

ALASKA STATE COMMISSION FOR HUMAN RIGHTS  
1901 Bragaw Street, Suite 300  
Anchorage, Alaska 99508  
(907) 276-7474

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BEFORE THE ALASKA STATE COMMISSION FOR HUMAN RIGHTS ON  
REFERRAL TO THE OFFICE OF ADMINISTRATIVE HEARINGS

ALASKA STATE COMMISSION FOR )  
HUMAN RIGHTS, ROBERT W. CORBISIER, )  
EXECUTIVE DIRECTOR, *ex rel.*, )  
SARAH JACOBS, )  
 )  
Complainant, )  
 )  
v. )  
 )  
KULA RENTALS INCORPORATED )  
*d/b/a* GINGER'S RESTAURANT. )  
 )  
Respondent. )  
\_\_\_\_\_ )

OAH No.

ASCHR No. J-23-122

**ACCUSATION**

Robert W. Corbisier, Executive Director of the Alaska State Commission for Human Rights, *ex rel.* Sarah Jacobs, hereby alleges the following against Kula Rentals Incorporated *d/b/a* Ginger's Restaurant:

1. Alaska State Commission for Human Rights ("ASCHR") is a state agency tasked with enforcing AS 18.80 which prohibits discrimination within the State of Alaska.
2. Sarah Jacobs ("Complainant") was visiting the State of Alaska at the time of the incident.
3. Complainant is a person with a disability, professionally diagnosed by Kimberly Matoka, a Licensed Professional Counselor (Arizona License Number LPC-11602).
4. Complainant employs a trained service dog as an accommodation for this disability, under the recommendation of Matoka.
5. Kula Rentals Incorporated ("Respondent") is a corporation in the State of Alaska with business entity number 10101906.

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- 6. Kula Rentals Incorporated (hereinafter “Ginger’s Restaurant”) does business under the name Ginger’s Restaurant, located at 44332 Sterling Highway, #53, Soldotna, Alaska.
- 7. Ginger’s Restaurant is a food service establishment that offers its services to members of the general public.
- 8. Ginger’s Restaurant meets the definition of “public accommodation” under AS 18.80.300(16).
- 9. Ginger’s Restaurant meets the definition of “place of public accommodation, resort or amusement” under 6 AAC 30.990(9).
- 10. Ginger’s Restaurant rents space at the Peninsula Center Mall located at 44332 Sterling Highway, Soldotna, Alaska.
- 11. Entrances to the shopping mall where Ginger’s Restaurant is located feature a sign that indicates that while pets are not allowed, service animals are permitted. The sign displays an illustration of a dog wearing a service vest and includes a reference to California Health and Safety Codes.
- 12. Upon information and belief, Ginger’s Restaurant has no signage of its own relating to service animals or alert animals displayed whatsoever.
- 13. On the morning of July 29, 2023, Complainant entered Ginger’s Restaurant with their trained service dog.
- 14. On the morning of July 29, 2023, Complainant’s service dog was not wearing a vest.
- 15. Complainant attempted to dine at Ginger’s Restaurant on the morning of July 29, 2023.
- 16. Complainant was denied service on the morning of July 29, 2023.
- 17. During calls held on February 8 and 26, 2024, Respondent asserted that the reason for this denial of service was that Complainant’s service dog lacked a vest or other identifiable signs that the dog was a trained service animal.
- 18. In a call on February 8, 2024, Respondent asserted that tourists patronizing Ginger’s Restaurant were uncomfortable with service animals.

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- 19. In a call on February 8, 2024, Respondent asserted that the restaurant has had problems with prior customers bringing in pets.
- 20. In a call on February 8, 2024, Respondent asserted that real service dogs would always bear a vest, as individuals with disabilities should be proud to advertise that their animal is a service dog.
- 21. In a call on February 8, 2024, Respondent asserted that Ginger’s Restaurant does not have sufficient room for dogs of any kind.
- 22. In a call on February 8, 2024, Respondent asserted that their lease and the sign outside mall entrances requires service animals to wear vests and allowing unvested animals into the restaurant would violate this agreement.
- 23. When served with a subpoena requesting this lease, Respondent failed to produce said lease.
- 24. In a call on February 26, 2024, Respondent asserted that the Complainant was not served due to the dog appearing to be unkempt.
- 25. In a call on May 31, 2024, Respondent asserted that Complainant was not served due to becoming argumentative over the laws surrounding service animals.

**FIRST CAUSE OF ACTION**  
**KULA RENTALS INCORPORATED, d/b/a GINGER’S RESTAURANT**  
**DISCRIMINATION BASED UPON *DISABILITY***  
***A VIOLATION OF AS 18.80.230***

- 26. Paragraphs 1 – 25 are realleged and incorporated herein.
- 27. Alaska Statute 18.80.230(a)(1) prohibits discrimination on the basis of disability in places of public accommodation.
- 28. Under Title 6 of the Alaska Administrative Code Chapter 30, Article 6, a public accommodation shall modify policies, practices, or procedures, to permit the use of a service or alert animal by an individual with a disability.

