

**UNITED STATES DISTRICT COURT:
SOUTHERN DISTRICT OF NEW YORK**

BRANDI BYNUM,

Plaintiff,

v.

IN ZONE LOGISTICS LLC and AMAZON,
INC.,

Defendants.

Civil Action No.:

Hon.

ECF Case

COMPLAINT

TRIAL BY JURY DEMANDED

Plaintiff BRANDI BYNUM (“Plaintiff”) by and through her attorneys, Sutton Sachs Meyer, PLLC, as and for her Complaint against Defendants IN ZONE LOGISTICS LLC and AMAZON, INC. (“Defendants”), hereby alleges the following upon information and belief.

NATURE OF THE ACTION

1. Plaintiff Brandi Bynum brings this action for sex discrimination, sexual harassment, hostile work environment, and negligent supervision under Title VII of the Civil Rights Act of 1964, the New York State Human Rights Law, and the New York City Human Rights Law.

2. Ms. Bynum is a survivor of a violent rape in 2022, after which she spent months in a nursing home recovering from stroke-like symptoms arising out of her trauma. She came to this job hoping to regain financial stability and a return to normalcy.

3. Instead, on October 28, 2025, within an hour of stepping into her first shift as a delivery trainee, her supervisor, Jonathan, subjected her to physical sexual harassment so severe that any reasonable employer would treat the situation as an emergency.

4. Her supervisor cornered her in elevators and buildings, violated her body, and treated her like an object he could molest at will. He controlled the route, the pace, and the environment, leaving Ms. Bynum, a trainee on her first day, with no authority, no experience, and no escape.

5. Despite Ms. Bynum doing exactly what a responsible employee should do by immediately reporting the assault to the Amazon Ethics hotline, to Amazon HR, and to her In Zone Logistics managers, Defendants failed to intervene, effectively ignoring her urgent pleas for help for days.

6. The physical nature of the harassment, the predatory power dynamic, and the flagrant disregard for employee safety by management render Defendants fully liable for the severe emotional and psychological harm inflicted upon Plaintiff.

JURISDICTION AND VENUE

7. This Court has jurisdiction over Plaintiff's federal claims under Title VII, 42 U.S.C. § 2000e *et seq.* pursuant to 28 U.S.C. §§ 1331 and 1343.

8. The Court has supplemental jurisdiction over Plaintiff's related State and City Law claims pursuant to 28 U.S.C. § 1367.

9. Venue is proper in this District under 28 U.S.C. § 1391 because the events giving rise to this claim occurred in New York County, New York, and Defendants conduct business within this District.

PROCEDURAL PREREQUISITIES

10. Plaintiff filed charges of discrimination upon which this Complaint is based with the Equal Employment Opportunities Commission.

11. Plaintiff received a Notice of Right to Sue from the EEOC, dated March 17, 2026 with respect to her charges of discrimination.

12. This Action has been commenced within ninety (90) days of receipt of said Notice of Right to Sue.

PARTIES

13. Plaintiff Brandi Bynum is a resident of New York and was hired by In Zone Logistics as an Amazon delivery person.

14. Defendant In Zone Logistics operates as a delivery partner and employer of Plaintiff.

15. Defendant Amazon, Inc. exercises sufficient control over the delivery routes, ethics reporting, and operational protocols of In Zone Logistics employees to be considered a joint employer for the purposes of Title VII liability.

FACTS COMMON TO ALL CAUSES OF ACTION

Hiring and Immediate Predatory Behavior

16. Activate promotes itself as a Plaintiff was subjected to one of the most basic and egregious forms of workplace sexual harassment.

17. In this regard, her supervisor sent her an unsolicited photograph of his erect penis. (**Exhibit A** hereto).

18. The image came from his personal number.

19. This explicit message was sent while the perpetrator was employed in a supervisory role over Ms. Dixon.

Defendant's Failure to Protect and Negligent Supervision

20. Ms. Bynum began her employment as an Amazon delivery person with In Zone Logistics on Tuesday, October 28, 2025.

21. At approximately 11:05 a.m., she arrived for her first field training at the intersection of East 37th Street and Park Avenue in New York, New York.

22. She was assigned to be trained by a supervisor named Jonathan, described as a Black male with a slim build, short hair, a long goatee, and eyeglasses.

