

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

In the Matter of the Complaint of:

THE NEW YORK CITY COMMISSION ON
HUMAN RIGHTS,

Complainant,

— against —

F45 TRAINING INCORPORATED,

Respondent.

VERIFIED COMPLAINT

Complaint No. M-E-Q-25-160069

NATURE OF THE ACTION

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent F45 Training Incorporated for violating § 8-107(32) of the Administrative Code of the City of New York, the New York City Human Rights Law (“NYCHRL”). As of November 1, 2022, the NYCHRL requires employers in New York City to include a good faith salary range for every job, promotion, and transfer opportunity advertised. The Commission alleges as follows:

JURISDICTION AND VENUE

The Commission initiates this Complaint pursuant to NYCHRL § 8-109(c). The effects of the alleged unlawful policies and practices described in this complaint occurred in the City of New York.

PARTIES

1. The Commission’s address is 22 Reade Street, New York, NY 10007.
2. Respondent Fulcrum Digital is an employer as defined by NYCHRL § 8-102 and, upon information and belief, employs four (4) or more employees. Respondent’s address for service of process is F45 Training Incorporated, c/o Corporation Service Company, 251 Little

Falls Drive, Wilmington DE, 19808 . Its business address is F45 Training Incorporated, 3601 S Congress Ave, Ste E, Austin, TX, 78704-7232.

FACTS

3. Respondent maintains a careers page on its website, <https://f45training.com/> (“Jobs Site”).

4. As of May 7, 2025, at least two listings on the Jobs Site for positions in New York City or containing work to be performed in New York City did not display salary ranges. These include: Sales Associate, Full Time, F45 Flatiron; and Sales Associate, Full Time, F45 Lower East Side. *See* Exhibit A (Jobs Site 5-7-25 screenshots).

CHARGE I

5. Complainant incorporates and realleges paragraphs 1 through 4 of this Complaint as though fully set forth herein.

6. The Commission charges that Respondent has unlawfully discriminated against job applicants by failing to include a salary range in job listings for positions in New York City currently on its Jobs Site, in violation of § 8-107(32) of the NYCHRL.

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests judgment against Respondent as follows:

- a) Declaring that Respondent’s acts, practices, and omissions complained of herein violate the NYCHRL;
- b) Directing Respondent to make all necessary modifications to its policies, practices, and procedures to comply with NYCHRL;

- c) Directing Respondent to train all management, agents, and employees on NYCHRL;
- d) Directing Respondent to engage in affirmative relief, including anti-discrimination training, policy revisions, posting and notice to employees, and monitoring.
- e) Awarding such other and further relief as the Commission deems just and proper.

Katherine Carroll, being duly sworn, deposes and says:

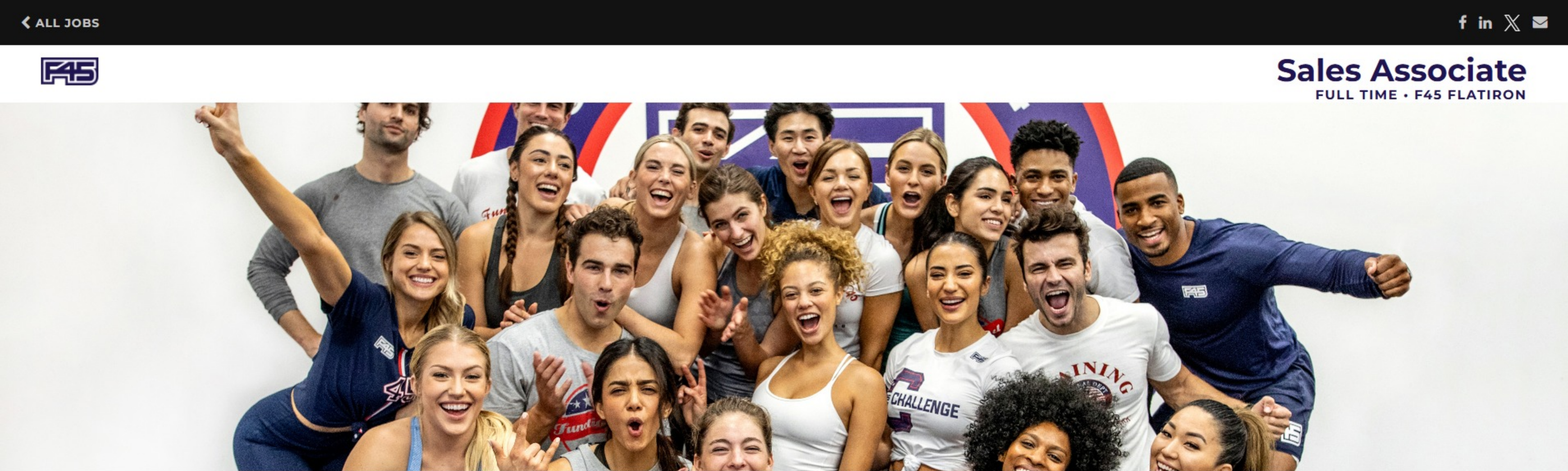
I am the Deputy Commissioner of the Law Enforcement Bureau of the New York City Commission on Human Rights, the Complainant herein; I have read the foregoing Complaint and know the content thereof; the same is true of my own knowledge, except as to the matters therein stated on information and belief; and, as to those matters, I believe the same to be true.

