

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF RICHMOND
Civil Division

APRIL BINGHAM,

Plaintiff,

v.

THE CITY OF RICHMOND,

Serve: Laura Drewry, City Attorney
900 East Broad Street, Suite 400
Richmond, Virginia 23219

&

DANNY AVULA, MAYOR,

Serve: Danny Avula, Mayor
900 East Broad Street, Suite 201
Richmond, Virginia 23219

&

SABRINA JOY-HOGG,
FORMER RICHMOND CAO,

Serve: Sabrina Joy-Hogg
City of Newport News
Office of the City Manager
2400 Washington Avenue
Newport News, Virginia 23607

&

SCOTT MORRIS, DPU DIRECTOR,

Defendants.

Serve: Scott Morris
730 East Broad Street, 6th Floor
Richmond, Virginia 23219

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW, Plaintiff April Bingham, (hereinafter, "Plaintiff" or "Bingham") by and through undersigned counsel, brings this action for defamation pursuant to Virginia Supreme Court Rule 3.2 against the Defendants, its agents, directors, and employees acting the course of their official duties, and states as follows:

NATURE OF THE CASE

1. This matter involves a common law claim for defamation of character based on false statements made by and actions taken by each of the Defendants to the public regarding Plaintiff after the January 6, 2025, water crisis in the City of Richmond.
2. It is also the policy of the Commonwealth of Virginia, pursuant to the Virginia Fraud and Abuse Whistleblower Protection Act (the "Act"), Virginia Code §2.2-3009 et seq., that citizens and governmental employees be free to report instances of wrongdoing, abuse or unethical conduct committed by government officials without fear of retaliation.
3. Plaintiff's actions in the wake of the power outage and failed water system crisis in January 2025, have been misrepresented by the City and its officials, including the Mayor, despite her excellent performance reviews and competency to serve as Senior Director of the City of Richmond Department of Public Utilities since December 2021.
4. Among other things, Plaintiff was forced out of her job in retaliation for not agreeing with the Mayor to violate state regulations which would have compromised the integrity of her actions to ensure impacted residents had safe drinking water in the aftermath of the power outage.
5. The Mayor misrepresented to local media and the public at large that Plaintiff was not competent to continue in her role, publicly blamed her for the failures at the water treatment

plant, wrongfully diminished public confidence in Plaintiff, thereby setting up a justification to force Plaintiff out of City employment.

6. As a result of these actions, Plaintiff has suffered loss of employment, back pay, professional injury and emotional distress directly at the hands of the City.

JURISDICTION & VENUE

7. The Circuit Court for the City of Richmond has authority to entertain this action and to grant the relief requested herein pursuant to Virginia Code §§ 8.01-260 and 8.01-261.
8. This Court is the proper venue pursuant to Virginia Code § 8.01-261(1)(a) because some or all of the acts and/or omissions germane to this case occurred in the City of Richmond.
9. This Circuit Court for the City of Richmond has authority to entertain this action and to grant the relief requested herein pursuant to Virginia Code § 18.2-417.
10. This Circuit Court for the City of Richmond has authority to entertain this action and to grant the relief requested herein pursuant to Virginia Code § 2.2-3011(D).

PARTIES

11. At the time of the actions outlined in this Complaint, Plaintiff resided in the downtown area of the City of Richmond and was a citizen of the Commonwealth of Virginia. Plaintiff currently resides in the state of Maryland.
12. Plaintiff worked for the City of Richmond's Department of Public Utilities during all times relevant to this Complaint.
13. Defendant City of Richmond is a governmental agency located in the Commonwealth of Virginia.
14. Defendant Danny Avula is the elected Mayor of the City of Richmond and was Mayor at the time of the actions complained of in this action.

