation, a waiver thereof in writing signed by the person or persons entitled to such notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.

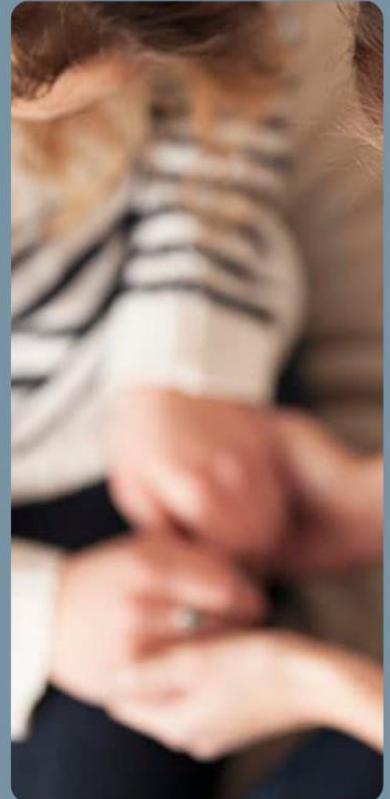
G) DISSOLUTION: The Corporation may be dissolved in accordance with the laws of the State of Illinois upon the affirmative vote of at least three-fourths of the Directors then serving at a regular or special meeting of the Board of Directors.

As revised and approved on December 30 2024

EXHIBIT 3



EMPLOYEE HANDBOOK



**Compassionate Acceptance | Dignity & Respect | Grace-filled Truth |
Hopeful Encouragement**

The Pregnancy Care Center of Rockford is an affiliate of Heartbeat International and CareNet.

Use of this manual does not create an attorney-client relationship, nor does it constitute legal services. The information is intended for general informational purposes and should not be relied upon as substitute for the direct counsel of an attorney.

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PART I: INTRODUCTION TO THE PREGNANCY CARE CENTER

Welcome!

Welcome to The Pregnancy Care Center of Rockford! We are thrilled to have you as a member of our team! The Pregnancy Care Center is a non-profit ministry with the mission to offer compassionate help and hope to those experiencing an unplanned pregnancy, to present sexual abstinence as a positive lifestyle for singles, to provide opportunity for healing and restoration to those who have been hurt by abortion, and to present an opportunity for all to enter into a life-changing relationship with Jesus Christ.

As an affiliate of Heartbeat International, Care Net, Save the Storks, and NIFLA, The Pregnancy Care Center of Rockford is part of an International network of pregnancy centers which share the common mission of ministering to women and men as they face pregnancy.

Mission Statement

The Pregnancy Care Center of Rockford offers help and hope in the name of Jesus Christ to those facing pregnancy decisions.

It is our vision to see God glorified through loving, empowering, and supporting all those facing pregnancy decisions, so that choosing abundant life today and for future generations is celebrated.

Statement of Faith

We believe in God the Father Almighty, Maker of heaven and earth.

And in Jesus Christ, His only Son, our Lord

who was conceived by the Holy Ghost, born of the Virgin Mary,
suffered under Pontius Pilate, was crucified, dead, and buried.

He descended into hell.

The third day he rose again from the dead.

He ascended into heaven and sits at the right hand of God the Father Almighty.

From thence He shall come to judge the living and the dead.

We believe in the Holy Spirit the holy Christian Church,
the communion of saints, the forgiveness of sins,
the resurrection of the body, and the life everlasting.

Statement of Principle

The Pregnancy Care Center of Rockford is an outreach ministry of Jesus Christ through His Church. Therefore, The Pregnancy Care Center, embodied in its staff and volunteers, is committed to presenting the Gospel to women with crisis pregnancies — both in word and in deed. Therefore, those who serve as The Pregnancy Care Center directors, staff, volunteers, and Board members are expected to walk in a personal relationship with Jesus Christ and seek to live a lifestyle that reflects Him.

The Pregnancy Care Center is committed to providing its clients with accurate and complete information about both prenatal development and abortion.

The Pregnancy Care Center is committed to adopting and enforcing internal procedures to assure that abortion education is performed in a caring and compassionate manner with due respect for the emotional sensibilities of each client. Prior to usage by The Pregnancy Care Center, client materials containing descriptions or depictions of abortion will be reviewed by a qualified medical professional (ex. physician or nurse) and determined to be medically accurate. Materials with graphic depictions of abortion or its results are not content-appropriate when the primary effect of such materials is to shock rather than to educate. When using approved abortion education materials with clients, Center personnel will always give specific warnings and obtain written client permission before showing any videos, brochures, or diagrams that contain any visual depictions of abortion or its results. No client will ever be asked, pressured, or coerced to view abortion education materials which she or he has indicated a desire not to see.

The Pregnancy Care Center is committed to integrity in dealing with clients, earning their trust, and providing promised information and services. The Pregnancy Care Center denounces any form of deception in its corporate advertising or individual conversations with its clients.

The Pregnancy Care Center is committed to assisting women carry to term by providing emotional support and practical assistance. Through the provision of God's people and the community at large, women may face the future with hope and plan constructively for themselves and their babies.

The Pregnancy Care Center does not discriminate in providing services because of the race, creed, color, national origin, age, or marital status of its clients.

The Pregnancy Care Center does not refer for or perform abortions.

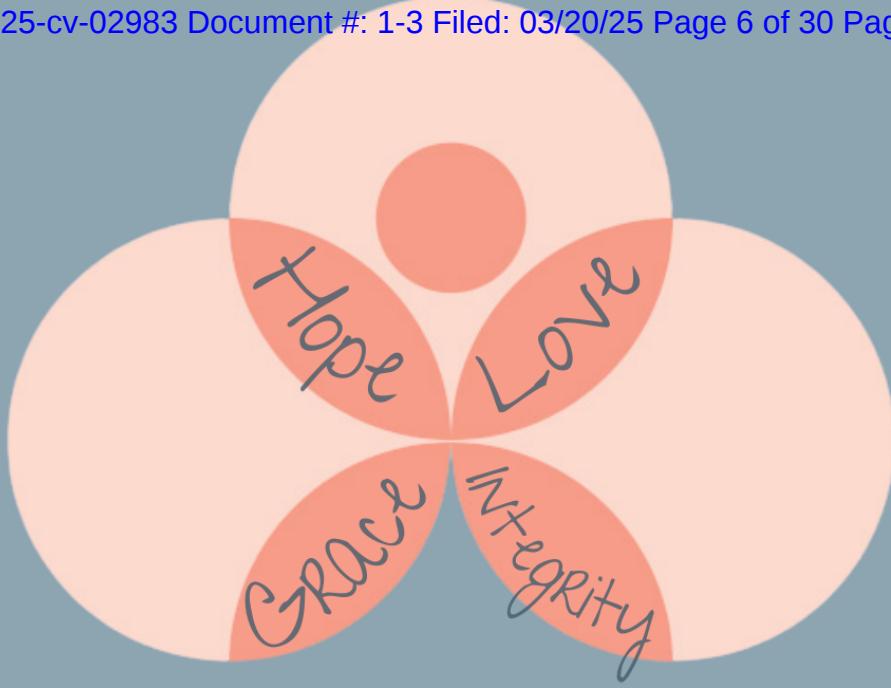
The Pregnancy Care Center offers assistance free of charge at all times.

The Pregnancy Care Center is committed to creating awareness within the local community of the needs of pregnant women and the fact that abortion only compounds human need rather than resolving it.

The Pregnancy Care Center does not recommend, provide, or refer single women for contraceptives. (Married women seeking contraceptive information should be urged to seek counsel, along with their husbands, from their pastor and/or physician.)

The Pregnancy Care Center recognizes the validity of adoption as an alternative to abortion, but it is not biased toward adoption when compared to other life-saving alternatives. The Pregnancy Care Center is independent of adoption agencies, relating to them in the same manner as to other helpful referral sources. As The Pregnancy Care Center interacts with independent adoption agencies, we shall assure that referrals are made in a manner that fully protects the interests of clients and avoids any conflicts of interest. The Pregnancy Care Center receives no payment of any kind from these agencies, does not enter into contractual relationships with them, and does not share combined office space. Adoption agencies are not established under the auspices of The Pregnancy Care Center of Rockford. The Pregnancy Care Center neither initiates nor facilitates independent adoptions, though they may refer for independent adoptions in states where it is legal.

The Pregnancy Care Center otherwise upholds all of the principles and requirements set forth in our Commitment of Care.



HOPE

Our hope is found in Jesus. Clients will find life-giving support and resources which bring hope to the hopeless.

INTEGRITY

We will honor God by being honest and transparent. Our work will be done with excellence, and our clients can trust us and our practices.

LOVE

God is love. Clients will feel loved, seen, and heard from the moment they step through our doors. Every person will be loved no matter their circumstances or choices.

GRACE

Jesus is grace. Christ died for us so that we might live. Clients will receive grace and compassion, no judgment.

PART II: EMPLOYMENT TERMS & CONDITIONS



Non-Discrimination Policy

Subject to the Constitution of the United States and all applicable state and federal laws, The PCC does not discriminate in its employment practices or in the administration and dissemination of its programs and services.

Employee Selection and Screening

The Pregnancy Care Center of Rockford seeks to recruit, select, and hire the most qualified applicant for every available employment position. A personal relationship with Jesus Christ is a requirement for any employee, as well as believing that abortion is never a morally acceptable option.

Due to the age of our clients, generally only persons who are 18 years or older are considered for employment. The Executive Director is authorized to make exceptions only in extraordinary circumstances and when the concerns expressed in this policy are otherwise satisfied.

In regard to sexual activity and relationships, The Pregnancy Care Center and all employees and volunteers must honor the biblical design for marriage between one man and one woman. So, sexual abstinence until marriage and sexual monogamy within marriage is the biblical standard to which we adhere as the only effective means of preventing unwanted, sexually-related outcomes, fostering healthy God-honoring relationships, and presenting a strong moral position in the world. This philosophy is implemented on all levels of operations including client counsel, school presentations, and the expected lifestyle of all volunteers and staff.

Additionally, to maintain the core values of our faith-based organization and operate as the hands and feet of Jesus Christ, The Pregnancy Care Center and all employees and volunteers must never violate the sixth commandment or Genesis 9:6 by referring, assisting in the procurement of, providing, or receiving an abortion. Violation of this policy is cause for refusal to hire, and/or discipline up to and including termination. This policy is implemented on all levels of operations including client counsel, school presentations, and the expected lifestyle of all volunteers and staff.

The Board entrusts the Executive Director with hiring authority, giving proper consideration to all relevant factors in evaluating the qualifications of applicants, including: (1) personal character, (2) gifts and skills, (3) educational background, and, (4) prior relevant experience. The Executive Director is also expected to follow appropriate selection and screening procedures to verify the qualifications and to investigate the background of each applicant under consideration in order to ensure reasonable fitness to perform the duties of the position in question.

Employment of Relatives

The Pregnancy Care Center of Rockford generally prohibits the hiring of immediate family members of staff and Board members. Relatives of employees may be considered for employment only if it is determined that it will not produce any undue effects upon organization morale or operations. No

persons, including relatives, will be considered for any position unless he or she meets all minimum qualifications.

At-Will Employment

The Pregnancy Care Center of Rockford does not enter into employment contracts with its employees. This employee handbook does not constitute a contract and can be amended at any time. This handbook does not create any contractual rights or obligations. All employment with The Pregnancy Care Center of Rockford is on an at-will basis, and we reserve the right to terminate any employee at any time, with or without cause.

Classification of Employees

Employees are classified as follows:

1. **FULL-TIME:** An employee who works 40 hours or more per week on a regularly scheduled basis.
2. **PART-TIME:** An employee who regularly works less than 40 hours per week.
3. **TEMPORARY:** An employee who is hired for a limited period of time for a specific purpose or project, including interns and student-hires.
4. **INDEPENDENT CONTRACTOR:** Those who are paid based upon a service they provide. Independent contractors are not considered to be employees of The Pregnancy Care Center and are not covered by this employee handbook.

All employees, regardless of status, are subject to all policies and procedures.

Employees of The Pregnancy Care Center of Rockford are classified as "exempt" or "nonexempt" according to the following definitions:

Exempt employees are salaried positions in managerial, administrative, or professional roles, as defined by federal and state labor laws. These positions are not entitled to minimum wage or mandatory overtime pay. Exempt employees are expected to work the hours necessary to complete their tasks, regardless of the total time worked. During particularly busy periods, exempt employees may consult with the Executive Director to request flexibility in their work hours. Such adjustments may be granted at the Executive Director's discretion, based on appropriateness and circumstances.

Non-exempt employees hold positions in clerical, technical, or service roles and are entitled to minimum wage and overtime pay as mandated by federal and state labor laws. Non-exempt employees must obtain prior approval from the Executive Director before working any overtime hours. Compensatory time off in lieu of pay is not permitted; however, employees may receive time off within the same workweek in which extra hours were worked. The Executive Director may require this time off.

Job Descriptions

Job descriptions for each position are prepared by the Executive Director and approved by the Board's Personnel Committee. Each job description contains a clear and concise description of the duties and

responsibilities encompassed within the job position, including title, hours expected, identity of supervisor, qualifications, and relevant duties. The job description is made known to all applicants who are being considered for employment.

Upon hiring, each employee is expected to become thoroughly familiar with the job description as well as with the job descriptions of any other persons with whom he or she will closely work. The job criterion set forth in the job description is considered as a primary reference in connection with any related job evaluations.

The Executive Director periodically reviews and, if necessary, modifies job descriptions to assure that they are up to date. Any employee affected by such changes is promptly provided with a copy of the amended job description.

Attendance

The Pregnancy Care Center depends upon the regular attendance of employees. Unexcused absences and unexcused incidents of tardiness disrupt normal operations of the organization.

Each employee is required to arrive at work in a timely manner and work the hours normally scheduled for that employee. An employee should contact his or her supervisor no later than 8:00 a.m. if expecting to be absent or tardy that day. An unexcused absence is defined as an absence which occurs contrary to any of The Pregnancy Care Center's leave policies. An unexcused tardiness is defined as tardiness which occurs without justifiable reason. An employee may expect that repeated incidents of unexcused absences or unexcused tardiness will lead to disciplinary action, including possible termination.

As a part of the culture of collaboration and teamwork, it is expected that employees will attend and participate in the annual fundraisers unless previous arrangements have been discussed with the Executive Director.

PART III: COMPENSATION & BENEFITS



Pay

All employees will be paid on a bi-weekly basis. For the purpose of defining hours worked, the workweek shall be from Sunday to Saturday. All employees will be paid on the Tuesday immediately following the completion of the previous two-week work period.

For each two-week work period, employees will submit time sheets showing hours worked to the nearest 15-minute interval. These timesheets will be signed by both the employee and the Executive Director and should be submitted no later than Wednesday at 4:00 p.m. prior to the next designated payday. An employee who fails to do this may have pay delayed until the next pay period.

Wage and Salary Determination

The Board initially determines the wage or salary level for each employee, with the goal of paying all employees fairly and equitably. Initial salary levels are based upon the degree of responsibility, education, and experience required. All non-exempt employees are paid at an hourly rate which meets or exceeds the applicable minimum wage level.

Salary levels are reviewed at least once a year when the Executive Director makes appropriate recommendations to the Board concerning any proposed pay adjustments, except as related to the Executive Director's pay. The Board, at its sole discretion, may authorize pay adjustments based upon such relevant factors as level of job performance, cost of living increases, and the financial status of the organization. No employee is paid a salary or wage that may be deemed unreasonably excessive.

Bonuses

Bonuses, when paid, are a matter of discretion, not of right. Whether The Pregnancy Care Center will pay any employee a bonus in a particular year will depend upon a number of factors to be considered by the Executive Director and the Board of Directors. The Pregnancy Care Center makes no promise regarding the payment of bonuses, and employees should not expect to receive a bonus. The fact that a bonus may be granted once, or more than once, does not mean that it will be granted again in the future, or that, if granted, it will be in the same amount.

Compensatory Time

Exempt employees are not legally entitled to overtime pay and are not strictly subject to a 40-hour workweek. As executives and professionals, such employees are paid to perform more broadly defined functions, which may reasonably require them from time to time to work hours in excess of their normally scheduled hours. Nevertheless, The Pregnancy Care Center of Rockford seeks to avoid having any employee, whether exempt or non-exempt, work an unhealthy and excessive number of hours. To this end, compensatory time may be granted to exempt employees under the following conditions:

The Executive Director, at her discretion (or the Board with respect to a request from the Executive Director), may choose to grant equal time off to an exempt employee for hours worked in excess of 40 hours in a week. Compensatory time must be taken within 30 days of being earned. Compensatory time will not be exchanged for monetary compensation.

Expenses & Reimbursements

The Pregnancy Care Center of Rockford will reimburse employees and volunteers for all out-of-pocket expenses reasonably incurred for ministry-related activities, including expenses incurred in connection with approved travel and meetings. The Executive Director will implement appropriate procedures to assure that only reasonably necessary expenses are approved and that such expenses are promptly and accurately reported for reimbursement purposes.

Paid & Unpaid Time Off

Holidays

All employees are eligible to receive the following paid holidays:

New Year's Eve Day & New Year's Day
Good Friday
Memorial Day
Independence Day
Labor Day
Thanksgiving Day
Friday following Thanksgiving Day
Christmas Eve Day & Christmas Day
Regularly scheduled workdays falling on December 26-30

For all employees, holidays which fall on a regularly scheduled workday will be paid at the employee's regular rate for the number of hours typically worked that day. Holidays falling on Saturday or Sunday will not be paid as they are not a regular workday for employees.

Paid Time Off

During the first two years of employment, full-time employees are eligible for 80 hours (2 weeks) of annual vacation time. Part-time employees receive prorated annual leave based on the number of hours per week they are scheduled to work. Employees earn but may not use annual leave during their first three months of employment. After two years of employment, full-time employees receive 120 hours (3 weeks) of vacation time. After six years of employment, full-time employees receive 160 hours (4 weeks) of vacation time. **Vacation time also includes each employee's earned sick time.**

There are two types of paid time off offered to employees.

1. As required by the State of Illinois, Illinois Paid Leave hours are equivalent to one work week and can be used for any reason of the employee's choosing. Employees will not be required to provide a reason for such leave, or documentation (as proof of or in support of) the need for Illinois Paid Leave. IL Paid Leave is not in addition to the hours an employee has for PTO, but rather a separate category. Illinois Paid Leave balances are not paid out upon termination. Illinois Paid Leave must be used in a minimum increment of two hours.
2. Vacation is a time of rest and recreation, and employees are expected to use their vacation leave. Employees may not carry over vacation time from one year to the next, nor can vacation time be paid out for any employee, except upon termination. Failure to provide a two-week notice of termination will result in a loss of one-half of the accrued leave payments. Requests to take annual leave must be approved one month in advance by the Executive Director. Employees may choose to take a full or half day in hourly increments, based on the number of hours earned by that employee.

The Pregnancy Care Center wants you to take time to rest, replenish and pursue special interests. Paid vacation is one way we show appreciation for your loyalty and continued service.

Employees are expected to plan their vacation time with consideration to work schedules, and the Executive Director may withhold approval of vacation requests and, if necessary, ask employees to reschedule in order to meet work demands. If a conflict arises, preference will be given to the employee with the most seniority. Vacation time will not be used if a paid holiday falls during a scheduled vacation.

Inclement Weather Policy

The Center will be closed when Rockford Public Schools are closed due to heavy snow or hazardous driving conditions, though it may not close due to extreme temperatures. The Executive Director will use her discretion when deciding if the Center remains open or closes. If the Center is open and employees choose not to come to work, they may elect to either work their normal hours, take PTO, take unpaid time, or make up the hours at other times during that pay period. Please use caution and be safe if choosing to come into the Center.

Health & Medical Leave

Medical leave in connection with pregnancy, childbirth, or any major medical condition will be compensated for up to two weeks of the employee's regular weekly pay. If an employee needs additional time off beyond the amount of her accrued personal and sick leave, the employee may use accrued vacation time and then, if necessary, apply for unpaid leave. The Executive Director may grant such requests so long as the anticipated absence will not unduly disrupt the operations of the Center. The PCC of Rockford will not approve requests for leave related to conduct contrary to its mission, including leave related to obtaining an abortion.

