

DOCKET NO. HHD-CV25-6203467-S	:	SUPERIOR COURT
	:	
EMILY TYROL	:	J.D. OF HARTFORD
	:	
vs.	:	AT HARTFORD
	:	
FFD CENTRAL LLC	:	June 24, 2025

DEFENDANT’S ANSWER TO COMPLAINT AND SPECIAL DEFENSES

The Defendant, FFDW EJC LLC (misnamed as “FFD Central, LLC”) (“Defendant” or “Fine Fettle”), through its undersigned counsel, hereby provides its answer and special defenses in response to the Plaintiff’s Complaint dated April 10, 2025.

1. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 1 and therefore leaves Plaintiff to her proof.

2. Defendant admits that FFD Central, LLC is a Connecticut limited liability corporation with a principal place of business located at 40 Woodland Street, Hartford CT 06105, but denies the remaining allegations in this paragraph. The proper name of the defendant is FFDW EJC LLC, which is the entity that employed Plaintiff prior to her termination.

3. Defendant admits that it employed 1 or more individuals. The remaining allegations in Paragraph 3 constitute legal conclusions to which no response is required.

4. Defendant admits the allegations in Paragraph 4.

5. Defendant denies the allegations in Paragraph 5. Plaintiff was hired on or about October 21, 2022.

6. Defendant admits the allegations in Paragraph 6.

7. Defendant denies the allegations in Paragraph 7. Plaintiff’s promotion to Sales Floor Manager became effective on or about February 12, 2023.

8. Defendant admits the allegations in Paragraph 8.

9. Defendant admits the allegations in Paragraph 9.
10. Defendant admits the allegations in Paragraph 10.
11. Defendant admits that Ryan Green was the General Manager of the Manchester location during Ms. Tyrol's employment but denies the remaining allegations in Paragraph 11.
12. Defendant admits the allegations in Paragraph 12.
13. Defendant admits the allegations in Paragraph 13.
14. Defendant admits that Andrew Johnson was the Assistant General Manager of the Manchester location during Ms. Tyrol's employment but denies the remaining allegations in Paragraph 14.
15. Defendant admits the allegations in Paragraph 15.
16. Defendant admits that Bridget Bozzi is employed as Head of Human Resources but denies the remaining allegations in Paragraph 16.
17. Defendant admits that Rudy DeCiantis was a Sales Floor Manager at the Manchester location during Ms. Tyrol's employment but denies the remaining allegations in Paragraph 17.
18. Defendant denies the allegations in Paragraph 18.
19. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 19.
20. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 20.
21. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 21.

22. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 22.

23. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 23.

24. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 24.

25. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the specific allegations in Paragraph 25.

26. Defendant denies the allegations in Paragraph 26.

27. Defendant admits that Jalen Manzie was alleged to have targeted and prioritized female customers, and that he would occasionally step away from his workstation on the sales floor. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 27.

28. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 28.

29. Defendant admits that it received reports that Mr. Manzie used the store's security cameras to watch female customers, and that Mr. Manzie was disciplined for this conduct. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 29.

30. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 30.

31. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 31.

32. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 32.

33. Defendant admits that it is aware Ms. Tyrol claims to have taken down hand-drawn images of nude women in the vault. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 33.

34. Defendant denies the allegations in Paragraph 34.

35. Defendant admits that it is aware that Mr. Moore was alleged to have consumed alcohol during a break and made sexual comments to Ms. Cyr, but is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 35.

36. Defendant admits that it is aware that Mr. Moore was alleged to have discussed his open relationship and penis size with Ms. Cyr, but is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 36.

37. Defendant admits that it is aware Mr. Moore was alleged to have made this comment to Ms. Cyr, but is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 37.

38. Defendant admits the allegations in Paragraph 38.

39. Defendant admits the allegations in Paragraph 39.

40. Defendant admits the allegations in Paragraph 40.

41. Defendant admits that the December 2023 version of Fine Fettle's Employee Handbook contains a section entitled "Alcohol, Drug and Smoke-Free Workplace Policy."

42. Defendant admits the allegations in Paragraph 42.

43. Defendant denies the allegations in Paragraph 43.

44. Defendant denies the allegations in Paragraph 44.

45. Defendant denies the allegations in Paragraph 45.

46. Defendant denies the allegations in Paragraph 46.

47. Defendant denies the allegations in Paragraph 47.

48. Defendant denies the allegations in Paragraph 48.

49. Defendant denies the allegations in Paragraph 49.

50. Defendant denies the allegations in Paragraph 50.

51. Defendant admits that Plaintiff was out of work for a period of time in May 2023 for medical reasons. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 51.

