

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

In the Matter of the Complaint of:

THE NEW YORK CITY COMMISSION
ON HUMAN RIGHTS,

Complaint No. M-E-Q-23-123840

Complainant,

VERIFIED COMPLAINT

— against —

THE BANK OF NEW YORK MELLON,

Respondent.

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent The Bank of New York Mellon (“BNY Mellon”) for violating § 8-107(32) of the Administrative Code of the City of New York (“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 § 8-109(c) of the NYCHRL. 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 BNY Mellon is an employer as defined by § 8-102 of the NYCHRL and, upon information and belief, employs fifteen (15) or more employees. Respondent BNY Mellon’s address for service of process is c/o General Counsel, 240 Greenwich Street, New York, NY 10286. Its business address is c/o CEO Thomas P. Gibbons, 240 Greenwich Street, New York, NY 10286.

FACTS

3. Respondent maintains a “Join Our Team” page on its website, <https://bnymellon.eightfold.ai/careers> (the “Jobs Site”).
4. As of May 31, 2023, the Jobs Site <https://www.lifeatspotify.com/jobs> contains 270 job listings for positions in New York City at BNY Mellon.
5. As of May 25, 2023, at least three of the listings on the Jobs Site for positions in New York City do not include a salary range, including: Senior Business Analyst (ID: 37577), Managing Counsel (ID: 40439), and Cloud Security Engineer (ID: 40266).

CHARGE I

6. Complainant incorporates and realleges paragraphs 1 through 5 of this Complaint as though fully set forth herein.
7. 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 website, in violation of § 8-107(32) of the NYCHRL.

PRAYER FOR RELIEF

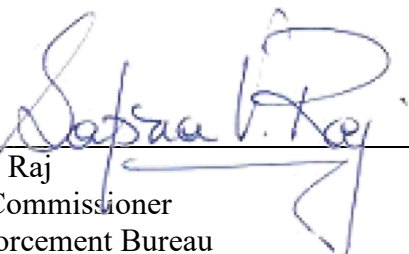
WHEREFORE, the Commission respectfully requests judgment against Respondent as follows:

- a) Declaring that Respondent’s acts, practices, and omissions complained of herein violate the NYCHRL;
- b) Enjoining Respondent and its/their agents, employees, and successors and all other persons in active concert or participation from aiding, abetting, inciting, compelling, or coercing any of the acts forbidden by the NYCHRL;

- c) Directing Respondent to make all necessary modifications to their policies, practices, and procedures to comply with NYCHRL;
- d) Directing Respondent to train all management, agents, and employees on NYCHRL;
- e) Directing Respondents to engage in affirmative relief, including anti-discrimination training, policy revisions, posting and notice to employees, and monitoring.

Sapna V. Raj, 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
October 3, 2023



Sapna V. Raj
Deputy Commissioner
Law Enforcement Bureau
New York City Commission on Human Rights
22 Reade Street, 3rd Floor
New York, NY 10007

Prepared by: Savannah Madley
Agency Attorney