23. Before the shift even fully began, while waiting to load the delivery truck, Jonathan immediately began sexually harassing Ms. Bynum. He approached her and asked, “Can I ask you a question. What would it take hypothetically, for me to be in your rotation?”

24. Plaintiff immediately shut him down, stating she did not have time for any more men.

Escalation and Physical Assault & Harassment

25. Shortly thereafter, Plaintiff and Jonathan arrived at their first delivery stop.

26. They entered an elevator that could barely fit two people. Taking advantage of the confined space, Jonathan forcefully grabbed Plaintiff’s left hand and stated, “Where’s your ring at? A woman like you is supposed to wear her ring.”

27. Plaintiff snatched her hand back, telling him her ring was at home and there was no need to wear it to deliver packages. She professionally attempted to re-direct and de-escalate the situation.

28. At a subsequent stop on the route, located at 35 West 35th Street, the harassment escalated into criminal physical assault.

29. While Plaintiff was digging into the delivery bags to verify the packages, Jonathan approached her from behind and rubbed her shoulders. Plaintiff shrugged her shoulders to move away, prompting him to briefly stop.

30. However, Jonathan then proceeded to grope Plaintiff’s right buttocks, inappropriately stating, “Your ass is nice and soft.”

31. After Plaintiff moved to the side to escape his touch, Jonathan reached out and began rubbing her left thigh from the outer thigh to the inner thigh.

32. He further reached toward her face, menacingly stroking the cheek below her left eye.

33. The other trainee present on the route, Mike F., was out of sight during these physical assaults.

34. Throughout the shift, Jonathan continued to subject Plaintiff to vile and explicit verbal harassment. He told her he “would have delivered more than packages to [her] house.”

35. While near the delivery truck, he explicitly stated, “I bet your pussy is nice and tight.”

Supervisor Drug Use on the Job

36. Adding to the hostile, unsafe, and entirely unprofessional work environment, Jonathan openly possessed and consumed marijuana while supervising the route.

37. While near the truck, he displayed a colorful weed grinder, rolling papers, and a white container with marijuana.

38. He then proceeded to roll a “blunt” while sitting on the stoop in front of the work truck.

Coercion and End of Shift

39. Upon returning from the route, Plaintiff was asked if she wanted to finish the truck on another available route. She explicitly declined.

40. While Plaintiff was answering the driver, Jonathan continuously whispered at her to take his phone number.

41. Feeling unsafe and wanting to document her harasser’s identity to report him, Plaintiff accepted the number (929-683-xxxx) and asked him to spell his name. He repeatedly asked for her number in return, which she refused to provide. Plaintiff then walked away.

Defendants' Failure to Respond

42. 36. Upon leaving, Ms. Bynum immediately took action. She called the Amazon Ethics hotline (1-877-781-2416) and filed a formal complaint.

43. She also contacted Amazon Human Resources, making it completely clear she had been touched and harassed.

44. She also reported the urgent situation to the on-site In Zone Logistics supervisors via a company WhatsApp group chat.

45. At 7:33 P.M. on October 29, 2025, Plaintiff messaged the group chat: "I need someone to call me at some point tomorrow. If I miss your call, I'll call back. But it's urgent." Defendants ignored this urgent message.

46. On Thursday, October 30, 2025, at 11:29 A.M., having heard nothing, Plaintiff sent another message: "I'm still waiting for someone to call me, I've been waiting since Tuesday. It is now Thursday. I explained that it was urgent."

47. In response, instead of taking immediate protective action, management members "Inzone performance..." and "Oscar Calixto" responded dismissively with "WHATS THE ISSUE?" and "YOUR MANAGERS ARE IN THIS CHAT AS WELL" and "???" (**Exhibit A** hereto).

48. Due to Defendants' complete failure to protect her, Plaintiff filed a formal police report with the NYPD at the Midtown Precinct South on October 31, 2025, resulting in Complaint Report Number 15742 for Forcible Touching and Harassment.

FIRST CLAIM
(Sex Discrimination – Sexual Harassment and Hostile Work Environment)
[42 U.S.C. § 2000e *et seq.*]

49. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in all paragraphs heretofore as if fully set forth herein.

50. This claim is authorized and instituted pursuant to the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, for relief based upon the unlawful employment practices of Defendants. Plaintiff complains of Defendant's violation of Title VII's prohibition against discrimination in employment based, in whole or in part, upon an employee's gender.