FACTUAL ALLEGATIONS

Background

15. Bingham was hired by Mr. Calvin Farr, former Department of Public Utilities (DPU) Director, on February 3, 2020, to be the Deputy Director – Senior for the Customer Service Division.
16. Bingham holds a Bachelor of Science degree in Business Administration from the University of Maryland – College Park and a Master of Management in Public Administration from the University of Phoenix.
17. Prior to coming to the City of Richmond, Bingham worked for DC Water in Customer Service, Accounts Receivable, and Billing, as well as, with Washington Gas in improving their customer service operations for almost 22 years.
18. At DC Water, Bingham oversaw the agency's \$33M meter upgrade as the Deputy Program Manager and customer service manager for 120,000 water and sewer customers.
19. As Deputy Director Senior for the Richmond DPU Customer Service Division, Bingham was responsible for approximately 170 full-time employees across an emergency call center, a non-emergency call center, billing, collections, and field/metered services for 230,000 gas and water customers.
20. At DPU, Bingham was tasked with correcting the City's very public billing crisis with City customers who were complaining about the lack of transparency in billing and correcting the revenue shortfall for DPU.
21. Bingham cleared the backlog of over 20,000 complaints of billing errors and discontinued service calls by 2023 through the use of creative problem-solving techniques and enhanced

- technology. Her methods also included hiring permanent and temporary staff at the call centers and implementing new policies and procedures.
22. When COVID hit in March 2020, Mrs. Bingham, only five weeks into her new role, marshalled her resources to address this service crisis in the midst of health concerns for her employees in the field while still attempting to deliver much-improved service to customers who had experienced service-related issues for the past several years. COVID forever changed the way the department operated.
 23. Bingham met and exceeded work expectations while in this role.
 24. In April 2021, Mr. Farr resigned as DPU Director and went to another locality to work as a General Manager for its sewer authority.
 25. As his replacement, Mr. Alfred Scott, then Deputy Director of Richmond Gas Works, was named as the Interim DPU Director. Mr. Scott became Bingham's direct supervisor.
 26. During the time that Bingham reported to Mr. Scott, no concerns were raised about her competency, accomplishments, or commitment to the department.
 27. On December 4, 2021, Bingham was promoted to DPU Senior Director, as the first woman to hold this position in the City's history, and was responsible for overseeing more than 700 full-time employees across water, wastewater, stormwater, natural gas and streetlight maintenance.
 28. Bingham's promotion was confirmed and announced by former Mayor Levar Stoney.
 29. Most importantly, Bingham participated in a competitive process for the position and was selected thereafter. As DPU Senior Director, Bingham would now report to Mr. Robert Steidel, the Deputy Chief Administrative Officer for Operations.

30. The posted job description for the DPU Director position required a Bachelor's degree in Public Administration or a field directly related to the assignment, and eight years of progressively responsible related experience that includes significant management and supervisory experience.
31. The primary focus of the position was and has always been to oversee and manage the City's water, wastewater, stormwater, natural gas utilities and streetlight maintenance.
32. Under Mr. Steidel's supervision, Bingham led DPU, with more than 700 full-time employees, and met and exceeded expectations, and no concerns were noted with her performance.
33. Mr. Steidel retired from city service on December 31, 2024, and Bingham's reporting structure changed to reflect Ms. Sabrina Joy-Hogg, the Deputy Chief Administrative Officer for Finance and Administration, was her direct supervisor.
34. On January 1, 2025, Dr. Danny Avula, MD, was sworn in as the City of Richmond's 81st mayor and he became Bingham's second level supervisor.

January 6, 2025, Water Incident

35. During the later part of December 2024, Bingham was on vacation away from the City of Richmond.
36. On December 31, 2024, Bingham's entire chain of command retired from the City, including CAO Lincoln Saunders, and DCAO, Robert Steidel.
37. In advance of a predicted major storm event, Mayor Avula refused to offer an acting DCAO of Operations position to Bobby Vincent, an engineer and Director of Public Works, leaving the Operations portfolio under the direct supervision of a non-engineer, CAO Sabrina Joy-Hogg.

38. While on vacation, Eric Whitehurst, Deputy Director, Senior for Water & Wastewater Services, was left in charge of DPU operations.
39. On January 3, 2025, Governor Glenn Youngkin declared a state of emergency for the coming winter storm which was predicted to impact the entire Commonwealth through the weekend and early upcoming week.
40. On January 5, 2025, Mayor Danny Avula declared a state of emergency in the City of Richmond due to the anticipated impact of severe weather conditions.
41. Mayor Avula also closed all City of Richmond offices on Monday, January 6, 2025.
42. Most employees of the Department of Public Utilities and Department of Public Works are considered essential personnel and expected to work despite these emergency declarations.
43. Bingham returned from vacation to the City of Richmond on January 6, 2025.
44. On this same day, the Commonwealth experienced a severe snowstorm, and the City of Richmond was significantly impacted by a power outage.
45. As a result of decades of aging infrastructure, the backup power system at the water treatment plant failed to activate, which caused a loss of power at the plant impacting water service in the City and surrounding localities that rely on water from the City.
46. On January 6, 2025, Mayor Avula and Julian Waters, press secretary, and Ross Catrow, Director of Strategic Communications were provided talking points by Rhonda Johnson, DPU's Public Information Officer (PIO) and at every phase of the January 6, 2025, water treatment plant event.
47. As Senior Director, Bingham was briefed at 10:00 a.m. on January 6, 2025, by the Plant Superintendent and within minutes, Bingham briefed her boss, Sabrina Joy-Hogg and Director Stephen Willoughby (City Department of Emergency Management) via phone.

