

# LAW OFFICE OF M. CHRISTIAN BOTTOMS

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May 20, 2010

Mr. William D. Brandt, P.C.  
880 Liberty Street NE  
Salem, Oregon 97301

RE: Confederation of Clubs v. Front Street Inn

Dear Mr. Brandt,

Mr. Hochberg and I are in receipt of your letter dated April 27, 2010. This letter is written in response and to serve a second notice upon your client for unlawful business invitee practices.

The Front Street Inn is not a private club. It is open to the public for the purpose of business. As such, there is an implied contractual agreement between Front Street Inn and the general public. Front Street Inn is required to check identification for age and cannot allow patrons to enter in violation of health codes (no shoes, no shirt, no service) and/or customers who are inebriated. However, a business open to the public cannot violate the citizenry's constitutional rights or unlawfully discriminate against members of the public. Front Street Inn may not discriminate against people's race, ethnic background, gender, religion, military status, disability or their first amendment rights to wear club affiliations. On April 17, 2010, Front Street Inn blatantly discriminated against club members, veterans, African-Americans, and women.

The excuse that Front Street Inn's policy of discrimination was pursuant to a "dress code" is offensive. Men and Women who served our country in the United States Military who are banned from entering a public establishment for wearing a Veteran's patch or any other patch is disgraceful.

Apparently, your client's unlawful policy was initiated at the hands of the Salem Police Department. A Public body intentionally targeting a group for unlawful discrimination is of grave concern to our members. I am not authorized to accept, however, I will propose that if you provide us with adequate information related to the Salem Police Department's statements to your client, we would consider not filing an action against Front Street Inn.

Thank you,

M. Christian Bottoms  
Attorney at Law

cc: Confederation of Clubs  
Sam Hochberg, Attorney at Law  
Richard M. Lester, NCOM (National Coalition of Motorcyclists)