

DOCKET NO: AAN-CV24-6054431-S

**LIVIA BACON F/K/A MATTHEW
BACON,**

Plaintiff,

v.

**GTI ROCK ISLAND, LLC D/B/A GREEN
THUMB INDUSTRIES,**

Defendant.

SUPERIOR COURT

J.D. OF ANSONIA-MILFORD

AT MILFORD

FEBRUARY 16, 2024

NOTICE TO SUPERIOR COURT OF FILING OF NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant, GTI Rock Island, LLC d/b/a Green Thumb Industries, filed a Notice of Removal of this action in the United States District Court for the District of Connecticut. A copy of said Notice is attached hereto as **Exhibit A**. This Notice to the Superior Court was filed and served pursuant to 28 U.S.C. § 1446(d).

/s/ James H. Golicz

Elizabeth R. McKenna
emckenna@littler.com
James H. Golicz
jgolicz@littler.com

LITTLER MENDELSON, P.C.
One Century Tower
265 Church Street
Suite 300
New Haven, CT 06510
Telephone: 203.974.8700
Facsimile: 203.974.8799

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2024, a copy of the foregoing was sent via email or First Class Mail to all counsel and pro se parties of record as follows:

Rebecca M. Harris
Cicchiello & Cicchiello LLP
364 Franklin Avenue
Hartford, CT 06114
rharris@chicchielloesq.com
(*Accepts E-Service*)

/s/ James H. Golicz
James H. Golicz

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

**LIVIA BACON F/K/A MATTHEW
BACON,**

Plaintiff,

v.

**GTI ROCK ISLAND, LLC D/B/A GREEN
THUMB INDUSTRIES,**

Defendant.

Civil Action No.:

February 16, 2024

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1332, GTI ROCK ISLAND, LLC D/B/A GREEN THUMB INDUSTRIES (“Defendant”), by its attorneys, Littler Mendelson, P.C., hereby removes the above captioned action to the United States District Court for the District of Connecticut, and respectfully state as follows:

1. By way of Summons and Complaint, Plaintiff, Livia Bacon f/k/a Matthew Bacon (“Plaintiff”), commenced a civil action against Defendant in the Connecticut Superior Court in the Judicial District of Ansonia-Milford at Milford styled, *Livia Bacon f/k/a Matthew Bacon*, Superior Court, JD of Ansonia-Milford at Milford, Docket No. AAN-CV24-6054431-S (the “Superior Court Action”). Defendant filed a notice of removal in the above captioned action.

2. True and correct copies of the Summons and Complaint served by Plaintiff on Defendant are attached hereto as **Exhibit A** and constitutes all processes, pleadings and orders served upon Defendant GTI Rock Island, LLC d/b/a Green Thumb Industries in the Superior Court Actions to the present date. 28 U.S.C. § 1446(a).

3. On January 19, 2024, Plaintiff caused Defendant to be served with process. As such, this Notice of Removal is being filed within thirty (30) days of the date Defendant was served with

a copy of the Complaint in the Superior Court Action. 28 U.S.C. § 1446(b).

4. The Superior Court Action includes claims for violations of Conn. Gen. Stat. § 46a-60(b)(1) and (b)(4).

5. Complete diversity of citizenship exists between Plaintiff and Defendant at the time of filing the Complaint, at the time of removal, and at all intervening times.

6. Plaintiff is a natural person who, according to the complaint, is a citizen of the State of Connecticut, residing in the City of Shelton, CT.

7. Defendant is a limited liability company organized under the laws of Illinois with a principal place of business and principal executive offices in Chicago, IL. A copy of the Illinois Secretary of State Business Entity Search is attached hereto as **Exhibit B**.

8. This Court has original jurisdiction over this Action under the provisions of 28 U.S.C. § 1332, in that the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs, and is between citizens of different states for diversity purposes. The Action may, therefore, be removed pursuant to 28 U.S.C. § 1441(a) and (b).

9. This Notice of Removal is being filed in the District of Connecticut, the District Court of the United States for the district and division within which the Superior Court Actions are pending. 28 U.S.C. §§ 1441(a) and 1446(a).