52. Defendant admits that it was aware Plaintiff was out of work for a period of time in May 2023 for medical reasons. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in Paragraph 52.

53. Defendant admits that Plaintiff returned to work on or about May 21, 2023, after having missed approximately two weeks of work for medical reasons. Defendant denies the remaining allegations in Paragraph 53 as phrased.

54. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 54.

55. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 55.

56. Defendant denies the allegations in Paragraph 56.

57. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 57.

58. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 58.

59. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 59.

60. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 60.

61. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 61.

62. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 62.

63. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 63.

64. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 64.

65. Defendant admits the allegations in Paragraph 65.

66. Defendant admits the allegations in Paragraph 66.

67. Defendant denies the allegations in Paragraph 67.

68. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 68.

69. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 69.

70. Defendant is without knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 70.

71. Defendant denies the allegations in Paragraph 71.
72. Defendant admits the allegations in the first sentence of Paragraph 72. Defendant denies the allegations in the second sentence of Paragraph 72.
73. Defendant admits the allegations in Paragraph 73.
74. Defendant admits the allegations in Paragraph 74.
75. Defendant admits the allegations in Paragraph 75.
76. Defendant admits the allegations in Paragraph 76.
77. Defendant admits the allegations in Paragraph 77.
78. Defendant admits the allegations in Paragraph 78.
79. Defendant admits the allegations in Paragraph 79.
80. Defendant admits that Plaintiff's review stated "would appreciate seeing a positive attitude more often." Defendant denies the remaining allegations in Paragraph 80.
81. Defendant denies the allegations in Paragraph 81.
82. Defendant admits the allegations in Paragraph 82.
83. Defendant admits that Plaintiff's failure to improve her attitude since her review was on of the reasons she was terminated. Defendant denies the remaining allegations in Paragraph 83.
84. Defendant denies the allegations in Paragraph 84.
85. Defendant admits the allegations in Paragraph 85.
86. Defendant admits the allegations in Paragraph 86.
87. Defendant admits the allegations in Paragraph 87.
88. Defendant denies the allegations in Paragraph 88.
89. Defendant denies the allegations in Paragraph 89.

90. Defendant denies the allegations in Paragraph 90.

91. Defendant denies the allegations in Paragraph 91.

92. Defendant admits the allegations in the first sentence of Paragraph 92. Defendant denies the allegations in the second sentence of Paragraph 92. With respect to the third sentence of Paragraph 92, Defendant admits that Ms. Bozzi provided Plaintiff with paperwork to complete for FMLA leave, which she called “job protection leave.” Defendant denies the remaining allegations in this paragraph.

93. Defendant admits the allegations in Paragraph 93.

94. Defendant admits the allegations in Paragraph 94.

FIRST COUNT

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

1. Defendant repeats and incorporates by reference its responses to the foregoing allegations as if fully set forth herein.

95. Defendant denies the allegations in Paragraph 95.

96. Defendant denies the allegations in Paragraph 96.

97. Defendant denies the allegations in Paragraph 97.

98. Defendant denies the allegations in Paragraph 98.

99. Defendant denies the allegations in Paragraph 99.

100. Defendant denies the allegations in Paragraph 100.

101. Defendant denies the allegations in Paragraph 101.

102. Defendant denies the allegations in Paragraph 102.

103. Defendant denies the allegations in Paragraph 103.

104. Defendant denies the allegations in Paragraph 104.

105. Defendant denies the allegations in Paragraph 105.

106. Defendant denies the allegations in Paragraph 106.

107. Defendant denies the allegations in Paragraph 107.

SECOND COUNT

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

1. Defendant repeats and incorporates by reference its responses to the foregoing allegations as if fully set forth herein.

108. Defendant denies the allegations in Paragraph 108.

(a) Defendant denies the allegations in Paragraph 108(a).

(b) Defendant denies the allegations in Paragraph 108(b).

(c) Defendant denies the allegations in Paragraph 108(c).

(d) Defendant denies the allegations in Paragraph 108(d).

109. Defendant denies the allegations in Paragraph 109.

110. Defendant denies the allegations in Paragraph 110.

111. Defendant denies the allegations in Paragraph 111.

112. Defendant denies the allegations in Paragraph 112.

113. Defendant denies the allegations in Paragraph 113.

THIRD COUNT

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

1. Defendant repeats and incorporates by reference its responses to the foregoing allegations as if fully set forth herein.

