

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 —

DION LEE INTERNATIONAL
CORPORATION,

Respondent.

VERIFIED COMPLAINT

Complaint No. M-E-Q-24-129976

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent Dion Lee International Corporation (“Dion Lee”) 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 Dion Lee is an employer as defined by NYCHRL § 8-102 and, upon information and belief, employs fifteen (15) or more employees. Respondent’s address for service of process is c/o Citrin Cooperman & Company LLP, 529 Fifth Avenue, 2nd Floor, New

York, NY 10017. Its business address is Dion Lee International Corporation, 401 Broadway, Ste 1912, New York, NY 10013-3017.

FACTS

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

4. As of August 9, 2023, the Jobs Site contains two job listings for positions in New York City at Dion Lee.

5. As of August 9, 2023, 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: Workroom Associate and Patternmaker.

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 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;

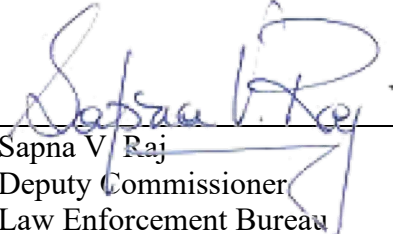
b) Directing Respondent to make all necessary modifications to its policies, practices, and procedures to comply with NYCHRL;

- 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.

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
December 4, 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