

RETURN DATE: SEPTEMBER 22, 2026	:	SUPERIOR COURT
	:	
OMNRI NKOY MOORE	:	J.D. OF HARTFORD
	:	
VS.	:	AT HARTFORD
	:	
VZL STAFFING SERVICES, LLC D/B/A	:	
VERANO D/B/A CT PHARMA	:	AUGUST 13, 2026

COMPLAINT

1. The Plaintiff in this matter, OMNRI NKOY MOORE ("Plaintiff"), was at all times relevant to this Action a resident of East Hartford, Connecticut.

2. Defendant, VZL Staffing Services, LLC d/b/a Verano d/b/a CT Pharma ("Defendant"), is a foreign limited liability company organized under the laws of the State of Illinois, with a principal business address of 224 West Hill Street, Suite 400, Chicago, Illinois 60610.

3. 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 1. 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.

4. Defendant operates a cannabis production facility located at 280 Dividend Road, Rocky Hill, Connecticut 06067.

5. At all times relevant hereto, Defendant was an "employer" and Plaintiff was an "employee" within the meaning of the Connecticut Fair Employment Practices Act ("CFEPA"), Conn. Gen. Stat. § 46a-60 et seq.

6. Venue is proper in the Judicial District of Hartford pursuant to Conn. Gen. Stat. § 46a-100 because Plaintiff resides in East Hartford, Connecticut.

7. Plaintiff commenced employment with Defendant on or about May 19, 2025, as a Cure Specialist. Plaintiff earned \$18.00 per hour and ordinarily worked approximately forty hours per week.

8. As a Cure Specialist, Plaintiff performed tasks including hanging, curing, trimming, and otherwise preparing cannabis produced at Defendant's Rocky Hill facility.

9. Prior to the suspension and subsequent termination at issue in this action, Plaintiff had not been disciplined by Defendant.

10. At all times relevant Plaintiff performed his work for Defendant at or above satisfactory levels.

11. During Plaintiff's employment, Defendant's employees repeatedly subjected Plaintiff to racial stereotyping, racist commentary, and false insinuations and accusations that Plaintiff would steal or had stolen cannabis.

12. In or about mid-June 2025, Plaintiff clocked in at approximately 7:02 a.m., within Defendant's seven-minute grace period. Dale, a white Cure Specialist whose last name is presently unknown to Plaintiff, approached Plaintiff and stated, "You need to stop being on black people time."

13. In or about early to mid-June 2025, following a union meeting and while Plaintiff was speaking with a coworker named Abby, a cultivation employee of Defendant stated to Plaintiff and Abby, "You know black guys like white girls with fat asses."

14. Throughout Plaintiff's employment, Defendant's employees also repeatedly accused or insinuated that Plaintiff was stealing cannabis.

15. On one occasion, Plaintiff asked David, a white supervisor whose last name is presently unknown to Plaintiff, how to properly discard cannabis fragments remaining on stems.

David responded, "I'll take those, because they might go missing," and, through his tone, facial expressions, and words, conveyed that Plaintiff would steal the cannabis.

16. In or about early June 2025, in response to the racist commentary, stereotyping, and repeated accusations of theft, Plaintiff complained to Niki Jones, Defendant's Inventory Control Manager, about the racist conduct occurring at Defendant's facility.

17. Jones asked Plaintiff whether he was in the union. When Plaintiff responded that he was not yet in the union, Jones stated, "Unfortunately, without the union backing you, there's nothing you can do." Jones further stated, "There's a lot of that happening here, because there's a lot of people here like that."

18. On June 19, 2025, within approximately two weeks of Plaintiff's complaint to Jones, Defendant suspended Plaintiff from employment on the purported basis that Defendant had received reports that Plaintiff had been stealing cannabis. Plaintiff had not stolen cannabis.

19. In connection with Defendant's accusation of cannabis theft or diversion, the Connecticut Department of Consumer Protection ("DCP"), Drug Control Division, investigated the matter.

20. During the DCP investigation, Agent Algis Domeika contacted Plaintiff and informed him that he had reviewed surveillance footage, concluded that Plaintiff had not stolen anything, and would communicate that conclusion to Defendant.

