

RETURN DATE: May 13, 2025

EMILY TYROL : SUPERIOR COURT
VS. : HARTFORD JUDICIAL DISTRICT
FFD CENTRAL, LLC : APRIL 10, 2025

COMPLAINT

1. Plaintiff Emily Tyrol was and is a resident of Lebanon, Connecticut.
2. Defendant FFD Central, LLC was and is a Connecticut limited liability company with a principal place of business located at 40 Woodland Street, Hartford, Connecticut 06105.
3. Defendant employs 1 or more individuals and is an employer within the meaning of the Connecticut Fair Employment Practices Act (CFEPA).
4. Defendant employed plaintiff.
5. Defendant hired plaintiff on or about October 10, 2022.
6. Plaintiff's job position at time of hire was Dispensary Technician and worked at defendant's Willimantic location.
7. Plaintiff was subsequently promoted to Sales Floor Manager on February 13, 2023.
8. As Sales Floor Manager, Plaintiff worked at defendant's Manchester location.
9. Plaintiff was qualified for the job.
10. Plaintiff is female.
11. Defendant employs Ryan Green as a general manager.
12. Green is a supervisor.
13. Green supervised plaintiff.

14. Defendant employs Andrew Johnson as an assistant general manager.
15. Johnson supervised plaintiff.
16. Defendant employs Bridget Bozzi. She is the director of human resources employee.
17. Defendant employs Rudy DeCiantis as a Sales Floor Manager.
18. Rudy DeCiantis engaged in sexual harassment in the defendant's workplace.
19. In June/July 2023, DeCiantis talked about his vasectomy in detail.
20. DeCiantis talked about inserting his toe into the vagina of wife's friend while in a hot tub.
21. DeCiantis would simulate masturbation utilizing a garbage "picker upper" tool.
22. DeCiantis talked about his sex life.
23. DeCiantis talked about his wife's sex drive.
24. DeCiantis talked about "queefs".
25. DeCiantis talked about his penis.
26. Defendant employs Jalen (Jay) Manzie as a Dispensary Technician.
27. Manzie would target and purportedly prioritize attractive female customers. would step away from his register on the sales floor to wait for female customers at the front desk.
28. Manzie would discount orders made by physically attractive female customers specifically they were female and attractive.
29. Manzie used the store's security cameras to follow watch the female customers – zooming in on their body parts.
30. Manzie would give out his personal cell phone number to female customers.

31. Manzie has physically hugged or attempted to hug a female co-worker who did not want to be hugged by him.

32. When the female co-worker rejected Manzie's attempt to hug her, Manzie got upset.

33. There have been hand-drawn images of nude women displayed in defendant's vault.

34. Defendant employs Kendill Moore as a Dispensary Technician.

35. Moore has consumed alcohol in his care while on break. When he returned to work, he made sexual comments to a female co-worker Dispensary Technician Joselyn (Josie) Cyr.

36. Moore talked about his "open relationship" and his penis sized.

37. Moore commented that his penis does not fit inside of women.

38. Cyr reported Moore's alcohol consumption and sexual comments to plaintiff.

39. On or about June 22, 2023, plaintiff reported Moore's misconduct to Ryan Green and Andrew Johnson.

40. Defendant has an Employee Handbook.

41. The Handbook contains "Alcohol, Drug and Smoke-Free Workplace Policy".

42. Multiple female employees have complained about Manzie's workplace behavior.

43. Plaintiff reported sexual harassment and a hostile work environment to defendant multiple times.

44. Plaintiff reported sex harassment and hostile work environment to Adrienne Briones-Carlson – Respondent's New England Regional Director.

45. In June 2023, plaintiff spoke to Adrienne Briones-Carlson about the sex harassment and hostile work environment.

46. In March 2023, plaintiff emailed Johnson and Green about her concerns and opposition to a hostile work environment on account of sex.

47. In May 2023, plaintiff emailed Johnson, Green and DeCiantis about her concerns and opposition to a hostile work environment on account of sex.

48. In May/June 2023, plaintiff sent an email expressing concerns and opposition to a hostile work environment and sex harassment. The email was forwarded to Bozzi.

49. On July 11, 2023, plaintiff sent a text message to defendant expressing her concerns with the hostile work environment on the basis of sex.

50. Plaintiff had numerous verbal communications with Respondent about the sexual harassment and the hostile work environment and that Respondent needed to do something to put an end to it.