Dated: New York, NY
August 29, 2025



Katherine Carroll
Deputy Commissioner
Law Enforcement Bureau
New York City Commission on Human Rights
22 Reade Street, 3rd Floor
New York, NY 10007

Exhibit A



Our F45 family is looking to grow our sales team. If you are a positive, outgoing, confident team player this might be the perfect role for you. We are looking for a superstar sales professional. Someone who has an unstoppable drive to grow multiple studios, feels comfortable making calls, a fitness lover, strong customer service skills and an overall self-driven sales person.

Key Responsibilities:

- Meet and exceed all key performance sales indicators for our studios, including membership sales/renewals, maximizing workout traffic and maintaining premium customer service levels
- Build strong relationships with F45 members, corporate businesses and local businesses
- Conduct in person, goal-oriented consultations with all trial members
- Work collaboratively with the studio managers to manage the studio, ensuring smooth and cohesive operations
- Generate 10+ new leads daily
- Connect with warm leads daily
- Attend all sales and training meetings

Qualifications:

- 1 year previous sales experience, preferred
- Excellent customer service skills
- Motivated and passionate about health and fitness
- Positive and detail oriented person that can talk to anyone
- Comfortable learning new Software, such as MBO, ClubOS

Benefits:

- Flexible schedule
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- Monthly Team outings

Apply with Indeed

First Name*

Last Name*

Email*

Phone*

☒ **YES, TEXT ME!**

I want to get text messages for this job from F45 Training CP005172.
Message and data rates may apply. Reply STOP to opt out. See our User Terms of Service and Privacy Policy for details.

Location

Address

City

State

ZIP Code

Resume/CV*

Upload File

Or

Type/Paste Text

Cover Letter

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Type/Paste Text

Recent Job Title

Recent Employer

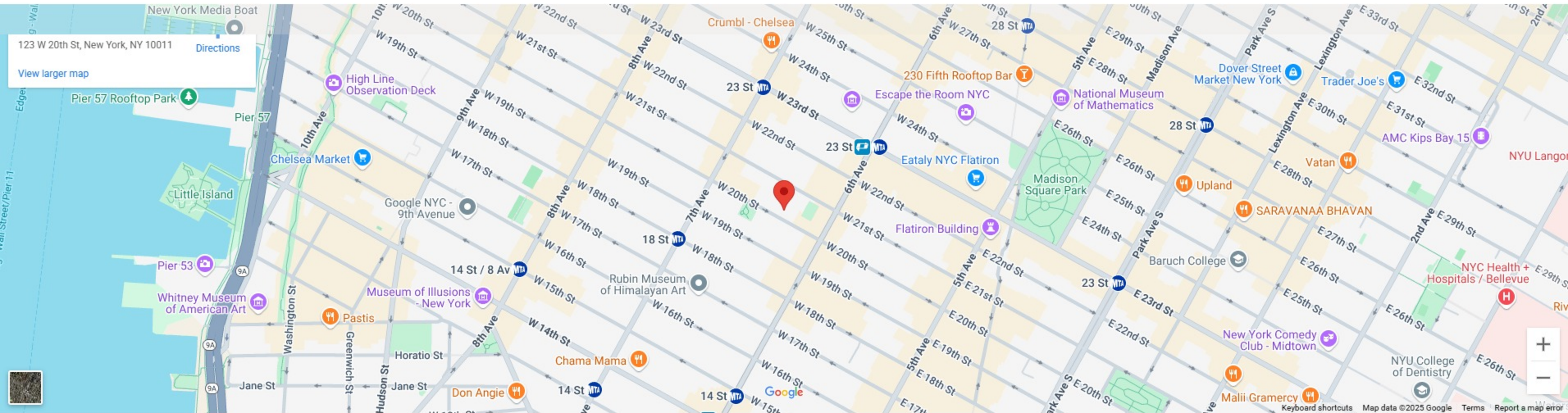
How many years of sales experience do you have?*

