



**City of Chicago**  
**COMMISSION ON HUMAN RELATIONS**  
 740 N. Sedgwick, 4<sup>th</sup> Floor, Chicago, IL 60654  
 312/744-4111 (Voice), 312/744-1081 (Fax), 312/744-1088 (TDD)

**IN THE MATTER OF:**

Patricia Holloway  
**Complainant,**  
 v.

Gold Star Hospitality, Inc. d/b/a Burger King  
**Respondent.**

**Case No.:** 23-P-28

**Date of Ruling:** February 27, 2025

**Date Mailed:** March 17, 2025

**TO:**

Lucher & Patricia Holloway  
 300 E. 90<sup>th</sup> St.  
 Chicago, IL 60619

Vishalt Thakkar  
 520 S. Bolingbrook Dr.  
 Bolingbrook, IL 60440

Anthony Boyle  
 Diesel Law, Ltd.  
 1016 W. Jackson Blvd., Suite 45  
 Chicago, IL 60607

**FINAL ORDER ON LIABILITY AND RELIEF**

YOU ARE HEREBY NOTIFIED that, on February 27, 2025, the Chicago Commission on Human Relations issued a ruling in favor of Complainant in the above-captioned matter, finding that Respondent violated the Chicago Human Rights Ordinance. The findings of fact and specific terms of the ruling are enclosed. Based on the ruling, the Commission orders Respondent:

- a. Make payment to Complainant of \$500 in emotional distress damages;
- b. Make payment to Complainant of pre- and post-judgment interest on the emotional distress damages from the date of the violation, January 25, 2023;
- c. Reasonable attorney fees and costs upon proof of same; and
- d. To pay a fine to the City of Chicago in the amount of \$5,000.<sup>1</sup>

Pursuant to Commission Regulations 100(15) and 250.150, a party may obtain review of this order by filing a petition for a common law *writ of certiorari* with the Chancery Division of the Circuit Court of Cook County according to applicable law.

**CHICAGO COMMISSION ON HUMAN RELATIONS**

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<sup>1</sup>**COMPLIANCE INFORMATION:** Parties must comply with a final order after administrative hearing no later than 28 days from the date of mailing of the later of a Board of Commissioners' final order on liability or any final order on attorney fees and costs, unless another date is specified. See Reg. 250.210. Enforcement procedures for failure to comply are stated in Reg. 250.220.

**Payments of damages and interest** are to be made directly to Complainant. **Payments of fines** are to be made by check or money order payable to City of Chicago according to an invoice which will be mailed under a separate cover.

**Interest on damages** is calculated pursuant to Reg. 240.700, at the bank prime loan rate, as published by the Board of Governors of the Federal Reserve System in its publication entitled "Federal Reserve Statistical Release H.15 (519) Selected Interest Rates." The interest rate used shall be adjusted quarterly from the date of violation based on the rates in the Federal Reserve Statistical Release. Interest shall be calculated on a daily basis starting from the date of the violation and shall be compounded annually.



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312/744-4111 (Voice), 312/744-1081 (Fax)  
[cchrfilings@cityofchicago.org](mailto:cchrfilings@cityofchicago.org)

**IN THE MATTER OF:**

Patricia Holloway<sup>1</sup>  
**Complainant,**  
v.

Case No.: 23-P-28

Gold Star Hospitality, Inc. d/b/a Burger King  
**Respondent.**

**FINAL RULING ON LIABILITY AND RELIEF**

**I. PROCEDURAL HISTORY**

On February 27, 2023, Complainant Patricia Holloway filed a Complaint with the Commission on Human Relations against Respondent Gold Star Hospitality, Inc. d/b/a Burger King. Complainant alleged that Respondent failed to provide a designated accessible parking space at its public accommodation in violation of Chapter 6-10 of the Chicago Human Rights Ordinance (“CHRO”). Respondent failed to comply with Commission Rule 210.260 by failing to file and serve a response to Complainant’s Complaint. On April 11, 2023, the Commission mailed to Respondent an Order to Respond and Notice of Potential Default. Respondent failed to file and serve a Response in this matter. On June 2, 2023, the Commission entered an Order of Default against Respondent. The Commission also consolidated the two cases by order dated June 2, 2023.

The administrative hearing in this case was held on June 24, 2024. Complainant Patricia Holloway appeared at the administrative hearing represented by her attorney.