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- 29. Kula Rentals Incorporated, *d/b/a* Ginger’s Restaurant failed to make the required modifications to its policies, practices, and procedures to permit the usage of service animals when it denied service to Complainant due to their service animal.
- 30. A place of public accommodation is required to make modifications to policies or procedures to permit the use of service animals, even if other customers experience discomfort, there have been prior issues with pets, or Complainant’s alleged argumentative demeanor.
- 31. Under Title 6 of the Alaska Administrative Code Chapter 30, Article 6, an individual with a disability shall be permitted to be accompanied by a service or alert animal in all areas of a place of public accommodation where members of the public, program participants, clients, customers, patrons, or invitees, as relevant, are allowed to go.
- 32. Kula Rentals Incorporated, *d/b/a* Ginger’s Restaurant failed to permit an individual with a disability to be accompanied by their service animal in all areas of a place of public accommodation where clients are allowed to go when it denied Complainant the opportunity to dine in due to their service animal.
- 33. A place of public accommodation needs to permit a disabled individual to be accompanied in an area where members of the public, clients, customers, patrons, and invitees are all allowed, such as a restaurant’s dining area, even if the place of public accommodation does not believe there is sufficient room for a service animal.
- 34. Under Title 6 of the Alaska Administrative Code Chapter 30, Article 6, a service animal handler shall not be required to obtain any certification or registration from any organization purporting to certify service animals, nor shall the animal be required to carry a tag, vest, or other documentation identifying the animal as a service animal.
- 35. Kula Rentals Incorporated, *d/b/a* Ginger’s Restaurant required a service animal handler to carry a tag, vest, or other documentation when it denied service to Complainant, due to their service dog not wearing a vest.

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36. A place of public accommodation may not require a service animal handler to carry a tag, vest, or other documentation even if a place of public accommodation believed their lease required service animal vests, believed that Complainant’s dog appeared unkempt, or believed that individuals with disabilities should be proud to advertise their service animals.

37. Kula Rentals Incorporated, *d/b/a* Ginger’s Restaurant unlawfully discriminated against Complainant when it denied service due to Complainant’s disability accommodation, their service animal.

**PRAYER FOR RELIEF**

Wherefore, the Executive Director asks for the following relief:

1. An order declaring Respondent, Kula Rentals Incorporated, *d/b/a* Ginger’s Restaurant, violated AS 18.80.230 by refusing to serve Sarah Jacobs on July 29, 2023, due to their service dog which served as an accommodation for their disability.
2. An order that the Respondent establish policies and procedures for making reasonable accommodations for patrons with disabilities.
3. An order requiring that the Respondent send a copy of its proposed policy to the Commission for review and approval within a reasonably designated time.
4. An order requiring that this policy must be approved by the Commission before it is adopted and disseminated.
5. An order that the Respondent adopt and disseminate to all employees a policy that clearly states that service and alert animals may accompany an individual with a disability in all areas where members of the public, program participants, clients, customers, patrons, or invitees, as relevant, are allowed to go.
6. An order that the Respondent send a copy of its proposed policy to the Commission for review and approval within a reasonably designated time.
7. An order requiring that this policy must be approved by the Commission before it is adopted and disseminated.

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- 8. An order that the Respondent adopt and disseminate to all employees a policy that clearly states that service animals need not carry a tag, harness, vest, or other form of documentation to be treated as service animals, with all relevant protections under the law.
- 9. An order that the Respondent send a copy of its proposed policy to the Commission for review and approval within a reasonably designated time
- 10. An order requiring that this policy must be approved by the Commission before it is adopted and disseminated.
- 11. An order that the Respondent provide three (3) hours of training, by a neutral third-party trainer approved by the Commission, to the owner and staff of Ginger’s Restaurant on the laws and regulations prohibiting disability discrimination in places of public accommodation.
- 12. An order requiring that the training include a section on the laws and regulations governing service animals in Alaska, including 6 AAC 30.610.
- 13. An order requiring that the training include instruction on the applicable law, with examples or scenarios to explain how the law applies to places of public accommodation.
- 14. An order requiring that the training include instruction on the obligations and responsibilities of managers and supervisors upon witnessing or receiving complaints of discriminatory behavior.

Dated at Anchorage, Alaska 7/21/2025.

ALASKA STATE COMMISSION  
FOR HUMAN RIGHTS

DocuSigned by:  
*Alexander Roider*  
 By: \_\_\_\_\_  
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 Alexander Roider  
 Human Rights Attorney  
 Alaska Bar No. 2402018

**ACCUSATION**

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**CERTIFICATE OF SERVICE**


I hereby certify that on 7/21/2025, true and correct copies of the foregoing **Accusation** and accompanying **Referral of Complain to Hearing** and **Entry of Appearance** were served via Certified Mail on:

Sarah Jacobs [Sent via Alaska ZendTo per request]

Kula Rentals Incorporated dba. Ginger’s Restaurant  
c/o George Wright  
717 Maple Drive  
Kenai, AK 99611

and that the original filing was submitted on the same date to:

Dorene Lorenz, Chairperson  
Alaska State Commission for Human Rights  
1901 Bragaw Street, Suite 300  
Anchorage, AK 99508

Signed by:  
  
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Kathryn Dufresne, Law Office Assistant