51. In May 2023, Plaintiff took a medical leave of absence due to a pregnancy-related complications.

52. Defendant was notified of plaintiff's medical leave absence and the reason for it.

53. Plaintiff return from medical leave.

54. Upon her return from medical leave, multiple female employees complained to Plaintiff that the workplace was a "boys club" and "locker room talk" continued while she had been out on medical leave.

55. Multiple female employees expressed relief that Plaintiff returned to work following medical leave.

56. Following return from medical leave, Plaintiff continued to discuss the hostile work environment with Johnson and Green and that the hostility based on gender had to be stopped.

57. On June 22, 2023, a female Dispensary Technician, Christina Hatcher, told Plaintiff that she had created a “boys club” mentality among the females on the team and that she had incited “feminist thinking” among young female employees on the team.

58. While on medical leave, Hatcher told Plaintiff that the team was lucky to have her.

59. While on medical leave, Hatcher told Plaintiff that she was upset about DeCiantis being involved in employee reviews and Plaintiff not being with employee reviews.

60. While on medical leave, Hatcher told Plaintiff that the Defendant did not deserve her.

61. Upon return from medical leave, someone told Hatcher that Plaintiff was talking negatively with another employee.

62. Plaintiff did not talk negatively about Hatcher with another employee.

63. Upon return from medical leave, Hatcher suddenly had a very close relationship with Manzie.

64. Upon return from medical leave, Hatcher commented to Plaintiff: “Who cares if Jay wants to ring out all the pretty girls”.

65. On or about June 22, 2023, Plaintiff earned a \$1.00 merit increase in her hourly pay.

66. The hourly wage increase did not take effect until July 2, 2023.

67. At all times relevant, Plaintiff performed her job at or above a satisfactory level.

68. On July 11, 2023, a female Dispensary Technician, Grace Gardner reported Manzie's behavior to Plaintiff and requested that she not be placed next to him on the sales floor.

69. Plaintiff encourages Gardner to write down her concerns and notify Green.

70. Cassandra (Cassie) Lenci expressed concern to Plaintiff that Green bought cocaine from Manzie.

71. Green had openly discussed his cocaine use with employees.

72. Plaintiff asked Green about purportedly buying cocaine from Manzie. Green stated that he bought shoes from Maznie.

73. A gun was found in the employee's bathroom.

74. Joselyn Cyr found the gun and reported it to Plaintiff. Amberly Singer-Scully was made aware of the gun and reported it to Plaintiff and to Bozzi. Both female employees expressed concern about the presence of a gun in the workplace.

75. Green stated that the gun was left by an armored guard. Defendant uses armed guards to deliver and pick up cash.

76. On or about June 22, 2023, Defendant issued plaintiff a 90 day performance review. The date of issuance was well past the 90 day mark of plaintiff's employment.

77. The Review form asks the reviewing manager to decide whether the employee receives a merit increase in pay. The reviewing manager circled "yes" to plaintiff receiving a merit increase.

78. Plaintiff scored 17 out of a total of 24 points on the Review.

79. The Review was largely positive.

80. The area of criticism in the Review was (a) "would appreciate seeing a positive attitude more often"; and (b) for her to reduce her complaining.

81. Plaintiff had a positive attitude in the workplace and her complaining pertained to the workplace harassment.

82. On July 19, 2023, defendant terminated plaintiff's employment.

83. Defendant told plaintiff that she was being terminated because it had not seen a more positive attitude since the Review.

84. Any and all reasons offered by defendant to explain the termination decision would be pretext to disguise unlawful discrimination and/or retaliation.

85. On July 19, 2023, defendant announced via the company's Slack channel that plaintiff's position was not being "backfilled".

86. On July 27, 2023, defendant announced three (3) sales floor lead job position openings.

87. On August 1, 2023, defendant announced a fourth sales floor lead job position opening.

88. Plaintiff was subjected to sex harassment in defendant's workplace.

89. The sexual harassment was unwelcomed.

90. The sexual harassment was severe or pervasive.

91. Plaintiff subjectively, reasonably and objectively perceived her work environment to be hostile.

92. Plaintiff inquired about FMLA with Bozzi. In response, Bozzi told Plaintiff that she was at risk of losing her job. Bozzi told Plaintiff that she needed to complete "job assurance" paperwork.

