



## BUREAU OF LABOR AND INDUSTRIES

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:

Headquarters:

Frehoo, Inc. DBA Stars Cabaret &  
Steak House  
4570 SW Lombard  
Beaverton, OR 97075

Contact: Lisa Amato  
Wyse Kadish LLP  
621 SW Morrison Ste 1300  
Portland OR 97205

Frehoo, Inc.  
4570 SW Lombard  
Beaverton, OR 97075

AIDER/ABETTOR:

Jeff Struhar  
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.

Continued on reverse side

### PORTLAND

800 NE Oregon St., Suite 1045  
Portland, Oregon 97232-2180

### SALEM

3865 Wolverine Ave. NE; E-1  
Salem, Oregon 97305-1268

### EUGENE

1400 Executive Parkway, Suite 200  
Eugene, Oregon 97401-2158

