

CITY OF NEW YORK  
COMMISSION ON HUMAN RIGHTS

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In the Matter of the Complaint of:

THE NEW YORK CITY COMMISSION ON  
HUMAN RIGHTS,

Complainant,

— against —

JUICE GENERATION INC.,

Respondent.

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**VERIFIED COMPLAINT**

Complaint No. M-E-Q-25-160059

**NATURE OF THE ACTION**

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent Juice Generation Inc. 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 Juice Generation Inc. 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 and principal office address is Juice Generation Inc., 122 E 42nd St Ste 3905, New York, NY, United States, 10168.

### **FACTS**

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

4. As of May 22, 2025, listings on the Jobs Site for the position of “Team Member” in New York City or containing work to be performed in New York City did not display a salary range. *See Exhibit A (Jobs Site 5-22-25 screenshot).*

### **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  
November 24, 2025



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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

TEAM MEMBER - COMPETITIVE PAY AND BENEFITS!

Job Details

|               |                                           |              |                           |
|---------------|-------------------------------------------|--------------|---------------------------|
| Level         | Entry                                     | Job Shift    | Any                       |
| Job Location  | Various New York Locations - New York, NY | Job Category | Restaurant - Food Service |
| Position Type | Full Time                                 |              |                           |

Description

Juice Generation is hiring Team Members and Shift Supervisors for our 20 NYC locations!

If you have previous restaurant or café experience working as a barista or server and are ready to learn all about juicing and plant-based ingredients, we want to meet you!

**JUICING SINCE 1999**  
Juice Generation is New York’s premier juice bar. Independently owned and operated since opening our doors in 1999, thousands of New Yorkers make their way to Juice Generation every day for their fix of signature juices, smoothies, and açai bowls.

**THIRSTY FOR CHANGE?**  
We believe a big part of healthy living is working in a place that supports your personal and professional growth. Juice Generation offers a health-minded, upbeat environment where you can sharpen your skills, grow your career, and really thrive.

**SMOOTHIES WITH BENEFITS**  
At Juice Generation we offer comprehensive benefits for all full-time employees. We believe it’s a smart investment in our greatest natural resource. We’re proud that benefits for all full-time employees include:

- **COMPETITIVE WAGES** - Hourly pay + tips.
- **HEALTH BENEFITS** - Medical, dental, and vision coverage for full-time employees.
- **401(k) PROGRAM** - We'll match a portion of what you contribute to help boost your savings!
- **PAID COMMUNITY SERVICE** - We believe in giving back – and we sponsor monthly opportunities for volunteering.
- **PLANT-BASED MENU** - Enjoy a juice or smoothie on us every day you work!
- **GROWTH OPPORTUNITIES** - We offer Supervisor & Manager training sessions several times per year.

**COVID-19 considerations:**  
*In compliance with the order of the NYC Commissioner of Health and Mental Hygiene, Juice Generation requires all employees to provide proof of vaccination against COVID-19, subject to a reasonable accommodation being granted.*

**Our Commitment to Diversity and Inclusion (EEO Statement):**  
*Juice Generation is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, reproductive health decisions, marital status, veteran status, sexual orientation, genetic information, arrest record, or any other characteristic protected by applicable federal, state, or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, and general treatment during employment.*

Qualifications

- Must have minimum of 6 months experience: counter/deli/barista role strongly preferred
- Available to work full time
- High energy and the ability to work in a fast paced environment
- Ability to lift at least 25 pounds
- Essential physical requirements of all in store positions include; standing for long periods of time, climbing and moving of ladders
- Food Handlers Certificate is a huge plus!

Apply Now

Legal First Name\*

Legal Last Name\*

Email\*

Confirm Email\*

Phone\*  
+1 (xxx) xxx-xxxx

Attach Resume/CV \*

SUBMIT

JUICE GENERATION- JUICING SINCE 1999!

