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BUREAU OF LABOR AND INDUSTRIES
Civil Rights Division Complaint of Unlawful Practice

AUG 08 2013

CIVIL RIGHTS DIVISION
PORTLAND OFFICE

COMPLAINANT:

Case #: **STPASO130808-11097**

Attorney:

Rachel N. Cryer
[REDACTED]

Paul Thompson
Thompson Law LLC
3519 NE 15th Ave, Suite 498
Portland, OR 97212

Phone: 971-258-0562

RESPONDENT:

Contact:

Headquarters:

Melissa Klein *dba* SweetCakes By
Melissa
44 NE Division Street
Gresham, OR 97030

Aaron Klein (Owner)
Melissa Klein (Owner)
[REDACTED]

SweetCakes By Melissa
44 NE Division Street
Gresham, OR 97030

Aaron Klein *dba* SweetCakes By
Melissa
44 NE Division Street
Gresham, OR 97030

County: MULTNOMAH

of Employees: 1+ [REDACTED]

ORS 659A.403(1); 659A.409

I, Rachel N. Cryer, being first duly sworn, do depose and say as follows:

Allegations: I allege unlawful discrimination in a place of public accommodation in that Respondent failed to provide full and equal accommodations for goods and services based upon my sexual orientation.

1. I am a thirty year old female in a same-sex relationship who requested cake service for my wedding.
2. Respondent is a bakery and a place of public accommodation for purposes of ORS 659A.400(1).
3. Upon information and belief, I am aware that Respondent provides wedding cakes for weddings where the persons getting married are not of the same sex.
4. On January 17, 2013, I went to Respondent's shop for a scheduled appointment to order a wedding cake and met with owner Aaron Klein. Respondent asked for the date of the wedding and for the

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PORTLAND
800 NE Oregon St., Suite 1045
Portland, Oregon 97232-2180

SALEM
3865 Wolverine Ave. NE; E-1
Salem, Oregon 97305-1268

PENDLETON
1327 SE 3rd St.
Pendleton, Oregon 97801-4101

EUGENE
1400 Executive Parkway, Suite 200
Eugene, Oregon 97401-2158

names of the bride and groom. I told him, "there are two brides and our names are Rachel and Laurel." Respondent then told me that they do not provide their services for same-sex weddings.

5. Respondent cited a religious belief for its refusal to make cakes for same sex couples planning to marry.
6. At times relevant to this complaint, Respondent has openly stated that it refuses to sell wedding cakes to same-sex couples for weddings, including but not limited to statements made to customers and the press.

I allege that Respondent did not afford me full and equal accommodations without any distinction, discrimination or restriction on account of my sexual orientation, ORS 659A.403(1), and that Respondent engaged in the unlawful practice of publishing and displaying communication to the effect that its goods and services will be refused, withheld from and denied to individuals on account of their sexual orientation. ORS 659A.409.

JEP