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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:

Rachel N. Cryer  
3630 SE Cesar E. Chavez, #1  
Portland, OR 97202

Case #: **STPASO130808-11097**

Phone #: 503-740-5072

Attorney:

Paul Thompson  
Thompson Law LLC  
3519 NE 15<sup>th</sup> Ave, Suite 498  
Portland, OR 97212

Phone: 971-258-0562

RESPONDENT:

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

Contact:

Aaron Klein (Owner)  
Melissa Klein (Owner)  
49521 E Cherryville Drive  
Sandy, OR 97055

Headquarters:

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+

Phone #: 503-674-5400

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

I swear (or affirm) that I know and understand this complaint and that it is true to the best of my knowledge, information and belief.

Your signature: Rachel Greer

Verification upon Oath or Affirmation

State of OREGON

County of Multnomah

Signed and sworn to (or affirmed) before me this 5 Day of August 20 13

by Rachel Greer

Notary Public - State of OREGON

NADINE M SCRUTON  
 My Commission Expires May 04, 2015

OFFICIAL SEAL  
 NADINE M SCRUTON  
 NOTARY PUBLIC - OREGON  
 COMMISSION NO. 458241  
 MY COMMISSION EXPIRES MAY 04, 2015

Date on which commission expires May 04, 2015

(name of person making statement)