Maternity/Paternity Leave

Maternity/Paternity Leave is up to 8 weeks paid followed by 4 weeks unpaid. Employees may use accrued PTO or IL PLA days as applicable towards unpaid leave. Leave is available to all employees associated with the birth of an employee's own child or the permanent placement of a child with the employee in connection with adoption.

Eligibility: Paid maternity/paternity leave is available to all paid employees of 20+ hours per week after one full year of employment and who plan to return to work after leave. For those who have been employed for less than one year and/or work less than 20 hours/week, no paid leave will be given.

Procedure: This time off can begin up to two weeks before the expected birth but will not exceed 12 weeks. One week of M/P leave will be equal to one week of the employee's current work schedule.

- Written notice must be provided by the employee to the ED at least three weeks prior to the start of M/P leave. This notice should include the anticipated start date and anticipated return date. However, special considerations will be granted should an emergency arise and the time off does not go according to the plan stated in the notice.
- Written or verbal notice of return-to-work date should be provided by the employee to the ED at least two weeks prior to the anticipated return date.

- The PCC Board reserves the right to extend M/P leave on a case-by-case basis. This is contingent on the unique circumstances of the employee and on the ministry's financial and staffing ability to grant the request for time off greater than 12 weeks. This request must be made in writing with detailed information regarding the unique circumstances which require greater than eight weeks time off, for consideration by the Board of Directors. Board determination will be provided in writing within 10 business days of the request.

During M/P leave, if a paid holiday occurs during the time the employee is on leave, he/she will not accrue holiday pay for that holiday. However, the returning employee will remain eligible for all other benefits currently provided by The PCC.

Bereavement Leave

All employees who have completed at least three months of continuous employment and who experience the death of an immediate family member (parent, grandparent, parent-in-law, spouse, sibling, child, grandchild, step-parent, step-sibling, step-child, or step-grandchild), may take up to two days of paid bereavement leave.

Jury Duty

If you are selected for jury duty, you will be placed on leave. The Pregnancy Care Center of Rockford will pay you your normal days' pay, provided you give the Executive Director notice of your selection for jury duty within three business days of receiving the notice.

Military Leave

The Pregnancy Care Center of Rockford will comply with all applicable federal and state laws in connection with situations in which employees are required to obtain leaves of absence for military service or in which employees seek reinstatement of employment and benefit rights.

Unpaid Leave

Employees may request unpaid leave, not covered by any of the other policies included herein, by filing a written request with the Executive Director. An unpaid leave of absence may be granted for a maximum of thirty days. The Executive Director may use her discretion to grant or deny the request, depending on the circumstances of the request and/or the needs of The Pregnancy Care Center.

Insurance

The Pregnancy Care Center of Rockford will at all times maintain general liability insurance, professional liability insurance, and such other insurance as may be deemed reasonably necessary to protect the Center and its representatives against possible claims arising in connection with The Pregnancy Care Center's operations.

The Pregnancy Care Center of Rockford will at all times maintain such property insurance as may be deemed reasonably necessary to protect its property against unexpected loss. The Executive Director will take appropriate steps to confirm that liability insurance coverage is in place for special events.

Honoraria

Honorarium or other payments made as a result of an employee's speaking engagement or as a result of other activity undertaken in a representative capacity for The Pregnancy Care Center of Rockford will be deemed to belong to the organization and should be promptly turned over to The Pregnancy Care Center if paid directly to the employee.

Continual Training & Development

The Pregnancy Care Center of Rockford seeks to nurture a culture of lifelong growth and development for employees. Therefore, regular staff meetings, retreats, and conferences will be scheduled for the purpose of growing in knowledge and practice.

Employees are encouraged to pursue opportunities for personal and professional growth, and when relevant and applicable, The Pregnancy Care Center will provide financial assistance if funding is available. All opportunities in which funding is sought from The Pregnancy Care Center need prior approval from the Executive Director and a written follow-up report with how the relevant learning will be implemented at The Pregnancy Care Center.

PART IV: EMPLOYEE RELATIONS



Performance Evaluations

Each employee will receive an annual performance review. New employees and those with particular circumstances may receive more frequent reviews. An annual review of the Executive Director will be conducted by the Chairman of the Board or by another Board member designated by the Board.

The performance evaluations will address among other factors: attendance, dependability, initiative, work quality, work quantity, and ability to work with others. The purpose of these performance evaluations is to provide necessary feedback and to help employees improve their job performance. All employees will have an opportunity to discuss their performance evaluations with their immediate supervisors. Written copies of the annual performance evaluations will be kept in the employee's personnel file.

Corrective Action

The Pregnancy Care Center of Rockford expects all employees to perform their jobs in a satisfactory manner and in accordance with all standards of The Pregnancy Care Center. There may be times, however, when employees fail to perform their jobs in a satisfactory manner or fail to comply with standards. Minor performance deficiencies and minor incidents of misconduct will usually result in a discussion with a supervisor and an attempt to remedy problems before termination.

Matters which may result in termination or other disciplinary action include, but are not limited to, the following: (1) Unsatisfactory job performance, (2) Repeated tardiness, (3) Excessive absence, (4) Insubordination, (5) Illegal acts, (6) Dishonesty, (7) Falsification of records, (8) Destruction of property,

(9) Failure to adhere to the Statement of Principle, including referring, assisting in the procurement of, providing, or receiving an abortion; (10) Improper conduct toward a client or coworker, (11) Sexual harassment, and (12) Other misconduct.

This policy does not alter an employee's at-will relationship with the Center, and The Pregnancy Care Center of Rockford reserves the right to terminate an employee at any time for any reason.

Conflict Resolution

It is the policy of The Pregnancy Care Center of Rockford to foster the resolution of disputes in accordance with biblical principles. All persons associated with The Pregnancy Care Center, including Board members, employees and volunteers, are encouraged to seek prompt resolution of any disputes that may arise. This should first be attempted on a one-on-one basis in accordance with Matthew 18:15.

If such initial attempt(s) are not successful, the matter should promptly be referred to an appropriate supervisor or Center representative. If applicable, the Center's grievance procedure should be implemented and followed. Each person involved in any such dispute is encouraged to engage in self-examination, to relinquish any undue selfish goals, and to humbly submit to the conciliation process so that relationships may be promptly restored in forgiveness and love.

Each Board member, employee, and volunteer will be required to enter into a written agreement providing for implementation of Christian mediation proceedings, and, if necessary, arbitration proceedings for the resolution of any disputes arising in connection with such person's involvement with the organization.

Grievance Procedure

If you have a complaint concerning The Pregnancy Care Center, or if you are dissatisfied with any action taken or decision made that affects you, you are encouraged to seek resolution of that matter through the Center's grievance procedure. To facilitate the use of this procedure, every supervisor is counted upon to have an "open door" policy to entertain staff concerns or complaints. Similarly, open communication is encouraged and expected of every employee and volunteer.

Step 1: If your complaint is based upon the belief that you have been wronged by a person who is also associated with this ministry, you shall promptly go to that person and seek resolution of your complaint in accordance with the dictates of Matthew 18:15. If such an attempt at personal reconciliation is not successful or if your complaint is not against another individual associated with the ministry, proceed to Step 2.

Step 2: Set forth in writing to your immediate supervisor the nature and basis of your complaint along with a statement of the relief or corrective action you are requesting. Your immediate supervisor shall consider and investigate the validity of your complaint and shall respond in writing within 10 working days after receiving your complaint. If you are not satisfied with this result, you may proceed to Step 3. If your complaint is against your immediate supervisor and you have already sought resolution of that complaint in accordance with Step 1, you may skip Step 2 and proceed to Step 3. If your complaint is against the Executive Director and you have already sought resolution of that complaint in accordance with Step 1, you may skip Step 2 and Step 3, and proceed to Step 4.

Step 3: Set forth in writing to the Executive Director the nature and basis of your complaint along with a statement of the relief or corrective action which you are requesting. The Executive Director shall consider and investigate the validity of your complaint and shall respond in writing to you within 10 working days after receiving your complaint. If you are not satisfied with this result, you may proceed to Step 4.

Step 4: Set forth in writing to the Chairman of the Board the nature and basis of your complaint along with a statement of the relief or corrective action you are requesting. The Executive Director as well as any person(s) who are the subject of such complaint shall be provided with a copy of the complaint filed. The Board shall consider, investigate, and render a decision concerning the validity of your complaint and the relief to be provided, if any. Such a decision shall be rendered and communicated to you no later than 60 days after your complaint is filed with the Board President.

This grievance procedure may be bypassed if extraordinary circumstances, such as the need to report criminal misconduct, are so required. Any deadlines set forth in this grievance procedure may be extended by mutual agreement of the parties involved. No person who files a good faith complaint in accordance with this grievance procedure shall be disciplined or shall suffer any other form of retaliation for having utilized this grievance procedure.

Voluntary Termination

Employees who are contemplating leaving employment due to work-related problems or issues are encouraged to first speak with their supervisor and/or to utilize The Pregnancy Care Center's grievance procedure. All employees are expected to give two weeks' notice prior to leaving their employment. Failure to provide such notice will result in a loss of one-half of the accrued leave payments to which the employee would otherwise be entitled.

In the absence of extraordinary circumstances, any employee who fails to report to work or to call in after three consecutive scheduled workdays will be deemed to have abandoned his or her job, and such a situation will be treated as a voluntary termination without notice.

Exit interviews may be conducted of employees who voluntarily separate from employment to ascertain the reasons for their leaving, to identify any specific job concerns or issues, and to facilitate possible workplace improvements.

Personnel Files

Personnel files will be maintained for all employees. These files will be kept strictly confidential. Employees may inspect their own personnel file by making arrangements with their supervisor.

All reference requests and other outside requests for information concerning current and former employees or volunteers will be referred to the Executive Director. The Executive Director may provide information on current and former employees or volunteers as appropriate. Except as otherwise required by law, this information will be limited to verification of employment, position held, and length of employment.

Suspected Misconduct, Dishonesty, Fraud, and Whistle-Blower Protection

If any person knows or has suspicion about misconduct, dishonesty, or fraud, the Executive Director should be contacted. If the alleged wrongdoing concerns the Executive Director, then the Chairman of the Board or another officer should be notified. If the Executive Director, Chairman of the Board, or officer receives information about misconduct, dishonesty, or fraud, he or she shall inform the Board, which shall determine the appropriate procedure for investigating all credible allegations.

At all times, the privacy and reputation of individuals involved will be respected. There will be no punishment or other retaliation for the reporting of conduct under this policy. The anonymity of the person reporting will be protected as requested unless this would impede the investigation.

PART V: WORKPLACE CONDUCT



Working Hours & After-Hours Procedures

The administrative office hours of The Pregnancy Care Center at 4108 Morsay Drive are Monday - Friday from 8:00 a.m. to 5:00 p.m. Center hours are Monday from 9:00 a.m. - 5:00 p.m., Tuesday from 9:00 a.m. - 8:00 p.m., Wednesday from 9:00 a.m. - 3:00 p.m., Thursday 9:00 a.m. - 8:00 p.m., and Fridays from 9:00 a.m. - 1:00 p.m. Subject to any budgetary constraints imposed by the Board, the Executive Director will be responsible for determining and changing, as necessary, the regular hours of the Center, taking into account relevant factors.

Use of the Center after regular business hours should be as limited as possible and is permitted only as necessary and only for Center business. Any employee working at the Center after regular business hours will be responsible for keeping the Center doors locked while present and locked upon leaving. The Executive Director will implement such further procedures and restrictions as necessary to protect employees and the Center.

Dress and Appearance

All persons who serve at The Pregnancy Care Center of Rockford should dress in a way that is both approachable and presentable. Therefore, all employees and volunteers are expected to dress appropriately, with attention to the message their attire communicates. It is important not to dress in a manner that would intimidate clients; attire should reflect competence, neatness, and an approachable demeanor.

Examples of appropriate attire include: skirts, pants, capris, jeans, nice shirts, sweaters, and sweatshirts. Nurses may wear scrubs of their choosing.

Examples of inappropriate work attire include: jeans with holes and/or rips, shorts, mini-skirts, tight and/or revealing attire, or athleisure wear. Pro-life themed clothing is not permitted, as well as jewelry and buttons as they may produce a barrier between the client and staff.

The Executive Director will be responsible to evaluate and ensure the standards of office dress and appearance are being upheld. Treat your body as a temple of the Holy Spirit, embracing and honoring its God-ordained goodness by dressing modestly and appropriately, and dressing consistently with your biological sex (1 Corinthians 6:19; 2 Corinthians 6:16; Romans 8:9)

Confidentiality & Security

It is forbidden for employees to discuss confidential matters related to The Pregnancy Care Center, co-workers, Board members, volunteers, donors, or clients with anyone (including, but not limited to, friends, spouses, relatives, etc.) except as required in the course of the employee's work or by court order or other legal mandate. Violations of confidentiality are considered very serious and will not be tolerated.

The Pregnancy Care Center of Rockford recognizes the importance of employing appropriate security measures. All client and donor files will be secured in a locked cabinet or locked office.

All outside doors will be equipped with appropriate locks that will be secured during the hours when the Center is not open. Only the Executive Director and staff will be issued keys to the Center. The Executive Director will implement, at her discretion, such other procedures and rules as may be necessary to provide adequate security for The Pregnancy Care Center.

In order to open the Center, at least three staff members must be present. These staff members must include individuals from the following categories: Receptionist, Client Advocate, Nurse, and/or Center Director. If three employees from these categories are not present, the Center cannot be opened and the doors will remain locked.

Sexual Harassment

The Pregnancy Care Center of Rockford will not tolerate any form of sexual harassment within the work environment. Sexual harassment is illegal, unbiblical, degrading, and interferes with work performance.

Sexual harassment occurs when unwelcome conduct of a sexual nature becomes a condition of an employee's continued employment, affects other employment decisions regarding the employee, or creates an intimidating, hostile or offensive work environment. Sexual harassment may include requests for sexual favors, unwanted physical touching, unwelcome sexual comments or jokes, nonverbal sexual conduct or gestures, unwelcome displays of sexual pictures or objects, and other sexually based unwelcome conduct.

The Pregnancy Care Center of Rockford requires the cooperation of every employee to assure that no sexual harassment takes place within the workplace. An aggrieved employee should promptly report sexual harassment to his or her immediate supervisor. However, if the immediate supervisor is an

offending party, the aggrieved party shall report the matter to the next highest supervisor or, if there is no such higher supervisor, to the Chairman of the Board.

All reports of sexual harassment will be promptly investigated, and appropriate remedial actions will be taken. Any employee who is found to have engaged in sexually harassing conduct will be subject to immediate discharge.

Substance Use

Any employee or volunteer found to be in possession of, using, or distributing illegal drugs will be reported to the police, and the relationship of such employee or volunteer with The Pregnancy Care Center will be terminated. Any employee or volunteer who consumes alcohol during his or her regularly assigned hours or who comes to The Pregnancy Care Center under the influence of drugs or alcohol may be subject to having his or her relationship with the organization terminated.

Outside Employment

Any employee who is able to continue to perform job duties for The Pregnancy Care Center of Rockford in a satisfactory manner will not be restricted from outside employment. If outside employment appears to be detrimental to the employee's performance or in conflict with The Pregnancy Care Center's policies, the Executive Director will request the employee to terminate the outside employment.

Involvement in Adoptions

The Pregnancy Care Center's ministry is to serve the needs and interests of clients, and situations are avoided in which the interests of employees, volunteers, or others for whom they act conflict with the interests of clients. Therefore, The Pregnancy Care Center strictly prohibits employees and volunteers from taking any steps on their own behalf or on the behalf of others to pursue the adoption of any client's child. This prohibition also applies to any steps that may be taken to pursue adoptions from clients of other Heartbeat-affiliated pregnancy care centers. Such conduct will constitute grounds for immediate termination.

The Pregnancy Care Center of Rockford also recognizes that the ability of persons to serve as employees or volunteers for the Center may be negatively affected if they are themselves involved in pursuing an adoption. Therefore, persons who are engaged in pursuing adoption will be generally discouraged from applying for employment or volunteer service during the period that any such pursuit of adoption continues. To the extent that existing employees or volunteers become involved in an adoption process, the Executive Director will closely monitor such situations to assure that such employees or volunteers can continue to perform their responsibilities in an appropriate manner.

Political Activities

The Pregnancy Care Center's status as a tax-exempt corporation requires that it refrain from participating in any political campaigns and other political activities as an organization. Employees participating in any such political activities outside of work or volunteering at the Center should be done with caution, such as refraining from wearing clothing with The Pregnancy Care Center's name,

which might erroneously indicate that he or she is acting in a representative capacity for the organization.

No political campaign literature or petitions will be allowed to be maintained, posted or distributed upon The Pregnancy Care Center premises. No employee or volunteer, while acting in a representative capacity for the Center, will be allowed to make statements for or against any political candidates. The Board may authorize Center personnel to participate in insubstantial lobbying efforts on behalf of the Center, but no such efforts will be undertaken without the express authorization of the Board.

Activism at Abortion Facilities

The Pregnancy Care Center employees and volunteers are expected to project an image and attitude of compassion and empathy toward clients. The Pregnancy Care Center believes that the ability to do this may be jeopardized if its employees or volunteers are observed by clients or others participating in protest activities at or near abortion clinics. Therefore, all employees and volunteers are expected to refrain from engaging in any such abortion clinic activism whether during work hours or during off-hours. This includes picketing, praying, sidewalk counseling, and acts of civil disobedience. This policy does not limit staff from participating in other political activities during their own time, including participation in peaceful pro-life marches.

Conflicts of Interest

All staff members of The Pregnancy Care Center of Rockford are expected to perform their duties and responsibilities for the organization free from undue competing interests and influences. Staff members will not use their positions to acquire any improper personal gain or advantage. The Pregnancy Care Center shall not directly engage in any business transactions with staff members or with any persons or entities closely related to staff members, unless the following conditions are met:

A decision is made, without the participation of the interested staff member, that the transaction is in the best interest of the organization; an objective showing can be made through competitive bids, appraisals, or other similar evidence that the transaction is fair to The Pregnancy Care Center; and, If the proposed transaction involves the payment of more than \$5,000.00, it is reviewed and approved by The Pregnancy Care Center's Board, attorney, accountant, or appropriate outside consultant.

Staff members will not misappropriate for their own benefit any property or opportunities that properly belong to The Pregnancy Care Center. In this connection, staff members are advised that, in the absence of some special agreement, all materials that they author or prepare while working for The Pregnancy Care Center will remain the exclusive property of the organization.

Staff members are prohibited from participating in decisions on behalf of the organization when their ability to make a decision in the best interest of the organization may be unduly influenced by personal interests or concerns. Staff members will not personally accept any gifts from vendors or other outside parties that seek favorable consideration by The Pregnancy Care Center.

The Pregnancy Care Center of Rockford recognizes and generally encourages its employees and volunteers to seek to serve other organizations and causes in the community. However, staff members should remain cautious about serving on behalf of other organizations that may have contrary philosophies or goals.

Personal Usage of Office Equipment & Supplies

The Pregnancy Care Center of Rockford expects all staff members to exercise honesty, good judgment, and common sense in connection with their personal use of any property and materials belonging to The Pregnancy Care Center. Employees and volunteers are permitted to make limited personal use of telephones and office equipment provided that such usage does not interfere with the normal operations of the organization and provided that any expenses incurred are promptly reimbursed. Personal phone calls are made or received only as reasonably necessary and limited to no more than 5 minutes. Whenever possible, personal calls are made or received during scheduled breaks.

Employees and volunteers will request approval from the Executive Director before making personal use of other office equipment, amenities, or materials. The Executive Director will implement appropriate procedures to assure that employees and volunteers reimburse the Center for any personal expenses incurred for postage, copies, or other materials. The Executive Director will determine the number of reasonable charges to be assessed for personal copies made upon the office copier by staff members. Any staff member who utilizes the office computer or Internet to gain access to pornographic or inappropriate materials will be subject to disciplinary action including the possibility of immediate termination.

Personal Use of E-Mail

The purpose of The Pregnancy Care Center's email is to conduct Center business. Incidental and occasional personal usage of the Center's e-mail system will be permitted if it does not interfere with business. All email communications will be handled in the same manner as letters, faxes, and other business communications.

