

RETURN DATE: NOVEMBER 25, 2025 : SUPERIOR COURT
DAVID T. MORIZIO : J.D. OF MERIDEN
V. : AT MERIDEN
WILLOW BROOK WELLNESS, LLC
D/B/A VERANO CONNECTICUT, LLC : OCTOBER 31, 2025

COMPLAINT

1. This is a wrongful termination action brought pursuant to Conn. Gen Statute 46a-60. The claim was initially filed with the CHRO on January 31, 2024. Fact Finding Investigations took place on March 4, 2025 and April 28, 2025. A decision to date had not been received by the CHRO. As such a Release of Jurisdiction was requested and obtained on October 10, 2025, to preserve the statute of limitations.
2. At all times mentioned herein, the Plaintiff, David T. Morizio (hereinafter, "Plaintiff"), remains a resident of the Town of Avon, in the state of Connecticut.
3. The Defendants in this matter, Willow Brook Wellness, LLC d/b/a Verano Connecticut, LLC (hereinafter, "Defendants") are a domestic company with a business address of 1371 East Main Street, Meriden, Connecticut 06450 and 415 N. Dearborn Street, 4th Fl, Chicago, IL 60654.

4. The Defendants operate a marijuana dispensary at 1371 East Main Street, Meriden, Connecticut 06450 (hereinafter, "dispensary" or the "Defendants' dispensary").
5. Plaintiff commenced his employment with the Defendants on February 13, 2023, as a full-time pharmacist after being hired by the Regional Retail Director at the Defendants, Gary Krol, Jr.
6. Prior to his employment with the Defendants, the Plaintiff worked as a pharmacist for a Connecticut cannabis dispensary that is a direct competitor of the Defendants' dispensary.
7. At all relevant times, the Plaintiff performed his work for the Defendants at or above satisfactory levels.
8. Plaintiff's personnel file provided by the Defendants contained no write-ups or documented performance issues until his termination on November 5, 2023 due to being in violation of SOP ZL Meriden D-SOP-02, Open and Close Procedures and for unauthorized discounts for customer transactions.
9. Plaintiff's personnel file was devoid of any evidence of training provided to the Plaintiff by the Defendants concerning state laws, statutes and/or regulations pertaining to his employment.

10. At all relevant times, Plaintiff's Regional Retail Director at the Defendants was Gary Krol, Jr.
11. When Plaintiff was hired by the Defendants as a pharmacist, he was told by Gary Krol, Jr., that he could use a manager, senior, and/or veteran's discount at his discretion for patients that he brought over to the Defendants from his prior employer, as the Defendants sought the business of the Plaintiff's prior patients.
12. The Plaintiff brought over approximately 120 new patients who followed him to the Defendants, which translated to thousands of dollars in new revenue.
13. Gary Krol, Jr., called the Plaintiff on March 24, 2023, and expressed his appreciation for the number of new patients that he had brought to the Defendants and informed the Plaintiff that he was working on having a bonus awarded to him.
14. Gary Krol, Jr., in the past had specifically directed that the Plaintiff provide discounts to Gary Krol, Jr.'s friends and hairdresser, as was shown by evidence submitted and testimony elicited during the CHRO hearings.
15. Gary Krol, Jr., directed the Plaintiff to use discounts so that the Defendants could obtain new customers from other dispensaries.
16. The registers at the Defendants' dispensary were and still are pre-programmed with a veteran's discount of 15%, a senior discount of 10%, and a discretionary manager

discount, all of which Gary Krol, Jr., instructed the Plaintiff to use at the Plaintiff's discretion.

17. During CHRO proceedings, Pharmacist Patrick Miller, a current pharmacist of the Defendants, testified to the existence of a pamphlet, brochure, or employee training document containing information on the aforementioned discounts.
18. Gary Krol, Jr., instructed the Plaintiff to use the veteran's discount code for Ms. Story, a former customer of the Plaintiff's former employer, so the Defendants could compete with the Plaintiff's prior employer by reducing the total cost of Ms. Story's products to an amount close to that which she would have paid for comparable products at the Plaintiff's prior employer.
19. The Plaintiff submitted as evidence before the CHRO a log documenting the use of discount codes for patients and customers of the Defendants.
20. The log showed discounts the Defendants had instructed and allowed the Plaintiff and his former colleagues to provide so the Defendants could keep track of the customers/patients who were receiving discounts.
21. The Plaintiff as well as current employees of the Defendants testified that the above-mentioned customer, Ms. Story, still to this day is provided discounts by the Defendants for products purchased at the Defendants' dispensary.