**II. FINDINGS OF FACT**

1. At the time of the Complaint, Complainant was a 69-year-old retired Chicago public school principal. (C).<sup>2</sup>

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<sup>1</sup> Lucher Holloway and Patricia Holloway each filed a Complaint in this matter. Complainant Lucher Holloway (CCHR Case No. 23-P-27) failed to appear at the administrative hearing, and his counsel did not provide an explanation for his absence or seek a continuance on his behalf; therefore, pursuant to Rule 240.398, Complainant Lucher Holloway’s case is dismissed without further notice. The hearing only focused on the claims alleged by Complainant Patricia Holloway.

<sup>2</sup> “C.” denotes Complainant’s original Complaint.

2. Complainant had knee replacement surgery in 2013, which makes it difficult for her to stand and to walk. (Tr. 18; C.).<sup>3</sup>
3. As a result of her knee surgery, Complainant needs to use a cane or walker. (Tr. 18).
4. Complainant has an Illinois disability placard for her car. (Tr. 11; C.).
5. Complainant needs accessible parking to assist in being able to enter places and for safety. (Tr. 11, 12).
6. Complainant needs the shorter distance from an accessible parking space in order to safely enter an establishment. (Tr. 13).
7. If a business lacks accessible parking with a shorter distance to the entrance, Complainant testified that she will not patronize that business but will go elsewhere. (Tr. 14)
8. Complainant testified that between 12:00 pm and 1:00 pm on January 25, 2023, she drove to the Burger King at 7 East Garfield Blvd. in Chicago intending to have lunch with her husband. (Tr. 10).
9. The Burger King has a relatively small parking lot. (Tr. 12).
10. When Complainant arrived, there were at least ten cars parked in the parking lot. (Tr. 12).
12. In response to leading questions by her lawyer, Complainant testified that she did not see any accessible parking signage, anything painted on the ground designating accessible parking, or any yellow striped lines designating an access aisle for accessible parking. (Tr. 12, 13).
13. Complainant entered her Complaint into evidence at the administrative hearing including a picture of the Burger King parking lot showing that there was no designated accessible parking space near the entrance to the Burger King. (C.; Exh. 1).<sup>4</sup>
14. Because she could not park near the entrance, Complainant was unable to eat at the Burger King and left without having lunch. (Tr. 14).
15. Complainant did not speak with anyone in the Burger King restaurant to express her concerns about the lack of accessible parking. (Tr. 13).
16. Complainant has never returned to this Burger King restaurant. (Tr. 16, 19).
17. In response to leading questions by her lawyer, Complainant agreed that not being able to have lunch at the Burger King caused “a great deal of frustration,” “internal turmoil,” and “aggravation.” (Tr. 15, 16).
18. Complainant testified that it was frustrating “[b]ecause I’m looking forward to getting what I want when I enter any facility. There’s a need for whatever you want. You want to do that at a

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<sup>3</sup> “Tr.” followed by a number denotes the hearing transcript followed by the page number(s).

<sup>4</sup> “Exh.” followed by a number denotes exhibits submitted into evidence at the hearing.

particular time. So then when you can't, you're like: Oh, [w]hat's going on here. It's very upsetting." (Tr. 15, 16).

19. Complainant did not show any actual damages resulting from her experience at the Burger King. (Tr. 19).

20. Complainant provided no doctor's bills or evidence of out-of-pocket costs caused by the Burger King visit. (Tr. 19).

21. Complainant testified that she was not aware whether Respondent made any changes to the parking lot after her visit. (Tr. 19).

### III. CONCLUSIONS OF LAW

An order of default means that a respondent is deemed to have admitted the allegations of the Complaint and to have waived any defenses to the allegations, including defenses concerning the Complaint's sufficiency. As further set forth in Commission Rule 235.320, an administrative hearing is held only to allow a complainant to establish a *prima facie* case and to establish the nature and amount of relief to be awarded. Complainants can rely on the complaint to establish a *prima facie* case or present additional evidence. *Id.*

Because the Commission entered an Order of Default in this matter, Respondent is deemed to have admitted the allegations of the Complaint and to have waived any challenges to the Complaint's sufficiency. Rule 235.320. *See also, Godard v. McConnell*, CCHR No. 97-H-64 (Jan. 17, 2001); and *Horn v. A-Aero 24 Hour Locksmith, et al*, CCHR No. 99-PA-32 (July 19, 2000). Complainant is entitled to a finding of liability in her favor and an award of relief so long as she establishes a *prima facie* case of disability discrimination. Rule 235.320. *See also, Barnett v. T.E.M.R. Realty, et al*, CCHR No. 97-H-31 (Dec. 6, 2000).