All messages created, sent, or received using The Pregnancy Care Center's email system, including personal messages, are the property of The Pregnancy Care Center. The Pregnancy Care Center retains the right to access, retrieve, and disclose the contents of all such messages, including personal messages. Employees and volunteers may not retrieve or read any e-mail message that was not sent to them unless authorized by the designated e-mail recipient or the Executive Director. No business or personal e-mail messages will be sent within or from The Pregnancy Care Center that contain any offensive, obscene, or other inappropriate content.

Use of Social Media

The Pregnancy Care Center of Rockford upholds a high standard of integrity in using social media forums. Only designated employees will be administrators of The Pregnancy Care Center's online forums. Caution will be used when posting statuses or photos. Photos or information about clients will not be used without prior written permission by the client.

The Pregnancy Care Center strongly encourages employees to use caution in their personal usage of social media. As someone associated with The Pregnancy Care Center, employees should ensure all online content is consistent with the mission and values of The Pregnancy Care Center. If offering opinions, employees should make it clear that personal views do not reflect that of The Pregnancy Care Center. Social media should never be used as a forum to discuss issues related to The Pregnancy

Care Center, staff, volunteers, or clients. The Executive Director may monitor employees' virtual activity.

Safety & Cleanliness

The Pregnancy Care Center of Rockford is committed to providing a safe work environment for its employees and volunteers. The Pregnancy Care Center will abide by all applicable OSHA regulations as well as any other applicable state or local safety regulations. All employees and volunteers are expected to follow good safety practices and to adhere to all applicable safety rules and procedures. No employee or volunteer will be requested to perform any duty or responsibility that may expose such employee or volunteer to an unreasonable risk of personal harm.

Any employee or volunteer who becomes aware of any unsafe working condition will immediately report such condition to his or her supervisor. Any employment or service-related injuries to employees or volunteers should be promptly reported. The willful violation of safety rules, the failure to report unsafe conditions, and the failure to report incidents involving employee or volunteer injury are considered serious offenses and may result in disciplinary action, including possible termination.

The Pregnancy Care Center also strictly prohibits any form of violence in the workplace, including verbal threats, nonverbal threats, and related actions. Employees and volunteers will promptly report any incidents involving violence or threats of violence that they may observe. The Executive Director will take prompt and appropriate remedial actions. Any criminal misconduct will be immediately reported to appropriate authorities. Any employee or volunteer who engages in such improper conduct may be subject to immediate dismissal.

The Pregnancy Care Center of Rockford properties will be kept in a safe condition for clients and other visitors. Special attention will be given to keeping walkways and other areas traversed by clients and visitors safe at all times. Any ice, snow, or debris will be promptly removed from walkways or such other areas. Any other unsafe conditions will also be remedied as promptly as reasonably possible. Employees or volunteers who observe any unsafe conditions will promptly remedy such conditions or report them to the Executive Director.

The Pregnancy Care Center of Rockford maintains all portions of its offices in a clean, neat, and sanitary condition for the benefit of clients and staff. Once a week, a hired cleaning person does a basic cleaning. However, all employees and volunteers are expected to contribute, as appropriate, in meeting this goal. The kitchen area is provided for the convenience of employees and volunteers. Persons who use the kitchen are responsible for keeping it clean, neat, and sanitary. The practices relating to cleaning the Center should provide a good exercise in exhibiting our "servant" attitude.

Personal Visitors

The Pregnancy Care Center of Rockford desires to preserve maximum confidentiality and comfort for clients who visit the Center. Therefore, employees and volunteers should exercise caution when hosting visitors, including children or family members, during Center hours. Employees or volunteers who anticipate the need to have visitors should seek the prior permission from the Executive Director.

Harassing or Threatening Calls

Obscene calls and harassment calls are not tolerated. The caller is politely and firmly informed that the call is not acceptable and will be ended immediately. Even if callers insist that they have pregnancy-related concerns, the conversation is ended. The call is reported to the Executive Director and is recorded on the Center phone log. The Executive Director reports calls which are repetitive in nature to the police and the telephone company. The Chairman of the Board is made aware of this report.

All calls which threaten to harm personnel or to damage the facility are to be taken seriously, and the following steps will be taken in responding to a call, including a bomb threat or any similar threat: The caller will be kept on the line as long as possible and asked to provide as much detail as possible about the nature of the threat. If caller ID is in use, the phone number of the caller will be noted. If caller ID is not in use, the phone upon which the call is received should then be left off the receiver, and no further calls should be made on that phone until the appropriate authorities are able to pursue a trace.

The call should be reported to the Executive Director immediately. The local police and the FBI will be notified immediately on a different phone. The person receiving the phone call will make a detailed report of the incident including the exact wording of the threat, details concerning the caller's voice, and details of background noise.

The Pregnancy Care Center will be promptly evacuated if an imminent threat is made to damage the Center or to harm its personnel. The Chairman of the Board will also be notified. With input from appropriate authorities, the Board and the Executive Director will determine how long the Center should remain closed. Clients with appointments and volunteers will be advised of the temporary closing of the Center.

Responding to Incidents

Employees and volunteers will be prepared to respond in a proper manner to unusual incidents which may occur at the Center. The first priority should be to obtain any needed assistance, including emergency medical care or first aid, for persons who appear or claim to be injured in connection with any such incidents. If any outside assistance is required, an employee or volunteer should promptly call 911 and report the situation.

The Executive Director will be promptly notified of any incidents, including those in which no apparent injuries have been sustained. The Executive Director will conduct an appropriate investigation into the details of the incident. The Executive Director will fill out an incident report with input from employees and volunteers who witnessed the incident or who were present when the incident occurred. Names, addresses, and phone numbers of any other witnesses should also be recorded. Reasonable efforts will be taken to preserve any physical evidence and to photograph any physical conditions which may have contributed to the incident. Any unsafe conditions should be promptly remedied to prevent future incidents. The Executive Director will promptly notify the Center's insurance carrier of any incidents in which any actual or alleged injuries have occurred.

Responding to Media Inquiries

The Pregnancy Care Center of Rockford recognizes that its communications through the public media may have a significant impact upon the community's perception of the organization. To ensure all communications fairly and accurately portray The Pregnancy Care Center, the Executive Director is considered the only official spokesperson. Any official communication about The Pregnancy Care Center and any responses to media inquiries should be referred to the Executive Director, or in her absence, the Development Director.

Use of Client Stories

The Pregnancy Care Center recognizes that client stories may be shared from time to time at fundraising events. No such information will be disclosed unless the client has signed an appropriate release granting The Pregnancy Care Center permission to share information concerning the relevant aspects of the client relationship. Also, no pictures, statements or other recordings relating to a client or a client's child will be reproduced or published unless and until the client has first signed an appropriate media release form. Any time such consent is requested, the client will be advised that she is under no obligation to give her consent and that nothing of value will be given or withheld in exchange for her decision.

Relationships with Clients

The Pregnancy Care Center of Rockford seeks to establish professional mentoring relationships with clients. Employees or volunteers should not transport clients to and from the Center or other appointments. They should also refrain from giving financial or material assistance to clients outside the established programs of The Pregnancy Care Center. Non-clients who come to the Center seeking assistance may qualify for one-time emergency supplies but should not ever be given money. Those needing additional assistance should be referred to other agencies which provide emergency meals, shelter, or material goods.

Employees of The Pregnancy Care Center should also refrain from giving parties or showers to individual clients unless it is a practice which can be fairly provided for all clients without favoritism.

Staff members of The Pregnancy Care Center should refrain from physical contact with clients. If touch is perceived to be helpful or comforting to the client, prior verbal consent must be obtained. Touching of any kind that is sexually oriented or motivated is strictly forbidden and will result in immediate dismissal of the staff member.

Working With Other Organizations

The Pregnancy Care Center of Rockford recognizes that opportunities may arise to partner with other organizations that share a similar mission. The Pregnancy Care Center is prepared to pursue such opportunities when there is compatibility with the other organization. Before any informal partnership or working relationship is undertaken with another organization, the Executive Director will confirm that the other organization is a bona fide, reputable, and responsible organization that shares substantially similar goals and philosophies. The Executive Director will review written copies of the organization's mission or purpose statement, statement of faith, and vision statement; obtain

and review a copy of the organization's 501(c)(3) certificate and annual report; meet with the organization's leaders; and then determine whether an informal partnership or working relationship may be undertaken with the other organization.

Part VI: Facility Use Policies and Procedures



Introduction

God has given The Pregnancy Care Center the gift of a beautiful Center to be used to serve the needs of women, men, and children who need help and hope in the midst of an unplanned pregnancy. It is our desire to steward this resource the best we can.

We will also work to promote an environment and culture in which all employees and volunteers feel safe and secure. We want each employee to feel informed and prepared to act in a variety of emergency or disaster situations.

Facility Security

Each staff member will be issued a key to the facility, and the last person to leave the facility is responsible for locking the door and setting the security alarm. Duplication of keys is prohibited. If the key is lost, the administrator should be contacted immediately. Keys may not be loaned to anyone unless approved by the Executive Director. The Executive Director will retrieve keys from all employees upon leaving the ministry.

The door facing Morsay Drive should not be used to enter and exit the building except in case of an emergency.

Each staff member will have a personalized code to disarm and arm the security system, a code which should not be given out to volunteers or others unless approved by the Executive Director. In the event that an employee accidentally sets off the alarm, she should promptly disarm the alarm and call the Executive Director.

Facility General Care

- Exit signs will always be kept well-lit and visible.
- If the heat or air conditioning on the thermostats is adjusted while using a space, the temperature should be adjusted back when the space is no longer needed. **Ceiling fan in the great room should be left on at all times to circulate the air.**
- Any damage to the facility or its belongings should be reported to the Executive Director or Development Director.
- If water cooler bottle is empty, employees should replace it with a full bottle, which can be found in the storage closet. The dispenser should not be left plugged in with an empty bottle. The dispenser should not be tipped on its side. If it is tipped for any reason, 24 hours must ensue before plugging it in.

Cleaning & Upkeep

- The Center will be kept tidy and clean to serve our clients most effectively. Each staff member should keep his or her office clean and reasonably decluttered. A cleaning crew will be hired to clean the bathrooms and floors.
- Mentoring room cabinets and reception drawers should be kept clean, organized, and decluttered. Staff will perform regular sweeps to ensure clutter is not building up.
- Cleaning materials can be found in the utility closet off the reception area. Materials should be returned when finished, and the closet should be kept organized.
- We will work to maintain a welcoming and professional lawn and landscaping for our clients, volunteers, and donors. While most outdoor chores will be hired (mowing, plowing, etc), employees are encouraged to pick up trash or pull weeds if needed. If all employees help when something is out of place, a welcoming entry can be maintained.

Donation Processing & Baby Boutique

While we are incredibly grateful for the in-kind donations we receive, we must also work to manage the inventory and keep it under control. All donations received should be received and placed in the back hallway where they will be sorted and integrated into the baby boutique, diaper closet, or storage cabinets. Items should not be randomly shoved into a closet or the boutique. If uncertain where something should be placed, an employee should wait and ask the Center Director.

Parking

The parking lot will be well maintained and well-lit in the evening. As much as possible, employees should park away from the facility or utilize one of our five rented spots at Randee's Music to leave the best spots for the clients. Employees should keep cars locked and without valuables. Extra care should be taken if employees walk at the back of the lot near the creek. If any issues arise in the parking lot or any loiterers are spotted hanging around the parking area, employees should inform the Executive Director immediately.

Neighbors

We desire to have a positive relationship with our neighbors. If, for any reason, a neighbor approaches a staff member to argue or complain about a matter, he or she should not engage in an argument or debate. Employees should listen attentively then calmly assure the neighbor that the Executive Director will be informed and will follow-up. As soon as possible, the employee should dismiss herself.

Security of Client, Donor, and Volunteer Information

The Pregnancy Care Center maintains the confidentiality of its clients and donors at all times within the limits of the law. Staff and volunteers are responsible for maintaining the confidentiality of private information. Disclosure by and between staff of private information occurs only as necessary to carry out job functions as determined by the Executive Director. In addition to the existing Center policies in place to protect client information, the following measures will be taken:

- All file cabinets with client, donor, staff, or volunteer information will be kept locked in a secure location. When records are not in a secured file, they will not be left unattended or out in the open. The Center Director will keep the key to the file cabinets.

- All computers will be password protected as well as the database where client and donor information is stored.
- The ultrasound room shall be kept locked, and the ultrasound machine will be password protected.
- Client files and financial records will be kept closed and locked at all times. No one is to access these files without approval by the Executive Director.
- Client records, copies of records, or anything identifying personal client information are never taken out of the Center or left out on the reception desk for anyone to see. Any notes or screens displaying client information should be closed or put away when the reception desk is left unattended.
- All client information needing to be discarded should be placed in the locked shred box found in the reception area.
- When making prayer requests or sharing stories in newsletters, only non-identifying details are provided unless there is written consent to do so. Photos may be used only with a signed photo release.

Use of Office Equipment and Services

The Pregnancy Care Center of Rockford expects all staff members to exercise honesty, good judgment and common sense in connection with their personal use of any property and materials belonging to The Pregnancy Care Center. Personal phone calls are made or received only as reasonably necessary.

Employees and volunteers will request approval from the Executive Director before making personal use of other office equipment, amenities or materials. The Executive Director will implement appropriate procedures to assure that employees and volunteers reimburse the Center for any personal expenses incurred for postage, copies, or other materials.

Any staff member who utilizes the office computer or Internet to gain access to pornographic or inappropriate materials will be subject to disciplinary action including the possibility of immediate termination.

Computer System Usage

The computer systems, including all computer usages such as email and Internet access is the property of The Pregnancy Care Center and should be used for Center purposes only. Staff may make limited personal use of the computer during non-work time to type personal material or access the Internet, provided such use is not contrary to the Center's mission, policies, principles or any applicable laws.

Any software should only be used for approved Center business. Only software for which the Center owns the license should be used on computers. Employees are liable for any damages incurred as a result of violating company security, copyright, or licensing agreements.

Injury of Client or Staff

In the event of injury, staff will administer quality care and document the incident.

- The Center will maintain a first aid kit.

- In the event of an emergency, staff will notify the Executive Director, or, if the ED is unavailable, the staff person or volunteer nurse most qualified to assess the situation.
- In the event of a minor injury, and if the client or staff person desires first aid, appropriate first aid will be administered by either the client or staff person, or by the ED or person most qualified to administer first aid.
- If a client or staff member is unconscious, unable to request help, or requests emergency assistance, 911 should be called immediately by the ED or person assessing the situation.
- If in doubt whether emergency help is needed or the extent of emergency response required, the person assessing the injury should call 911 and let the EMTs determine the extent of the injury.
- The ED should be notified in the event of an injury.
- Children accompanying clients should remain with the client and should not be left unattended.
- An incident report must be filled out and filed with the client records or personnel file, depending on who is injured.

Facility Usage by Staff and Outside Groups

We hope that this facility is used to its fullest capacity. If you would like to use a shared space during business hours, reserve the space with the Administrative Assistant, who will keep a calendar to ensure the same space is not double-booked.

Children of staff and volunteers (as well as clients) are to remain in the care of their parents while in the Center. So that we maintain a professional and calming environment, children should not be running and playing in the great room or in the reception area and should never be left unattended.

If staff and/or volunteers would like to use the facility outside business hours or normal operations, a request should be made to the Executive Director. Use by outside groups will be determined and approved on a case-by-case basis. No fee will be charged, but the group using the facility will be responsible for cleaning after their event and/or donations will be accepted. This policy may change in the future.

Fire

The Pregnancy Care Center will keep working fire detectors and extinguishers throughout the facility and have them maintained and tested regularly. To avoid potential fires, all employees, volunteers, and clients should refrain from smoking inside the facility and on our property. Candles with open flame are not permitted. **Staff should unplug space heaters and small appliances when not in use.**

On discovering a fire, the alarm should be raised by shouting "FIRE!" to alert anyone in the immediate vicinity. If safe to do so, a nearby appropriate fire extinguisher may be used to fight the fire, but only if the exit is clear. Employees should leave the building by the nearest exit and report to the appropriate Assembly Point, calling 9-1-1 as soon as possible.

Two exits are available on the bottom floor: the main entrance door to the parking lot or the Morsay Drive door in the Great Room. Two exits are available upstairs: the stairs down to the Great Room or the Staff Kitchen door leading onto the roof. A two-story escape ladder is available under the upstairs kitchen sink.

Tornado

In the event of a tornado:

- Employees should seek a small interior room (such as client or staff bathrooms, volunteer office, appliance boutique, or back hallway) preferably constructed with reinforced concrete, brick, or block with no windows and a heavy concrete floor or roof system overhead.
- Employees should gather in the center of the room and avoid corners, as they attract debris.
- If no room is available, employees should gather in a hallway on the lowest floor possible, staying away from doors, windows, and outside walls.
- As soon as possible, staff, visitors, and clients should be accounted for by a head count.

Staff and volunteers on the Mobile Medical Unit should also be aware of what to do if caught outdoors when a tornado is threatening. They should seek shelter in a basement or sturdy building. If no shelter is within walking distance, the employee should drive the vehicle, using a seat belt, to the nearest shelter. If flying debris is encountered while in a vehicle, two options are available:

- 1) Employees should stay in the vehicle with the seat belt on, keeping their head below the windows and covering it with their hands or a blanket.
- 2) If there is an area which is noticeably lower than the roadway, employees should lie in that area and cover their head with their hands.
- 3) As soon as possible, employees should get to safety and report to the Executive Director.

Advanced Awareness and Preparedness

Many intruders or active shooters know their victims and display disturbing behaviors in advance that may tip others off to destructive actions. Any unusual behavior by coworkers, volunteers, callers, or clients should be reported to the Executive Director immediately, including:

- Talking about violent incidents
- Focusing on dangerous weapons
- Expressing paranoia or depression
- Making threats or extreme statements
- Political or radical rants

Unusual behavior or threatening clients should be communicated to the entire staff. All staff and volunteers should exercise caution on social media in the event that a client is following online.

Any suspicious activity around or in the building should be reported to the Executive Director immediately, including doors left ajar or propped open, emergency equipment that has been tampered with, lights removed, etc. If you see something, say something.

Unwanted Intruder or Active Shooter

Intruder or active shooter situations are unpredictable and evolve quickly. There are actions each employee can take in advance and during a situation to increase the probability of a good outcome.

If an intruder or active shooter comes on the property or into the facility, the following options are best in this order:

1. **Run.** If possible, someone should hit the panic button located under the reception desk then run, leaving belongings behind. (Each employee and volunteer should know one to two possible escape routes to exit the building.) Someone should call 9-1-1 from another location as soon as possible.
2. **Hide.** If you are not able to exit safely, find a place to hide out of the shooter's view. Lock and block entry doors if possible. Silence your cell phone so no light, sound or vibration can be detected. Call 9-1-1 when it is safe to do so..
3. **Fight.** As a last resort and only if life is in imminent danger, employees should attempt to incapacitate the shooter. Acting with physical aggression, employees should throw items at the shooter and try to hit the panic button located under the reception desk if accessible or call 9-1-1 when it is safe to do so.

When law enforcement arrives, their priority will be to locate and neutralize the threat; therefore:

- remain calm and follow instructions
- put down any items in your hands
- raise hands and spread fingers
- keep your hands visible at all times
- avoid quick movements toward officers
- avoid pointing, screaming or yelling
- do not stop to ask officers for help or directions when evacuating

Information you should provide to law enforcement:

- location of the intruder or active shooter
- number of intruders or active shooters
- physical descriptions
- number and type of weapons
- number of potential victims, if any.

FINANCE & ADMINISTRATION



If your role at The PCC involves managing financial tasks—such as processing donations, making purchases, opening mail, or preparing documents for the annual audit—please refer to the financial policies binder for guidance.

EXHIBIT 4



The Pregnancy Care Center of Rockford's Policy for Employee and Volunteer Moral Conduct

The purpose of this document is to provide expectations of conduct for representatives of The Pregnancy Care Center of Rockford (The PCC). Representatives include employees, volunteers, and members of the Board of Directors.

