

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 —

INDEED, INC.,

Respondent.

VERIFIED COMPLAINT

Complaint No. M-E-Q-24-129332

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent Indeed, Inc. (“Indeed” or “Respondent”) 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 employment agencies and 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 Indeed is an employment agency as defined by NYCHRL § 8-102 (“The term ‘employment agency’ includes any person undertaking to procure employees or opportunities to work.). Upon information and belief, employs fifteen (15) or more employees.

3. Respondent's address for service of process is Indeed, Inc. Attn: CT Corporation System, 28 Liberty St, New York, NY 10005.

4. Respondent's business address is Chris Hyams, 6433 Champion Grandview Way, Building 1, Austin, TX, 78750, USA..

FACTS

5. Respondent maintains a job search platform, <https://www.indeed.com/> ("Platform").

6. Respondent's Platform is used by employers to procure employees and by employees to procure opportunities to work.

7. As of July 7, 2023, Respondent's Platform contains 58,655 job listings for positions in New York City by various employers.

8. As of July 7, 2023, a number of job postings listed on Respondent's Platform did not contain salary and wage ranges or had ranges that were not made in good faith. While Respondent does consistently provide estimated salary ranges based on similar jobs and user generated data when hirers fail to provide this information, Respondent's estimate is not binding.

CHARGE I

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

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

PRAYER FOR RELIEF

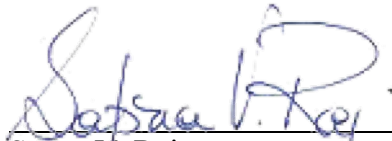
WHEREFORE, the Commission respectfully requests judgment against Respondent as follows:

- 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
November 15, 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