



CHARGE OF DISCRIMINATION

Claimant Adam Hahn files this charge of religious discrimination against his former employer MOR Manufacturing, its parent company Pelco Products, Inc., and its subsidiary TrafficCalm, in Post Falls, Idaho.¹ Adam is a disabled combat veteran with a 100% disability rating who served five combat tours in Iraq and Afghanistan. Before being fired by MOR, Adam had a spotless employment record. He served 22 years in the United States Army, over half of that time in Special Operations. Prior to being fired, he worked for three years at MOR without a single disciplinary action. Adam had never been disciplined or terminated from any job. Now, he brings this charge of religious discrimination to uphold the freedoms for which he fought.

At the time of the events described below, Adam was employed as a supervisor by MOR Manufacturing. Adam is a devout Christian and is open about his faith.

In January 2026, one of Adam's male coworkers began identifying as female. MOR told its employees that they would be prohibited from using this employee's legal name, and instead would be required to use the transgender coworker's new preferred female name and to use "she/her" or "they/them" pronouns to refer to the coworker. This applied not just to communications *with* the coworker, but also to any conversations or communications *about* the coworker, even those in which the coworker was not present.

Due to his sincerely held religious beliefs, Adam cannot refer to a male by a female name or female pronouns. Adam believes that God created men and women in the image of God, that they are created distinct with individual value and worth, and that the biological sex with which God created each person is immutable. Adam's faith also prohibits him from bearing false witness—lying about something or someone—prohibiting him from referring to a person by pronouns inconsistent with the binary sex which God individually created each person or by a name that communicates a particular sex.

¹ This charge is being separately filed against TrafficCalm, MOR Manufacturing, and Pelco Products. They are collectively referred to herein as "MOR" for simplicity.



Adam first made MOR aware of these convictions on or about January 19, 2026. He told MOR that, by requiring him to refer to this coworker by pronouns which were inconsistent with a person’s created sex, the company was forcing him to violate his sincerely-held Christian religious beliefs. The company responded in an email that same day, telling him, “we need to honor the use of the preferred name and pronouns—so we will need to begin addressing [the coworker] as [the new female name] and use the preferred pronouns”

On January 26, 2026, Adam met with MOR’s Human Resources. MOR offered a purported “accommodation” of using “they/them” pronouns and referring to the coworker by the new female name in all communications. This was not an accommodation: in fact, it was almost exactly the same policy from which Adam was seeking an accommodation. It still required him to use “they/them” pronouns (pronouns which Adam believes are inconsistent with how God created the coworker) and the new female name (a name Adam believed communicated a false identity about his coworker). “They/them” pronouns carry an ideological connotation implying an affirmation of a view of sex and gender that violates Adam’s religious convictions. In addition, they describe a person in a way inconsistent with how God made him or her. MOR’s “accommodation” did nothing to accommodate Adam or resolve the situation.

Adam informed MOR of the inadequacy of its “accommodation.” Although MOR was purportedly already treating Adam’s statements as a request for accommodation, on January 27, 2026, Adam made his request for a reasonable accommodation more explicit by email: “I am officially putting MOR Manufacturer [sic], Pelco Solutions, and other relevant party on notice, that it is against my religious beliefs, to refer to someone by a gender that is not their biological gender and by a non-legal name. I request immediate accommodation in this matter.”

In the meantime, Adam received numerous requests for clarification regarding the new policy from the employees under his supervision. Several expressed their religious concerns to Adam. These employees also explained that the instructions given by HR were unclear. So, Adam gathered together the employees that he supervised on or around January 28, 2026 to update them on the company’s new policy on how to refer to this coworker. He also explained that he was requesting an accommodation and that, under federal law, the employees also had the right to request an accommodation if they wished.



Throughout this process, Adam consciously worked to prevent any incidents regarding the coworker’s preferred name and pronouns. Rather than use the preferred name and pronouns (violating Adam’s religious beliefs), or use the coworker’s legal name and male pronouns (causing potential offense), Adam chose to avoid using any pronouns or first name when speaking to the coworker.

On February 2, 2026, MOR’s Human Resources Manager Teri Henke-Park responded to Adam’s request for accommodation. She purported to provide an “accommodation” to Adam, but this accommodation reinforced all the points of the existing company policy that violated Adam’s convictions. Henke-Park made clear that Adam would be prohibited from using the coworker’s legal name and then went one step further: if Adam did not want to use the new female name to refer to the coworker, he would be required to refer to *every* employee by his or her last name without any salutation (like Mr., Miss, or Mrs.). And while Adam could use the coworker’s legal name in official company documents that “require[d] a legal first and last name,” in other undefined contexts, he could not. Lastly, the company said it would enforce its requirement that Adam use “they/them” pronouns to refer to the coworker—both in conversations with the coworker and in any communications about the coworker. These requirements were not only unreasonable but also continued to violate Adam’s religious convictions.