10. With respect to removal based on diversity jurisdiction, Defendant represents as follows:

- a. The parties of this Action are citizens of different states, and were citizens of different states at the time the suit was initiated;
- b. This is a civil action involving claims that Plaintiff was discriminated against on the basis of Plaintiff's gender identity/expression and retaliation

in violation of the Connecticut Fair Employment Practices Act, Conn. Gen. Stat. § 46a-60(b)(1), *et seq.*;

- c. Plaintiff seeks monetary damages, reinstatement, or in lieu thereof, front pay, punitive damages, and reasonable attorney's fees and costs which, if Plaintiff is successful, will exceed \$75,000.00.

11. Accordingly, the requirements of 28 U.S.C. § 1332(a)(1) are satisfied, and the court would have original subject matter jurisdiction over this action if it had originally been brought in Federal Court. Removal is, therefore, proper under 28 U.S.C. § 1441(a) and (b).

12. Defendant reserves the right to file additional support for this Notice of Removal by way of affidavits, deposition testimony, expert testimony, discovery responses, supplemental memoranda, and legal argument.

WHEREFORE, Defendant, having provided notice as required by law, now remove the above-captioned action from the Connecticut Superior Court for the Judicial District of Stamford/Norwalk to the United States District Court for the District of Connecticut.

/s/ James H. Golicz

Elizabeth R. McKenna (ct28113)
emckenna@littler.com
James H. Golicz (ct31155)
jgolicz@littler.com

LITTLER MENDELSON, P.C.
One Century Tower
265 Church Street
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Telephone: 203.974.8700
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2024, a copy of the foregoing was sent via email or First Class Mail to all counsel and pro se parties of record as follows:

Rebecca Harris
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Hartford, CT 06114
rharris@cicchielloesq.com
(Accepts E-Service)

/s/ James H. Golicz

James H. Golicz (ct3115)

EXHIBIT A

SUMMONS - CIVIL

JD-CV-1 Rev. 2-22

C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259;
P.B. §§ 3-1 through 3-21, 8-1, 10-13

For information on
ADA accommodations,
contact a court clerk or
go to: www.jud.ct.gov/ADA.

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

**Instructions are on page 2.**

- ☐ Select if amount, legal interest, or property in demand, not including interest and costs, is LESS than \$2,500.
- ☒ Select if amount, legal interest, or property in demand, not including interest and costs, is \$2,500 or MORE.
- ☐ Select if claiming other relief in addition to, or in place of, money or damages.

TO: Any proper officer

By authority of the State of Connecticut, you are hereby commanded to make due and legal service of this summons and attached complaint.

Address of court clerk (Number, street, town and zip code)

14 West River Street, Milford, CT 06460

Telephone number of clerk

(203) 877 - 4293

Return Date (Must be a Tuesday)

February 20, 2024☒ Judicial District

G.A.

At (City/Town)

☐ Housing Session☐ Number: _____**Milford**

Case type code (See list on page 2)

Major: **M**Minor: **90****For the plaintiff(s) enter the appearance of:**

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)

Cicchello & Cicchello LLP, 364 Franklin Avenue, Hartford, CT 06114

Juris number (if attorney or law firm)

419987

Telephone number

(860) 296 - 3457

Signature of plaintiff (if self-represented)

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book.

☒ Yes ☐ No

E-mail address for delivery of papers under Section 10-13 of the Connecticut Practice Book (if agreed)

rharris@cicchelloesq.com

Parties	Name (Last, First, Middle Initial) and address of each party (Number, street, P.O. Box, town, state, zip, country, if not USA)	
First plaintiff	Name: Livia Bacon f/k/a Matthew Bacon Address: c/o 364 Franklin Avenue, Hartford, CT 06114	P-01
Additional plaintiff	Name: Address:	P-02
First defendant	Name: GTI Rock Island, LLC d/b/a Green Thumb Industries - 325 West Huron Street, Chicago, IL 60654 Address: Agent Details - C T Corporation System, 208 So. LaSalle Street, Suite 814, Chicago, IL 60604	D-01
Additional defendant	Name: Address:	D-02
Additional defendant	Name: Address:	D-03
Additional defendant	Name: Address:	D-04
Total number of plaintiffs: 1		Total number of defendants: 1
		☐ Form JD-CV-2 attached for additional parties

Notice to each defendant

- You are being sued.** This is a summons in a lawsuit. The complaint attached states the claims the plaintiff is making against you.
- To receive further notices, you or your attorney must file an *Appearance* (form JD-CL-12) with the clerk at the address above. Generally, it must be filed on or before the second day after the Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to appear.
- If you or your attorney do not file an *Appearance* on time, a default judgment may be entered against you. You can get an *Appearance* form at the court address above, or on-line at <https://jud.ct.gov/webforms/>.
- If you believe that you have insurance that may cover the claim being made against you in this lawsuit, you should immediately contact your insurance representative. Other actions you may take are described in the Connecticut Practice Book, which may be found in a superior court law library or on-line at <https://www.jud.ct.gov/pb.htm>.
- If you have questions about the summons and complaint, you should talk to an attorney.

