

THE
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April 28, 2016

INTAKE UNIT, Attn: Raquel C., Guerra
Illinois Department of Human Rights
100 West Randolph Street, Ste. 10-100
Chicago, IL 60601

Re: In the Matter of Alexandra Katzman and Bernadine's Stillman Inn

Dear Ms. Guerra:

Enclosed for filing please find a Charge of Discrimination, with Attachment, and an Appearance in the above referenced matter. Please do not hesitate to contact me if you have any questions. Thank you for your attention to this matter.

Sincerely,

Rebecca K. Glenberg
Roger Baldwin Foundation of ACLU, Inc.
180 N. Michigan Ave., Suite 2300
Chicago, IL 60601
Phone: 312-201-9740 Ext. 316
Facsimile: 312-201-9760



STATE OF ILLINOIS
ILLINOIS DEPARTMENT OF HUMAN RIGHTS

CHICAGO OFFICE
DEPARTMENT OF HUMAN RIGHTS
100 W RANDOLPH ST., SUITE 10-100
CHICAGO, ILLINOIS 60601
(312) 814-6200
(866) 740-3953 (TTY)

SPRINGFIELD OFFICE
DEPARTMENT OF HUMAN RIGHTS
222 S. COLLEGE ST., ROOM 101
SPRINGFIELD, ILLINOIS, 62704
(217) 785-5100
(866) 740-3953 (TTY)

CHARGE NO: _____

CHARGE OF DISCRMINIATION

COMPLAINANT

Name Alexandra Katzman
Address [REDACTED]
City, State ZIP [REDACTED]
Telephone Number [REDACTED]

I believe that I have been personally aggrieved by a civil rights violation committed on

(date/s of harm): November 1, 2015 , by:

RESPONDENT

Name Bernadine's Stillman Inn
Address 513 Bouthillier St.
County Jo Daviess
City, State ZIP Galena, IL 61036-2703
Telephone Number (815) 777-0557

SEE ATTACHED

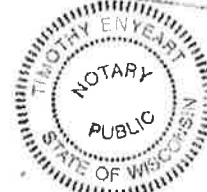
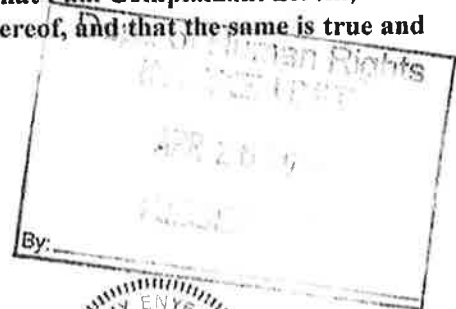
I, Alexandra Katzman on oath or affirmation state that I am Complainant herein, that I have read the foregoing charge and know the contents thereof, and that the same is true and correct to the best of my knowledge.

[Signature] 4/27/16
Complainant's Signature and Date

Subscribed and Sworn to

Before me this 27th day
of April, 2016.

[Signature]
Notary Public Signature



Notary Stamp
My Commission is permanent.

ATTACHMENT

I. A. ISSUE/BASIS

November 1, 2015: Respondent Bernadine's Stillman Inn, a public accommodation, denied to Alexandra Katzman and her fiancé, Jonathan Webber, the full and equal enjoyment of its facilities, goods, and services on the basis of religion, by refusing to allow them to hold a non-religious wedding ceremony at its facility.

