

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

In the Matter of the Complaint of:

THE NEW YORK CITY COMMISSION ON
HUMAN RIGHTS,

Complainant,

VERIFIED COMPLAINT
Complaint No. M-H-V-26-164008

— against —

PARK TERRACE CARE CENTER, INC.,

Respondent.

NATURE OF THE ACTION

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent Park Terrace Care Center, Inc. for violating §§ 8-107(5)(o) and (17), of the Administrative Code of the City of New York (the “Code”). Since January 1, 2025, § 8-107(5)(o), otherwise known as the Fair Chance Housing Law, has outlawed inquiries into, and statements about, potential tenants’ criminal conviction histories before an offer to purchase, rent, or lease a housing accommodation.

The Commission further alleges that maintaining barriers in residential applications to people with criminal records has a disparate impact on race and national origin in violation of § 8-107(17) of the Code. 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 Park Terrace Care Center, Inc., owns and/or operates Park Terrace Care Center, a residential care facility located at 59-20 Van Doren St, Rego Park, NY 11368. Respondent's address for service of process is Park Terrace Care Center, Inc., 59-20 Van Doren St, Rego Park, NY 11368.

FACTS

3. On or about November 13, 2025, a tester employed by the Commission contacted Respondent by telephone and requested to be transferred to the New Admissions Department.

4. The tester spoke with an employee who identified herself as the Admissions Director for Respondent. The tester stated that he wanted to have his father admitted to the facility and was calling for more information about the process.

5. After discussing the potential resident's medical condition, insurance, employment status, and current residence, the tester inquired whether a criminal record would prevent admission to the facility. The Admissions Director then asked whether "he had served time."

CHARGE I

Housing Discrimination Based on Criminal History in Violation of § 8-107(5)(o) of the Code

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

7. The Commission charges that Respondent made a statement that expressed, directly or indirectly, a limitation or specification based on arrest or criminal conviction history before providing the individual with a rental or lease agreement that would commit the housing accommodation to the individual, in violation of § 8-107(5)(o) of the Code.

CHARGE II
Race, National Origin, and Criminal Record Discrimination in Housing in Violation of § 8-107(17) of the Code.

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

9. The Commission charges that Respondent has policies and practices creating a disparate impact on race, national origin, and people with arrest or criminal conviction records, in violation of § 8-107(17) of the Code.

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
December 30, 2025



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