The court staff is not allowed to give advice on legal matters.

Date	Signed (Sign and select proper box)	☒ Commissioner of Superior Court ☐ Clerk	Name of person signing
01/17/2024			Rebecca M. Harris, Esq.
If this summons is signed by a Clerk:			For Court Use Only
a. The signing has been done so that the plaintiff(s) will not be denied access to the courts.			File Date
b. It is the responsibility of the plaintiff(s) to ensure that service is made in the manner provided by law.			
c. The court staff is not permitted to give any legal advice in connection with any lawsuit.			
d. The Clerk signing this summons at the request of the plaintiff(s) is not responsible in any way for any errors or omissions in the summons, any allegations contained in the complaint, or the service of the summons or complaint.			
I certify I have read and understand the above:	Signed (Self-represented plaintiff)	Date	Docket Number

Instructions

1. Type or print legibly. If you are a self-represented party, this summons must be signed by a clerk of the court.
2. If there is more than one defendant, make a copy of the summons for each additional defendant. Each defendant must receive a copy of this summons. Each copy of the summons must show who signed the summons and when it was signed. If there are more than two plaintiffs or more than four defendants, complete the Civil Summons Continuation of Parties (form JD-CV-2) and attach it to the original and all copies of the summons.
3. Attach the summons to the complaint, and attach a copy of the summons to each copy of the complaint. Include a copy of the Civil Summons Continuation of Parties form, if applicable.
4. After service has been made by a proper officer, file the original papers and the officer's return of service with the clerk of the court.
5. Use this summons for the case type codes shown below.

Do not use this summons for the following actions:

- | | |
|--|---|
| <ul style="list-style-type: none"> (a) Family matters (for example divorce, child support, custody, parentage, and visitation matters) (b) Any actions or proceedings in which an attachment, garnishment or replevy is sought (c) Applications for change of name (d) Probate appeals | <ul style="list-style-type: none"> (e) Administrative appeals (f) Proceedings pertaining to arbitration (g) Summary Process (Eviction) actions (h) Entry and Detainer proceedings (i) Housing Code Enforcement actions |
|--|---|

Case Type Codes

MAJOR DESCRIPTION	CODE Major/Minor	MINOR DESCRIPTION	MAJOR DESCRIPTION	CODE Major/Minor	MINOR DESCRIPTION
Contracts	C 00	Construction - All other	Property	P 00	Foreclosure
	C 10	Construction - State and Local		P 10	Partition
	C 20	Insurance Policy		P 20	Quiet Title/Discharge of Mortgage or Lien
	C 30	Specific Performance		P 30	Asset Forfeiture
	C 40	Collections		P 90	All other
	C 50	Uninsured/Underinsured Motorist Coverage	Torts (Other than Vehicular)	T 02	Defective Premises - Private - Snow or Ice
	C 60	Uniform Limited Liability Company Act - C.G.S. 34-243		T 03	Defective Premises - Private - Other
	C 90	All other		T 11	Defective Premises - Public - Snow or Ice
Eminent Domain	E 00	State Highway Condemnation		T 12	Defective Premises - Public - Other
	E 10	Redevelopment Condemnation		T 20	Products Liability - Other than Vehicular
	E 20	Other State or Municipal Agencies		T 28	Malpractice - Medical
	E 30	Public Utilities & Gas Transmission Companies		T 29	Malpractice - Legal
	E 90	All other		T 30	Malpractice - All other
Housing	H 10	Housing - Return of Security Deposit		T 40	Assault and Battery
	H 12	Housing - Rent and/or Damages		T 50	Defamation
	H 40	Housing - Housing - Audita Querela/Injunction		T 61	Animals - Dog
	H 50	Housing - Administrative Appeal		T 69	Animals - Other
	H 60	Housing - Municipal Enforcement		T 70	False Arrest
	H 90	Housing - All Other		T 71	Fire Damage
Miscellaneous	M 00	Injunction		T 90	All other
	M 10	Receivership	Vehicular Torts	V 01	Motor Vehicles* - Driver and/or Passenger(s) vs. Driver(s)
	M 15	Receivership for Abandoned/Blighted Property		V 04	Motor Vehicles* - Pedestrian vs. Driver
	M 20	Mandamus		V 05	Motor Vehicles* - Property Damage only
	M 30	Habeas Corpus (extradition, release from Penal Institution)		V 06	Motor Vehicle* - Products Liability Including Warranty
	M 40	Arbitration		V 09	Motor Vehicle* - All other
	M 50	Declaratory Judgment		V 10	Boats
	M 63	Bar Discipline		V 20	Airplanes
	M 66	Department of Labor Unemployment Compensation Enforcement		V 30	Railroads
	M 68	Bar Discipline - Inactive Status		V 40	Snowmobiles
	M 70	Municipal Ordinance and Regulation Enforcement		V 90	All other
	M 80	Foreign Civil Judgments - C.G.S. 52-604 & C.G.S. 50a-30		*Motor Vehicles include cars, trucks, motorcycles, and motor scooters.	
	M 83	Small Claims Transfer to Regular Docket	Wills, Estates and Trusts	W 10	Construction of Wills and Trusts
	M 84	Foreign Protective Order		W 90	All other
	M 89	CHRO Action in the Public Interest - P.A. 19-93			
	M 90	All other			

