



CITY OF CHICAGO  
COMMISSION ON HUMAN RELATIONS

Case No. 92-E-80

AMENDED COMPLAINT

City of Chicago  
Richard M. Daley, Mayor

Commission on  
Human Relations

Clarence N. Wood  
Chairman/Commissioner

Suite 6A  
300 North Dearborn Court  
Chicago, Illinois 60611  
312) 744-4711 (Voice)  
312) 744-1081 (FAX)  
312) 744-1088 (TDD)

COMPLAINANT'S NAME		TELEPHONE NO.
G. Keith Richardson		(312) 525-7524
STREET ADDRESS	CITY, STATE AND ZIP CODE	COUNTY
555 W. Cornelia, #708	Chicago, Illinois 60657	Cook
RESPONDENT'S NAME		TELEPHONE NO.
Mr. Nelson L. Carter, Director and Chicago Council Boy Scouts of America		559-0990
STREET ADDRESS	CITY, STATE AND ZIP CODE	
730 West Lake	Chicago, Illinois 60606	
DISCRIMINATION BASED ON (CHECK AS MANY AS APPROPRIATE)		
<input type="checkbox"/> RACE	<input type="checkbox"/> COLOR	<input type="checkbox"/> SEX
<input type="checkbox"/> AGE	<input type="checkbox"/> RELIGION	<input type="checkbox"/> DISABILITY
<input type="checkbox"/> NATIONAL ORIGIN	<input type="checkbox"/> ANCESTRY	<input checked="" type="checkbox"/> SEXUAL ORIENTATION
<input type="checkbox"/> MARITAL STATUS	<input type="checkbox"/> PARENTAL STATUS	<input type="checkbox"/> MILITARY DISCHARGE STATUS
<input type="checkbox"/> SOURCE OF INCOME	<input type="checkbox"/> RETALIATION	
DATE DISCRIMINATION TOOK PLACE - LATEST DATE IF CONTINUING (MONTH, DAY, YEAR)		
May 21, 1992 and continuing to the present		
TYPE OF COMPLAINT		
<input checked="" type="checkbox"/> EMPLOYMENT	<input type="checkbox"/> HOUSING	<input type="checkbox"/> CREDIT <input type="checkbox"/> BONDING <input type="checkbox"/> PUBLIC ACCOMMODATION

THE PARTICULARS ARE (IF ADDITIONAL SPACE NEEDED, ATTACH EXTRA SHEETS):  
(This is an amendment of the original complaint filed on May 21, 1992, not a new complaint.)

- I am an Eagle Scout, and also a Vigil Honor Member of the Order of the Arrow based on "distinguished contributions" I have made to the Boy Scouts "above and beyond [my] immediate responsibilities." I have been a regional chair of the Boy Scouts' Explorers program, a National Vice President of Explorers, and a member of the Boy Scouts' Executive Board for the North Center Region.
- I previously worked for six summers at Boy Scout camps. The Boy Scouts National Camp School has certified me as an instructor of Scouting skills.
- In May, 1992, I was looking for a job and was interested in any position that may have been open with the Boy Scouts. I am a gay man, however, and I knew the Boy Scouts had a policy prohibiting employment of gay men and lesbians. (See Attachment A.)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 19\_\_\_\_.

\_\_\_\_\_  
SIGNATURE OF COMPLAINANT

\_\_\_\_\_  
NOTARY PUBLIC

DATE: \_\_\_\_\_

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COMPLAINT - CONTINUED

4. Therefore, on May 21, 1992, I telephoned the Chicago Area Council of the Boy Scouts to ask about that employment policy and discuss the Boy Scouts' discrimination against gay men and lesbians. I spoke with Susan Teplinsky, a Council employee.

5. During our conversation, I told Teplinsky I am a gay man. I asked her if the Boy Scouts' policy barring employment of homosexuals was still in place. She said that it was.

6. I asked Teplinsky if there was any way the Boy Scouts might consider hiring a gay man. She responded, "No way is the Boy Scouts of America about to give a job to a homosexual." I said that was too bad because I would be interested in applying for a job with the Boy Scouts, and therefore I would be filing a complaint of employment discrimination with the Chicago Commission on Human Relations.

7. I did not formally apply for a job with the Boy Scouts because to do so would have been futile, based on the Boy Scouts' discriminatory practices, policies and statements.

8. On May 21, 1992, when I contacted the Boy Scouts, there was at least one job opening with the Chicago Area Council that I would have been qualified to hold. I have a college degree, the one formal requirement for employment with the Boy Scouts. Also, in addition to my background with the Boy Scouts (described above), I have experience with sales, management, public relations and other administrative work for non-profit and for-profit organizations.

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COMPLAINT - CONTINUED

9. Since I filed my original complaint in this case, the attorney for the Chicago Area Council has claimed that the Boy Scouts have a new employment policy which bars gay men and lesbians from only some jobs. However, that alleged policy is so vague and ambiguous that it would allow and encourage continuing discrimination on the basis of sexual orientation, and I believe the Boy Scouts will continue to discriminate on that basis.

10. I remain interested in any job opening with the Chicago Area Council of the Boy Scouts.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

SUBSCRIBED AND SWORN TO BEFORE ME THIS 30<sup>th</sup> DAY OF July, 1992.

*A. F. [Signature]*  
Signature of Complainant

Date: 7/30/92

*Antonette M. Blood*  
NOTARY PUBLIC SEAL " OFFICIAL SEAL "  
ANTONETTE M. BLOOD  
NOTARY PUBLIC, STATE OF ILLINOIS  
MY COMMISSION EXPIRES 1/8/95