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BEFORE THE ALASKA STATE COMMISSION FOR HUMAN RIGHTS

ALASKA STATE COMMISSION FOR )  
HUMAN RIGHTS, PAULA M. HALEY, )  
EXECUTIVE DIRECTOR, *ex rel.*, )  
SYDNEY PETERSON, )  
  
Complainant, )  
  
v. )  
  
SULLIVAN’S OF ALASKA, INC., d/b/a )  
SULLIVAN’S STEAKHOUSE, )  
  
Respondent. )

ASCHR No. J-12-192

ACCUSATION

Paula M. Haley, Executive Director of the Alaska State Commission for Human Rights, *ex rel.* Sydney Peterson, hereby alleges the following against Respondent

Sullivan’s of Alaska, Inc., d/b/a Sullivan’s Steakhouse:

1. Respondent Sullivan’s of Alaska, Inc., is an Alaska corporation doing business as a licensed restaurant, Sullivan’s Steakhouse, located at 320 West 5<sup>th</sup> Avenue, Anchorage, Alaska (“Sullivan’s Steakhouse”).

2. Sydney Peterson was hired by Sullivan’s Steakhouse in or about May 2011 as a hostess. Ms. Peterson was born on March 28, 1994, and was under the age of eighteen at the time she was hired and throughout the duration of her employment at Sullivan’s Steakhouse.

3. On or about December 29, 2011, Todd Endres, the general manager at Sullivan’s Steakhouse, held a mandatory meeting on the restaurant premises which

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was attended by several minor employees. Mr. Endres announced a new policy barring the employment of individuals under the age of eighteen years. Sullivan's Steakhouse immediately terminated the employment of Ms. Peterson and at least four other minor employees.

4. Since December 29, 2011, Sullivan's Steakhouse has maintained a policy and practice of discriminating against minors by failing to hire or rehire anyone under the age of eighteen.

**FIRST CAUSE OF ACTION  
DISCRIMINATION BECAUSE OF AGE  
A VIOLATION OF AS 18.80.220(a)(1)**

- 5. Paragraphs 1 - 4 above are realleged and incorporated herein.
- 6. Sydney Peterson worked for Sullivan's Steakhouse as a hostess.
- 7. Ms. Peterson was qualified for her job and her performance was satisfactory.
- 8. Ms. Peterson is a member of a protected class based on her age.
- 9. Ms. Peterson was terminated from her employment because of her age.

10. After Ms. Peterson's employment was terminated, Sullivan's Steakhouse retained and hired persons eighteen years of age and older for hostess positions.

11. The decision of Sullivan's Steakhouse to terminate Ms. Peterson's employment violates AS 18.80.220(a)(1).

12. Ms. Peterson has suffered damages in the form of lost wages and benefits because Sullivan's Steakhouse terminated her employment.

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**PRAYER FOR RELIEF**

Wherefore, the Executive Director asks for the following relief:

1. That the Commission issue an order declaring that Sullivan’s Steakhouse violated AS 18.80.220(a)(1) by terminating Sydney Peterson’s employment.
2. That the Commission order Sullivan’s Steakhouse to adopt and disseminate a policy of nondiscrimination under the Alaska Human Rights Law.
3. That the Commission order Sullivan’s Steakhouse to obtain in-person training, conducted by a neutral, third-party trainer, of at least six hours in length for its managers and supervisors and three hours in length for its employees, on the provisions of the Alaska Human Rights Law that prohibit discrimination in employment, and that such order specify that the trainer and training curriculum be approved by the Executive Director prior to the training being conducted.
4. That the Commission order Sullivan’s Steakhouse to eliminate from Ms. Peterson’s personnel records all documents and entries relating to the facts and circumstances that led to Ms. Peterson filing the above-captioned charge and any of the related events occurring thereafter.
5. That the Commission order Sullivan’s Steakhouse to refrain from penalizing Ms. Peterson in any way in future considerations for employment and, if rehired, for transfers, promotions, or upgrading because Ms. Peterson complained about discrimination or because she filed a complaint with the Commission.

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6. That the Commission order Sullivan’s Steakhouse to refrain from advising or informing any other employer or potential employer of Ms. Peterson of the facts or circumstances involved in this case.

7. That the Commission order Sullivan’s Steakhouse to pay any back pay, including any lost benefits or remuneration, to Ms. Peterson, plus interest at the applicable legal rate, the exact amount of which will be proven at hearing.

8. That the Commission order Sullivan’s Steakhouse to reinstate Ms. Peterson or pay the statutory maximum amount of front pay, including benefits or remuneration, the exact amount of which will be proven at hearing.

Dated this 27th day of October 2014 at Anchorage, Alaska.

ALASKA STATE COMMISSION  
FOR HUMAN RIGHTS

*Signature Redacted*

By: \_\_\_\_\_  
Elizabeth Smith  
Human Rights Attorney  
Alaska Bar No. 9402003