93. Plaintiff filed her a complaint against defendant with the Connecticut Commission on Human Rights and Opportunities (CHRO) on or about November 7, 2023.

94. Plaintiff received a Release of Jurisdiction from the CHRO on or about January 24, 2025. (Ex.1).

FIRST COUNT

(Hostile Work Environment/Sexual Harassment In Violation of C.G.S. §46a-60(b)(8))

1. Plaintiff repeats the foregoing allegations as if the same were repeated herein.

95. Plaintiff was repeatedly subjected to sex harassment in defendant's workplace.

96. The harassment was unwelcomed.

97. The harassment was based on plaintiff's sex.

98. Plaintiff subjectively, reasonably and objectively perceived her work environment to be hostile.

99. Defendant knew or should have known that the plaintiff was being harassed because of her sex and unreasonably failed to stop the sex harassment.

100. Defendant failed to take reasonable, appropriate, and adequate measures to prevent sex harassment from taking in the workplace.

101. Defendant failed to take reasonable, appropriate and adequate remedial measures when addressing workplace sex harassment.

102. As a result of the hostile work environment, plaintiff suffered harms and losses.

103. As a result of the sexual harassment, plaintiff has been deprived of work and equal employment opportunities because of the sex harassment.

104. As a result of defendant's sexual harassment of the plaintiff, plaintiff has been deprived of income and wages, employee benefits, and interest.

105. As a further result of defendant's sexual harassment, plaintiff has suffered severe humiliation, embarrassment, anxiety, worry, humiliation, degradation, shame, mental anguish, harm to personal reputation, harm to professional reputation and emotional distress.

106. Plaintiff has suffered and will continue to suffer injuries and losses as a result of the sexual harassment.

107. Defendant exhibited reckless indifference to plaintiff's legally protected rights afforded to her under the CFEPa.

SECOND COUNT
(Gender Discrimination in Violation of C.G.S. §46a-60(b)(1))

1. Plaintiff repeats the allegations in paragraphs 1 through 107 above as if fully incorporated herein.

108. Defendant, by and through its agents and/or employees, violated the Connecticut Fair Employment Practices Act C.G.S. §46a-60a *et seq.* in one or more of the following ways.

(a) In that defendant interfered with plaintiff's privilege of employment on the basis of plaintiff's gender;

(b) In that defendant discriminated against the plaintiff in such a way that adversely affected her status as an employee;

(c) In that defendant treated the plaintiff adversely different from similarly situated employees;

(d) In that defendant intentionally discriminated against the plaintiff.

109. As a result of defendant's unequal treatment and discrimination, plaintiff has been deprived of her employment and equal employment opportunities because of her gender.

110. As a result of defendants' discrimination of the plaintiff, plaintiff has been deprived of income, wages, and benefits.

111. As a further result of defendants' discrimination, plaintiff has suffered emotional pain, suffering, embarrassment, shame, inconvenience, mental anguish, loss of enjoyment of life, impairment of her personal and professional reputation, damage caused by the Plaintiff's loss of

insurances and savings and investment opportunities, and other pecuniary and non-pecuniary losses.

112. Plaintiff has suffered and will continue to suffer injuries and losses as a result of defendant's wrongful and discriminatory acts.

113. Defendant exhibited reckless indifference to plaintiff's legal rights in the workplace.

THIRD COUNT
(Pregnancy Discrimination in Violation of C.G.S. §46a-60(b)(7))

1. Plaintiff repeats the allegations in paragraphs 1 through 113 above as if fully incorporated herein.

114. Defendant, by and through its agents and/or employees, violated the Connecticut Fair Employment Practices Act C.G.S. §46a-60a *et seq.* in one or more of the following ways.

(a) In that defendant interfered with plaintiff's privilege of employment on the basis of plaintiff's pregnancy;

(b) In that defendant discriminated against the plaintiff in such a way that adversely affected her status as an employee;

(c) In that defendant treated the plaintiff adversely different from similarly situated employees;

(d) In that defendant intentionally discriminated against the plaintiff.

115. As a result of defendant's unequal treatment and discrimination, plaintiff has been deprived of her employment and equal employment opportunities because of her gender.

116. As a result of defendants' discrimination of the plaintiff, plaintiff has been deprived of income, wages, and benefits.