RETURN DATE: FEBRUARY 20, 2024	:	SUPERIOR COURT
	:	
LIVIA BACON f/k/a	:	
MATTHEW BACON	:	J.D. OF ANSONIA-MILFORD
	:	
VS.	:	AT MILFORD
	:	
GTI ROCK ISLAND, LLC d/b/a	:	
GREEN THUMB INDUSTRIES	:	JANUARY 17, 2024

COMPLAINT

COUNT ONE: **Gender Identity/Expression Discrimination and Hostile Work Environment
in Violation of Conn. Gen. Stat. § 46a-60(b)(1).**

1. Plaintiff, Livia Bacon f/k/a Matthew Bacon (“Plaintiff”), was at all times set forth herein, and remains, a resident of the City of Shelton in the State of Connecticut.
2. The Defendant in this matter, GTI Rock Island, LLC d/b/a Green Thumb Industries (“Defendant”), is domestic corporation organized under the laws of the State of Illinois with a primary business address of 325 W. Huron Street, Suite 700, Chicago, IL 66054.
3. Defendant is a cannabis company that operates a store more commonly known as Rise Branford located at 471 East Main Street, Branford, CT 06405, where it dispenses cannabis products.
4. Plaintiff filed a timely administrative complaint against Defendant with the Connecticut Commission on Human Rights and Opportunities, and thereafter received a release of jurisdiction letter therefrom, a copy of which is appended hereto as Exhibit A. This Action is brought within 90 days of receipt of said release of jurisdiction letter. As such, Plaintiff has exhausted all administrative remedies, and this Action is timely.
5. Plaintiff commenced her employment on December 19, 2022. Her shift lead responsibilities included cash handling, sending deposits, managing personnel, delegating tasks amongst other employees, and receiving inventory.

6. Plaintiff is transgender female, and during her employment with Defendant, Plaintiff was undergoing transition.

7. Plaintiff's direct supervisors were Patricia Marr ("Marr"), the Store Manager, Vania Hernandez-Guerrero, the Assistant Store Manager, and Fred Trink, the District Manager.

8. At all times relevant, Plaintiff performed her work at or above satisfactory levels.

9. At approximately 12:30 pm, on or about March 16, 2023, Chuck Lindow ("Lindow"), a Regional Asset Protection Manager, was in the store at or about the commencement of Plaintiff's shift.

10. Lindow pulled Plaintiff aside and conveyed that he had been informed by another employee that Plaintiff had been consuming marijuana products on-site during her shift.

11. Plaintiff inquired of Lindow during the conversation, "Am I in trouble for this?" Lindow responded, "Until recently, I would have thought there was a policy violation, but based on what Alex Milner ["Milner"] said in a meeting recently, there is no clear rule about employees being under the influence [of THC] at work. That's something that we're going to clarify going forward."

12. Upon Lindow's request, Plaintiff wrote a statement on paper, effectively summarizing the conversation she had with Lindow, and wherein she conveyed that she had utilized a vaporizer pen while off-site, and in her vehicle. The statement was handed over to Lindow.