The Chicago Human Rights Ordinance (CHRO) defines disability, in part, as a determinable physical or mental characteristic, or the history or perception of such characteristic, which may result from disease, injury, congenital condition of birth or functional disorder. The CHRO prohibits discrimination based on disability (along with other protected classes) concerning the full use of a public accommodation. Section 6-10-070 of the CHRO states:

No person that owns, leases, rents, operates, manages or in any manner controls a public accommodation shall withhold, deny, curtail, limit or discriminate concerning the full use of such public accommodation by any individual because of the individual's...disability.

The rules that govern disability discrimination in public accommodations further provide that no individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities...or accommodations of any public accommodation by any private entity that owns, leases, rents, manages, or in any way controls the public accommodation. Rule 600.201. The rules require that a public accommodation remove barriers where such removal is readily achievable; this obligation is ongoing. The rules provide examples of steps to remove barriers, including creating a designated accessible parking space. Rule 600.304(b)(18).

To state a *prima facie* case of public accommodation discrimination based on disability, Complainant must show that she has a disability; she was qualified to use the public

accommodation at issue; and that due to Respondent's discriminatory actions – here, failure to remove barriers to access – she was denied full and equal enjoyment of Respondent's facility. Once Complainant proves a *prima facie* case, the burden shifts to Respondent to show that there were no such barriers or to explain why the removal of the barriers was not readily achievable. *Doering v. Zum Deutchen Eck*, CCHR No. 94-PA-35 (Sept. 14, 1995).

In light of the Order of Default, and based upon the evidence adduced at the hearing, the Commission agrees with the Hearing Officer's recommendation that Complainant has met her burden of proving a *prima facie* case. First, on the issue of disability, the Commission finds that Complainant was able to show she has a disability as defined by the CHRO, and secondly, that she was qualified to dine at Respondent's restaurant and to utilize an accessible parking space. Complainant testified that she had knee replacement surgery and needed to use a cane or walker for mobility. She stated that on the date she visited the Burger King, the parking lot was full and because there was no accessible parking space she could not park close enough to be able to walk to the entrance. Had there been an accessible parking space, Complainant was qualified to park there because she possessed a disability placard. Finally, the evidence shows that Respondent's parking lot had a barrier limiting full and equal enjoyment of the restaurant to customers with disabilities because it did not have any accessible parking spaces or signage indicating where customers with disabilities could park. Respondent, who did not appear at the hearing, failed to present any evidence that providing an accessible parking space and signage was not readily achievable.

Based upon the foregoing, the Commission adopts the Hearing Officer's finding that Complainant has proven that Respondent discriminated against her based on her disability in violation of the Chicago Human Rights Ordinance.

#### **IV. REMEDIES**

In her Complaint, Complainant seeks actual damages, punitive damages and injunctive relief compelling Respondent to provide proper accessible parking for persons with disabilities. In her Pre-Hearing Memorandum prepared by her attorney, Complainant seeks the following damages:

- |                                   |         |
|-----------------------------------|---------|
| 1. Actual (Out-of-Pocket) Damages | \$7,500 |
| 2. Emotional Distress Damages     | \$2,500 |
| 3. Punitive Damages               | \$2,500 |

Upon finding a violation of the CHRO, the Commission has broad powers to order relief to compensate complainants to make them whole, and may award relief as set forth in Section 2-120-510(l) of the Chicago Municipal Code:

Relief may include, but is not limited to, an order...to pay actual damages, as reasonably determined by the Commission for injury or loss suffered by the complainant; to pay appropriate punitive damages when the respondent acted with actual malice, willfully, or with such gross negligence as to indicate a wanton disregard of the complainant's rights, as reasonably determined by the Commission...; to admit the complainant to a public accommodation; to extend to the complainant full and equal enjoyment of the goods, services, facilities, privileges, advantages or accommodations of the respondent...; and to take such action as may be necessary to make the individual complainant whole, including but not limited to, awards of interest on the complainant's actual damages...from the date of

the civil rights violation. These remedies shall be cumulative, and in addition to any fines imposed...

It is the complainant's burden to prove by a preponderance of the evidence that they are entitled to the damages claimed. *See e.g., Carter v. CV Snack Shop*, CCHR No. 98-PA-3 (Nov. 18, 1998).