114. Defendant denies the allegations in Paragraph 114.

(a) Defendant denies the allegations in Paragraph 114(a).

- (b) Defendant denies the allegations in Paragraph 114(b).
 - (c) Defendant denies the allegations in Paragraph 114(c).
 - (d) Defendant denies the allegations in Paragraph 114(d).
- 115. Defendant denies the allegations in Paragraph 115.
 - 116. Defendant denies the allegations in Paragraph 116.
 - 117. Defendant denies the allegations in Paragraph 117.
 - 118. Defendant denies the allegations in Paragraph 118.
 - 119. Defendant denies the allegations in Paragraph 119.

FOURTH COUNT

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

1. Defendant repeats and incorporates by reference its responses to the foregoing allegations as if fully set forth herein.

- 120. Defendant denies the allegations in Paragraph 120.
 - (a) Defendant denies the allegations in Paragraph 120(a).
- 121. Defendant denies the allegations in Paragraph 121.
- 122. Defendant denies the allegations in Paragraph 122.
- 123. Defendant denies the allegations in Paragraph 123.
- 124. Defendant denies the allegations in Paragraph 124.
- 125. Defendant denies the allegations in Paragraph 125.

FIFTH COUNT

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

1. Defendant repeats and incorporates by reference its responses to the foregoing allegations as if fully set forth herein.

126. Defendant denies the allegations in Paragraph 126.

(a) Defendant denies the allegations in Paragraph 126(a).

(b) Defendant denies the allegations in Paragraph 126(b).

127. Defendant denies the allegations in Paragraph 127.

128. Defendant denies the allegations in Paragraph 128.

129. Defendant denies the allegations in Paragraph 129.

130. Defendant denies the allegations in Paragraph 130.

WHEREFORE, Defendant denies that Plaintiff is entitled to any relief whatsoever, and demands that Plaintiff's Complaint be dismissed with prejudice, and that Defendant be awarded its costs, expenses, and attorney's fees incurred in defending this meritless action.

SPECIAL DEFENSES

By alleging the special defenses herein, the Defendant does not intend to alter any burden of proof that otherwise exists with regard to the claims in the Complaint. All special defenses are pled in the alternative and do not constitute an admission either of liability or as to whether Plaintiff is entitled to relief, which relief is expressly denied.

FIRST SPECIAL DEFENSE (AS TO ALL COUNTS)

The Plaintiff's Complaint fails to state a claim upon which relief can be granted.

SECOND SPECIAL DEFENSE (AS TO ALL COUNTS)

Plaintiff's claims, in whole or in part, are barred by the applicable statute of limitations.

THIRD SPECIAL DEFENSE (AS TO ALL COUNTS)

The Plaintiff's claims are barred, in whole or in part, to the extent she failed to mitigate her alleged damages, including, but not limited to, by failing to use reasonable diligence to seek and obtain new and/or substitute employment.

FOURTH SPECIAL DEFENSE (AS TO ALL COUNTS)

All actions taken by the Defendant with respect to Plaintiff's employment were taken for legitimate, non-discriminatory, and non-retaliatory reasons, including, but not limited to, Defendant's receipt of multiple customer complaints regarding Plaintiff, and Plaintiff's repeated violation of company policy.

FIFTH SPECIAL DEFENSE (AS TO ALL COUNTS)

To the extent the trier of fact concludes that Defendant's actions were unlawfully motivated (which Defendant denies), Plaintiff's claims are barred because Defendant would have taken the same actions irrespective of Plaintiff's protected class(es).

SIXTH SPECIAL DEFENSE (AS TO ALL COUNTS)

Although Defendant denies that any actionable conduct occurred, Plaintiff unreasonably failed to take advantage of the preventative and/or corrective opportunities provided by Defendant or to otherwise avoid any alleged harm.

SEVENTH SPECIAL DEFENSE (AS TO ALL COUNTS)

The Complaint and all purported claims therein are barred because the Defendant has been misnamed. The name of the entity that owns the Manchester dispensary is FFDW EJC LLC.

Defendant reserves the right to amend its Answer, to add additional or other Special Defenses, to delete or withdraw Special Defenses, and to add others as they may become necessary after reasonable opportunity for discovery.

THE DEFENDANT,
FFD CENTRAL, LLC (misnamed),
By its Attorneys,

/s/ Alexandra L. Civittolo

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CERTIFICATION

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on June 24, 2025, to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties of record who received or will immediately be receiving electronic delivery.

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/s/ Alexandra L. Civittolo

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