Strategic Communications was being managed by Sabrina Joy-Hogg within the Emergency Operations Center at the Main Library.

48. The Mayor has said on multiple occasions that he was briefed around 1:00 p.m., which is untrue.
49. However, the talking points were altered and/or ignored in response to the growing public demand for information and social media content on Facebook and Twitter/X, which included @AprilBingDPU, @RichmondDPU, and @CityRichmondVA.
50. Due to concerns about her personal safety, Bingham removed all her personal social media pages on January 8, 2025. She began to receive anonymous online threats from the public along with calls on her personal cell phone from local media related to her involvement in the January 6th water event.
51. From January 6-15, 2025, Bingham was on site at the City of Richmond's water treatment plant and was actively involved in finding the causes of this crisis and working with her staff to accurately inform her chain of command of the causes and work to reassure the public of the action steps to be taken to restore power and water to citizens.
52. From January 6-11, 2025, a boil water advisory was put in place by the City.
53. Under 12VAC5-590-640, "[w]aterworks shall be designed to provide a minimum residual pressure of 20 psig at all service connections. Design shall be based on the most restrictive conditions, defaulting to the greater of peak hour demand or maximum daily water demand plus applicable fire flows. Fire flow design values shall be identified by the engineer after coordination among the owner, local and state building officials, and fire officials. Distribution system hydraulic modeling may be used to demonstrate compliance with this requirement."

54. On or before January 8, Mayor Avula hosted multiple conversations with VCU directly (i.e. James Reynolds and Jarrett Talley regarding "when the sample testing clock starts" under 12.VAC5-590-640. Using his own interpretation of regulation 12.VAC5-590-640, coupled with mounting pressure from the public regarding the sample testing schedule from the surrounding counties, on or about January 9, 2025, Mayor Avula verbally directed staff to begin sample testing *before* all service connections reached 20 psig.
55. For Richmond's boil water advisory, the City needed total coliform and E.coli samples taken from the distribution system to serve as the basis for deciding when to lift the boil water notice. The mayor hosted conference calls with Bingham, her laboratory staff and VDH to alter the number of sampling rounds, the number of samples in each round, and the length of testing time between sampling rounds.
56. The boil water notice was set to be lifted after results from two consecutive rounds of samples taken 24 hours apart demonstrated the absence of coliform bacteria.
57. Bingham expressed her disagreement with the Mayor's decision to shorten the length of time needed to certify the second set of test results from the Virginia Department of Health, which was needed to lift the boil water advisory.
58. Bingham states that Felicia Bracey, Acting DPU Lab Manager, is aware of the Mayor's aggressive and unethical approach to conducting the proper testing to ensure safety of the water after the power outage.
59. Bingham further states that Maggie Anderson, former Chief of Staff, is aware of the Mayor's interference by disallowing City employees to perform their job without influencing James Reynolds, Director at the Virginia Department of Health, Office of Drinking Water.

60. On January 15, 2025, CAO Sabrina Joy-Hogg and Tyrome Alexander, former Director of Human Resources, presented Bingham with a separation package with Ms. Joy-Hogg stating that "things did not look good" for Bingham.
61. On January 15, 2025, WWBT Channel 12 with Madison McNamee at 2:49 p.m., just moments after her separation, aired her interview with Mayor Avula.
62. Mayor Avula stated, "We've all been looking at what does the future look like, and so I think she has been amazing in being present and being responsive and being helpful and ultimately, we realized collectively it was, again an amicable agreement, and she decided to step down."
63. The truth is Bingham did not make the decision to step down, but rather the City made the decision to force her to resign and later terminated her employment.
64. Mayor Avula further said, "I got there about 9 or 10 that night, and we had an onsite IT technician who was working on it, but ultimately, we need to call in external help that was coming over from Virginia Beach, and so possibly if that had been able to happen a few hours earlier, but again we were so far into it, and there was a lot of different things happening. So, I think the after-action report will give me more clarity."
65. On January 15, 2025, at 5:53 p.m., Tyler Lane, WTVR Channel 6 reporter published his personal interview with Mayor Avula regarding the water event.
66. In response to Mr. Layne's question about whether the water incident could have been avoided, Mayor Avula stated several times that he did not know whether the citywide water crisis could have been avoided.