Amendments and Modifications

The guidelines below may be modified, substituted, replaced, or changed by The Pregnancy Care Center at any time for any reason. Representatives will be notified of any changes.

POLICY

The PCC seeks to be an organization that is “Christian” in every sense of the word; therefore, all staff, volunteers, and Board Members represent The PCC—and more importantly, the Gospel of Jesus Christ—in their work as well as in their private lives. The PCC exists as a fellowship of Christians across a wide variety of denominations and church traditions whose staff members sign a common Statement of Faith. While The PCC offers its help to people in need, regardless of their religious beliefs, representatives of our organization cannot separate who they are from what they do, and seek to work in a manner that draws people to Christ. Words clarify the meaning of our deeds, deeds verify the integrity of our words about Jesus Christ, and signs are the acts of God in the midst of what we do and say.

Throughout all of life, in word and deed, The PCC's staff must be committed to glorifying God and witnessing His love in the person of His Son Jesus Christ. We seek to value and honor our staff, volunteers, and Board Members and abide by biblically-sound standards that bring honor to God and one another. We desire to model behavior that is consistent with our Christian commitment and witness, calling others to a life-changing commitment in the name of Christ.

It is impossible for The PCC to identify every form of behavior that we understand the Bible defines as acceptable or unacceptable to our God. Therefore, we have provided the following guidelines. We hope that these guidelines will help clarify expectations and assist representatives in deciding whether or not The PCC is the right place for them to serve the Lord.

Guidelines and Standards

1. How can I know what The PCC of Rockford considers “biblically-sound standards” and behavior “consistent with our Christian commitment and witness”?

The PCC acknowledges that “all have sinned and fall short of the glory of God, and are justified freely by His grace through the redemption that came by Christ Jesus.” (Romans 3:23-24) The PCC is not looking for “perfect” human beings, but repentant followers of Jesus. Indeed, when we sin, we must repent and turn from our sin because ongoing and unrepentant sin is not acceptable to God. We recognize that singling out certain behaviors as unacceptable requires drawing a line based on the determination of whether that particular behavior is: disruptive in the workplace, reflects poorly on the name of Christ or The PCC’s reputation, distracts us from our core mission, compromises the safety of oneself or others, or is likely to be offensive or off-putting to our donors and/or ministry partners. Christians may sincerely reach different conclusions on some behaviors; but for this private organization, the Board of Directors and the Executive Director of The PCC discern and establish the standards to be upheld by employees. Rather than trying to itemize behavioral “do’s and don’ts,” representatives should consider the following Biblical guidelines:¹

- A. Does this behavior, wherever engaged in, glorify God? Does it cause others to praise your Heavenly Father? Is it worthy of Jesus Christ?** [See Matthew 5:16; Colossians 1:9-12; I Corinthians 10:31-11:1; Ephesians 4:22-24}
- B. Does it build up other Christians and encourage love and good deeds?** [See Hebrews 10:23-25; Ephesians 4:1-3; 15-16; Ephesians 5:3-4; Colossians 3:15-17]
- C. Is it loving?** [See John 13:34-35; Ephesians 5:1-2; Galatians 5:13]
- D. Does it advance truth and truthfulness?** [See I John 1:5-7; 3:18; Ephesians 4:25; 2 Timothy 2:15]
- E. Is it good stewardship, i.e., a responsible way to use God-given time, talent and resources?** [See I Peter 4:10; Ephesians 2:10; Colossians 3:23-24]
- F. Is this behavior consistent with the teachings of scripture?** [See Philippians 1:27; Titus 2:11-12; Galatians 5:22-25; Romans 13:13-14; Matthew 19:4-5; Proverbs 26:20; I Corinthians 6:9-10; 6:12-13; 17-19; Philippians 4:8]

2. Does The PCC of Rockford have the right to have such standards that address my behavior outside of, as well as during, my work hours?

¹ Scripture verses mentioned in this sample policy are quoted in full in Attachment 1 of this document. Unless otherwise noted, Scripture is quoted from New International Version.

Yes, it does, under decades of well-established law. A church or religious association, such as The PCC has the right to consider religious criteria in employment matters, according to judicial interpretations of the religious freedom guarantee in the First Amendment to the U.S. Constitution as well as several federal statutes (including the Civil Rights Act of 1964). This includes the right to set and apply to job applicants, employees' and volunteers' standards of conduct that are based on sincere religious belief.

3. Do The PCC of Rockford's standards apply to my private relationships or conduct outside of the workplace?

Yes. We are Christian 24/7, not just while we are at The PCC. While The PCC seeks to respect the privacy of its employees, one's life away from work is an important component of one's witness as a Christian. As a Christian organization, The PCC expects biblically-faithful conduct both inside and outside the workplace. Such conduct reinforces the center's core mission, instead of distracting from it.

We expect all representatives of The PCC to conduct themselves honorably in their private lives. Any behavior inside or outside the workplace which becomes: disruptive in the workplace, reflects poorly on the name of Christ or The PCC's reputation, distracts from our core mission, compromises the safety of oneself or others, or is likely to be offensive or off-putting to our donors and/or ministry partners, may be grounds for refusal to hire or discipline up to and including dismissal.

Examples of these behaviors include, but are not limited to

- substance or alcohol over-use or abuse;
- harassment of any type;
- child or spousal abuse or neglect;
- theft, fraud, embezzlement, corruption, bribery, misappropriations, or inappropriate removal or possession of property belonging to The PCC, a co-worker, a vendor, or any individual or organization;
- sexual conduct outside the biblical covenant of marriage between a man and a woman;
- Referring, assisting in the procurement of, providing, or receiving an abortion in violation of the sixth commandment and Genesis 9:6;
- malicious gossip;
- physical aggression: fighting or threatening violence; etc.

All representatives of The PCC are expected to conduct themselves according to these guidelines. The PCC reserves the right to define acceptable conduct for all representatives of The PCC and to end the employment or volunteer opportunities of an individual who fails to comply with these expectations.

The Pregnancy Care Center of Rockford's Employee Commitment

I acknowledge that The PCC is a Christian ministry that requires that all employees subscribe to its Statement of Faith and applicable principles and which requires that all employees uphold Christian moral standards in the entirety of their lives.

Accordingly, I commit and pledge that:

1. I have accepted Jesus Christ as my personal Savior and Lord.
2. I have read, understand, and I am in full agreement with The PCC's *Statement of Faith*.
3. I believe that God values all human life, from fertilization until natural death, and as our Creator, He has a plan and purpose for all people, including the unborn. Therefore, I reject abortion as a morally acceptable option.
4. I will support The PCC in offering alternatives to abortion to women and men, including accurate information, compassionate emotional support, and spiritual guidance, consistent with the *Commitment of Care and Competence* upheld by Care Net and The PCC.
5. During the time I am employed with The PCC, I agree to regularly attend a Christian church.
6. During the time I am employed with The PCC, I will consistently live my life in a way that upholds Christian moral standards, including, but not limited to, refraining at all times from:
 - substance or alcohol over-use or abuse;
 - harassment of any type;
 - child or spousal abuse or neglect;
 - theft, fraud, embezzlement, corruption, bribery, misappropriations, or inappropriate removal or possession of property belonging to The PCC, a co-worker (or any individual), a vendor, or any individual or organization;
 - sexual conduct outside the biblical covenant of marriage between a man and a woman;
 - Referring, assisting in the procurement of, providing, or receiving an abortion in violation of the sixth commandment and Genesis 9:6;
 - malicious gossip;
 - physical aggression: fighting or threatening violence.
7. I have read, understand, and will abide by the The PCC's policies and procedures established by the Medical Director, Executive Director, and Board of Directors.
8. I accept responsibility to act as an advocate on behalf of people to whom I minister under the auspices of The PCC. I will keep ALL information concerning clients in STRICT CONFIDENCE, according to the policies of The PCC, including after I leave employment with The PCC.
9. I have received, read, and understand The PCC's employee handbook. I agree that (a) it exists to inform me about the center's policies and to assist me in doing my job, (b) it does not constitute an employment contract, (c) it does not confer rights on any employee, (d) it is subject to change at any time, and (e) it is the confidential property of The PCC.

I further acknowledge that my employment with The PCC of Rockford is on an at-will basis and may be terminated by myself or The PCC at any time, with or without cause.

Employee Name (printed)

Employee Signature

Date

The Pregnancy Care Center of Rockford's Volunteer Commitment

Recognizing that The Pregnancy Care Center of Rockford is a Christian ministry, I eagerly and openly acknowledge that I have placed my faith in Jesus Christ as my personal Lord and Savior. I have read and fully agree with The PCC's *Statement of Faith*. I commit to regularly attending a Christian church.

I believe that God values all human life, from fertilization until natural death, and as our Creator, He has a plan and purpose for all people, including the unborn. Therefore, I reject abortion as a morally acceptable option.

I accept the responsibility to act as an advocate for women and men visiting The PCC as clients; offering them alternatives to abortion, including accurate information, compassionate emotional support, and spiritual guidance, consistent with the *Commitment of Care and Competence* upheld by Care Net and the PCC. I will keep ALL information concerning clients in STRICT CONFIDENCE, according to the policies of The PCC including after I am no longer a volunteer at The PCC.

Recognizing that, as a volunteer at The PCC of Rockford, I represent Christ and this ministry to clients and in my community, I will consistently live my life in a way that upholds Christian moral standards, including, but not limited to, refraining from:

- substance or alcohol over-use or abuse;
- harassment of any type;
- child or spousal abuse or neglect;
- theft, fraud, embezzlement, corruption, bribery, misappropriations, or inappropriate removal or possession of property belonging to The PCC, a co-worker, or a vendor;
- sexual conduct outside the biblical covenant of marriage between a man and a woman;
- referring, assisting in the procurement of, providing, or receiving an abortion in violation of the sixth commandment and Genesis 9:6;
- malicious gossip;
- physical aggression: fighting or threatening violence.

I will uphold all policies and procedures established by the Medical Director, Executive Director, and Board of Directors. I commit to faithfully serve as a volunteer at The PCC according to the hours agreed upon with my supervisor, and to attend all required volunteer staff meetings and in-service training sessions unless excused by my supervisor.

I understand that volunteers are vital to the ministry of The PCC, that my role at The PCC is completely voluntary and uncompensated, that no expectation of current or future employment is associated with my volunteer role at The PCC, and that my volunteer relationship with The PCC may be ended at any time by myself or The PCC.

Volunteer Name (printed)

Volunteer Signature

Date

The Pregnancy Care Center of Rockford's Board Member Commitment

Recognizing that The Pregnancy Care Center of Rockford is a life-affirming Christian ministry, I soberly commit to fulfilling the duties of a member of the Board of Directors for The PCC.

Before God and the members of the Board of Directors for The PCC of Rockford, I commit and pledge that:

1. I have accepted Jesus Christ as my personal Savior and Lord. I seek to pursue spiritual maturity through the practice of spiritual disciplines, being led by the Holy Spirit, and regular involvement in a Christian church.
2. I have read, understand, and I am in full agreement with The PCC's *Statement of Faith, Commitment of Care and Competence, Mission, Vision*, and applicable principles.
3. I will pray for the ministry of The PCC, for my colleagues on this center's Board of Directors, and for the center's staff, volunteers, clients, and ministry partners.
4. I believe that God values all human life, from fertilization until natural death, and as our Creator, He has a plan and purpose for all people, including the unborn. Therefore, I reject abortion as a morally acceptable option.
5. I will support The PCC in offering alternatives to abortion to women and men, including accurate information, compassionate emotional support, and spiritual guidance.
6. I will faithfully engage my responsibilities as a Board Member by
 - Attending all meetings of the board unless I am hindered from doing so by a compelling reason, in which case I will notify the board chair or vice chair, in advance, of the reasons for my absence.
 - Preparing for each board meeting by reading related materials, resources, and reports.
 - Fulfilling my fiduciary duties, together with other Board Members, in an encouraging way, being open, positive, and teachable, seeking to maintain the unity of the Spirit in the bond of peace.
7. I will keep in STRICT CONFIDENCE all private information received in the course of my duties related to The PCC, including confidential information about Board matters, as well as center personnel, donors, finances, and clients, including after I am no longer a board member at The PCC.
8. Recognizing that, as a volunteer Board Member at The PCC, I represent Christ and this ministry in my community, I will consistently live my life in a way that upholds Christian moral standards, including, but not limited to, refraining from:
 - substance or alcohol over-use or abuse;
 - harassment of any type;
 - child or spousal abuse or neglect;
 - theft, fraud, embezzlement, corruption, bribery, misappropriations, or inappropriate removal or possession of property belonging to the PCC, a co-worker, or a vendor;
 - sexual conduct outside the biblical covenant of marriage between a man and a woman;
 - Referring, assisting in the procurement of, providing, or receiving an abortion in violation of the sixth commandment and Genesis 9:6
 - malicious gossip
 - physical aggression: fighting or threatening violence.

I understand that Board Members are vital to the ministry of The PCC of Rockford, that my role at The PCC is completely voluntary and uncompensated, that no expectation of current or future employment is associated with my board membership at The PCC, and that my board service at The PCC is subject to the bylaws of The PCC. The foregoing statements reflect my considered commitment, before God, to The PCC.

Board Member Name (printed)

Board Member Signature

Date

ATTACHMENT I

SCRIPTURE QUOTES

A. DOES IT GLORIFY GOD? DOES IT CAUSE OTHERS TO PRAISE YOUR HEAVENLY FATHER? IS IT WORTHY OF JESUS CHRIST?

- Matthew 5:16: *"In the same way, let your light shine before others, that they may see your good deeds and glorify your Father in heaven."*
- Colossians 1:9-12: *"We continually ask God to fill you with the knowledge of his will through all the wisdom and understanding that the Spirit gives, so that you may live a life worthy of the Lord and please Him in every way: bearing fruit in every good work, growing in the knowledge of God, being strengthened with all power according to his glorious might so that you may have great endurance and patience, and giving joyful thanks to the Father, who has qualified you to share in the inheritance of his people in the kingdom of light."*
- 1 Corinthians 10:31-11:1: *"So whether you eat or drink or whatever you do, do it all for the glory of God. Do not cause anyone to stumble, whether Jews, Greeks or the church of God—even as I try to please everybody in every way. For I am not seeking my own good, but the good of many, so that they may be saved. Follow my example, as I follow the example of Christ."*
- Ephesians 4:22-24: *You were taught, with regard to your former way of life, to put off your old self, which is being corrupted by its deceitful desires; to be made new in the attitude of your minds; and to put on the new self, created to be like God in true righteousness and holiness."*

B. DOES IT BUILD UP OTHER CHRISTIANS AND ENCOURAGE LOVE AND GOOD DEEDS?

- Hebrews 10:23-25: *"Let us hold unwaveringly to the hope we profess, for he who promised is faithful. And let us consider how we may spur one another on toward love and good deeds, not giving up meeting together, as some are in the habit of doing, but encouraging one another—and all the more as you see the Day approaching."*
- Ephesians 4:1-3; 15-16: *"...I urge you to live a life worthy of the calling you have received. Be completely humble and gentle; be patient, bearing with one another in love. Make every effort to keep the unity of the Spirit through the bond of peace." "...speaking the truth in love, we will in all things grow up into Him who is the head, that is, Christ. From Him, the whole body joined and held together by every supporting ligament, grows and builds itself up in love, as each part does its work."*
- Ephesians 5:3-4: *"But among you, there must not be even a hint of sexual immorality, or of any kind of impurity, or of greed, because these are improper for the Lord's people. Nor should there be obscenity, foolish talk, or coarse joking, which are out of place, but rather thanksgiving."*

- Colossians 3:15-17: “Let the peace of Christ rule in your hearts, since as members of one body you were called to peace. And be thankful. Let the message of Christ dwell among you richly as you teach and admonish one another with all wisdom through psalms, hymns, and songs from the Spirit, singing to God with gratitude in your hearts. And whatever you do, whether in word or deed, do it all in the name of the Lord Jesus, giving thanks to God the Father through him.”

C. IS IT LOVING?

- John 13:34-35: “A new command I give you: Love one another. As I have loved you, so you must love one another. By this, everyone will know that you are my disciples, if you love one another.”
- Ephesians 5:12: “Follow God’s example, therefore, as dearly loved children and walk in the way of love, just as Christ loved us and gave himself up for us as a fragrant offering and sacrifice to God.”
- Galatians 5:13: “You, my brothers and sisters, were called to be free. But do not use your freedom to indulge the sinful nature; rather, serve one another humbly in love.”

D. DOES IT ADVANCE TRUTH AND TRUTHFULNESS?

- 1 John 3:18: “Dear children, let us not love with words or tongue but with actions and in truth.”
- Ephesians 4:25: “Therefore each of you must put off falsehood and speak truthfully to your neighbor, for we are all members of one body.”
- 2 Timothy 2:15: “Do your best to present yourself to God as one approved, a worker who does not need to be ashamed and who correctly handles the word of truth.”
- 1 John 1:5-7: “This is the message we have heard from Him and declare to you: God is light; in Him, there is no darkness at all. If we claim to have fellowship with Him and yet walk in the darkness, we lie and do not live out the truth. But if we walk in the light, as he is in the light, we have fellowship with one another, and the blood of Jesus, his Son, purifies us from all sin.”

E. IS IT GOOD STEWARDSHIP (i.e., A RESPONSIBLE WAY TO USE GOD-GIVEN TIME, TALENT, AND TREASURE/RESOURCES?)

- 1 Peter 4:10: “Each of you should use whatever gift you have received to serve others, as faithful stewards of God’s grace in its various forms.”
- Ephesians 2:10: “For we are God’s workmanship, created in Christ Jesus to do good works, which God prepared in advance for us to do.”

- Colossians 3:23-24: “Whatever you do, work at it with all your heart, as working for the Lord, not for human masters, since you know that you will receive an inheritance from the Lord as a reward. It is the Lord Christ you are serving.”

F. IS THIS BEHAVIOR CONSISTENT WITH THE TEACHINGS OF SCRIPTURE?

- Philippians 1:27: “Whatever happens, as citizens of heaven live in a manner worthy of the gospel of Christ. Then, whether I come and see you or only hear about you in my absence, I will know that you stand firm in the one Spirit, striving together with one accord for the faith of the gospel.”
- Titus 2:11-12: “For the grace of God has appeared that offers salvation to all people. It teaches us to say ‘No’ to ungodliness and worldly passions, and to live self-controlled, upright, and godly lives in this present age.”
- Galatians 5:22-25: “But the fruit of the Spirit is love, joy, peace, patience, kindness, goodness, faithfulness, gentleness and self-control. Against such things, there is no law. Those who belong to Christ Jesus have crucified the sinful nature with its passions and desires. Since we live by the Spirit, let us keep in step with the Spirit.”
- Romans 13:13-14: “Let us behave decently, as in the daytime, not in carousing and drunkenness, not in sexual immorality and debauchery, not in dissension and jealousy. Rather, clothe yourselves with the Lord Jesus Christ, and do not think about how to gratify the desires of the sinful nature.”
- Matthew 19:4-5: “Haven’t you read,” he replied, “that at the beginning the Creator, ‘made them male and female,’ and said, ‘For this reason, a man will leave his father and mother and be united to his wife, and the two will become one flesh’?”
- Proverbs 26:20: “Without wood, a fire goes out; without a gossip, a quarrel dies down.”
- 1 Corinthians 6:9-10; 6:12-13; 17-19: “Do you not know that the wicked will not inherit the kingdom of God? Do not be deceived; neither the sexually immoral nor idolaters nor adulterers nor male prostitutes nor homosexual offenders...will inherit the kingdom of God. ‘I have the right to do anything,’ you say—but not everything is beneficial. ‘I have the right to do anything’—but I will not be mastered by anything. You say, ‘Food for the stomach and the stomach for food, and God will destroy them both.’ The body, however, is not meant for sexual immorality but for the Lord, and the Lord for the body. But whoever is united with the Lord is one with Him in spirit. Flee from sexual immorality. All other sins people commit are outside their bodies, but those who sin sexually sin against their own bodies. Do you not know that your bodies are temples of the Holy Spirit, who is in you, whom you have received from God? You are not your own...”
- Philippians 4:8: “Finally, brothers and sisters, whatever is true, whatever is noble, whatever is right, whatever is pure, whatever is lovely, whatever is admirable—if anything is excellent or praiseworthy—think about such things.”