Are you able to work weekends?*

Are you able to work remote?*

☐ I was referred to this position by a current employee

SUBMIT APPLICATION



ONE OF THE FASTEST-GROWING FITNESS FRANCHISES IN THE WORLD

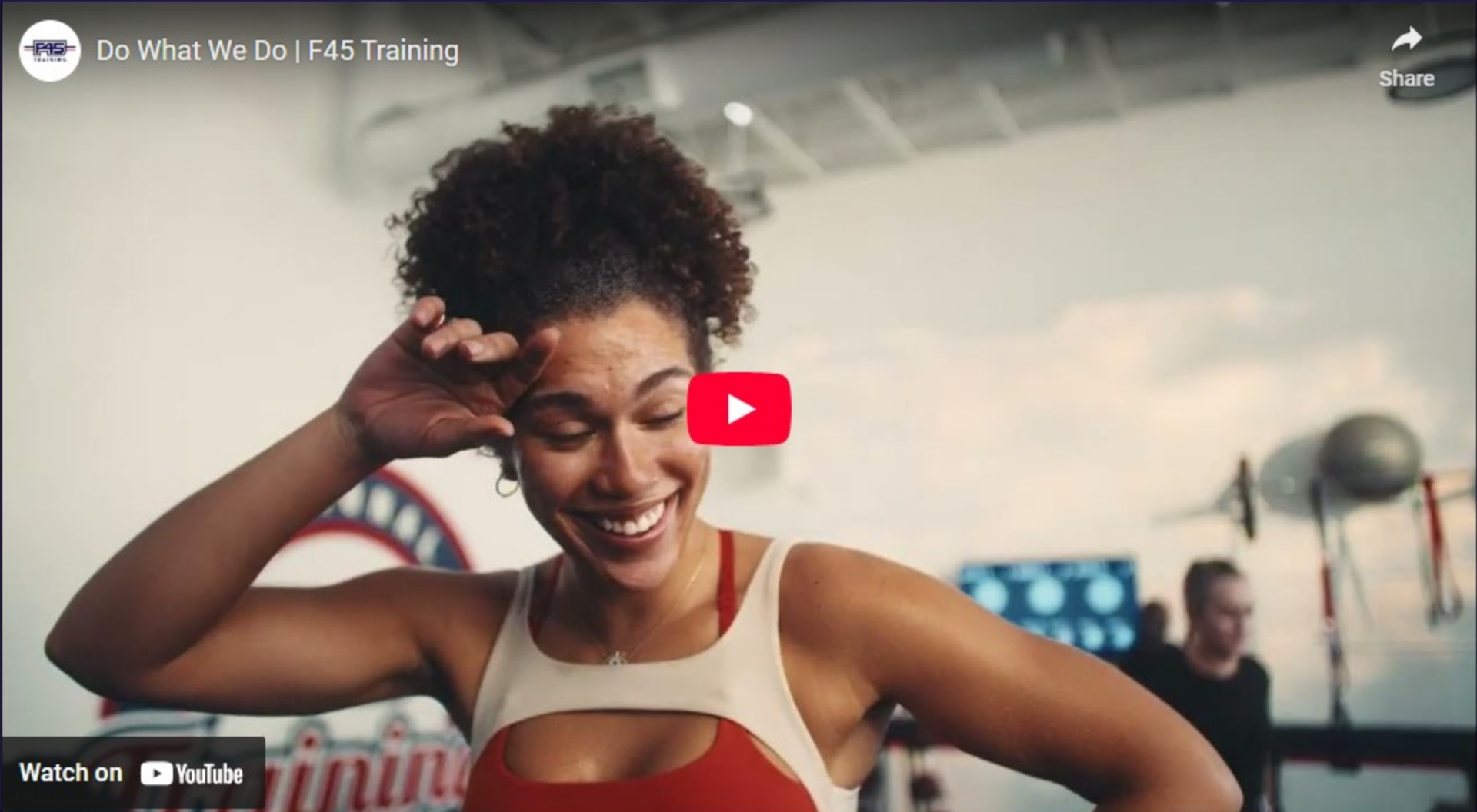
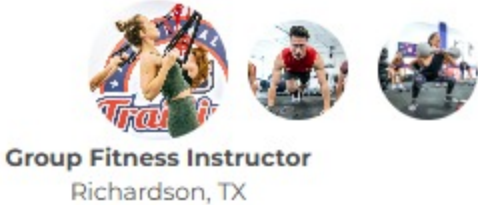
F45 Training is a global fitness phenomenon. With over 1,800 locations in more than 45 countries, F45 is endorsed by pro athletes and celebrities alike and has revolutionized the fitness industry. Our commitment to community and results means life-changing experiences for our franchise network and members.