13. Lindow concluded the conversation by conveying that he was handling the situation from a Human Resources ("HR") perspective because Milner was on vacation for that week. Plaintiff was told that she would hear from Milner upon his return.

14. After the conversation, Plaintiff returned to complete the remainder of her shift without issue.

15. Upon information and belief, Juliana Daniels ("Daniels"), another shift lead, had reported to Lindow or others through Defendant's ethics portal.

16. During Plaintiff's tenure with Defendant, Nadine Mate-Piovanneti ("Mate-Piovanneti"), fellow shift lead, treated Plaintiff disparately as compared to her similarly situated peers, barking orders at Plaintiff and treating her with disrespect, while not subjected Plaintiff's coworkers to such treatment.

17. Upon information and belief, Daniels commented to a fellow coworker, Shyler Longobardi, words to the effect of "I can't believe how Nadine is treating Livia—I wouldn't stand for that," effectively confirming that Plaintiff was being singled out for disrespectful treatment.

18. On March 17, 2023, Plaintiff had a conversation with Marr. During the course of the conversation, Plaintiff said that she knew Marr had heard about Plaintiff's interaction with Lindow. Plaintiff asked Marr if they had any issues which needed to be discussed.

19. During the course of the ensuing conversation, Plaintiff reported to Marr her belief that Mate-Piovanneti was creating a toxic work environment. Plaintiff conveyed that she was not intending on going over anyone's head but that she would be lodging a complaint with HR.

20. Later in the afternoon on or about March 17, 2023, Plaintiff stayed late on a Friday to assist with a line of customers.

21. In response, Mate-Piovanneti berated Plaintiff for staying after her scheduled shift time in front of people whom Plaintiff supervised. However, Mate-Piovanneti was not responsible for scheduling shifts and was not responsible for monitoring overtime.

22. At the conclusion of Plaintiff's shift, she texted Marr complaining about Mate-Piovanneti's conduct.

23. That same day, Plaintiff contacted Milner and that a meeting to take place concerning the work environment, Plaintiff's interaction with Lindow, and other commentary and conduct of coworkers at the store.

24. Plaintiff worked through the following weekend, relatively without issue.

25. On or about March 21, 2023, Plaintiff had a phone conversation with HR at around 1:00 pm, wherein she again conveyed the substance of what she had reported to Lindow concerning his inquiry regarding use of marijuana on premises.

26. Plaintiff also explained that the vaporizer she had utilized in her car was CBD, as opposed to THC, and accordingly, could not have resulted in Plaintiff being under the influence. She had not had the opportunity to clarify with Lindow during their conversation because she had felt blindsided. Milner thanked her for clarifying.

27. Plaintiff then expressed some frustration with how the process had been executed and how it had been handled by an Asset Protection Manager in a less-than-confidential manner.

28. Plaintiff conveyed that she wanted to move on to the deeper cultural issues and why the situation may be personal. She said there appeared to be a history at the workplace of people using HR complaints to settle personal gripes, and Plaintiff provided some examples.

29. During the ensuing exchange, Plaintiff reported to Milner that people were treating her differently because of her gender identity, noting that she had observed she was not being treated with the same amount of respect as her non-trans coworkers.

30. Milner said that HR would take Plaintiff's observations into consideration but that the issue would be considered separately from the vaporizer incident.

31. Milner conveyed, "We're not looking into the consumption on-site policy. We're looking at this as a being under the influence policy."

32. Plaintiff reiterated that it had been a CBD pen, yet Milner responded that the policy was with regard to cannabis products generally, not just THC.

33. Plaintiff said that she was being treated more harshly than others, as other employees were routinely under the influence. The only discipline that the others received—if any—was a verbal warning.

34. Plaintiff conveyed unambiguously that she was being singled out.

35. Plaintiff told Milner that she loved her job and that her job was paying for her transition, which she had only recently started. Plaintiff then inquired as to whether termination was on the table, to which Milner responded, "Yes," and conveyed that she would have another discussion with Marr.

36. Plaintiff reported to work on the following Thursday, March 23, 2023, and was terminated that day.

37. Upon information a belief, Plaintiff's complaints of discrimination were not investigated by Defendant, and no action was taken in regards to her complaints.

38. The Defendant, through its agents, servants, and/or employees, discriminated against the plaintiff, subjected the plaintiff to unwarranted discipline and a hostile working environment, and ultimately terminated the Plaintiff's employment on the basis of her sexual orientation or perceived sexual orientation or gender identity.