67. The Mayor is quoted several times talking about the need for the “after action report” to help determine the root cause. Yet, Bingham was released from her position on January 15, 2025, at 10:00 a.m.
68. During the Tyler Lane interview, Mayor Avula was asked whether Bingham was asked to resign or whether it was completely her own decision and that she was not the right person in the position knowing that the issues with the water treatment plant and efforts to upgrade the structure did not originate or reside with her.
69. On January 16, 2025, Mayor Avula conducted a daily “Facebook” live feed for the City of Richmond VA government.
70. On this live feed, Mayor Avula spoke of the items that Bingham put in place before she was released from service on January 15th which indicated that Bingham, as Senior Director, had led the recovery efforts, including UPS backup batteries, auxiliary pumps and Plant capacity at 68-74 million.
71. Reflecting back on January 15, 2025, at 12:18 p.m., WTVR CBS 6 posted an article, “Bingham out after Richmond Water Crisis, city announces interim DPU Director.
72. A press conference was held on January 15, 2025, announcing Scott Morris as the Interim Director.
73. In the article, Bingham is blamed for not responding to the July 2022 EPA inspection findings until January 3, 2025.
74. However, the truth is that Bingham informed the Mayor and his entire administration that she was not aware of, nor did she attend the EPA Inspection on July 26-28, 2022. Staff at the Water Plant failed to advise her of the event taking place and the Virginia Department

of Health representative (Toby Bryant) sent her a letter dated October 11, 2024, seeking an update.

75. As Senior Director, Bingham negotiated a response date of December 6, 2024, based on holidays and coordination efforts with staff. Once the new Mayor was announced, Bingham used her Christmas holiday to host meetings with the Plant Staff to finalize and release the document to EPA on January 3, 2025. She never received an official letter from the EPA regarding the July 2022 inspection, nor did she receive a response from the January 3, 2025, submission.
76. The City refuses to correct the record on this matter, continuing to fuel the public narrative that Bingham was not competent for her role as Senior Director.
77. On January 22, 2025, Bingham revoked the separation agreement in writing to City Attorney, Laura Drewry.
78. On the same day, during the City Council's Government Operations Standing Committee meeting, members inquired about whether Bingham had an exit interview and the City represented that they had reached out to Bingham and that she had not cooperated.
79. The City never reached out to Bingham; therefore, it is untrue that she was uncooperative in any such exit interview.
80. In an interview with the Richmond Free Press hours after Bingham's exit, Avula praised her work during the crisis, describing her resignation as an "amicable" and voluntary one following ongoing conversations on the future of DPU leadership.
81. Bingham's resignation was not amicable or voluntary, and she was not in ongoing conversations about the future of DPU leadership.

82. When asked by the Richmond Free Press reporter if he would have fired Bingham if she hadn't resigned, Avula opted not to speculate on the choices he would've made in that situation. He stated, "I think the conversations, again, were really amicable and we both got to a point of mutual understanding of what we thought the next phase was going to be," Avula said. "It worked out well, and we're really grateful for the work that she's done and looking forward to the next chapter of leadership."
83. The Mayor's statement is again false as it pertains to amicable nature of her separation.
84. Mayor Avula further told Richmond Free Press the search for a permanent DPU director would begin after the investigation into the crisis enters its second phase, the water plant restoration process is underway for "a few months," and a new Chief Administrative Officer is appointed.
85. On January 27, 2025, The Virginia Senate Committee blocked a proposal to alter the criteria for hiring future directors of the Department of Public Utilities, which was aimed at Bingham.
86. On February 7, 2025, Bingham's first attorney, Sara McDonough, Esq, sent a demand letter to the City, which was ignored along with the subsequent follow-up requests.
87. On February 13, 2025, Bingham sent an email to City Council addressing the questions that they raised to the City about her exit interview and collaboration for the after-action report.
88. On February 14, 2025, Mayor Avula starts the press conference with WRIC ABC News 8 by saying "the preliminary report affirms that due to the power outage, there was a sequence of events that led to flooding, equipment damage and service disruption."