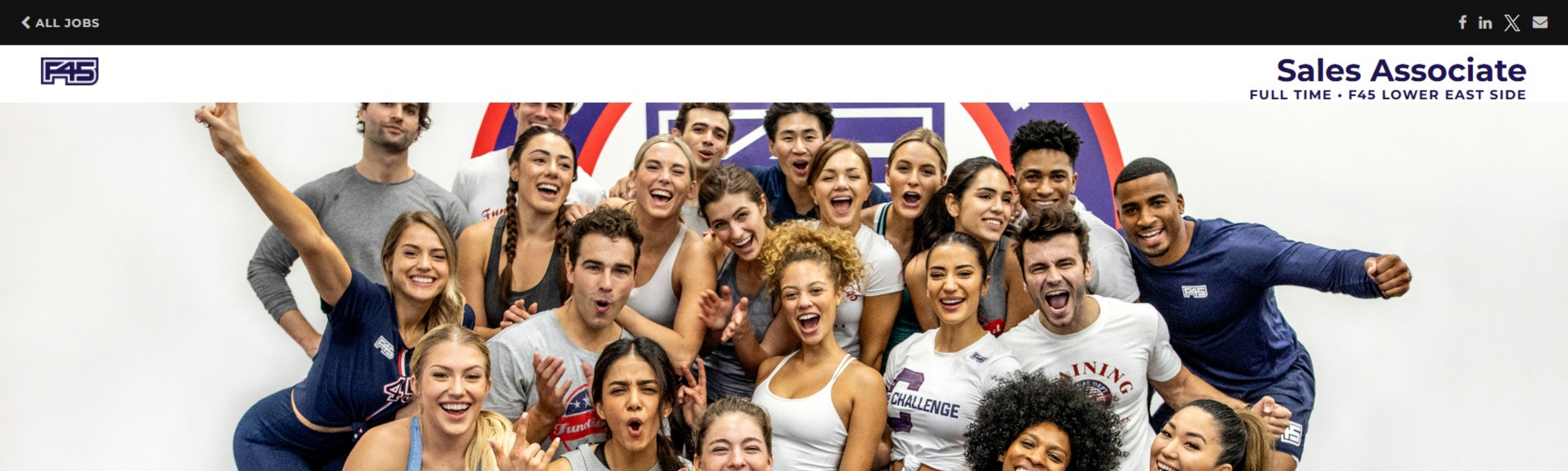
By joining our team, you'll have the opportunity to:

- Help grow and support our F45 network
- Develop your career
- & have a ton of fun doing it!



I've had a great experience being around my coworkers and members. When I come into work there is always something talk about we are like family we all do the same amount of work. It's a place you can be yourself while still being professional.





Our F45 family is looking to grow our sales team. If you are a positive, outgoing, confident team player this might be the perfect role for you. We are looking for a superstar sales professional. Someone who has an unstoppable drive to grow multiple studios, feels comfortable making calls, a fitness lover, strong customer service skills and an overall self-driven sales person.