### **Actual Damages**

The Commission adopts the Hearing Officer's finding that there is no basis in the record for Complainant's request for \$7,500 in actual or out-of-pocket damages. To the contrary, Complainant admitted at the hearing that she did not have any actual damages resulting from her experience at Burger King. She had no doctor's bills or out-of-pocket costs caused by the Burger King visit. Therefore, the Commission agrees with the Hearing Officer's finding that Complainant is not entitled to any out-of-pocket damages in this case.

### **Emotional Distress Damages**

The Commission has repeatedly held that damages for emotional harm can be awarded as part of an award of actual damages. *Jones v. Shaheed*, CCHR No. 00-H-82 (Mar. 17, 2004). *See also, Cotten v. Bistro 18*, CCHR No. 14-P-24 (Oct. 8, 2015); and *Costa and Murphy v. Khalaf*, CCHR Nos. 15-P-09/10/11/12/13/14 (Dec. 14, 2017). Emotional distress damages are awarded in order to fully compensate the complainant for the emotional distress, humiliation, shame, embarrassment and mental anguish resulting from a respondent's unlawful conduct. *Id.*

Complainant is seeking \$2,500 in emotional distress damages. Complainant offers sparse testimony in support of her emotional distress claim. It was Complainant's counsel who suggested through leading questions that Complainant's experience at Burger King caused "a great deal of frustration," "internal turmoil" and "aggravation." Complainant did testify on her own accord that it was frustrating "[b]ecause I'm looking forward to getting what I want when I enter a facility. There's a need for whatever I want. You want to do that at a particular time. So then when you can't, you're like: Oh, what's going on here. It's very upsetting."

Complainant testified that she drove into the Burger King parking lot and when she did not find an accessible parking space, she left. Complainant did not attempt to enter the restaurant or eat there, and she had no contact with any of the Burger King employees. The Hearing Officer finds that Complainant's testimony at best reflects momentary frustration from not being able to park in the lot and eat at the restaurant. This reaction was short-lived and there is no evidence that Complainant experienced prolonged or ongoing emotional effects from the visit.

Complainant is entitled to some damages for the frustration caused by the barriers that denied her full enjoyment of the restaurant – here, the unavailability of accessible parking. Commission decisions have established those factors that should be considered in assessing damages in cases where, as here, they involve single, brief incidents of discriminatory conduct. The Commission's ruling in *Cotten v. Eat-A-Pita*, CCHR No. 07-P-108 (May 20, 2009), a case based upon strikingly similar facts, is directly on point. In *Eat-A-Pita*, the wheelchair-bound complainant passed a restaurant and decided he would like to eat there but then observed that the only access to the restaurant was by a flight of several stairs. Seeing he could not access the restaurant, the complainant chose to leave and did not attempt to eat there. He sought damages for emotional distress. His testimony concerning emotional distress was very limited and conclusory. When asked

by his counsel how he felt about not being able to access the restaurant, he replied in language very similar to the testimony in the instant case: "I felt humiliated. I felt embarrassed. I felt like a second-class citizen." *Id.*

In awarding \$500 in emotional distress damages in *Eat-A-Pita*, the Commission extensively reviewed its case law regarding emotional distress damages awards for single, brief incidents of discriminatory conduct. Relying upon the factors to be considered in determining the amount of such awards as set forth in *Nash/Demby v. Sallas Realty et al.*, CCHR No. 92-H-128 (May 17, 1995), the Commission found that the size of the award should be determined by (1) the egregiousness of the respondent's behavior and (2) the complainant's reaction to the discriminatory conduct. The Commission emphasized that more modest awards are appropriate when one or more of the following features are present:

- a. There was negligible or merely conclusory testimony concerning the emotional distress.
- b. The discriminatory conduct consisted of discrete acts which took place over a brief period of time.
- c. There were no prolonged effects of the discriminatory conduct.
- d. There was no medical treatment and/or a paucity of physical symptoms.
- e. The discriminatory conduct was not so egregious that one would expect a reasonable person to suffer extensive or ongoing distress.
- f. The complainant was not unusually fragile due to past experiences or a pre-condition.

In contrast, the Commission found that higher awards are appropriate when one or more of the following features are present:

- a. Detailed testimony reveals specific effects of the discriminatory conduct.
- b. The conduct took place over a prolonged period of time.
- c. The effects of the emotional distress were felt over a prolonged period of time.
- d. The mental distress was accompanied by physical manifestations and/or medical or psychiatric treatment.
- e. The discriminatory conduct was particularly egregious, accompanied by face-to-face conduct, slurs or epithets referencing a protected class and/or actual malice, or
- f. The complainant was particularly vulnerable.