39. The foregoing conduct of the Defendant constitutes unlawful discrimination, hostile work environment, and wrongful termination of employment in violation of the Connecticut Fair Employment Practices Act.

40. As a result of the foregoing unlawful conduct of the Defendant, Plaintiff has suffered, and will continue to suffer, lost wages and fringe benefits, as well as other consequential losses and damages.

41. As a further result of the foregoing unlawful conduct of the Defendant, the Plaintiff has been unable to obtain and or hold gainful employment.

42. As a further result of the foregoing unlawful conduct of the Defendant, the Plaintiff has expended attorney's fees and costs in order to secure the right to which she is entitled.

43. As a further result of the foregoing unlawful conduct of the Defendant, the Plaintiff has suffered and will continue to suffer in the future, considerable emotional and psychological pain and suffering.

COUNT TWO: Sex Discrimination in Violation of Conn. Gen. Stat. § 46a-60(b)(1)

1. The Plaintiff repeats and re-alleges paragraphs 1 through 37 above and incorporates them as paragraphs 1 through 37 of this Second Count as if fully stated herein.

38. Defendant is an “employer” within the meaning of the Connecticut Fair Employment Practices Act.

39. Defendant discriminated against Plaintiff in the terms and conditions of Plaintiff’s employment on account of her sex.

40. Defendant subjected Plaintiff to a pervasive and continuing course of discriminatory comments and conduct which had the purpose or effect of substantially interfering with Plaintiff’s work performance and/or the creation of an intimidating, hostile, or offensive work environment.

41. Defendant subjected Plaintiff to adverse employment action, motivated by Plaintiff’s sex.

42. As a result of Defendant’s unlawful conduct, as aforesaid, Plaintiff has sustained lost wages and benefits of employment, has been deprived of the benefits of gainful employment into the future, has sustained substantial emotional distress, and has incurred or will incur attorneys’ fees and costs.

COUNT THREE: Retaliation in violation of Conn. Gen. Stat. 46a-60(b)(4)

1. The Plaintiff repeats and re-alleges paragraphs 1 through 37 above, and incorporates them as paragraphs 1 through 37 of this Third Count as if fully stated herein.

38. The Defendant, through its agents, servants, and/or employees, against the plaintiff, subjected the plaintiff to unwarranted discipline and ultimately terminated the Plaintiff’s employment for engaging in protected activities in the course of her employment.

39. As a result of the plaintiff engaging in the above protected activities, the defendant retaliated against the plaintiff, taking adverse employment actions against her and ultimately terminated her employment.

40. The foregoing conduct of the Defendant constitutes unlawful retaliation in violation of the Connecticut Fair Employment Practices Act, §46a-60(a)(4).

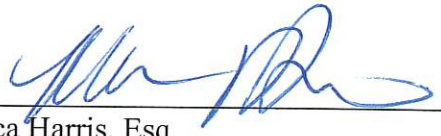
41. As a result of the foregoing unlawful conduct of the Defendant, Plaintiff has suffered, and will continue to suffer, lost wages and fringe benefits, as well as other consequential losses and damages.

42. As a further result of the foregoing unlawful conduct of the Defendant, the Plaintiff has been unable to obtain and or hold gainful employment.

43. As a further result of the foregoing unlawful conduct of the Defendant, the Plaintiff has expended attorney's fees and costs in order to secure the right to which she is entitled.

44. As a further result of the foregoing unlawful conduct of the Defendant, the Plaintiff has suffered and will continue to suffer in the future, considerable emotional and psychological pain and suffering.

THE PLAINTIFF
LIVIA BACON f/k/a MATTHEW BACON

By: 

Rebecca Harris, Esq.

Cicchiello & Cicchiello LLP

364 Franklin Avenue

Hartford, CT 06114

Tel: (860) 296-3457

Fax: (860) 296-0676

Juris: 419987

Email: rharris@cicchielloesq.com

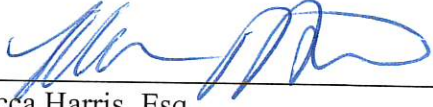
RETURN DATE: FEBRUARY 20, 2024	:	SUPERIOR COURT
	:	
LIVIA BACON f/k/a	:	
MATTHEW BACON	:	J.D. OF ANSONIA-MILFORD
	:	
VS.	:	AT MILFORD
	:	
GTI ROCK ISLAND, LLC d/b/a	:	
GREEN THUMB INDUSTRIES	:	JANUARY 17, 2024

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief:

1. Monetary damages;
2. Reinstatement, or in lieu thereof, front pay;
3. Punitive damages;
4. Reasonable attorney's fees and costs;
5. Such other relief which the Court deems just and reasonable.

