

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

Complaint No:
M-P-SC-12-1027198

In the Matter of the Complaint of:

NEW YORK CITY COMMISSION ON HUMAN RIGHTS,

Complainant,

- against -

SANDER'S BAKERY a.k.a. S&S BAKE SHOP,
WILLIAMSBURG KOSHER BAKE SHOP INC., and
AARON SANDERS,

Respondents.

Verified Complaint

The New York City Commission on Human Rights, complaining of Respondents, alleges as follows:

1. Complainant New York City Commission on Human Rights initiates this Complaint through its Law Enforcement Bureau pursuant to Section 8-109(c) of the Administrative Code of the City of New York ("Code"). Its address is 40 Rector Street, New York, NY 10006.
2. Respondent Sander's Bakery a.k.a. S&S Bake Shop ("Sander's") is a place and/or provider of a public accommodation as defined by Section 8-102 of the Code. Its address is 159 Lee Avenue, Brooklyn, NY 11211-8030.
3. Respondent Williamsburg Kosher Bake Shop Inc. ("WKBS") is a place and/or provider of a public accommodation as defined by Section 8-102 of the Code. Its address is 159 Lee Avenue, Brooklyn, NY 11211-8030.
4. Upon information and belief, Respondent Aaron Sanders is employed by Respondent Sander's and WKBS as the owner. His work address is c/o Sander's Bakery, 159 Lee Avenue, Brooklyn, NY 11211-8030.
5. On July 24, 2012, an employee from the New York City Commission on Human Rights visited Respondents' store and viewed a sign on its window stating, "No shorts, no barefoot, no sleeveless, no low cut neckline allowed in this store."

6. Complainant charges that Respondents posted a written communication that expressly intended to deny patrons the advantages, facilities, and/or privileges of a public accommodation based upon their gender and creed, in violation of Section 8-107(4) (a) of the Code.

Carlos Velez, being duly sworn, deposes and says: that I am the Executive Director of the Law Enforcement Bureau of the New York City Commission on Human Rights; I have read the foregoing Complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.

Carlos Velez
Executive Director
Law Enforcement Bureau

Subscribed and sworn to before me
this ____ day of _____, 2012.

Notary Public