B. PRIMA FACIE ALLEGATIONS

1. Ms. Katzman is Jewish. Her fiancé, Jonathan Webber, is Christian.
2. Respondent Bernadine's Stillman Inn ("the Inn") is an inn in Galena, Illinois, with more than 5 units for rent and is a public accommodation as defined by the Illinois Human Rights Act, 775 ILCS 5/5-101(A)(1).
3. The Inn markets itself as a wedding venue as well as a place of lodging. Weddings and receptions take place in a building on the grounds of the Inn containing a chapel and reception area. Accordingly, the Inn is also a "place of public gathering" and a public accommodation as defined by 775 ILCS 5/5-101(A)(4).
4. The Inn provides wedding services such as catering, flowers, music, and photography, among which clients may pick and choose. The Inn also provides a wedding officiant, but its website suggests that use of the in-house officiant is optional. In fact, the website provides instructions for how to engage a local judge to perform the wedding ceremony.
5. Ms. Katzman and Mr. Webber decided to get married at the Inn because they liked the venue, it was an appropriate size and convenient location, and because they had gotten engaged there.
6. In February 2015, Ms. Katzman and Mr. Webber sent the Inn a form outlining the services they wanted, specifically stating that they wanted a nonreligious ceremony. They also sent a nonrefundable deposit to secure the wedding date, May 14, 2016. The check was cashed immediately.
7. Ms. Katzman and Mr. Webber travelled to Galena to discuss wedding arrangements with the innkeeper, Dave Anderson, on November 1, 2015.
8. Mr. Anderson pulled out the form that Ms. Katzman and Mr. Webber had sent him months earlier, and told them that he could not do a nonreligious ceremony.
9. Ms. Katzman explained to Mr. Anderson that she is Jewish and that Mr. Webber is Christian, and that they wanted a ceremony that would not make either of their families uncomfortable. She told him that her friend's

mother, a judge, could perform the ceremony. Mr. Anderson said he was not comfortable having anyone but himself perform a ceremony in his chapel, and that maybe they could have the wedding in the courtyard. He did not respond when Ms. Katzman asked what they would do if it rained.

10. After consulting privately, Ms. Katzman and Mr. Webber asked Mr. Anderson what he would say if he performed the ceremony himself. Mr. Anderson read a long script that referred repeatedly to Jesus Christ.
11. Ms. Katzman and Mr. Webber asked if they could have a service that mentioned God but not Jesus. Ms. Katzman explained that she and her parents were Jewish, that half of the guests would be Jewish, and they would not be comfortable with the explicitly Christian service. At that point Mr. Anderson told her that their wedding was “not a good fit” for the Inn. He then refunded their deposit.
12. Ms. Katzman posted a review of the Inn on the website TripAdvisor in which she described the discrimination. The Inn posted the following response: “We are not against mixed faith couples. We can legally only do Religious Ceremonies. Both couples have to have some kind of faith for us to provide the ceremony.”
13. The Inn allows couples who are willing to have a Christian service to have weddings in the building on the grounds of the Inn. Ms. Katzman and Mr. Webber were denied the use of the facilities on the basis of religion.
14. As a result of the discrimination, Ms. Katzman and Mr. Webber had to cancel all of their existing wedding plans, discard the “save-the-date” cards they had ordered, find a new wedding venue, and tell their friends and families about the change of plans. The Inn’s unfair treatment of them on the basis of religion caused them to feel angry and humiliated.

STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS

IN THE MATTER OF)
)
ALEXANDRA KATZMAN,)
)
COMPLAINANT)
)
AND) CHARGE NO.:
)
BERNADINE'S STILLMAN INN,)
)
RESPONDENT)

A P P E A R A N C E

Rebecca K. Glenberg, hereby enter the
(Name of law firm/attorney/non-attorney representative)

appearance of Alexandra Katzman
(Name of Complainant or Respondent)

and our Appearance as their attorney (or non-attorney representative), and request that copies of all Pleadings, Orders, and other documents be served upon the undersigned for said Party in lieu service upon the Party.

Rebecca K. Glenberg
PRINT name of attorney/non-attorney representative

Roger Baldwin Foundation of ACLU, Inc.
Firm Name

180 N. Michigan Ave., Suite 2300
Address

Chicago IL 60601
City State ZIP Code

312-201-9740
Telephone Number

312-201-9760
Fax Number

DATED: April 28, 2016

By: 
Signature