EXHIBIT 5



Staff Nurse

Position Summary: Reporting to the Director of Nursing, the Staff Nurse will provide nursing care, client education, perform limited OB ultrasounds, and related administrative duties. The Staff Nurse will be trained on both the ultrasound machine in the center as well as on the machine on the Mobile Medical Unit. This is a part time position, 15-20 hours per week.

Ministry Purpose: In accordance with Philippians 2:4 and Romans 12:9-15, the Staff Nurse is responsible for servant leadership of the Center in carrying out its mission. As such, the Staff Nurse is responsible to diligently and prayerfully work with clients, staff, and volunteers to develop and maintain a Christian center that aids in the care for the physical, mental, and spiritual health and wellness of clients. The Staff Nurse is responsible for counseling and speaking with clients in a manner consistent with the Center's Statement of Faith and Statement of Principles to promote the sanctity of human life.

Qualifications

- Is a committed Christ-follower who demonstrates a personal relationship with Christ.
- Exhibits a strong pro-life commitment and upholds a lifestyle of sexual purity.
- Willing to uphold the Statement of Principle, Statement of Faith, and policies of The Pregnancy Care Center of Rockford.
- Holds a Registered Nurse license in good standing in the state of Illinois
- Have at least one year of experience in nursing.
- Exhibits strong interpersonal skills with an ability to care for clients with diverse backgrounds.
- Exhibits competence with computers as well as skills needed to operate the ultrasound machine. OB Ultrasound training is provided, experience with OB Ultrasound is a plus but is not required.

Detailed Duties:

I. Client Care

- Meet with clients to explain testing and perform medical intake.
- Perform pregnancy tests, STD tests, and limited obstetric ultrasounds.
- Take client vitals and record pertinent client information in the database.
- Provide education on client options and risks involved.
- Provide vitamins, materials, and referrals as needed.

II. Administration

- Review patient records at the end of day to ensure accurate data entry and upload of ultrasound photos and measurements.

- Ensure the nurse's station and ultrasound room are kept clean and organized.
- Make the Director of Nursing aware when supplies are getting low.
- Assist in putting together client paper charts.
- Treat ultrasound machine and other equipment with care.
- Communicate with radiologist regarding any abnormal ultrasounds or situations and alert the Director of Nursing.
- Meet with the Director of Nursing to communicate any medical or client related issues or concerns.
- Keep nursing license and other required certifications up to date.
- Undergo an annual evaluation with the Director of Nursing.
- Attend monthly nurse meetings as well as all staff meetings and annual staff retreat.

III. Public Relations

- Participate in all fundraising events for The Pregnancy Care Center.
- Give tours of the facility as needed to donors or community members.

Working Conditions: Majority of work is done indoors, with occasional shifts on the Mobile Medical Unit. 10% of time is spent on the computer and/or telephone. Occasional lifting, up to 30 pounds, is required.

Physical Requirements: This position requires sitting, manual dexterity for phlebotomy and ultrasound procedures, some bending, stooping and reaching, typing on a keyboard, phone usage, and the ability to lift 30 pounds for a limited period of time. The majority of work is done indoors, with occasional shifts on the Mobile Medical Unit as needed.

Disclaimer: This job description in no way states or implies that these are the only duties to be performed by the employee occupying this position. Employees will be required to follow any other job-related instructions and to perform any other job-related duties requested by their supervisor. Requirements are representative of the minimum levels of knowledge, skills and/or abilities to perform this job successfully. The incumbent will possess the abilities or aptitude to perform each duty proficiently. All requirements are subject to possible modification to reasonably accommodate individuals with disabilities. Some requirements may exclude individuals who pose a direct threat or significant risk to the health and safety of themselves or other employees. This document does not create an employment contract, implied or otherwise, other than an "at will" employment relationship.

Revised: October 2024

EXHIBIT 6



Receptionist

Position Summary: Reporting to the Center Director, the Receptionist is a part-time position that performs routine administrative tasks at the front desk of the Pregnancy Care Center. This includes greeting clients and other visitors, answering phones, scheduling client appointments, receiving and documenting material donations, and various other administrative tasks, as needed. This is a part-time position, 15-20 hours per week.

Qualifications:

1. Committed Christ-follower who demonstrates a personal relationship with Christ.
2. Exhibits a strong pro-life commitment and upholds a lifestyle of sexual purity.
3. Upholds the Statement of Principle, Statement of Faith, and policies of The Pregnancy Care Center of Rockford.
4. Has a two-year college degree or related experience equivalent. Experience in a non-profit or clinical setting a plus.
5. Excellent interpersonal communication skills, including written and verbal communication with attention to detail.
6. Have excellent computer skills, including Word, Publisher, Excel, and Power Point, as well as web-based databases, technology, and social media.
7. Self-motivated and dependable, able to manage multiple tasks and problem-solve while meeting deadlines with little supervision
8. A servant leader to the volunteers and a flexible team player with the staff

Detailed Duties:

I. Administration

1. Answer phones, transfer calls to the appropriate staff member, and schedule client appointments in person, over the phone, via email, and text message. Send appointment confirmation text reminders to all scheduled clients. Must be comfortable speaking with women facing pregnancy decisions and providing empathetic support.
2. Assist in the process of confidential and accurate data entry of client information, including scanning and saving documents into client records, and creating new client records when necessary.

3. Fill emergency packs with baby supplies, for clients and other community members as needed.
4. Accept and document material donations received.
5. Perform various other administrative tasks as needed, such as making photocopies, cutting, folding brochures, etc.
6. Maintain cleanliness and quality first impressions of the center for clients walking through the door, including dusting and cleaning entry way, and lobby area, as needed.
7. Participate in all staff meetings, trainings, and staff retreats.

II. Public Relations

1. Participate in all fundraising events for The Pregnancy Care Center.
2. Give tours of the facility as needed, to donors or community members.

Working Conditions: Majority of work is done indoors. 90% of time is spent on computer and/or telephone. Lifting up to 40 pounds required.

Disclaimer: This job description in no way states or implies that these are the only duties to be performed by the employee occupying this position. Employees will be required to follow any other job-related instructions and to perform any other job-related duties requested by their supervisor. Requirements are representative of the minimum levels of knowledge, skills and/or abilities to perform this job successfully. The incumbent will possess the abilities or aptitude to perform each duty proficiently. All requirements are subject to possible modification to reasonably accommodate individuals with disabilities. Some requirements may exclude individuals who pose a direct threat or significant risk to the health and safety of themselves or other employees. This document does not create an employment contract, implied or otherwise, other than an "at will" employment relationship.

Revised: 02/12/2025

EXHIBIT 7

§503 STANDARDS OF CONDUCT

In every organization there are rules and responsibilities which contribute to a harmonious work environment for all staff. Cooperation with these rules and responsibilities is the responsibility of all personnel.

*As employees of the Diocese of Springfield in Illinois, our employees are reminded that to the faithful and to the outside world, they represent the Catholic Church. "All Christians in any state or walk of life are called to the fullness of Christian life and to the perfection of charity. All are called to holiness: Be perfect, as your heavenly Father is perfect. In order to reach this perfection the faithful should use the strength dealt out to them by Christ's gift, so that . . . doing the will of the Father in everything, they may wholeheartedly devote themselves to the glory of God and to the service of their neighbor." **Catechism of the Catholic Church §2013** (internal quotation marks omitted.)*

*"The mission of the Roman Catholic Diocese of Springfield in Illinois is to build a fervent community of intentional and dedicated missionary disciples of the Risen Lord and steadfast stewards of God's creation who seek to become saints. Accordingly, the community of Catholic faithful in this Diocese is committed to the discipleship and stewardship way of life as commanded by Christ Our Savior and as revealed by Sacred Scripture and Tradition." **Fourth Diocesan Synod, statute #1.***

*"In the Diocese of Springfield in Illinois, 'all pastoral initiatives must be set in relation to holiness' and will invite people to a life of discipleship and stewardship." **Fourth Diocesan Synod, statute #2.***

503.1. Policy Every employee of the Diocese and Diocesan agencies¹ shall act in an honest and forthright manner in all workplace concerns; treat co-workers, supervisors, volunteers, parishioners, students, and visitors with respect; and conduct themselves in a moral and ethical manner consistent with Catholic principles. Every employee, as a representative of the Catholic Church to the faithful and to the outside world, has a ministerial calling. Every position has a ministerial aspect. Personnel must, therefore, conduct themselves in a way that does not contradict the doctrine and moral teaching of the Catholic Church.

503.2. Policy An employee who violates this policy will be subject to disciplinary action, up to and including termination.

Procedures

- a) Some of the actions which violate this policy include, but are not limited to:
 - 1) Falsification of employee or institutional records.
 - 2) Unauthorized possession of property or misappropriation of funds or assets.
 - 3) Insubordination.

¹ An "agency" as used herein shall include any department, institution, office, parish, school, juridic person or any subdivision thereof governed by the moral authority of the Roman Catholic Bishop of Springfield in Illinois.

- 4) Any social media engagement or other behavior that violates standards of safe environment for children.
- 5) Immoral or unethical conduct, actions, or lifestyles when such has an adverse impact on the Church, the Diocese, or the employee's job, or becomes publicly scandalous as determined by the Diocesan Bishop.
- 6) Public espousal or promotion of teachings or conduct that contradicts the doctrine and moral teaching of the Catholic Church and which may cause scandal as determined by the Diocesan Bishop.

b) Employees should also refer to their individual contracts and agreements with the Diocese or Diocesan agency, any employee handbooks provided by the Office for Human Resources or a supervisor, and all other Diocesan Policies for additional employment expectations. This policy and the examples above in no way limit the expectations found in these other sources.

c) The Diocesan Bishop has full authority to determine the ministerial expectations and aspect of each employment position and has full authority to determine violations and remedies related to this policy.

EXHIBIT 8



Diocese of Springfield in Illinois

Catholic Pastoral Center

Job Title:	Advocate
Division/Department:	Office for Respect Life and Human Dignity
Reports to:	Director, Department for Communications, Stewardship, and Faith Promotion Services
FLSA Status:	Exempt
Prepared Date:	February 2025
	Revised:

POSITION SUMMARY:

The Advocate plays a crucial role in fostering awareness and education among stakeholders within the Diocese of Springfield in Illinois, primarily focusing on issues regarding respect life, reproductive rights in alignment with Church teaching, outreach on behalf of the Pontifical Mission Society, as well as promoting principles of Catholic Social Teaching. This position collaborates on the planning and execution of impactful events and strategizes educational initiatives that highlight the value of human dignity. By engaging the community and facilitating discussions, this position seeks to create a culture that respects and uplifts every individual, promoting a deeper understanding of these vital matters.

ESSENTIAL FUNCTIONS:

- Leads the Diocesan effort in appropriate initiatives ensuring the four pillars of Hospitality, Prayer, Formation, and Service are evident in all aspects of ministries.
 - Provides educational information, materials, and training to parishes, clergy, deacons, and school staff on issues of life, charity, and justice. Supports local efforts and develops effective communication methods to inform parish and school staff of services, resources, and advocacy opportunities available.
 - Arranges and/or presents when needed to Catholic schools and parishes to promote the various life and dignity initiatives.
- Manage the application process and scheduling of missionaries of the Missionary Cooperation Plan.
 - Accept and review missionary applications. Determine placement of missionaries.
 - Review missionary visits. Update the program as necessary.
- Coordinate the Diocesan Campaign for Justice and Hope.
 - Coordinate application process. Serve as chair of the review committee.
 - Communicate with agencies regarding the campaign, the status of their application, answer questions, etc.
- Serves as the primary contact for respect life ministries and programs.
 - Chairs the Curia Pro-Life Committee.
 - Under the guidance of the Director, assists with planning with internal and external stakeholders the annual Pro-Life Mass in Springfield.
 - Assists with organizing 40 Days for Life events around the Diocese.
- Works closely with the Office for Communications and other diocesan offices to ensure consistent, sanctioned messaging and to promote the activities, events, and missionary activity for the Office for Respect Life and Human Dignity. Such events include World Mission Sunday, the CRS Rice Bowl Campaign, the Diocesan Campaign for Justice and Hope, and other initiatives. Coordinates with other offices in developing multi-faceted initiatives.

Job Description: Advocate, Office for Respect Life and Human Dignity

- Collaborates with the Office for Financial Services giving appropriate documentation for their collections and distributions of funds for the various appeals.
- Liaison for the Catholic Conference of Illinois. Serves on committees relevant to the position.
- Liaison for the Pontifical Mission Society and Catholic Relief Services. Serve as ambassador on behalf of the Bishop.
- When necessary, serve as liaison for other special ministries such as the Black Catholic Commission and Hispanic Ministry.
- Attends professional conferences, webinars, etc. as necessary and as permitted by the budget.
- Other duties as assigned.

EDUCATION, EXPERIENCE, AND SKILLS REQUIRED:

- Bachelors or Masters degree in Theology, Pastoral Ministry, Religious Studies, or related field. Related experience will be considered in lieu of education.
- 2-5 years experience of ministry or social work.

REQUIRED SKILLS, KNOWLEDGE, AND CHARACTERISTICS:

- Practicing Catholic in full communion with the teachings of the Church.
- Possesses an interest in people and situations around the world, social justice concerns, and pro-life matters.
- Strong communication skills; oral, written, and ability to speak publicly.
- Computer literate with proficiency in Microsoft Office products.
- Excellent interpersonal skills and the ability to build good working relationships with co-workers and others throughout the Diocese.
- Self-directed and able to work in ambiguity.
- Demonstrates excellent organizational and planning skills and possesses ability to set job priorities and accomplish goals with minimal supervision.
- Demonstrates a high degree of confidentiality.
- Willingness to work collaboratively as a member of a team.
- Desire to learn and undertake new and unfamiliar job responsibilities and tasks.
- Ability for evening and weekend work.
- Valid driver's license.

COMPANY SUMMARY:

The Roman Catholic Diocese of Springfield in Illinois seeks a dynamic and joyfully Catholic individual to help us "build a fervent community of intentional and dedicated missionary disciples of the Risen Lord and steadfast stewards of God's creation who seek to become saints," (Fourth Diocesan Synod, Statue #1). Every member of the Curia staff, as an extension of the ministry of the Diocesan Bishop, has a ministerial calling, and each position therefore has a ministerial dimension.

EXHIBIT 9



Diocese of Springfield in Illinois

Catholic Pastoral Center

Title:	Associate General Counsel
Division/Department:	Office of the Chancellor and General Counsel
Reports to:	Chancellor and General Counsel
FLSA Status:	Exempt
Prepared Date:	January 2025

POSITION SUMMARY:

"The mission of the Roman Catholic Diocese of Springfield in Illinois is to build a fervent community of intentional and dedicated missionary disciples of the Risen Lord and steadfast stewards of God's creation who seek to become saints." (Fourth Diocesan Synod, Statue#1). Therefore, every member of the Curia staff, as an extension of the ministry of the Diocesan Bishop, has a ministerial calling, and each position has a ministerial aspect.

This position serves in the capacity of an associate legal officer supporting the Chancellor and General Counsel in his role as chief legal advisor for the Diocesan Bishop, other officials of the Diocesan Curia, Diocesan pastors, and parochial administrators in basic matters of civil and canon law regarding routine Diocesan and parish activities. The Diocese includes the parishes, schools, high schools, Catholic cemeteries, and other institutions that fall under the Diocesan Bishop's jurisdiction.

ESSENTIAL FUNCTIONS:

- Assists the General Counsel in providing legal advice, interpretation, and guidance to the Diocesan Bishop and other officials of the Diocesan Curia, and Diocesan pastors and parochial administrators in basic matters of civil law regarding routine diocesan and parish activities, e.g., employment matters, insurance and benefits, contracts, property matters, internal investigations, liability, and risk management.
- Researches various legal questions, statutes, and regulations and provides memoranda summarizing and analyzing the same as assigned by the General Counsel.
- Assists the General Counsel in reviewing and advising on inquiries, questions, investigations, or other communications to the Diocese, parishes, schools, and agencies, from law enforcement, investigators, or legal counsel representing other persons or non-diocesan entities; advises on subpoenas, warrants, and other externally originated legal processes.
- Provides education to parishes, schools, and agencies on laws and legal issues affecting them or their programs.
- Assists the General Counsel in overseeing and supervising corporate compliance and governance, legislative compliance, and compliance with Diocesan policies.
- Once admitted to the Illinois Bar, assists the General Counsel in representing the Diocese, parishes, schools, and other entities before administrative bodies and, where appropriate, in court. Assists with discovery, motion practice, and oral hearings where assigned. Works in conjunction with outside counsel as selected and managed by the General Counsel.
- Assists the Chancellor in drafting official curial documents and recording official minutes of certain meetings.

Job Description: Chancellor and General Counsel

- Serves on the Policy Development Committee.
 - Assists the Chancellor in coordinating the development of Diocesan policies and procedures in collaboration with the Diocesan departments or offices responsible for their assigned area of expertise or responsibility.
 - Guides the development of policies and procedures through the consultative processes from inception to promulgation.
 - Edits policies and procedures for grammatical correctness, clarity, and consistency of format.
- Effectively use the current electronic document and record management system.
- Other duties as assigned.

EDUCATION, EXPERIENCE, AND SKILLS REQUIRED:

- Requires a Juris Doctor degree from an accredited law school in the United States.
- Requires license to practice law with admittance to the Illinois bar.
- Three or more years of relevant experience preferred.

REQUIRED SKILLS, KNOWLEDGE, AND CHARACTERISTICS

- Practicing Catholic in full communion with the teachings of the Church.
- Strong verbal, written, analytical and people skills.
- Excellent ability to organize, plan, set job priorities, and multi-task to meet deadlines.
- Proficient with Microsoft Office Suite and Outlook.
- Ability to maintain a high degree of confidentiality.
- Proven compliance with the Illinois Rules of Professional Conduct for Attorneys, including but not limited to conflicts of interest and ethical duties.
- Ability to display appropriate conduct as it pertains to the values of the Diocesan mission and the teachings of the Catholic Church.
- Ability to be dependable and available for work and complete work responsibilities.
- Ability to interpret data and provide suggestions and recommendations for improvements to the job or processes.
- Capable of resolving escalated issues arising from operations and requiring crisis prevention and management.
- Ability to have a high reading comprehension rate.
- Proven ability to solve problems and make effective decisions.
- Willingness to work collaboratively in a team-oriented environment.
- Capable of developing intimate knowledge of the Diocese and serving as a trusted advisor.
- Ability to work to reduce overall legal expenses and minimize legal risks.
- Desire to learn and undertake new and unfamiliar job responsibilities and tasks.
- Valid driver's license.

Physical Demands:

The physical demands of the position are those typically associated with work conducted in an office environment. The position requires the person to be able to lift 30 pounds. Must be able to operate a motor vehicle.

Work Environment:

The Diocesan Pastoral Center operates in a smoke-free environment. The employee must be willing to abide by all policies of the Diocese of Springfield in Illinois. The general environment for this position is that commonly associated with a temperature-controlled office setting.