22. While at work at the Defendants' dispensary, the Plaintiff witnessed a male co-worker, Dondre Taylor, say to another co-worker, Ms. Roberta-Wilcox Smith, (hereinafter, "Ms. Wilcox-Smith") "All Korean things taste good," "but I mean . . . is it true? Do all Korean things taste good?" The Plaintiff understood Dondre Taylor's statement to Ms. Wilcox-Smith to constitute racial and sexual harassment.
23. Melinda Slater another employee during this interaction stated "Yeah, even the p***y."
24. The Plaintiff spoke to Dondre Taylor about the inappropriate nature of his statements, as they had made Ms. Wilcox-Smith uncomfortable.
25. Raymond Grabowski, a General Manager brought Dondre Taylor's statement to the attention of the Defendants, which prompted the Defendants to begin an investigation.
26. Dondre Taylor was also reported of sexual harassment during this time by Alison Reily another employee of the defendants.
27. Alison Reily reported to the Defendants on June 30, 2023 that Dondre Taylor's "comment made me feel unsafe and uncomfortable. His behavior has made me nervous in the past, but I was never able to speak on anything specific before."
28. The Plaintiff served as a witness in the Defendants' investigation of Dondre Taylor's racially and sexually harassing statement to Ms. Wilcox-Smith. The Plaintiff testified

that when Dondre Taylor made the statements in issue “he observed Dondre looking Roberta up and down.”

29. Plaintiff stated that he “later pull Dondre aside and told him although he was probably just joking with his Korean comment he needed to be careful about how he says things and use a little more discretion because they could be construed by some as sexual in nature.”

30. The Plaintiff on July 5, 2023, was ordered by the Defendants into an office at the dispensary for a one-on-one meeting with Gary Krol, Jr. At said meeting, Gary Krol, Jr., questioned the Plaintiff about his marital status and family life and accused the Plaintiff of having a romantic relationship with Ms. Wilcox-Smith. Gary, Krol Jr.’s questioning and accusations were levied against the Plaintiff simply because the Plaintiff had spoken to Dondre Taylor about the latter’s racially and sexually harassing statement to Ms. Wilcox-Smith.

31. An investigation was initiated into Gary Krol Jr.’s, actions by the Defendants after complaints were raised by General Manager, Raymond Grabowski concerning possible theft, discriminatory actions against fellow employees, harassment, and promises/lies about promotions in August of 2023.

32. Plaintiff was contacted by the Defendant's Attorney, Kyle Yaptangco on August 31, 2023 as a possible witness concerning what he may know or knew pertaining to the details of the investigation that was being conducted into Gary Krol, Jr., which he participated in.
33. Testimony was obtained during the CHRO proceedings of the toxic workplace, racial and misogynistic comments, harassment of employees and promises/lies about promotions at the direction of Gary Krol, Jr.
34. Plaintiff in the past would help patients/customers carry products they had purchased from the Defendants out the front door or to to their vehicles who were handicap, blind and/or elderly at their request.
35. Patients/customers would ask for assistance from the Plaintiff as the doors to the Defendants' building are bulletproof and heavy.
36. Gary Krol, Jr., in the past had witnessed the Plaintiff assisting patients/customers to their vehicle(s) or out the front door with the Defendant's products and thanked him for doing so.
37. Plaintiff was never told not to help patients/customers carry their products to their vehicle(s) and/or out the front door of the establishment.

38. On November 5, 2023, the Plaintiff assisted Ms. Story out the front door of the Defendant's business onto the sidewalk at her asking.
39. Gary Krol, Jr., opened the door for the Plaintiff so that he could help walk Ms. Story out onto the sidewalk.
40. Gary Krol, Jr., can be seen on the surveillance video greeting the Plaintiff and Ms. Story provided by the Defendants.
41. The Plaintiff never left the sidewalk on this day and could see Defendant's Dispensary from where he was standing as evidenced by the surveillance provided by the Defendants.
42. Plaintiff was on the sidewalk for thirteen (13) to fourteen (14) seconds per the surveillance submitted and then walked back into the building.
43. November 5, 2023, was the last day that Plaintiff worked for the Defendants as he was placed on suspension November 8th and 9th, 2023.
44. Plaintiff was informed via writing on November 15, 2023, by the Defendants that the reason he was being terminated was for being in violation of SOP ZL Meriden D-SOP-02, Open and Close Procedures and for unauthorized discounts for customer transactions.