The HR manager ended its letter with a threat: “Addressing [the coworker] as [coworker’s male name], referring to [the coworker] as [male name] in internal communications at work, either written or verbal, or using male pronouns when speaking to [the coworker] or about [the coworker] in work communications, either written or verbal will be considered sexual harassment, and will result in appropriate discipline, up to and including termination.”

MOR issued a disciplinary letter just three days later (February 5, 2026) accusing Adam of “promoting personal religious and political views” during work hours, even though Adam did not discuss his religious or political views at work except when he briefly explained the accommodation process or when otherwise asked. Further, MOR had no policy prohibiting employees from discussing non-work topics during the day. Adam was warned that he was to immediately stop “discuss[ing] personal religious . . . beliefs” during work hours and was told that “[a]ny future incidents of this nature may result in further corrective action, up to and including termination of employment.”



Throughout this time, Adam made repeated attempts to set up a call with Paul Koenig, the CEO of Pelco to attempt to find a solution and amicably resolve the disagreement. The employee handbook informed employees that Koenig had an “open door policy” and that employees were free to meet with him about their workplace issues. But when Adam tried to set up a call with him, Koenig refused.

Soon after Adam received his disciplinary letter, the male coworker who identified as female was disciplined (not by Adam) for poor performance. Upset by this, the coworker quit—effective immediately. But the company continued to insist that Adam follow the policy, even though the coworker was no longer employed by the company.

Due to the discrimination and hostility Adam faced from MOR Manufacturing because of his religious beliefs, Adam decided to provide MOR with two weeks’ notice of resignation. But rather than allowing him to finish out his two weeks, MOR responded to Adam’s letter by discharging him. As soon as Adam submitted his resignation in writing, MOR’s general manager came to Adam’s office and asked him, “Do you know why I’m here?” Adam responded: “Are you here to fire me?” The general manager responded that “Pelco doesn’t want you around anymore, because they think you’re a distraction.” The manager told him that while Adam would be paid for the remaining week, Pelco insisted that he immediately turn in his badge, gather his belongings, and leave the premises. The manager later told another employee that the company “gave [Adam] the boot.”

As Adam was forced to leave the building that day, he felt a strong sense of shame. He had never been disciplined, much less fired, from any job before that day. But rather than let Adam finish out his last week and peacefully leave a company that had discriminated against and generally harassed him for his faith, MOR Manufacturing terminated his employment, forcing him to leave the premises.

MOR’s actions violated Title VII and the Idaho Human Rights Act in several ways.

First, MOR refused to provide Adam with an accommodation that actually accommodated his religious beliefs. Instead, it tried to pass off its original discriminatory policy as an “accommodation.”

Second, MOR subjected Adam to disparate treatment because of his religious beliefs when it prohibited him from mentioning his religious views in the workplace and disciplined him for doing so. It did so all while not maintaining a policy



prohibiting non-work-related speech or disciplining others for similar non-work-related speech.

Third, MOR retaliated against Adam for requesting a reasonable accommodation, for opposing his employer's unlawful disparate treatment and failure to accommodate his religious convictions, and for speaking to his coworkers about their rights under Title VII. This was the basis not just for the disciplinary letter but also for Adam's termination. The transgender coworker had already quit, mooting the issue of whether Adam would need to comply with the policy about how to refer to the coworker in the future. But MOR made clear it did not "want [Adam] around" and terminated him rather than allowing him to finish his final week. MOR did this because of Adam's religious convictions and for the purpose of preventing Adam from discussing Title VII with his other employees.

As a result of these failures to accommodate, disparate treatment, and retaliation—all constituting unlawful discrimination under Title VII and the IHRA—Adam has suffered significant humiliation, emotional distress, reputational injury, and economic damages. MOR's actions embarrassed Adam, who was seen by his coworkers packing and exiting the building for the last time. It was also a blow to his reputation; throughout his entire career, Adam had never once been fired or even disciplined. Now, he will have to mark on job application forms that he has previously been terminated. Adam enjoyed his work at MOR and would have preferred to stay there. In fact, he planned to stay there for many more years. But Adam has now been forced to find another job in another industry—trucking, which has caused him lower back pain requiring treatment. Worst of all, MOR's actions were explicitly designed to keep other employees in the dark regarding their rights under federal law.

MOR apparently sees civil rights as a "distraction" in its workplace. But those rights are no distraction. They represent the very freedoms for which Adam honorably served his country and was willing to give his life. Claimant Adam Hahn seeks all damages permitted under Title VII and the IHRA.