EXHIBIT 10



ANNUAL REPORT

2024

ILLINOIS DEPARTMENT OF
Human Rights

FISCAL YEAR 2024
JULY 1, 2023 - JUNE 30, 2024

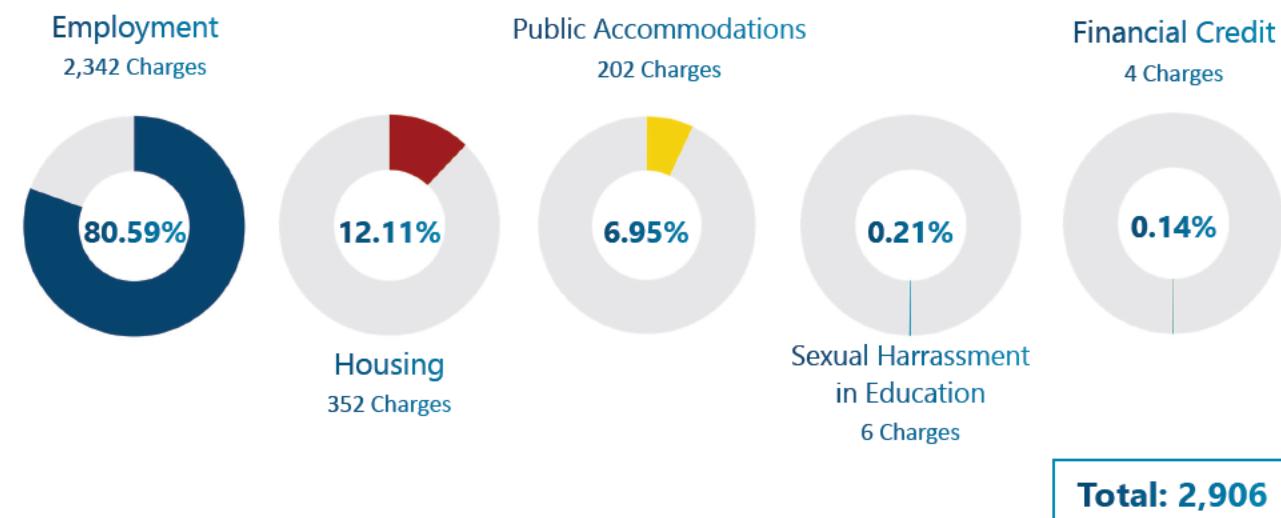
Investigation of Discrimination Claims

IDHR is responsible for investigating claims of unlawful discrimination, determining whether sufficient evidence exists to support those claims, and filing cases with the IHRC.

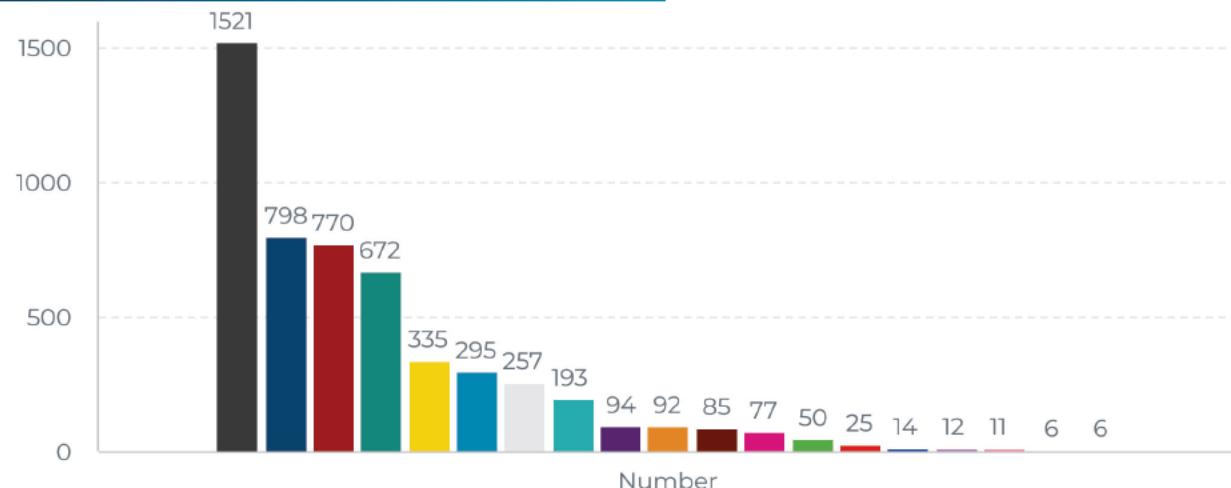
IDHR's role is to conduct a neutral investigation of the allegations in the charge. The Investigator assigned to the case may contact and interview relevant witnesses and may obtain pertinent documents from both parties. Respondents are required to preserve any records pertinent to the charge. In addition, Respondents are prohibited from retaliating against any person who has filed or otherwise participated in the investigation of a charge. A person who believes they have been retaliated against may file a retaliation charge with IDHR.

Charges Filed by Area, Overall

In FY 2024, the agency received **2,906** charges of discrimination, a 29% increase over 2,252 charges filed in FY 2023. The majority of charges were filed in employment (80.59%), followed by housing (12.11%), public accommodations (6.95%), sexual harassment in education (0.21%), and financial credit (0.14%).



Charges Filed by Basis, Overall



*A charge may have more than one basis for discrimination.
**Source of Income Status and Immigration Status as new protected bases in housing, and Conviction Record as a new protected basis in employment, are accounted for in the 'Other' category in FY 2024 since the data is not yet reliable.

Charge Processing Division

Partnership with the U.S. Equal Employment Opportunity Commission as a Fair Employment Practices Agency

In order for a state or local governmental agency to be qualified as a Fair Employment Practices Agency (FEPA), EEOC must certify that the agency's laws prohibiting employment discrimination are substantially equivalent to federal laws in regard to:

- the substantive rights protected by the agency,
- the procedures followed by the agency,
- the remedies available to the agency, and
- the availability of judicial review of the agency's actions.

FEPA contracts undergo periodic performance reviews by EEOC and must be renewed every three years, with the two intervening years as extensions.

IDHR began contracting with EEOC as a FEPA partner in 1974 (as the Fair Employment Practices Commission). During FY 2023, the EEOC approved IDHR's certification for another three-year term, including for FY 2024. The next review is scheduled for FY 2026.

- **Substantial Equivalency in the Law & Process.** To maintain eligibility as a FEPA agency under the contract with EEOC, IDHR must ensure that Illinois' laws prohibiting employment discrimination remain substantially equivalent with or above the federal equal employment laws. IDHR reviews pending legislation to evaluate the impact the legislation may have on the substantial equivalency of Illinois' employment anti-discrimination laws. IDHR also recommends legislation that may be beneficial to maintaining the substantial equivalency of Illinois' employment anti-discrimination laws. Similarly, the Charge Processing Division will recommend changes to IDHR's administrative rules and regulations which are necessary to maintain the substantial equivalency of Illinois' law. IDHR also monitors and, if necessary, intervenes in litigation that may impact the interpretation of the Act or IDHR's ability to enforce Illinois' laws in a manner that is substantially equivalent to the federal laws.
- **Cooperative Activities.** During FY 2024, IDHR partnered with EEOC to host a virtual outreach event in recognition of National Immigrants Day (October 28, 2023), to inform the public about rights afforded to immigrants to the United States. Held on October 23, 2023, the event included presentations from IDHR, EEOC, Illinois Representative Will Guzzardi, the Illinois Department of Labor, and the Legal Aid Society of Metropolitan Services.



7,439
Public Contacts



11,587
Intake Inquiries



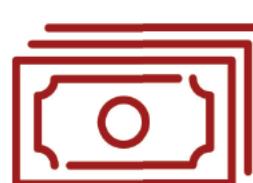
2,554
Charges Filed



2,670
Completed
Investigations



204.4 Days Average to
Complete Processing
of a Case



\$3,116,059
Secured in Settlements

*Intake Inquiries are CIS filings are similar.

**Charges filed are filings accepted and docketed with a charge number.

EXHIBIT 11

STATE OF ILLINOIS
103rd GENERAL ASSEMBLY
HOUSE OF REPRESENTATIVES
TRANSCRIPTION DEBATE

90th Legislative Day

4/16/2024

Speaker Manley: "The House shall be in order. Members will be in their chairs. We shall be led in prayer today by Rabbi Margaret Frisch Klein. Rabbi Frisch Klein is with the Congregation Kneseth Israel in Elgin, Illinois. Rabbi Frisch Klein is the guest of Representative Moeller. Members and guests are asked to refrain from starting their laptops, turn off all cell phones, and rise for the invocation and Pledge of Allegiance. Rabbi Klein."

Rabbi Frisch Klein: "In my tradition, you don't have to stand. We... we actually debate everything. So, if you're more comfortable sitting, that's okay with me. From the time of the Jewish prophet Jeremiah, about 2500 years ago, Jews have prayed for their leaders and advisors wherever they have lived, whoever the government of the day has been. Today, I stand before you, our elected officials, and pray. I pray for courage. It takes courage to be a leader, to give up time with family and friends, to take a risk. Sadly, we... we know just how real that risk can be. Not only for elected officials like Gabby Giffords or Representative Scalise, but for your staffs and your families, for judges and their families across this nation. You ran for office because you wanted to represent the people of Illinois, all the people of Illinois. You ran for office because you wanted to make a difference. You ran for office because you wanted to make a difference. Today, I pray for each of you, that you continue to make wise decisions on behalf of this great state. Today, I pray for patience and strength when others disagree with you, when you need to reach across the aisle and build consensus and coalitions. Today, I pray for the budgeting process, that you

STATE OF ILLINOIS
103rd GENERAL ASSEMBLY
HOUSE OF REPRESENTATIVES
TRANSCRIPTION DEBATE

90th Legislative Day

4/16/2024

Morris: "DoIT. Oh, sorry, I was having a slow moment."

Ford: "You're doing a great job. I thought we'd have a little fun with you on your first Bill."

Morris: "Thank you."

Ford: "And you know what? I have to tell you, I'm so happy that you're here. You make Springfield so much better for all of us, and I hope that everyone votes for your Bill."

Morris: "Me too. Thank you."

Speaker Manley: "Representative Morris to close."

Morris: "Yes. I ask for a 'aye' vote."

Speaker Manley: "The question is, 'Shall House Bill 4813 pass?' All in favor vote 'aye'; opposed vote 'nay'. The voting is open. Have all voted who wish? Have all voted who wish? Have all voted who wish? Mr. Clerk, please take... take the record. On this question, there are 112 voting in 'favor', 0 'opposed', and 0 voting 'present'. This vote... this Bill, having received a Constitutional Majority, is hereby declared passed. Moving on to House Bill 4867, Representative Moeller. Mr. Clerk, please read the Bill."

Clerk Bolin: "House Bill 4867, a Bill for an Act concerning civil law. Third Reading of this House Bill."

Speaker Manley: "Representative Moeller."

Moeller: "Thank you, Madam Speaker. House Bill 4867 is a Bill that gives Illinoisans the freedom to consider and make whatever reproductive health decisions they wish without fear of discrimination or retaliation in the context of employment, housing, public accommodations, education, and financial credit. Developed in partnership with the Illinois Department on Human Rights, the agency responsible for

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enforcing the Illinois Human Rights Act, this Bill enhances civil rights protections for Illinoisans at a time when we must affirmatively stand up to protect and ensure those rights. The Dobbs decision two years ago held that the Constitution does not confer a right to abortion and returned the authority to regulate reproductive decisions to the states. Various existing laws are now being reexamined in the light of this changing constitutional jurisprudence and new needs are emerging. Illinois has, for the last two years, been committed to leading among our states in ensuring and protecting individual reproductive rights and bodily autonomy. Recognizing that the realm of possibility when it comes to reproductive choice now extends beyond that which traditionally falls under the term pregnancy, House Bill 4867 includes complementary protection for the right to reproductive decision making. Specifically, key provisions of the legislation include: It adds a protection against discrimination on the basis of reproductive health decisions to all Illinoisans, giving them the freedom to make decisions concerning whether, when, and how to start a family without the fear of discrimination or retaliation. It defines reproductive health decisions as a person's decision regarding the use of health care, such as contraception, fertility or sterilization care, miscarriage management care, assisted reproductive technologies, health care related to the continuation or termination of pregnancy, and prenatal, intranatal, and postnatal care. Third, it amends the... a... the Human Rights Act to complement the existing protection against pregnancy discrimination. And four, amends the Human

STATE OF ILLINOIS
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90th Legislative Day

4/16/2024

Rights Act to complement existing protections found under the Reproductive Health Act. This is an important measure, again, to ensure that those who are making these kinds of decisions are protected. And I would encourage an 'aye' vote."

Speaker Manley: "Chair recognizes Leader Windhorst."

Windhorst: "Thank you, Madam Speaker. Will the Sponsor yield?"

Speaker Manley: "She indicates she will."

Windhorst: "Thank you. Representative, there were some questions in committee relating to religious employers. And I'd like to cover that here on the floor if you don't mind, at least some of those topics. Under the law, how many employees must an employer have to be covered by the Act?"

Moeller: "We're pulling up the Act. It protects employers that have one or more employees. That's right."

Windhorst: "So, basically every employer, other than someone who employs himself, in the... in the state?"

Moeller: "Correct, yes."

Windhorst: "Pregnancy is currently covered under the Human Rights Act. Isn't that correct?"

Moeller: "Correct."

Windhorst: "Do we know, relating to that protection, how many claims have been made before the... the Department of Human Rights related to discrimination for the condition of pregnancy?"

Moeller: "Related to... in terms of pregnancy?"

Windhorst: "Yes."

Moeller: "I don't know offhand, but I'm sure we could get that for you."

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Windhorst: "Is it your understanding, with regard to exemptions in the Bill, that religious... religious organizations would be exempt as they are in existing law?"

Moeller: "Yes. It's my understanding that they would be."

Windhorst: "Would that also apply to religious hospitals?"

Moeller: "Yes. I... I believe under the Right of Conscience Act they would also be exempt."

Windhorst: "And other religious organizations, such as a... a Baptist children's home or evangelical children and family services?"

Moeller: "Yes. Yes."

Windhorst: "There are some religious organizations that do not provide coverage for contraception or abortion in their health care plans. That is a decision that's been made by the employer, obviously involving reproductive health care. Would that decision open those employers up to a human rights violation?"

Moeller: "I don't believe so."

Windhorst: "It was noted in committee, I believe by the department, that there are no exemptions for employer associations. Do you recall that being discussed in committee?"

Moeller: "I do. And I recall that that was the case."

Windhorst: "And I believe the concern that's been expressed to me is that that interpretation goes against some precedent in federal law."

Moeller: "That I'm not aware of. It's... it's my understanding that religious organizations would be exempt, but the... the term

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association is very broad, and therefore, I... I believe the understanding is that they would not be."

Windhorst: "And believe, specifically referencing crisis pregnancy centers, whether they would be subject to liability under the... this Act if it's amended?"

Moeller: "I'm sorry. What was your question? In terms of whether crisis pregnancy centers would be?"

Windhorst: "Yes, whether they would be exempt or would... they would be covered by this legislation?"

Moeller: "It's my understanding that organizations that have a religious affiliation would be exempt under the definition of a religious organization. If a crisis pregnancy center fell under that designation, then they would be exempt. But if not, then they would not be."

Windhorst: "Thank you. To the Bill."

Speaker Manley: "To the Bill."

Windhorst: "I believe there are some real concerns about the religious exemptions that have been raised by those organizations, and I'll be voting 'no'. Thank you."

Speaker Manley: "Representative Moeller to close."

Moeller: "Thank you. I request an 'aye' vote."

Speaker Manley: "The question is, 'Shall House Bill 4867 pass?' All in favor vote 'aye'; opposed vote 'nay'. The voting is open. Have all voted who wish? Have all voted who wish? Have all voted who wish? Mr. Clerk, please take the record. On this question, there are 72 voting in 'favor', 39 'opposed', 0 voting 'present'. This Bill, having received a Constitutional Majority, is hereby declared passed. House

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Bill 4870, Representative Kifowit. Mr. Clerk, please read the Bill."

Clerk Bolin: "House Bill 4870, a Bill for an Act concerning public employee benefits. Third Reading of this House Bill."

Speaker Manley: "Representative Kifowit."

Kifowit: "Thank you, Madam Speaker, Members of the General Assembly. House Bill 4870 is really a technical Bill that cleans up, really, an oversight, I think, with our retirees. We have retirees in the SERS pension system that have not gotten retirement payments for at least 30, sometimes 60, days, and it causes them great stress. So, 60 days, 90 days. So, what this Bill does is it cleans up and it ensures that the SERS payout, the best estimate that the system has when they retire. And then it gives them the ability to recoup any overage or underage that they need to in the future. So, this allows our retirees to continue on to be able to make their mortgage payments and their house payments and their car payments without delay. And really it really is the right thing to do. And I ask for an 'aye' vote."

Speaker Manley: "Chair recognizes Representative Reick."

Reick: "Thank you. Will the Sponsor yield?"

Speaker Manley: "She indicates she will."

Reick: "Representative, I'm looking at our analysis here, and it still states that the State Employee Retirement System is opposed to this Bill. Can you speak to the opposition, if it still exists?"

Kifowit: "Thank you, Minority Spokesperson. Yes, you were in committee when the SERS system did testify. They gave a myriad of... of explanations onto why they wanted to do it. One of the

EXHIBIT 12



NON-REGULATORY GUIDANCE

ILLINOIS PROTECTIONS AGAINST DISCRIMINATION BASED ON PREGNANCY, CHILDBIRTH, AND RELATED CONDITIONS, INCLUDING REPRODUCTIVE DECISION-MAKING

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I. INTRODUCTION

All Illinois residents have a right to reproductive autonomy, including freedom from discrimination based on pregnancy, childbirth, and pregnancy-related conditions. The Illinois Human Rights Act (the “Act”), provides broad protection against discrimination based on a person’s current pregnancy, past pregnancy, potential or intended pregnancy, and medical conditions related to pregnancy or childbirth.¹ Fundamental reproductive health decisions relating to pregnancy, such as use of contraception, sterilization, abortion, miscarriage management, and fertility care are protected in Illinois.²

Following the U.S. Supreme Court’s decision in *Dobbs v. Jackson Women’s Health Organization* to overrule *Roe v. Wade*, many states have rolled back the freedom of individuals to make reproductive health decisions.³ In contrast to other states narrowing of civil and human rights, Illinois law protects the choice to have an abortion and treats abortion in the same manner as other kinds of healthcare.⁴ Individuals are entitled to exercise this choice – or any other reproductive health decision – free from discrimination regardless of their sexual orientation, gender identity, race, ethnicity, immigration status, disability status, or any other protected characteristic.

The Illinois Department of Human Rights (the “IDHR”) and the Illinois Attorney General’s Office (the “OAG”) issue this non-regulatory guidance to clarify Illinois law as it relates to pregnancy and related reproductive health decisions, and to identify protections from pregnancy discrimination that exist in Illinois. The guidance is intended for Illinois residents, employers, housing providers, and the business and healthcare communities to better understand their rights and responsibilities concerning reproductive autonomy and to refrain from discrimination in these contexts.

II. ILLINOIS LAW CONTINUES TO AFFORD PROTECTIONS AGAINST DISCRIMINATION BASED ON PREGNANCY, CHILDBIRTH, AND RELATED CONDITIONS, INCLUDING REPRODUCTIVE DECISION-MAKING

The Illinois Human Rights Act provides broad civil rights protections throughout Illinois in the areas of employment, real estate transactions (housing), financial credit, and places of public accommodation. The IDHR is charged with enforcing the Act by securing for all individuals in Illinois freedom from unlawful discrimination and establishing equal opportunity and affirmative

¹ The term “pregnancy” under the Act is defined as “pregnancy, childbirth, or medical or common conditions related to pregnancy or childbirth.” 775 ILCS 5/1-103(L-5).

² *In the Matter of the Request for Review by Darolyn Lee*, Charge No. 2018CP2109, ALS 19-0830; *see also*, Reproductive Health Act, 775 ILCS 55/1-1 *et seq.*

³ Recently, the U.S. Supreme Court, in *Dobbs v. Jackson Women’s Health Organization*, held that the U.S. Constitution does not confer a right to abortion. *See* No. 19-1392, 597 U.S. (2022). This landmark case overruled *Roe v. Wade* and parts of *Planned Parenthood v. Casey*, giving individual states the full power to regulate abortion. *See* 410 U.S. 113 (1973); 505 U.S. 833 (1992).