89. Mayor Avula was asked this specific question by the media: "We never got a chance to get words from the previous director, April Bingham. Will there be an opportunity to hear from her about management of the facility?"
90. In response, Mayor Avula, "As you know, Director Bingham is no longer with the city and so I think if you all want to reach out – we won't be doing anything to be able to pull her back in. You will have to pursue that through the media."
91. On February 18, 2025, the City advised the media that Bingham was fired after she rescinded her resignation.
92. A press release dated February 26, 2025, confirmed Mr. Morris' permanent appointment as DPU Director, as someone who was the right person to lead the DPU because he is an engineer.
93. On February 26, 2025, during the Government Operations Standing Committee meeting, City Council inquired again about Bingham's input and collaboration for the interim report.
94. Scott Morris advised City Council that the administration had reached out and that Bingham declined the offer. This directly contradicts the Mayor's February 14th statement that there was no intent to reach out to Bingham about her management of the facility.
95. Bingham was never contacted and therefore, never declined any offer to provide input into the interim report of findings for the January 6, 2025, event.
96. On February 26, 2025, Bingham emailed City Council to advise them that she was never contacted about collaboration on an after-action report contrary to what Mr. Morris stated.
97. On the same day, Bingham received an email from Councilperson Reva Trammell acknowledging her email, stating that the water crisis was not her fault, and offering her support.

98. On March 3, 2025, Dean Mirshahi, a reporter from VPM published a report at 9:23 a.m. that stated that “[d]espite Richmond Mayor Danny Avula previously calling the city’s communications with surrounding localities “appropriate,” the draft report released Monday said the city didn’t “adequately convey” the severity of the situation with Chesterfield and Henrico on the morning of Jan. 6.”
99. Bingham states that communications were being managed by CAO Sabrina Joy-Hogg through the Emergency Operations Center at the Richmond Main Library.
100. Because the Plant was in crisis mode, Bingham provided updates to Sabrina Joy-Hogg every 30-45 minutes after she and Stephen Willoughby, Director of Emergency Management was notified at 10:00 a.m. of the boil water advisory request. There are phone logs and text messages that will further confirm the timeline of events.
101. Therefore, the Mayor ignored the information being shared with him for public awareness.
102. On March 18, 2025, Bingham participated in an interview with Tyler Lane, WTVR CBS 6 reporter, to set the record straight with regard to her efforts in response to the January 6th water event.
103. There have been two additional water crises since Scott Morris, DPU Director, has been in place.
104. On April 23, 2025, the Richmond Water Treatment Plant experienced another water event. Employees at the Richmond Water Plant had issues installing a new fluoride pump, leading to excess fluoride being pumped into the drinking water for about five (5) hours.
105. Therefore, City levels were four times higher and surrounding counties, like Hanover, Henrico, and Chesterfield, which share the City’s water supply, also had higher fluoride levels.

106. Those localities were not notified of this incident until late Sunday, April 27, 2025.
107. Henrico County complained about the repeated operational failures and communication breakdowns.
108. Hanover County stated that it was disappointed by the lack of timely communication.
109. Chesterfield County stated that it found out through its water samples that the April 25th water sample revealed the fluoride level were near the maximum federal limit of 4.0 mg/liter.
110. The City of Richmond also violated state law in not notifying the Virginia Department of Health Office of Drinking Water within the 24-hour window.
111. On May 27, 2025, another boil water advisory was issued by the City of Richmond, allegedly due to clogged filters at the Plant from heavy sediment load in the James River.
112. Yet, Scott Morris has not been forced to resign amid these subsequent water crises nor excoriated in the public sphere.
113. On May 6, 2025, current counsel mailed and emailed a confidential demand letter to Laura Drewry, City Attorney, and there was no response.
114. The same confidential demand letter was emailed to City Council President Cynthia Newbille on June 3, 2025, for response.
115. President Newbille requested that the City Attorney respond, but there has still been no response despite attempts to resolve this dispute outside of court.
116. Plaintiff also filed an EEOC Charge against the City in August 2025, which is currently pending.
117. As a direct result of the false information placed in the public sphere by the Defendants acting in their official capacities, Bingham has suffered loss of income, suffered irreparable

professional harm, which has impacted her ability to find gainful employment, incurred attorney's fees and legal costs, and emotional distress from threats to her safety as a result of her termination.

