

Civil Rights Division Complaint of Unlawful Practice



COMPLAINANT:

Case #: EEEMSH150727-12731

Commissioner Brad Avakian Bureau of Labor and Industries 800 NE Oregon Street, #1045

Portland, OR 97232

RESPONDENT:

Frehoo, Inc. DBA Stars Cabaret &

Contact: Lisa Amato

Wyse Kadish LLP

621 SW Morrison Ste 1300 Portland OR 97205 Headquarters: Frehoo, Inc.

4570 SW Lombard

Beaverton, OR 97075

AIDER/ABETTOR:

Beaverton, OR 97075

4570 SW Lombard

Jeff Struhar

Steak House

25989 Butteville Rd Aurora, OR 97002

County: WA

of Employees: 15+

Phone #:

ORS 659A.030(1)(b)

I, Commissioner Brad Avakian, being first duly sworn, do depose and say as follows:

Allegations: In order to protect the interests of vulnerable minors, and to ensure that the public's interest in this and similar matters is protected, the Commissioner of the Bureau of Labor and Industries hereby sets forth the following allegations:

- 1. During 2012, Respondent, directly or through an agent, employed a female individual under 16 years of age; her employment was explicitly conditioned on engaging in sexual acts with Respondent's customers.
- 2. On or about December 10, 2013, police arrested one of Respondent's managers based on charges including sexual abuse and compelling prostitution of a minor. Those offenses occurred within Respondent's establishment and in the course of the minor's employment, and that manager subsequently pled guilty to those charges.

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- 3. Subsequent to the sexual exploitation of the above minor employee, Respondent's president Jeff Struhar did not take appropriate corrective action to prevent the future sexual exploitation of other minor employees.
- 4. During the period from July to September, 2014, Respondent, directly or through an agent, employed another female individual under 16 years of age; that child's employment was explicitly conditioned on the lewd exhibition of her sexual or other intimate parts to Respondent's customers.
- 5. The conditions of employment for these minors constituted sexual harassment under OAR 839-005-0030.

The Commissioner believes Respondents have a continuing practice of unlawful employment discrimination based on sex, in that Respondents subject female minors to sexual harassment, in violation of ORS 659A.030(1)(b).

Crl 7.23.15

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.

I understand that this complaint is a public record and that the information herein may be disclosed to any person, at any time.

Your signature: Ball-

Verification upon Oath or Affirmation	on
State of OREGON	County of Multnomah
Signed and sworn to (or affirmed) before	ore me this 27 th Day of July 20.15
	(name of person making statement).
Shannon Lynn Willi Notary Public - State of OREGON	
The Control of the Co	X 仔细菜油 SHANNON LYNN WILLIS (f)
2/21/2018 Date on which commission expires	NOTARY PUBLIC - OREGON COMMISSION NO. 924990 MY COMMISSION EXPIRES FEBRUARY 21, 2018