⁴ *See, e.g.*, Reproductive Health Act, 775 ILCS 55/1-1 *et seq.*

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action as the policies of the State.⁵ The OAG has authority to enforce the Act when any person or group of people engages in a pattern or practice of discrimination prohibited by the Act.⁶

A. DISCRIMINATION

The Act prohibits discrimination on the basis of distinctly defined protected classes, including but not limited to pregnancy, sex, race, age, sexual orientation, and disability.⁷ The Act defines “pregnancy” to include “pregnancy, childbirth, or medical or common conditions relating to pregnancy or childbirth.”⁸ Pregnancy discrimination includes discrimination based on:

1. Current pregnancy;
2. Past pregnancy;
3. Potential or intended pregnancy, including the use of fertility treatments to become pregnant, contraception to prevent a pregnancy, or abortion to end a pregnancy;⁹
4. Medical or common conditions related to pregnancy or childbirth, including pre-eclampsia, gestational diabetes, post-partum depression, ectopic pregnancy, miscarriage, lactation and breastfeeding,¹⁰ and
5. Medical or common conditions related to pregnancy or childbirth, which may be a disability, perceived disability, or record of disability even if not permanent in nature.¹¹

B. HARASSMENT

Harassment based on a person’s pregnancy, childbirth, or pregnancy-related condition is a form of unlawful discrimination under the Act. This includes harassment based on a person’s reproductive decisions, such as whether to use contraception, fertility treatments, or abortion care. Actionable harassment in the workplace, housing, or public accommodation occurs when there is unwelcome conduct that is either severe or pervasive enough that it alters the conditions of the

⁵ See 775 ILCS 5/1-102.

⁶ 775 ILCS 5/10-104.

⁷ See 775 ILCS 5/1-102.

⁸ See 775 ILCS 5/1-103(L-5).

⁹ In the Matter of the Request for Review by Darolyn Lee, Charge No. 2018CP2109, ALS 19-0830 (pregnancy discrimination includes discrimination based on a non-pregnant person’s choice to use contraception as “a means to prevent, and to control the timing of, the medical condition of pregnancy.”). See also Int’l Union, United Auto., Aerospace & Agr. Implement Workers of Am., UAW v. Johnson Controls, Inc., 499 U.S. 187, 206 (1991) (interpreting federal pregnancy discrimination law to prohibit discrimination based on capacity to become pregnant); Turic v. Holland Hosp., Inc., 85 F.3d 1211, 1214 (6th Cir. 1996) (interpreting federal pregnancy discrimination law to prohibit discrimination based on having an abortion, or contemplating having an abortion); Pacourek v. Inland Steel Co., 858 F. Supp. 1393, 1402 (N.D. Ill. 1994) (interpreting federal pregnancy discrimination law to prohibit discrimination based on “potential or intended pregnancy”).

¹⁰ 56 Ill. Admin. Code §2535.20.

¹¹ 775 ILCS 5/1-103(I).

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victim's employment, housing, or full and equal enjoyment of a public accommodation, and creates a hostile or abusive environment.¹² Either one extremely serious act of harassment, or a series of less severe acts, could be severe or pervasive enough to constitute actionable harassment.¹³

C. REASONABLE ACCOMMODATIONS

The Act specifically requires employers to make reasonable accommodations for an employee's pregnancy, childbirth, and related medical or common conditions. Failure to accommodate on the basis of pregnancy is specifically prohibited under the Act.¹⁴ In other contexts, such as public accommodations and housing, a refusal to provide accommodations for pregnancy, childbirth, or related conditions may also constitute unlawful discrimination under the Act.¹⁵

D. RETALIATION

Retaliation is also unlawful under the Act. In the areas of employment,¹⁶ public accommodations, housing,¹⁷ and financial credit, it is a violation of the Act to retaliate against a person who engages in a protected activity. In this context, "protected activity" includes conduct where a person has opposed that which they reasonably and in good faith believe to be unlawful discrimination; has made a charge, filed a complaint, testified, assisted, or participated in an investigation, proceeding, or hearing under the Act; or has requested a reasonable accommodation.

¹² See, e.g., *Grimes v. Cnty. of Cook*, 455 F. Supp. 3d 630, 644 (N.D. Ill. 2020) (harassment in employment); *In the Matter of IDHR and Robin Hobson, Individually and On Behalf of Oquela Hobson et al.*, 2007 WL 6004201, Charge No. 2001CH2383, ALS NO. 11936 (Ill. Hum. Rts. Comm'n July 25, 2007) (harassment in housing); *In the Matter of the Request For Review By: Daniel Igwe, Petitioner*, ALS No. 16-0010, 2019 WL 1527836, at *2 (Ill. Hum. Rts. Comm'n March 27, 2019) (harassment in public accommodations).

¹³ See, e.g., *Hall v. City of Chicago*, 713 F.3d 325, 330 (7th Cir. 2013).

¹⁴ 775 ILCS 5/2-102(A), 2-102(I), and 2-102(J).

¹⁵ See, e.g., *In the Matter of: Michael S. and Andrea S., On Behalf, of P.S., A Minor, Complainants and Komarek Sch. Dist #94*, Charge No. 2015CP3418, ALS No. 16-0003, September 11, 2019, 2019 WL 7494510, at *12 (quoting *Ivanka Kojic and Gerald Haaman, et al.*, IHRC, ALS No. 5999 (A), December 18, 1995) (in the context of disability, finding that the Act imposes the same duty on public accommodations for reasonable accommodations that exists in the context of employment, because "the term 'discrimination' includes the refusal to eliminate barriers to accessibility when the elimination of such barriers will not impose undue financial and administrative burdens."). See also 775 ILCS 5/3-102.1 (requiring reasonable accommodations for disability in housing).

¹⁶ 775 ILCS 5/6-101(A).

¹⁷ 775 ILCS 5/6-101.5; 775 ILCS 5/3-105.1.

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III. HOW THE ILLINOIS HUMAN RIGHTS ACT PROTECTS AGAINST DISCRIMINATION BASED ON PREGNANCY, CHILDBIRTH, AND RELATED CONDITIONS

The Act prohibits discrimination on the basis of pregnancy in multiple contexts. The sections below further explain protections against pregnancy discrimination under the Act, and provide examples of potentially discriminatory conduct and solutions to consider.

A. EMPLOYERS/WORKPLACES

Discrimination against employees because of their pregnancy, childbirth, or related medical or common conditions is a civil rights violation under the Act. This includes matters such as hiring, firing, pay, job assignments, promotions, and other terms and conditions of employment.¹⁸ Employees who are affected by pregnancy, childbirth, or other related conditions must be treated the same as other employees who are similar in their ability to work.¹⁹

The prohibitions against pregnancy discrimination are broadly interpreted to give full effect to the purpose of the Act. As a result, the Act's workplace protections reach beyond the condition of actual pregnancy to cover non-pregnant employees with capacity to become pregnant.²⁰ An employer is prohibited from discriminating against an employee by failing to hire, disciplining, terminating, or harassing an employee because they may become pregnant in the future, or making assumptions or stereotyping an employee about what type of work they are capable of because of their pregnancy or their ability to become pregnant in the future.

The Act's protections from pregnancy discrimination also encompass the right to make reproductive health and family planning decisions, such as use or non-use of contraception, fertility treatments, and abortion.²¹ This means an employer may not take adverse action against an employee for choosing to use or not use contraception, terminating an unplanned pregnancy, or seeking treatment for fertility issues, and an employer may not require an employee to engage in any of the above to obtain or retain employment. Adverse actions include, but are not limited to failing to hire, discipline, terminating or harassing an employee. An employer is also prohibited from retaliating against an employee for exercising their rights under the Act or making a complaint.

Examples of Discriminatory Treatment

¹⁸ See 775 ILCS 5/2-102(I) (Pregnancy). In addition to the non-discrimination provisions of the Act, federal law also protects individuals from discrimination on the basis of pregnancy, childbirth, or related medical conditions and is enforced by the U.S. Equal Employment Opportunity Commission (“EEOC”). Under federal law, discrimination on the basis of pregnancy is a form of sex discrimination under Title VII of the Civil Rights Act of 1964 (“Title VII”) – unlike the Act which protects pregnancy as its own protected basis. Another notable distinction between Title VII and the Act is that to file a charge of pregnancy discrimination at the EEOC, the employer must have a minimum of 15 employees. To file a charge of pregnancy discrimination at the Department, an employer need have only 1 employee.

¹⁹ See 775 ILCS 5/2-102(I).

²⁰ *Pacourek v. Inland Steel Co.*, 858 F. Supp. 1393, 1402 (N.D. Ill. 1994); *see also Hall v. Nalco Co.*, 534 F.3d 644, 649 (7th Cir. 2008).

²¹ *See, e.g., Hall v. Nalco Co.*, 534 F.3d 644, 649 (7th Cir. 2008).

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In the context of employment, examples of discriminatory treatment by employers prohibited by the Act may include:

- An employer denying a person a request for scheduled medical time off when that person is seeking fertility treatments, while permitting those not seeking fertility treatments to take scheduled medical time off for a dental appointment.
- Forcing a pregnant employee to take leave when there is no medical necessity to do so.
- Threatening a pregnant employee with termination if they do not terminate their pregnancy.
- Failing to promote a non-pregnant employee capable of becoming pregnant because of the assumption that they will or may become pregnant and might be less committed to their work.
- Discharging a pregnant employee because they requested a reasonable accommodation to go to their medical appointments.
- Retaliating against an employee by denying them a promotion because they complained of pregnancy discrimination.

Harassment or creating a hostile work environment because of a person's pregnancy is also prohibited under the Act in the employment context.²² An employer may be strictly liable for harassment based on pregnancy if the alleged harasser is a member of management. An employer may also be liable for harassment based on pregnancy if an employee or a non-employee reported to employer that an alleged harasser subjected them to harassment based on pregnancy, and the employer did not take corrective measures or attempt to stop the harassment.

Examples of Harassment

Examples of harassing conduct based on pregnancy or a related condition may include:

- Subjecting a pregnant employee to harassment and ridicule because the pregnant employee cannot perform the strenuous functions of their position.
- Addressing a pregnant employee with derogatory terms after learning the pregnant employee plans to have an abortion.
- A manager harassing an employee with offensive comments about the employee's weight gain due to pregnancy.

Finally, employment discrimination based on failure to reasonably accommodate an employee on the basis of pregnancy is specifically prohibited under the Act.²³ Under the Act, if an employee has a pregnancy-related medical condition and needs a reasonable accommodation to do their job, the employer must accommodate the employee if it is not an undue hardship on the employer. To do this, the employee and employer must both participate in an interactive process

²² 775 ILCS 5/2-102(A).

²³ 775 ILCS 5/2-102(A), 2-102(I), and 2-102(J).

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to try to find a reasonable accommodation that enables the pregnant employee to perform the essential functions of their position but does not place too great a burden on the employer. Each situation is decided on an individual basis, taking into consideration the type of work, the requested accommodation, and the employer's size, among other factors.

Examples of Failure to Reasonably Accommodate

Possible examples of a failure to reasonably accommodate pregnancy-related conditions may include, depending on the situation:

- Failing to provide a lactating employee a place, other than a restroom, to express milk.
- Refusing to let a pregnant employee with gestational diabetes eat snacks while working.
- Denying a pregnant employee's request to use time off for abortion care.
- Immediately discharging a pregnant employee who requests a reasonable accommodation without discussing potential options for the accommodation.

Examples of Positive Solutions

The Act requires all employers in Illinois to inform workers about their rights regarding pregnancy in the workplace by (1) posting a notice in a conspicuous location on the employer's premises, and (2) including information in any employee handbook. Notices and a fact sheet are available in English and Spanish on the IDHR website at:

<https://dhr.illinois.gov/publications/pregnancy-rights-notice-requirement.html>

In the context of employment and pregnancy, childbirth, and other related medical conditions, employers should also consider steps including, but not limited to:

- **Know the law.** Make certain to stay up to date on federal, state, and local laws to avoid potential violations.
- **Training materials.** Develop mandatory training materials for leadership and staff on what constitutes harassment and discrimination on all aspects of pregnancy, childbirth, related conditions, and reproductive decisions.
- **Policies.** Regularly review and update employee handbooks and other written policies to address the requirements under federal and state law with respect to pregnancy, childbirth, related medical conditions, and other reproductive decisions.
- **Take action.** Make sure that leadership and staff are trained on these policies and follow them consistently. Respond to employee complaints concerning treatment in the workplace and take corrective action as appropriate to the circumstances.

B. PUBLIC ACCOMMODATIONS

A place of public accommodation cannot deny a person the full and equal enjoyment of their facilities, goods, or services because the person is pregnant or breastfeeding, or because of

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reproductive decisions like seeking an abortion or using contraceptives. A place of public accommodation must also make accommodations upon request for a person's pregnancy or pregnancy-related condition when failing to do so would deny that person the full and equal enjoyment of their facilities, goods, or services.²⁴

Places of public accommodation include a wide range of business, recreation, lodging, service, entertainment, and transportation facilities in Illinois. The Act includes public officials and non-religious schools in the category of public accommodations and prohibits them from engaging in discrimination based on pregnancy, childbirth, and related conditions. The kinds of businesses and facilities prohibited from engaging in discrimination under Illinois law include, but are not limited to:

- Hotels, motels, and inns;
- Restaurants and bars;
- Theaters, movie theaters, concert halls, stadiums, and other entertainment facilities;
- Auditoriums, convention centers, lecture halls, and other places of public gathering;
- Bakeries, grocery stores, clothing stores, hardware stores, and shopping centers;
- Laundromats, dry cleaners, banks, gas stations, barber shops, beauty shops, travel agencies, shoe repair stores, funeral parlors, and other service establishments;
- Law, insurance, and accounting offices;
- Pharmacies, dentist offices, healthcare offices, and hospitals;
- Public transportation trains, buses, terminals, and stations;
- Museums, libraries, and galleries;
- Parks, zoos, amusement parks, and other places of recreation;
- Senior citizen centers, homeless shelters, food banks, non-religious adoption agencies, and other social service center establishments;
- Gyms, spas, bowling alleys, and golf courses;
- Non-religious nursery schools, day care centers, K-12 schools, colleges, and universities; and
- Public officials.

Certain exceptions apply to medical, dental, or other health care professionals, as well as to private professional service providers such as lawyers, accountants or insurance agents. These professionals are not considered to have committed a civil rights violation if they refer an individual to other service providers or refuse to treat or provide services to an individual for a non-discriminatory reason. So long as the professional would also refer or refuse to treat or provide services to all individuals who sought the same treatment or service, they do not violate the Act.²⁵

²⁴ See *In the Matter of: Michael S. and Andrea S., On Behalf, of P.S., A Minor, Complainants and Komarek Sch. Dist #94*, Charge No. 2015CP3418, ALS No. 16-0003, September 11, 2019, 2019 WL 7494510, at *12 (quoting Ivanka Kojic and Gerald Haaman, et al. IHRC, ALS No. 5999 (A), December 18, 1995) (in the context of disability, finding that the Act imposes the same duty on public accommodations for reasonable accommodations that exists in the context of employment, because "the term 'discrimination' includes the refusal to eliminate barriers to accessibility when the elimination of such barriers will not impose undue financial and administrative burdens.").

²⁵ 775 ILCS 5/5-102.1.

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Types of Public Accommodations

Below are examples of the Act's protections as they relate to various types of public accommodations.

1. HEALTH CARE FACILITIES

Illinois law protects against discrimination by healthcare providers and facilities including doctor's offices, hospitals, dentist offices, pharmacies, and health insurance offices. This includes discrimination because a person is pregnant or breastfeeding, because of childbirth decisions like having a cesarean section, or because of other reproductive decisions like having an abortion, seeking fertility treatments or sterilization, or using contraceptives.

Examples of Discriminatory Treatment

In the context of full and equal access to healthcare, examples of discriminatory treatment prohibited by the Act could include:

- Refusing to admit or schedule a consultation with a patient because the patient had an abortion.
- Refusing to provide individual services that are provided to other patients (such as a pap smear or prescriptions) because the patient seeks contraception or does not want to be pregnant.
- Subjecting a pregnant patient to intrusive and unnecessary examinations because of stereotypes about pregnancy (for example, subjecting pregnant patients to nonconsensual drug tests that are not required of non-pregnant patients).
- Harassing a patient, or refusing to respond to harassment by staff or other patients, based on the patient's decisions regarding pregnancy, childbirth, breastfeeding, or other reproductive healthcare.
- Denying an accommodation to a lactating patient who needs to breastfeed a baby during a clinic visit.
- Refusing to allow a patient to enter a facility because they previously complained of pregnancy discrimination by that facility.

The Act does not require healthcare providers to perform services outside their specialty area.²⁶ Nor does the Act require providing a particular health service when a provider has a legitimate, nondiscriminatory reason for denying or limiting that service, such as when a provider reasonably determines that a particular service is not clinically appropriate for a particular patient.

²⁶ See 775 ILCS 5/5-102.1.

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Related State and Federal Laws

Other state and federal laws and protections may also apply in healthcare settings, such as:

- The Illinois Health Care Right of Conscience Act generally protects healthcare providers who refuse to participate in healthcare services to which they have conscience objections.²⁷ However, even if a healthcare provider does not provide a service like abortion or contraception due to a conscience objection, they cannot engage in other activities that constitute unlawful pregnancy-related discrimination (such as harassing a patient for seeking such services).
- The Illinois Insurance Code may apply to health insurance offices. An FAQ about insurance coverage for reproductive healthcare services is available here: <https://www2.illinois.gov/sites/Insurance/Consumers/Pages/Reproductive-Health-Care-Services.aspx>
- The federal Emergency Medical Treatment and Active Labor Act places certain mandates on qualified medical personnel to examine or treat a patient with an emergency medical condition, such as an ectopic pregnancy or complications of pregnancy loss. Recent guidance can be found here: <https://www.cms.gov/files/document/qso-22-22-hospitals.pdf>
- Section 1557 of the federal Affordable Care Act prohibits discrimination in covered health programs or activities. The Office of Civil Rights (“OCR”) of the U.S. Department of Health & Human Services enforces this law. For more information (including how to submit a complaint with OCR), go to: <https://www.hhs.gov/civil-rights/for-individuals/section-1557/index.html>

²⁷ 745 ILCS 70/5.

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2. SCHOOLS, COLLEGES, AND DAY CARES

The Act's protections apply to non-religious day care centers and schools including nursery schools, K-12 schools, colleges, and universities. These places are prohibited from denying anyone enrollment or access to facilities, goods, or services because of a pregnancy-related condition and are required to respond to harassment based on pregnancy, pregnancy-related conditions, or reproductive health decisions.

Examples of Discriminatory Treatment

In the context of non-religious schools, examples of discriminatory treatment prohibited by the Act could include:

- Refusing to enroll a pregnant student.
- Failure to respond when a teacher or student engages in severe or pervasive harassment of another student for being pregnant or having an abortion.
- Denying a lactating student access to a place, other than a restroom, to express breastmilk.²⁸

Examples of Positive Solutions

A variety of resources are available to schools to ensure equitable treatment of pregnant and parenting students. Some state and federal agency resources for school settings include:

- The Illinois School Code prohibits sex discrimination, including discrimination based on actual or potential marital or parental status.²⁹ The Illinois State Board of Education's Student Care Department has resources, including model inclusive policies for schools, at: <https://www.isbe.net/Pages/Student-Care.aspx>
- Federal law (Title IX) protects pregnant and parenting students from discrimination at school. This includes discrimination against students who choose to terminate a pregnancy. The U.S. Department of Education has resources for schools and students on this issue, including:
<https://www2.ed.gov/about/offices/list/ocr/docs/ocr-pregnancy-resource.pdf>
<https://www2.ed.gov/about/offices/list/ocr/frontpage/pro-students/issues/sex-issue03.html>

²⁸ In addition to protections under the Illinois Human Rights Act, the Illinois School Code also includes specific requirements that public and charter schools must make for lactating students who need to express breastmilk or breastfeed. See 105 ILCS 5/10-20.60, 34-18.53, and 27A-5(g).

²⁹ See 105 ILCS 5/10-22.5, 27-1 and 34-18(1); 23 Ill. Adm. Code 200.

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3. PUBLIC OFFICIALS

Under the Illinois Human Rights Act, public officials must not deny any person the full and equal enjoyment of their office's services, accommodations, facilities, privileges, or property because of unlawful discrimination.³⁰ This includes discrimination based on pregnancy, childbirth, and pregnancy-related conditions, including the person's reproductive decision-making.

In addition, the Reproductive Health Act prohibits government officials in Illinois from denying, interfering with, or discriminating against a person's fundamental right to make reproductive care decisions.³¹ This fundamental right includes decisions such as whether to use birth control, how to manage a pregnancy loss, and decisions about giving birth such as whether to have a caesarean surgery or epidural anesthesia.