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First Name*

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Phone*

YES, TEXT ME!

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Location

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Resume/CV*

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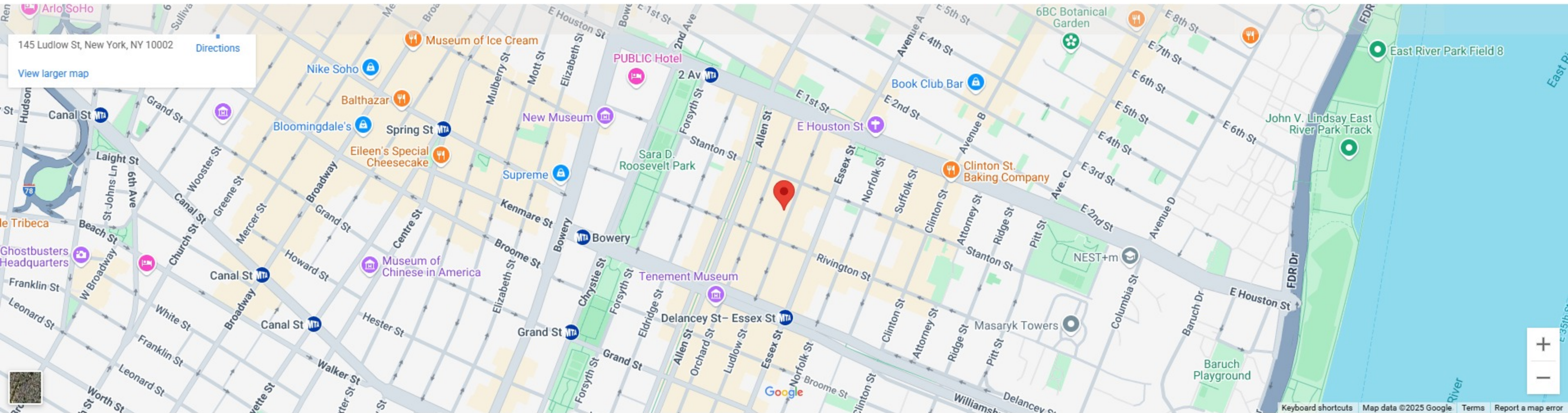
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SUBMIT APPLICATION

CULTURE THAT CRUSHES IT

Our mission at F45 is to create the world's greatest workout. This isn't only about creating an unbelievable fitness experience—it's about building a community and culture. As evidenced by HQ and every F45 studio around the world, culture isn't just about appearance. It's about our core beliefs, how we treat each other, how we make decisions, and most importantly, bringing a sense of fun and friendship to everything we do.