THE PLAINTIFF
LIVIA BACON f/k/a MATTHEW BACON

By: 
Rebecca Harris, Esq.
Cicchiello & Cicchiello LLP
364 Franklin Avenue
Hartford, CT 06114
Tel: (860) 296-3457
Fax: (860) 296-0676
Juris: 419987
Email: rharris@cicchielloesq.com

RETURN DATE: FEBRUAR 20, 2024

LIVIA BACON f/k/a
MATTHEW BACON

VS.

GTI ROCK ISLAND, LLC d/b/a
GREEN THUMB INDUSTRIES

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SUPERIOR COURT

J.D. OF ANSONIA-MILFORD

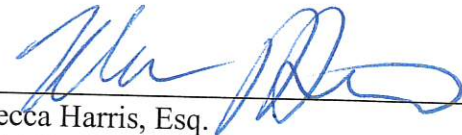
AT MILFORD

JANUARY 17, 2024

STATEMENT OF AMOUNT IN DEMAND

The Plaintiff herein certifies that the amount in demand is in excess of \$15,000.00, exclusive of interest and costs.

THE PLAINTIFF
LIVIA BACON f/k/a MATTHEW BACON

By: 

Rebecca Harris, Esq.

Cicchiello & Cicchiello LLP

364 Franklin Avenue

Hartford, CT 06114

Tel: (860) 296-3457

Fax: (860) 296-0676

Juris: 419987

Email: rharris@cicchielloesq.com

EXHIBIT A

STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Liva Bacon f.k.a. Matthew Bacon
COMPLAINANT

vs.

CHRO No. 2330582
EEOC No. 16A202301214

Green Thumb Industries d/b/a Rise Branford
RESPONDENT

RELEASE OF JURISDICTION

The Commission on Human Rights and Opportunities hereby releases its jurisdiction over the above-identified complaint. The Complainant is authorized to commence a civil action in accordance with CONN. GEN. STAT. § 46a-100 against the Respondent in the Superior Court for the judicial district in which the discriminatory practice is alleged to have occurred, in which the Respondent transacts business or in which the Complainant resides. If this action involves a state agency or official, it may be brought in the Superior Court for the judicial district of Hartford.

A copy of any civil action brought pursuant to this release must be served on the Commission at ROJ@ct.gov or at 450 Columbus Blvd., Suite 2, Hartford, CT 06103 at the same time all other parties are served. Electronic service is preferred. **THE COMMISSION MUST BE SERVED BECAUSE IT HAS A RIGHT TO INTERVENE IN ANY ACTION BASED ON A RELEASE OF JURISDICTION PURSUANT TO CONN. GEN. STAT. § 46a-103.**

The Complainant must bring an action in Superior Court within 90 days of receipt of this release and within two years of the date of filing the complaint with the Commission unless circumstances tolling the statute of limitations are present.

DATE: December 20, 2023



Tanya A. Hughes, Executive Director

Service:

Complainant: liviabacon30@gmail.com

Complainant's attorney: manny@cicchelloesq.com

Respondent: andy.dalessio@gtigrows.com

Respondent's attorney: emckenna@littler.com

EXHIBIT B



Business Entity Search

Entity Information

Entity Name	GTI ROCK ISLAND, LLC		
Principal Address	325 W. HURON ST., SUITE 700 CHICAGO, IL 60654		
File Number	05150124	Status	ACTIVE on 12-14-2023
Entity Type	LLC	Type of LLC	Domestic
Org. Date/Admission Date	02-11-2015	Jurisdiction	IL
Duration	PERPETUAL		
Annual Report Filing Date	12-14-2023	Annual Report Year	2024
Agent Information	C T CORPORATION SYSTEM 208 SO LASALLE ST, SUITE 814 CHICAGO, IL 60604-1101	Agent Change Date	07-02-2019

Services and More Information

Choose a tab below to view services available to this business and more information about this business.

Purchase Master Entity Certificate of Good Standing

[Purchase Assumed Name Certificate of Good Standing](#)

[Articles of Amendment Effecting A Name Change](#)

[Adopting Assumed Name](#)

[Change of Registered Agent and/or Registered Office](#)