51. Defendants engaged in unlawful employment practices prohibited by 42 U.S.C. § 2000e *et seq.* by discriminating against Plaintiff because of her gender, subjecting her to sexual harassment, and enabling a hostile work environment.

52. As joint employers, both In Zone Logistics and Amazon, Inc. are vicariously and strictly liable for the actions of their supervisor, Jonathan, who used his authority to trap and sexually assault Plaintiff on her very first day of employment.

SECOND CLAIM
(Sex Discrimination – Sexual Harassment and Hostile Work Environment)
[N.Y. Executive Law, art. 15, § 290 *et seq.*]

53. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in all paragraphs heretofore as if fully set forth herein.

54. By the actions described above, Defendants discriminated against Plaintiff on the basis of her gender in violation of the New York State Human Rights Law by allowing sexual harassment and a hostile work environment to occur.

55. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, harm for which she is entitled to an award of monetary damages and other relief, in addition to costs and reasonable attorneys' fees pursuant to N.Y. Exec. Law § 297(10) and punitive damages pursuant to § 297(4)(c).

THIRD CLAIM
(Sex Discrimination – Sexual Harassment and Hostile Work Environment)
[N.Y.C. Admin. Code §8-107 *et seq.*]

56. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in all paragraphs heretofore as if fully set forth herein.

57. By the actions described above, Defendants discriminated against Plaintiff on the basis of her gender in violation of the New York City Human Rights Law.

58. As a direct and proximate result of Defendants' unlawful and discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, harm for which she is entitled to an award of monetary damages and other relief, in addition to costs and reasonable attorneys' fees.

59. Defendants' unlawful and discriminatory actions constitute malicious, willful and wanton violations of the NYCHRL for which Plaintiff is entitled to an award of punitive damages pursuant to N.Y. City Admin. Code § 8-502(a).

FOURTH CLAIM
(Negligent Supervision)
[New York State Common Law]

60. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in all paragraphs heretofore as if fully set forth herein.

61. Defendants had a duty to reasonably supervise their employees, particularly supervisors who are entrusted with the safety of new trainees in isolated environments like delivery trucks.

62. Defendants breached this duty by failing to monitor a supervisor who openly possessed drug paraphernalia, consumed marijuana on the job, and used his authority to repeatedly physically assault and grope a subordinate employee on her first day.

63. Furthermore, Defendants negligently retained this supervisor by utterly failing to act when Plaintiff urgently reported the severe misconduct to the Amazon Ethics hotline, HR, and the local management group chat

64. By failing to take adequate preventive and responsive steps, Defendants negligently supervised the employee, which enabled the abuse, prolonged the hostile environment, and exposed Plaintiff to extreme emotional and psychological harm..

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the entry of judgment against Defendants as follows:

A. Declaring that Defendants engaged in unlawful employment practices prohibited by Title VII, the NYHRL, and the NYCHRL by discriminating against plaintiff on the basis of her gender;

B. Awarding Plaintiff compensatory damages for mental, emotional, and physical injury, distress, pain and suffering and injury to her reputation in an amount to be proven at trial but in any event no less than \$750,000.00;

C. Awarding Plaintiff punitive damages;

D. Awarding Plaintiff attorneys' fees, costs disbursements, and expenses incurred in the prosecution of this action; and

E. Such other and further relief as the Court may deem equitable, just and proper to remedy Defendants' unlawful employment practices.

DEMAND FOR JURY TRIAL

Plaintiff Brandi Bynum hereby demands a trial by jury on all issues so triable against Defendants.

Dated: New York, New York
June 4, 2026

Yours etc.,
SUTTON SACHS MEYER PLLC
Attorneys for Plaintiff

Ali R. Jaffery, Esq.
Ali R. Jaffery, Esq.
125 Park Avenue, 25th Floor
New York, NY 10017
t. (212) 480-4357
e. Ali@ssm.law

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VERIFIED COMPLAINT

SUTTON SACHS MEYER PLLC

Attorneys for Plaintiff

125 Park Avenue, 25th Floor

New York, NY 10017

e: Ali@ssm.law

t: (212) 480-4357

Pursuant to Fed. R. Civ. P. 11, *et seq.*, the undersigned, Ali R. Jaffery, Esq. hereby certifies to the best of his knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, that: (1) this document is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) the claims, defenses, and other legal contentions are warranted by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law, or for establishing new law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

By: /s/ Ali R. Jaffery, Esq.