117. As a further result of defendants' discrimination, plaintiff has suffered emotional

pain, suffering, embarrassment, shame, inconvenience, mental anguish, loss of enjoyment of life, impairment of her personal and professional reputation, damage caused by the Plaintiff's loss of insurances and savings and investment opportunities, and other pecuniary and non-pecuniary losses.

118. Plaintiff has suffered and will continue to suffer injuries and losses as a result of defendant's wrongful and discriminatory acts.

119. Defendant exhibited reckless indifference to plaintiff's legal rights in the workplace.

FOURTH COUNT
(Retaliation in Violation of C.G.S. §46a-60(b)(7)(K))

1. Plaintiff repeats the allegations in paragraphs 1 through 119 above as if fully incorporated herein.

120. Defendant, by and through its agents and/or employees, violated the Connecticut Fair Employment Practices Act C.G.S. §46a-60a *et seq.* in one or more of the following ways.

(a) In that defendant retaliated against plaintiff for requesting a pregnancy-related reasonable accommodation.

121. As a result of defendant's retaliation, plaintiff has been deprived of her employment and equal employment opportunities because of her gender.

122. As a result of defendant's retaliation, plaintiff has been deprived of income, wages, and benefits.

123. As a further result of defendant's retaliation, plaintiff has suffered emotional pain, suffering, embarrassment, shame, inconvenience, mental anguish, loss of enjoyment of life, impairment of her personal and professional reputation, damage caused by the Plaintiff's loss of insurances and savings and investment opportunities, and other pecuniary and non-pecuniary

losses.

124. Plaintiff has suffered and will continue to suffer injuries and losses as a result of defendant's wrongful and retaliatory acts.

125. Defendant exhibited reckless indifference to plaintiff's legal rights in the workplace.

FIFTH COUNT
(Retaliation in Violation of C.G.S. §46a-60(b)(4))

1. Plaintiff repeats and re-alleges the allegations set forth above in Paragraphs 1 through 125 as though fully set forth herein.

126. Defendant, by and through its agents and/or employees, violated the C.G.S. §46a-60(b)(4) et seq. in one or more of the following ways:

a. In that defendant retaliated against the plaintiff for reporting and opposing sexual harassment in the workplace;

b. In that defendant retaliated against the plaintiff for reporting and opposing unlawful employment practices including gender discrimination in the workplace.

127. As a result of defendant's retaliation, plaintiff suffered harms and losses including: loss of income, loss of employment, wages and employee benefits, and harm to her professional and personal reputations.

128. As a further result of defendant's retaliation, plaintiff has suffered humiliation, embarrassment, and emotional distress.

129. Plaintiff has suffered and will continue to suffer injuries as a result of defendant's retaliatory acts.

130. Defendant exhibited reckless indifference to plaintiff's legal rights.

DEMAND FOR RELIEF

WHEREFORE, plaintiff prays for appropriate damages including: compensatory damages; damages for back pay, front pay, lost personal days, emotional distress; attorneys' fees; costs; interest; job reinstatement; prejudgment interest; post judgment interest; CFEPa punitive damages; for an injunction requiring the removal of any and all adverse information contained in plaintiff's personnel file; for a trial by jury; and for all other just and proper relief.

Hereof fail not but of this writ with your doings thereon make due service and return according to law.

Dated at Newington, Connecticut this 10th day of April, 2025.

James V. Sabatini, Esquire
SABATINI AND ASSOCIATES, LLC
1 Market Square
Newington, CT 06111
Tel. No.: (860) 667-0839
Fax No.: (860) 667-0867
Email: jsabatini@sabatinilaw.com
Juris No. 052654

Please file our appearance
on behalf of the Plaintiff.

James V. Sabatini

STATEMENT OF AMOUNT IN DEMAND

The amount in demand is greater than \$15,000.00
exclusive of attorneys' fees and costs.

EXHIBIT 1



STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

Emily Tyrol
COMPLAINANT

CHRO No. 2410397
EEOC No. 16A202401614

V.

FFD Central, LLC
RESPONDENTS

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.

Tanya A. Hughes, Executive Director

DATE: 1/24/2025

Service

James V. Sabatini, Esq., jsabatini@sabatinilaw.com
Matthew V. Bertolino, Esq., mbertolino@sabatinilaw.com
Alexandra L. Civittolo, Esq., acivittolo@grsm.com