45. Testimony was obtained of former as well as current employees that confirmed that customers in the past and to this day are provided discounts for the products purchased at the Defendants and assisted out of the Defendants' dispensary.
46. The Defendants provided as a witness, Mr. Allende the Director, People Business Partner, on March 4, 2025.
47. Mr. Allende testified he did not conduct his own investigation into the reason for the Plaintiff's termination but instead relied on the recommendation of Gary Krol, Jr.
48. Mr. Allende was the ultimate person responsible for terminating the Plaintiff and admitted in sworn testimony that the Plaintiff was not terminated for violating SOP ZL Meriden D-SOP-02 nor for unauthorized discounts for customer transactions.
49. Mr. Allende testified that the Plaintiff instead was terminated for leaving the Defendants' dispensary unattended when he assisted Ms. Story out the front door. As aforesaid, Gary Krol, Jr., held the door for the Plaintiff and Ms. Story on that occasion.
50. Mr. Allende testified that by virtue of having assisted Ms. Story out the front door, the Plaintiff was in violation of C.G.S. 21a-408-38 Security of the Dispensary Department During Momentary Absences of a Dispensary. Mr. Allende's testimony is the first time this rationale for the Plaintiff's termination had been provided.

51. C.G.S. 21a-408-38 is the same statute the Defendants cited in their Answer to Complaint dated April 29, 2024.
52. A Work schedule for the Defendants' dispensary for November 5, 2023, the date on which the Plaintiff assisted Ms. Story, was submitted as evidence before the CHRO. Aforesaid work schedule demonstrated that two pharmacy technicians, Ms. Arifa Singh and Ms. Kenzi Scenti, were on the schedule along with the Plaintiff on November 5, 2023 such that the dispensary was staffed by both Ms. Singh and Ms. Scenti at the time the Plaintiff assisted Ms. Story out the front door.
53. Ms. Scenti testified before the CHRO on April 28, 2025 that on November 5, 2023, the date on which the Plaintiff assisted Ms. Story out the front door and allegedly violated or caused the Defendants to violate a Connecticut Statute regarding cannabis dispensary staffing, she was a pharmacy technician performing work at the Defendants' dispensary.
54. Mr. Allende testified in CHRO proceedings that he was unaware of the two pharmacy technicians being on the schedule and that if they were working at the time the Plaintiff assisted Ms. Story out the front door, then the Plaintiff's termination would have likely been improper, as the dispensary would have been compliant with C.G.S. 21a-408-38.

55. Following Mr. Allende's testimony in CHRO proceedings, the Defendants offered testimony from Mr. Ryan Ewing, a Compliance Employee of the Defendants. Mr. Ewing testified in contradiction of Mr. Allende's testimony and the Defendants' April 29, 2024 Answer that an alleged violation of C.G.S. 21a-408-38 did not motivate the Defendants to terminate the Plaintiff's employment but instead that the proper statute in fact was 21-a-420 and 21a-421j-16(a).
56. Mr. Allende and Mr. Ewing however, testified that they had discussed what the proper statute/regulation was that led to Plaintiff's termination beforehand.
57. Mr. Ewing testified that because no key employee and a pharmacist was present when the Plaintiff assisted Ms. Story out the front door on November 5, 2023, The Dispensary should have been closed.
58. Pharmacist Patrick Miller as well Assistant General Manager Oelette, who would fit the definition of key employee, were both present and working on November 5, 2023 at the time the Plaintiff assisted Ms. Story out the front door.
59. At the time the Plaintiff assisted Ms. Story out the front door, Ms. Arifa Singh and Ms. Kenzi Scenti, who are identified in State of Connecticut License Lookup as Key Employees, were also present at work.