*Id.*

Applying the foregoing factors, the Commission in *Eat-A-Pita* found that the complainant's testimony regarding emotional distress did not support more than a nominal award of damages. The incident was of relatively short duration and the complainant's minimal testimony merely stated

what any wheelchair user who encounters an entry barrier is likely to feel. The complainant's emotional distress was not prolonged or extensive. The Commission additionally noted that there was no evidence that anyone else noticed the complainant trying to access the restaurant, and that he was not subjected to any slurs or epithets related to his disability. The Commission concluded that a nominal award of \$500 in emotional distress damages was appropriate.

The Commission reached the same result in, *Cotten v. Eppy's Deli and Café*, CCHR No. 08-P-35 (Sept. 16, 2009). In that case, the same complainant wanted to eat at Eppy's Deli but could not access the restaurant because of the presence of steps at the entrance. Complainant left the restaurant and ate at a different restaurant next door. The Commission relied heavily upon its decision in the *Eat-A-Pita* case and the factors to be considered in cases involving single incidents of short duration. The Commission noted that the complainant's testimony about emotional distress was "sparse at best." As in *Eat-A-Pita*, it was the complainant's counsel who suggested through leading questions that complainant was "angry" and "frustrated" by being unable to have a meal at Eppy's Deli. The complainant only testified on his own accord that he felt humiliated that he was not able to gain access, and that he felt like a second-class citizen. The Commission found such conclusory testimony resulting from prodding by the complainant's counsel did not demonstrate specific distress flowing from the incident. Again, the single incident which did not result in extensive, prolonged emotional distress, warranted only nominal damages. The Commission awarded the complainant \$500. *Id.*

The Commission adopts the Hearing Officer finding that the facts underlying the *Eat-A-Pita* and *Eppy's Deli* cases are remarkably similar to the facts in Complainant's case. All of the cases involved single incidents of short duration. They all arise out of the inability of the complainants to access a restaurant because of a barrier. All of the complainants left before eating at the restaurants. In every case, there was sparse, conclusory testimony about emotional distress largely elicited from leading questions by counsel. In this case in particular, Complainant testified she never exited her car. There was no interaction with restaurant employees and no evidence of derogatory comments or egregious conduct. Complainant's emotional distress consisted mainly of momentary frustration at the time of the incident. There was no evidence of prolonged distress. Applying the factors governing awards of emotional distress, and consistent with the rulings in the *Eat-A-Pita* and *Eppy's Deli* cases, the Commission agrees with the Hearing Officer that there is no evidence in this case of egregious conduct by Respondent or of any extensive or prolonged emotional distress. Therefore, the Commission awards nominal damages for emotional distress in the amount of \$500.

### **Punitive Damages**

Complainant seeks punitive damages in the amount of \$2,500. Punitive damages may be awarded where a respondent has acted willfully or wantonly or where a respondent's actions were motivated by ill will or malice. Section 2-120-510(1), Chicago Municipal Code. *See also, Castro v. Georgeopoulos*, CCHR No 91-FH0-6-5591 (Dec. 18, 1991). Such damages are awarded to deter and punish actions that are in reckless disregard of a complainant's protected rights. *Akangbe v. 1428 W. Fargo Condo. Assn.*, CCHR No. 91-FH0-7-5595 (Mar. 25, 1992).

The only testimony regarding punitive damages in the record is Complainant answering yes to her attorney's leading question of whether Complainant would "like the Commission to award punitive damages for not only the discrimination but for failing to even address the issue." Complainant did not offer anything to support her request. There was no evidence that Respondent's staff acted in any way with ill will or malice toward Complainant. In fact, Complainant admits she had no interaction with Burger King staff when she visited the restaurant,



nor did she ever return to the restaurant after January 25, 2023. She has no knowledge whether Burger King remedied the lack of accessible parking. Because Complainant is unable to show one way or the other whether Respondent took corrective action there is no factual basis for contending that Burger King failed to address the issue.