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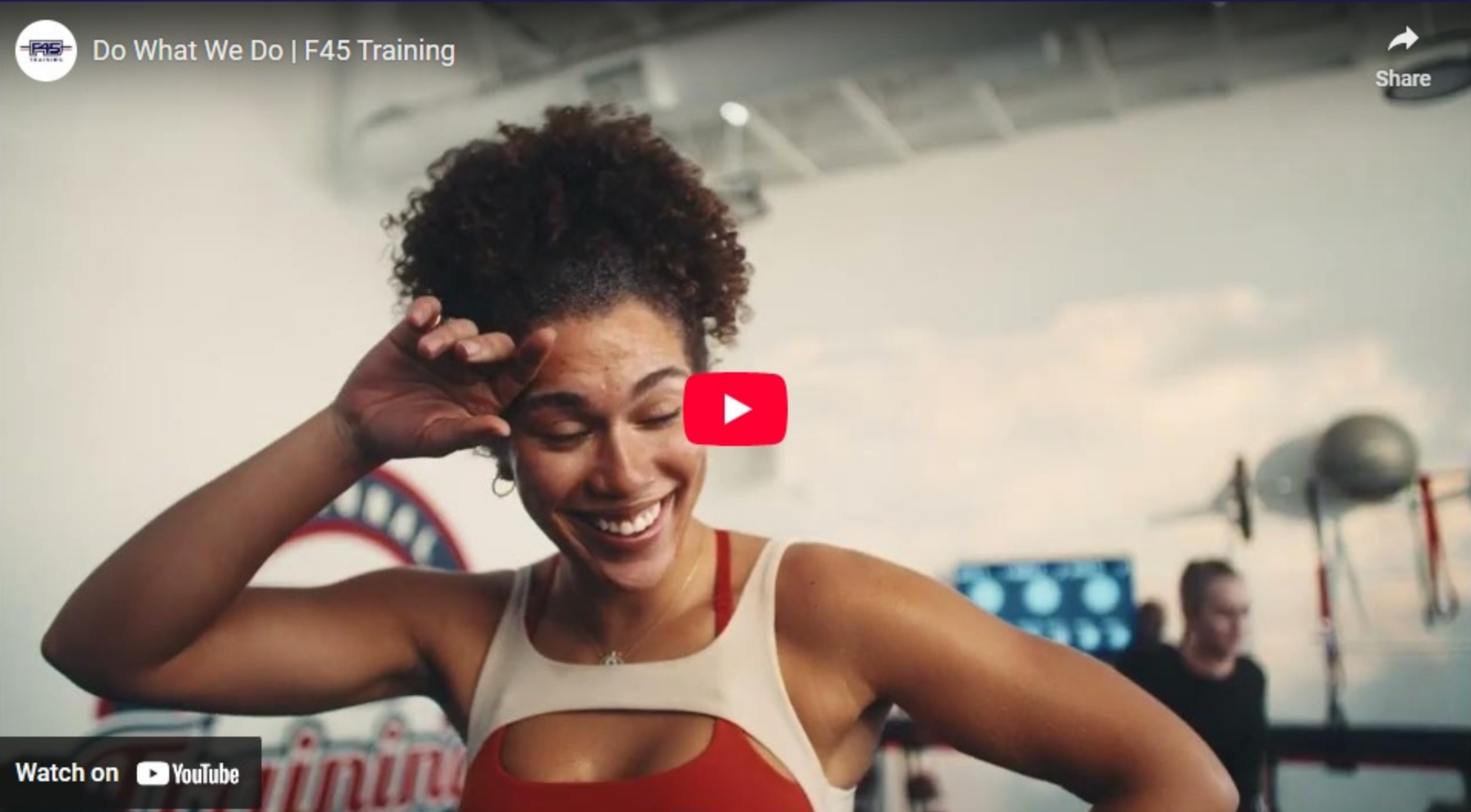
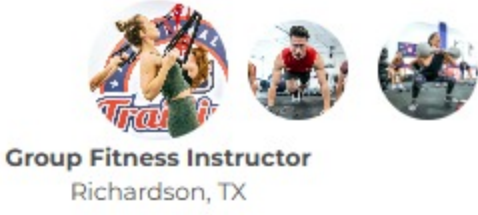


Exhibit A

(Enhanced)



Sales Associate

FULL TIME • F45 FLATIRON



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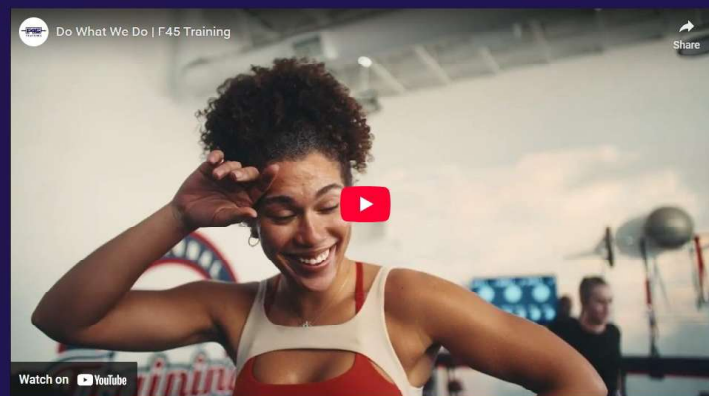
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Group Fitness Instructor
Richardson, TX





Sales Associate

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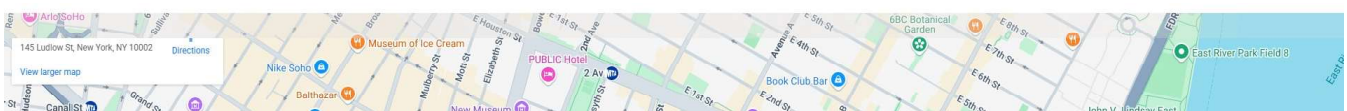
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