21. Despite the foregoing, Defendant terminated Plaintiff's employment on June 24, 2025.

22. Defendant's stated theft or diversion rationale was false and/or pretextual and followed closely after Plaintiff complained about race discrimination and racist conduct in the workplace.

23. Defendant's suspension and termination of Plaintiff also followed a pattern of racial stereotyping in which Plaintiff, a Black employee, was repeatedly and falsely associated with theft of Defendant's cannabis.

24. As a result of Defendant's conduct, Plaintiff has suffered and continues to suffer lost wages and benefits, emotional distress, humiliation, anxiety, and loss of dignity.

25. Any and all reasons Defendant has proffered for its adverse employment action against Plaintiff are false and/or pretext to mask its unlawful discriminatory intent.

COUNT ONE: RACE DISCRIMINATION – C.G.S. § 46a-60(b)(1)

26. All preceding allegations are hereby repeated and realleged in this Count as if fully set forth herein.

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

28. Defendant discriminated against Plaintiff in the terms and conditions of Plaintiff’s employment on account of race.

29. 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.

30. Defendant subjected Plaintiff to adverse employment action, motivated by Plaintiff’s race.

31. 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 TWO: RETALIATION IN VIOLATION OF C.G.S. § 46a-60(b)(4)

32. All preceding allegations are hereby repeated and realleged in this Count as if fully set forth herein.

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

34. Plaintiff engaged in protected activity by opposing Defendant’s discriminatory employment practices.

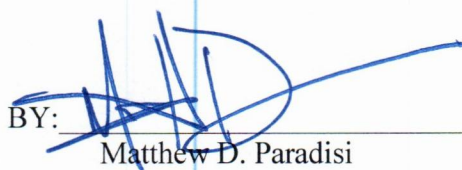
35. Defendant subjected Plaintiff to adverse employment action, motivated by Plaintiff having engaged in such protected activity.

36. 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.

WHEREFORE, Plaintiff prays for the following relief:

1. Money damages;
2. Reinstatement, or in lieu thereof, front pay;
3. Punitive Damages;
4. Attorneys' fees and costs of this Action; and
5. All other awardable relief.

PLAINTIFF,
OMNRI NKOY MOORE

BY: 

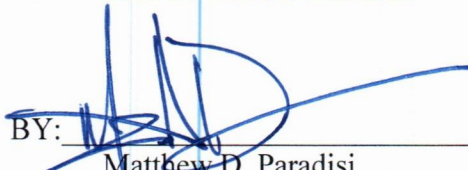
Matthew D. Paradisi
Cicchiello & Cicchiello, LLP
364 Franklin Avenue
Hartford, CT 06114
Phone: 860-296-3457
Fax: 860-296-0676
Email: mparadisi@cicchielloesq.com

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STATEMENT OF AMOUNT IN DEMAND

The amount in demand exceeds \$15,000.00, excluding costs and interests.

PLAINTIFF,
OMNRI NKOY MOORE

BY: 

Matthew D. Paradisi
Cicchiello & Cicchiello, LLP
364 Franklin Avenue
Hartford, CT 06114
Phone: 860-296-3457
Fax: 860-296-0676
Email: mparadisi@cicchielloesq.com

EXHIBIT 1

**STATE OF CONNECTICUT
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES**

OMNRI NKOY MOORE
COMPLAINANT

CHRO No. 2610118

v.

EEOC No. 16A-2026-00106

VZL STAFFING SERVICES LLC DBA
VERANO DBA CT PHARMA
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 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 must be served on the Commission by email at ROJ@ct.gov or, if you do not have access to email at Commission on Human Rights and Opportunities, ATTN: Legal Division, 450 Columbus Boulevard, Suite 2, Hartford, CT 06103, at the same time all other parties are served. **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. Please note that a Right to Sue Letter must be requested directly from the Equal Employment Opportunity Commission (EEOC) in order to file federal claims in federal court.

DATE: July 17, 2026



Tanya A. Hughes, Executive Director

Service:

Complainant: Moore , Omnri Nkoy, omnrismoore@yahoo.com

Complainant's Attorney: Matthew D. Paradisi, Esq., mparadisi@cicchielloesq.com

Respondent's Attorney: Justin Theriault, Esq., justin.theriault@jacksonlewis.com