While it is unclear, Complainant may be suggesting that she is entitled to punitive damages because Respondent did not respond to her Complaint and a default order was entered against it. Perhaps Respondent's supposed indifference to the Complaint is what Complainant meant by "failing to even address the issue." However, the Commission has rejected such an argument. Where a respondent's conduct is found not to be egregious, the single fact that the respondent defaulted is not enough to warrant the imposition of punitive damages. *Cotten v. Samer Food, Inc.*, CCHR No. 13-P-83 (Sept. 10, 2015); *Blakemore v. General Parking*, CCHR No. 99-PA-120 (Feb. 21, 2001). Because there is no showing that Respondent's conduct was egregious, the Commission adopts the Hearing Officer's finding that punitive damages are not warranted in this case.

### **Injunctive Relief**

In her Complaint, Complainant seeks injunctive relief compelling Burger King to have a parking lot with proper accessible parking for persons with disabilities. While the record in this case does not reflect whether Respondent has taken corrective action to provide accessible parking, if it has not done so, it should. Injunctive relief is explicitly authorized by Chi.Muni.Code Section 2-120-510(1). Commission case law also makes it clear that the Commission is authorized to order injunctive relief to remedy past violations of the CHRO and to prevent future violations. *See e.g., Maat v. String-A-Strand*, CCHR No. 05-P-28 (Feb. 20, 2008), citing *Frazier v. Midlakes Management, LLC*, CCHR No. 03-H-41 (Sept. 15, 2003); *Sellers v. Outland*, CCHR No. 02-H-73 (Oct. 15, 2003); and *Leadership Council for Metropolitan Open Communities v. Souchet*, CCHR No. 98-H-107 (Jan. 17, 2001). The Commission agrees with the Hearing Officer's recommendation and enters an order providing that if it has not already done so, Respondent must remedy its violation of the CHRO by providing accessible parking for persons with disabilities, to be completed within ninety (90) days of entry of the Commission's Order.

### **Interest**

Commission Rule 240.700 provides for pre- and post-judgment interest at the prime rate, adjusted quarterly, and compounded annually starting at the date of the violation. The Commission adopts the Hearing Officer's recommendation that pre- and post-judgment interest on the emotional distress damages of \$500 be awarded, starting from January 25, 2023, the date Complainant visited Burger King.

### **Fines**

The CHRO provides that the Commission shall impose a fine between \$5,000 and \$10,000 for each offense if a party is found to have violated the CHRO. Section 6-10-120. Here, Respondent violated the CHRO by failing to provide accessible parking and thereby creating a barrier to entry into its restaurant. The Commission adopts the Hearing Officer's recommendation that the Commission impose a fine in the amount of \$5,000 for Respondent's violation of the CHRO.

## Reasonable Attorney Fees and Costs

Section 2-120-510 (1) of the Chicago Municipal Code allows the Commission to order a respondent to pay a prevailing complainant's reasonable attorney fees and associated costs. The Commission has routinely found that prevailing complainants are entitled to such an order. *Godard v. McConnell*, CCHR No. 97-H-64 (Jan. 17, 2001). *See also, Brown v. Nguyen et al.*, CCHR No. 15-H-07 (Jan. 12, 2017). Because Complainant is the prevailing party in this case, the Commission orders Respondent to pay Complainant's reasonable attorney fees and costs.<sup>5</sup>

Complainant seeks attorney fees and costs in an amount to be determined in accordance with Commission Rule 240.630. Complainant should be awarded her reasonable attorney fees and costs, upon satisfactory proof of same.

## Objections

No objections to the Recommended Ruling were filed.

## **V. SUMMARY AND CONCLUSION**

The Commission finds that Complainant Patricia Holloway has established a claim of disability discrimination against Respondent Gold Star Hospitality d/b/a Burger King for failure to provide an accessible parking space, and that Respondent is therefore liable for disability discrimination in violation of the Chicago Human Rights Ordinance. As detailed above, the following relief is recommended:

1. Payment to Complainant of emotional distress damages in the amount of \$500;
2. Payment of interest on the foregoing damages from the date of violation on January 25, 2023;
3. Payment to the City of Chicago of a fine of \$5,000;
4. Compliance with the order for injunctive relief requiring Respondent to provide accessible parking in its parking lot; and
5. Reasonable attorney fees and costs.

## **CHICAGO COMMISSION ON HUMAN RELATIONS**

  
By: Nancy Andrade, Chair/Commissioner

Entered: February 27, 2025

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<sup>5</sup> Complainant's counsel ceased appearing on behalf of Complainant not long after the administrative hearing. The Commission has made several attempts to contact him, with no success. Nonetheless, because he did represent Complainant during the investigation and at the hearing, he is entitled to his attorney fees if he properly files a fee petition.