Finally, government officials are prohibited from punishing or otherwise penalizing a person for exercising certain decisions or taking certain actions during their pregnancy. This prohibition is triggered when the predominant basis for the punishment or penalty is the impact of the person's decision or action on their pregnancy, pregnancy outcome, or health.³²

4. SERVICE, RETAIL STORES, LODGINGS, AND OTHER PUBLIC ACCOMMODATIONS

Places of public accommodation such as restaurants, hotels, and retail stores are prohibited from discriminating against patrons based on pregnancy-related conditions. Since the *Dobbs* decision, Illinois has experienced an influx of out-of-state patients traveling to Illinois for reproductive healthcare. Because these traveling patients and their companions rely on Illinois hospitality and service industries during their travel, a heightened risk of pregnancy-related discrimination exists in these public accommodations if service providers and other establishments are not informed and aware of their obligations.

Places of public accommodation like service, lodging, retail stores, and entertainment establishments should review their policies and take steps to ensure that managers and staff are aware of their obligations under the Act and other applicable laws.

Examples of Discriminatory Treatment

Examples of discriminatory treatment in these establishments may include:

- A hotel refusing lodging to a guest because the guest has an appointment for an abortion during their stay.
- A restaurant policy that prohibits staff from serving pregnant patrons raw fish or alcohol.

³⁰ 775 ILCS 5/5-102(c).

³¹ 775 ILCS 55/1-20(a)(1).

³² 775 ILCS 55/1-20(a)(2).

OAG & IDHR Non-Regulatory Guidance:

- A gym operator failing to respond when a gym member harasses a guest for engaging in strenuous exercise while pregnant.
- A storeowner harassing a visitor for breastfeeding on the premises.³³
- A theater operator refusing to grant access to an available private non-bathroom space so that a lactating parent can express breastmilk during the intermission of a lengthy performance.
- A concert hall operator refusing to permit a pregnant patron to use a stool or the accessible seating area that is available to other patrons, such as patrons with disabilities.

Examples of Positive Solutions

Training on preventing pregnancy-related discrimination can be incorporated into other required non-discrimination trainings offered to employees, such as the sexual harassment prevention training programs required for all employers and for restaurants and bars under Illinois law. The IDHR’s website has more information about these required trainings at:

<https://dhr.illinois.gov/training/state-of-illinois-sexual-harassment-prevention-training-model.html>

C. LANDLORDS/HOUSING PROVIDERS

The Act includes protection from discrimination in housing and housing-related transactions, including refusing to rent or sell, posting discriminatory advertisements, or offering unequal terms and conditions of rental or sale on the basis of pregnancy.³⁴ In addition to discrimination because of pregnancy in housing matters, it is a violation of the Act to discriminate on the basis of “familial status” – which refers to a person who has children under 18 years of age.³⁵ Thus, under the Act’s housing-related protections, it is a civil rights violation to discriminate both against a person who is pregnant or planning to become pregnant, as well as a person who has children.³⁶

The Act’s protection against pregnancy and familial status discrimination in housing also extends to the ability to apply for and receive mortgage loans. Under the Act, mortgage lenders are prohibited from denying mortgages solely because a family member is pregnant or on

³³ In addition to protections under the Illinois Human Rights Act, the Illinois Right to Breastfeed Act also generally guarantees the right to breastfeed in any location, public or private, where the lactating person is otherwise authorized to be. 740 ILCS 137/1 *et seq.*

³⁴ See 775 ILCS 5/3, *et seq.*

³⁵ See 775 ILCS 5/3-101(E). The Act specifically provides that discrimination on the basis of “familial status” applies to “any person who is pregnant” or to anyone “in the process of securing legal custody of any individual who has not attained the age of 18 years.” *See id.*

³⁶ Under the federal Fair Housing Act, persons who are affected by pregnancy, childbirth or medical or common conditions related to pregnancy, are also protected from discrimination in housing; however, the protection is solely rooted in the basis of “familial status” rather than “pregnancy” specifically.

OAG & IDHR Non-Regulatory Guidance:

pregnancy-related leave, as long as they intend to return to work and can otherwise meet income requirements to qualify for the loan.³⁷

The Act also protects against harassment based on pregnancy in housing.³⁸ Harassment occurs when a housing provider or its agent or employee engages in conduct of such severity or pervasiveness that it alters the terms or conditions of tenancy for a tenant and results in an environment that is intimidating, hostile, offensive, or otherwise significantly less desirable. Also, a housing provider may be liable if it has reasonable knowledge of harassment based on pregnancy by one of its tenants toward a pregnant tenant, and fails to take corrective remedial measures or does not attempt to stop the harassment.

Finally, the Act has specific requirements around reasonable accommodations for tenants. The Act states that landlords must provide a reasonable accommodation for disabilities, which includes any pregnancy-related condition of a tenant that rises to the level of a disability. In order to establish discrimination for failure to make a reasonable accommodation for disability in housing, a tenant must establish that they have a disability, that they requested a reasonable accommodation in the housing, and that the housing provider unreasonably denied the accommodation and did not offer a reasonable alternative accommodation or engage in an interactive process.³⁹ For more information, consult IDHR's "Guidebook on Reasonable Accommodations and Modifications: A Guide for Housing Professionals" available on IDHR's website at <https://dhr.illinois.gov/publications/ra-rmguidebook.html>.

Examples of Discriminatory Treatment

Examples of discriminatory treatment in housing may include:

- Declining a person's request for a rental application because they are pregnant.
- Denying a mortgage loan because the applicant is on parental leave.
- Advertising to a potential buyer that housing is unavailable because they are pregnant.
- A landlord informing a pregnant tenant that they would not have rented to them had the tenant's pregnancy been more noticeable.
- Refusing to make repairs to a pregnant tenant's unit in hopes that they will vacate the premises.
- Evicting a tenant who filed a previous charge of discrimination against the landlord for subjecting them to pregnancy discrimination.

Examples of Positive Solutions

Examples of Positive Solutions:

- **Know the law.** Make certain to stay up to date on federal, state, and local laws to avoid potential violations.

³⁷ See <https://archives.hud.gov/news/2011/pr11-108.cfm>.

³⁸ 775 ILCS 5/3-102(B).

³⁹ 775 ILCS 5/3-102.1.

OAG & IDHR Non-Regulatory Guidance:

- **Training materials.** Develop mandatory training materials for landlords and housing providers and their agents on what constitutes harassment and discrimination in housing.
- **Policies.** Regularly review and update handbooks and other written policies to address the requirements under federal, state and local law with respect to preventing discrimination on the basis of family status, pregnancy, and pregnancy related conditions, including reproductive decisions.
- **Take action.** Make sure that staff are trained on these policies and follow them consistently. Respond to complaints concerning treatment in housing and take corrective action as appropriate to the circumstances.

Landlords and housing providers can participate in fair housing training provided by IDHR on regular basis. “The Basic Fair Housing Training for Landlords and Property Managers” course is offered regularly via webinar and is free of charge. For more information about IDHR training on fair housing, visit IDHR online at <https://dhr.illinois.gov/filing-a-charge/housing.html>.

OAG & IDHR Non-Regulatory Guidance:

IV. ENFORCEMENT AND HOW TO FILE A COMPLAINT

A. ILLINOIS ATTORNEY GENERAL'S OFFICE

The Illinois Attorney General's Office is committed to protecting the civil rights of all in Illinois, including the right to be free from discrimination and harassment based on pregnancy, childbirth, and related conditions including reproductive decision-making. The Illinois Human Rights Act grants the Attorney General the authority to investigate patterns and practices of discrimination and file suits to remedy pattern and practice violations.

- **Filing a Complaint with OAG*:** A complaint of a pattern or practice of discrimination can be filed with the OAG's Civil Rights Bureau by submitting a [Civil Rights Complaint Form](#) as follows:
 - By *calling* the Civil Rights Hotline at (877) 581-3692;
 - By *emailing* a Civil Rights Complaint Form to civilrights@ilag.gov;
 - By *faxing* a Civil Rights Complaint Form to (312) 814-3212; or
 - By *mailing* or *delivering in-person* a Civil Rights Complaint Form to the OAG's Chicago office: 100 W. Randolph Street, 11th Floor, Chicago, IL 60601.

* Please note that the OAG does not represent individuals or give individual legal advice. The choice of how to report an allegation of discrimination is a personal one and options to report to the OAG and the IDHR are not mutually exclusive. You may pursue one or more of the reporting options as differing procedures apply.

B. ILLINOIS DEPARTMENT OF HUMAN RIGHTS

The Illinois Department of Human Rights is committed to securing for all individuals in Illinois freedom from unlawful discrimination and establishing equal opportunity and affirmative action as the policies of the State. A person who believes they have experienced discrimination, harassment or retaliation based on pregnancy, childbirth or pregnancy-related conditions including reproductive decision-making, can file a charge of discrimination with the IDHR within 300 days of the date of the incident (violation) or within one year for housing violations.

- **Filing a Charge with IDHR*:** A charge of discrimination can be filed with the Illinois Department of Human Rights by submitting a completed [Complainant Information Sheet Form \(Form CIS\)](#) as follows:
 - By *calling* the IDHR at (312) 814-4320 or (866) 740-3953 (TTY);
 - By *emailing* a Form CIS to IDHR.Intake@illinois.gov;
 - By *faxing* a Form CIS to (312) 814-6251;
 - By *mailing* a Form CIS to the IDHR's Chicago or Springfield addresses at 555 W. Monroe St. Chicago, IL 60661 or 524 S. 2nd Street, Suite 300, Springfield, IL 62701; or
 - *In person* at the IDHR's Chicago or Springfield offices located at 555 W. Monroe St. Chicago, IL 60661, or 524 S. 2nd Street, Suite 300, Springfield, IL 62701.

OAG & IDHR Non-Regulatory Guidance:

* Please note that the IDHR does not represent individuals or give individual legal advice. The choice of how to report an allegation of discrimination is a personal one and options to report to the OAG and the IDHR are not mutually exclusive. You may pursue one or more of the reporting options as differing procedures apply.

IDHR Investigation & Mediation of Charges

Once a charge is received, the IDHR serves notice of the filing of a charge to all parties. The notice also contains an invitation to participate in the IDHR's mediation services. If all parties agree to mediation, the IDHR will assign a mediator who will schedule a mediation meeting with the goal of resolving the dispute in a mutually beneficial manner. If any party does not agree to mediation or the parties are unsuccessful reaching a resolution, the IDHR will assign the charge to an investigator to conduct an investigation. An investigation includes but is not limited to interviewing of witnesses, requesting the production of documents, and conducting a conference to determine the facts ("a fact-finding conference").

Once the investigation is complete, the IDHR will issue a determination either dismissing the charge due to a lack of substantial evidence that discrimination occurred or finding that substantial evidence exists that discrimination occurred. The IDHR may also dismiss the charge if it determines it lacks jurisdiction if, for example, the time to file has expired or the information given does not correlate to a protected category.

Where the IDHR dismisses a charge based on lack of substantial evidence or lack of jurisdiction and the individual believes the IDHR erred, the individual may file a Request for Review (appeal) of the IDHR's determination with the Commission. If the IDHR concludes that substantial evidence exists to support the charge, the individual may request that the IDHR prepare and file a Discrimination Complaint on their behalf in the Commission, or the individual may prepare and file their own Discrimination Complaint before the Commission or in the Illinois Circuit Court in their location.

More detailed information on this process can be found at <https://dhr.illinois.gov/filing-a-charge.html>.

EXHIBIT 13

Suggested Interview Questions for Applicants Related to Catholic Identity

*In ads for any position, clearly state in the qualifications
"Preference is given to practicing Roman Catholics"*

If candidate is Catholic:

- How familiar are you with the teachings of the Catholic Church?
- Do you struggle with any of the teachings of the Catholic Church?
- How do you try to implement prayer into your daily life?
- Where are you a parishioner?
- Are you involved in any ministries at (Parish name)?
- Are you involved in any other Catholic activities or organizations?

If candidate is non-Catholic:

- Do you follow any Christian denomination? If so, which one?
- What do you know of the Catholic Church? Are there any teachings of the Catholic Church you struggle with?
- Are you willing to help promote and be respectful towards the mission of the Catholic Church as well as the Diocese of Springfield in Illinois?

(Questions for Staff in Parishes)

- Why are you seeking employment in a Catholic organization?
- Through your ministry, how will you help those you serve to understand, accept, and appreciate Catholic teaching and values?
- What controversial issues do you think arise in connection with Catholic teaching today?
- Our employees are called to avoid actions and lifestyles that are contrary to the teachings and values of the Catholic Church. In fact, living contrary to the teachings of the Catholic Church can be grounds for dismissal. Do you have any concerns about this?
- If you had any questions regarding Church teachings to whom would you go?
- Employees are encouraged to attend and participate in religious activities in their parishes. Is this something you feel you can do?
- *The mission of the Roman Catholic Diocese of Springfield in Illinois is to build a fervent community of intentional and dedicated missionary disciples of the Risen Lord and steadfast stewards of God's creation who seek to become saints. Accordingly, the Community of Catholic Faithful in this Diocese is committed to the discipleship and stewardship way of life as commanded by Christ our Savior and as revealed by Sacred Scripture and Tradition.* To further this mission, the Diocese of Springfield in Illinois is committed to implementing the four pillars of hospitality, prayer, formation and service.¹

- What does this statement mean to you? What does this mean for your ministry?

EXHIBIT 14

Suggested Interview Questions for Applicants Related to Catholic Identity

*In ads for any position, clearly state in the qualifications
"Preference is given to practicing Roman Catholics"*

If candidate is Catholic:

- How familiar are you with the teachings of the Catholic Church?
- Do you struggle with any of the teachings of the Catholic Church?
- How do you try to implement prayer into your daily life?
- Where are you a parishioner?
- Are you involved in any ministries at (Parish name)?
- Are you involved in any other Catholic activities or organizations?

If candidate is non-Catholic:

- Do you follow any Christian denomination? If so, which one?
- What do you know of the Catholic Church? Are there any teachings of the Catholic Church you struggle with?
- Are you willing to help promote and be respectful towards the mission of the Catholic Church as well as the Diocese of Springfield in Illinois?

(Questions for Educators and any other Ministerial Employees)

- *"The mission of the Roman Catholic Diocese of Springfield in Illinois is to build a fervent community of intentional and dedicated missionary disciples of the Risen Lord and steadfast stewards of God's creation who seek to become saints. Accordingly, the Community of Catholic Faithful in this Diocese is committed to the discipleship and stewardship way of life as commanded by Christ our Savior and as revealed by Sacred Scripture and Tradition."* To further this mission, the Diocese of Springfield in Illinois is committed to implementing the four pillars of hospitality, prayer, formation and service.¹ What does this statement mean to you?
- How would you accomplish these objections in your ministry?
- How would you handle controversial issues about the Catholic Church that may arise in class/your ministry?

The President or Principal reviews the School's and Diocese's mission and philosophy with the candidate:

¹ Diocese of Springfield in Illinois 2017 Synodal Declarations, Fourth Diocesan Synod, [Fourth Synod Compiled Acts, Declarations and Statutes \(cld.bz\)](http://Fourth Synod Compiled Acts, Declarations and Statutes (cld.bz))

- Do the mission and philosophy of our school raise any concerns for you?
- Through your teaching, how can you help your students to understand, accept, and appreciate Catholic teaching and values?
- What controversial issues do you think arise in connection with Catholic teachings today?
- How would you handle controversial issues about the Catholic Church that may arise in a class?
- Catholic educators are called to avoid actions and lifestyles that are contrary to the teaching and values of the Catholic Church. In fact, living contrary to the teachings of the Catholic Church can be grounds for dismissal. What are your thoughts on this?
- If you had any questions regarding Church teachings to whom would you go?
- Our first priority is to facilitate the spiritual growth of our students. This may result in unexpected changes in our academic schedule to add Mass, guest speakers, or other liturgies. How would you support this on campus?
- All faculty are required to attend and participate in school Masses, Eucharistic Adoration, Campus Ministry programs, and begin every class with a prayer. Are you able to fulfill these requirements?

EXHIBIT 15

From: "Rosensweig, Jason" <Jason.Rosensweig@Illinois.gov>

Date: Friday, March 29, 2024 at 11:22 AM

To: Robert Gilligan <gilligan@ilcatholic.org>

Subject: Re: Amendment Language for HB 4867

Dear Bob,

Thank you very much for your work on this and for putting together and sharing these proposals. We truly to appreciate your concerns and are committed to preserving constitutionally protected religious liberty.

I appreciate the attempt to craft the second proposal in a focused way, as an alternative to the breadth of the first proposal. After much consideration, our view is that the harms or concerns you expressed are not reasons to exempt religious organizations, with a principal reason being that religious organizations must already contend with the issues and scenarios you mentioned around gender identity and sexual orientation, which are already fully protected classes in the HRA that do not carry exemptions like your proposals.

We think that the application of these protections, existing and new, to religious organizations has been and will continue to be appropriate, protecting people from unlawful discrimination without infringing on constitutionally protected religious liberty. And, religious organizations are of course not immune to misconduct and employees and constituents of those organizations do deserve protection from the egregious discriminatory offenses barred by the Human Rights Act.

In the interest of transparency, I also call your attention to the amendment filed to the Act, the notable change of which is that the bill now applies not only to employment but throughout the Act.

We always value hearing your perspective and learning from you, and remain willing to discuss further, but this is our current position after discussion and consideration.

Yours Sincerely,



JASON ROSENSWEIG, PhD |
DIRECTOR OF LEGISLATIVE AFFAIRS AND POLICY
Illinois Department of Human Rights
217.720.9918 (c)

From: Robert Gilligan <gilligan@ilcatholic.org>
Date: Tuesday, March 26, 2024 at 2:02 PM
To: Rosensweig, Jason <Jason.Rosensweig@Illinois.gov>
Subject: [External] Amendment Language for HB 4867

Jason:

There are two separate amendments here. I will label them #1 and #2. To keep them straight I am putting recommendation #2 in red. Recommendation #2 follows the expressive association definition as was found in the SCOTUS case – Dale vs. Boy Scouts of America.

When you've had a chance to review let me know.

Bob

Recommendation #1

The Catholic Conference recommendation is to amend the definition of "Employer."

We are operating from the good faith presumption that the State does not intend to impose the reproductive health care decision claims on actual religious orgs. Entering that venue is entering a "religious thicket," in the words of

the *Milivojevich* case. “The very process of trying to figure what is, and what is not, religious insinuates claims arising from that venue would violate the anti-entanglement provisions of the establishment clause (per *NLRB v. Catholic Bishop*) and/or interfere with our internal doctrinal speech in violation of the free exercise clause.”

This exemption is intended to apply across the board to any claim relying on a person’s reproductive health care decision. Even non-employees (e.g., independent contractors providing services to the employer) can bring RHD claims.

2-101 (B)(2)

“Employer” does not include any place of worship,

religious corporation, association, educational

institution, society, or non-profit nursing institution

conducted by and for those who rely upon treatment by

prayer through spiritual means in accordance with the

tenets of a recognized church or religious denomination

with respect to: (a) the employment of individuals of a

particular religion to perform work connected with the

carrying on by such place of worship, corporation,

association, educational institution, society or

non-profit nursing institution of its activities; or

(b) the Reproductive Health Decisions (as defined in

Subsection M of this Section) of any individuals employed to perform work connected with the carrying on by such place of worship, corporation, association, educational institution, society or non-profit nursing institution of its activities.

Recommendation #2

This exemption could be codified as a new subsection (E) in 775 ILCS 5/2-104 (entitled “Exemptions”).

(E) Nothing in this Act shall be construed to prohibit an employer that is an expressive association from considering the reproductive health decisions of employees or applicants for employment where such a prohibition would significantly burden the employer’s ability to advocate public or private viewpoints.

- (1) For purposes of this subsection, “an employer that is an expressive association” is an employer that engages in expressive activity. The employer need not have been created for the purpose of expressing a certain message or messages. The employer need not require every employee to agree on every issue.
- (2) Enforcement officials, including the Department of Human Rights, the Human Rights Commission, and courts, shall afford reasonable deference to the assertions of an employer that is an expressive association regarding:

(b) what would impair its expression.

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