60. In the event that the Defendants claim that this was not true on the date in question, then they were operating the business improperly and said denial would constitute an admission that the Defendants were operating the dispensary in violation of C21-a-420 and 21a-421j-16(a), the Plaintiff's conduct notwithstanding.
61. Testimony elicited from Pharmacist Patrick Miller in CHRO proceedings demonstrated that on many occasions and to present, the Defendants' dispensary is staffed by only one licensed pharmacist.
62. Pharmacists at the Defendants' dispensary provide private consults to new customers/patients, which are unpredictable in length and which they are required to provide in consultation rooms. During said consults, the dispensary remains open despite having no pharmacists working in the Defendants' dispensary, which contradicts the Defendants' proffered reason for terminating the Plaintiff and which may constitute violation of Connecticut Statutes concerning cannabis dispensary staffing.
63. Testimony during CHRO proceedings reflected that if, for example, a pharmacist must use the bathroom and is therefore not working pursuant to relevant Connecticut Statutes, the dispensary remains open, which contradicts the Defendants' alleged policies and potentially constitutes violation of Connecticut Statutes.

64. Testimony was elicited about a Pharmacist McAllister having left the Defendants' dispensary unattended and going to lunch off the Defendants' premises.
65. No disciplinary action was taken against Pharmacist McAllister, though the Defendants were made aware of Pharmacist McAllister having left the premises without proper coverage or closing the business.
66. Defendants allege that the Plaintiff was provided training on state rules, statutes, and/or regulations as they applied to his employment.
67. The Defendants provided no evidence before the CHRO to substantiate the allegation that such training in relevant Connecticut law was ever provided to the Plaintiff or any other similarly situated employees. The Defendants have provided no evidence that training was provided to the Plaintiff or any other similarly situated employee regarding the statutes cited in the Defendants' answer or in the testimony of Mr. Allende and Mr. Ewing. The Plaintiff's personnel file contained no such evidence, either.
68. Current Pharmacist Patrick Miller and employee Ms. Scenti testified that they have not received any training on applicable state statutes, regulations or laws as they relate to the Defendants' business.

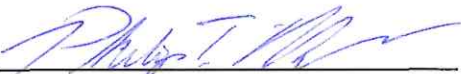
69. The Claimant's termination paperwork provided by the Defendants cites "Dismissal: At least one private informal discussion a Documented Counseling a Written Warning and Final Written Warning in previous 12-month period has not resulted in corrective action and/or where severity of recent incident warrants the level of action."
70. The Plaintiff never received a written warning or a final warning regarding any alleged improper conduct or job performance issues while he was employed by the Defendants.
71. Inconsistent with the Defendants' own disciplinary policies, which include a prior verbal and written warning, the Plaintiff was summarily terminated by the Defendants shortly after confronting Dondre Taylor for the latter having made a sexually and racially harassing statement to Ms. Wilcox-Smith and having participating in the Defendant's investigation into the actions of Gary Krol, Jr.
72. In response, Gary Krol, Jr., whose recommendation to terminate the Plaintiff was adopted by Mr. Allende without any investigation having been conducted.
73. The Plaintiff's personnel file reflects that he was terminated for violating a SOP ZL Meriden D-SOP-02, Open and Close Procedures and for unauthorized discounts for customer transactions..

74. Before the CHRO, the Defendants recanted the reason for termination outlined in the personnel file, instead claiming through Mr. Allende's testimony and through their Answer that the Plaintiff was actually terminated for violating C.G.S. 21a-408-38.
75. The Defendants then recanted Mr. Allende's testimony regarding the Plaintiff's reason for termination through the testimony of Mr. Ewing, who testified that the Plaintiff had actually violated C.G.S. 21-a-420 and C.G.S. 21a-421j-16(a)
76. The Defendants have offered no evidence, including but not limited to any training materials, guidance, handbooks, meetings, or discussions regarding Defendants' efforts to communicate to their pharmacists, employees, including the Plaintiff, any rules of conduct requisite to comply with the statutes/regulations cited by the Defendants in their witnesses' testimony and in their Answer.
77. The Defendants terminated the Plaintiff's employment because the Plaintiff opposed discriminatory conduct by Dondre Taylor against Ms. Wilcox-Smith and because he participated in an investigation into the actions of Gary Krol, Jr., in violation of C.G.S. § 46a-60.
78. The Defendants' proffered reasons for terminating the Plaintiff, which have been various and changing, are pretextual.

WHEREFORE, the Plaintiff claims:

1. Monetary damages;
2. Front pay, back pay or reinstatement;
3. Punitive damages;
4. Reasonable attorney fees and costs; and
5. Such other relief as is allowable by law.

THE PLAINTIFF,
DAVID T. MORIZIO.

By 
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STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest, or property in demand is greater than FIFTEEN THOUSAND DOLLARS (\$15,000.00), exclusive of interest and costs.

THE PLAINTIFF,
DAVID T. MORIZIO

By



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