CAUSES OF ACTION

COUNT I - Retaliation and Wrongful Discharge

118. Plaintiff incorporates by reference and realleges each allegation set forth above.
119. The Fraud and Abuse Whistle Blower Act (Va. Code § 2.2-3011 *et seq.*) states that “[n]o employer may discharge, threaten or otherwise discriminate or retaliate against a whistleblower whether acting on his own or through a person acting on his behalf or under his direction.”
120. An “employer” is defined by the statute as any person supervising one or more employees, including the employee filing a good faith report, a superior of that supervisor, or an agent of the governmental entity.
121. The City of Richmond, as Plaintiff's former employer, the Mayor Danny Avula, Scott Morris, and Sabrina Joy Hogg all qualify as an “employer” under the statute.
122. Plaintiff acted in good faith when she challenged the Mayor's efforts to bypass the protocols necessary to ensure all proper testing had been done according to state regulations to provide safe drinking water to residents after the January 6, 2025, water event.
123. Instead, Plaintiff was bullied into resigning by being offered an insufficient separation agreement and when she lawfully changed her mind, she was terminated.
124. As a result, Plaintiff has suffered significant financial loss, severe mental and emotional distress, humiliation and embarrassment for the acts and omissions of the Defendants.
125. Defendants acted willfully and recklessly against Plaintiff and without regard for her rights.

126. Defendants are liable for the actions detailed in this Complaint and for wrongful and retaliatory discharge of Plaintiff.

COUNT II – Defamation

127. Plaintiff incorporates by reference and realleges each allegation set forth above.
128. Under Va. Code § 18.2-417, [a]ny person who shall falsely utter and speak, or falsely write and publish, of and concerning any person of chaste character, any words derogatory of such person's character for virtue and chastity, or imputing to such person acts not virtuous and chaste, or who shall falsely utter and speak, or falsely write and publish, of and concerning another person, any words which from their usual construction and common acceptance are construed as insults and tend to violence and breach of the peace or who shall use grossly insulting language to any person of good character or reputation is guilty of a Class 3 misdemeanor.
129. When Mayor Avula made false statements about Plaintiff's alleged failure to communicate or update the City concerning events on the ground at the water Treatment Plant, he defamed Plaintiff.
130. When Mayor Avula made false statements about Plaintiff's amicable separation and alleged discussions about the future of DPU leadership, he defamed Plaintiff.
131. When Scott Morris told City Council that Plaintiff had declined to comment when asked to provide her feedback for the after-action report, he defamed Plaintiff.
132. When the City failed to correct the public record of Plaintiff not responding to the July 2022 EPA inspection as if she had been neglectful of her duties to improve processes within the Water Treatment Plant, the City allowed a false narrative to stand despite her several meetings and plans for improvement at the Plant to the EPA.

133. As a result, Plaintiff has suffered significant financial loss, severe mental and emotional distress, humiliation and embarrassment for the acts and omissions of the Defendants.
134. Defendants acted willfully and recklessly against Plaintiff and without regard for her rights.
135. Defendants are liable for the actions detailed in this Complaint and for Plaintiff's continued economic losses from being unable to find gainful employment due to damage to her professional reputation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Honorable Court, grants her the following relief:

1. For Count I, reinstatement to an equivalent position within the City government; back pay; reinstatement of all fringe benefits and seniority rights; attorneys' fees and costs;
2. For Count II, \$1,000,000.00 in actual, presumed, and punitive damages for making and/or causing statements to be made to the public which were clearly false and recklessly reported to numerous media outlets resulting in humiliation and damage to her professional career.
3. Order such other and further relief as may be deemed proper and just.
4. A trial by jury is demanded on all counts.

Respectfully Submitted,

/s/ Pamela Johnson Branch
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Senior Counsel
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Counsel for Plaintiff, April Bingham

CERTIFICATE OF SERVICE

I certify that the foregoing Complaint was filed via the VJEFS on January 12, 2026, with an email copy to the party below:

April Bingham, Plaintiff
april.bingham@verizon.net

BY:

/s/ Pamela Johnson Branch
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