

DOCKET NO: NNI CV26-6040475-S : SUPERIOR COURT
ROBERTA WILCOX-SMITH : J.D. OF MERIDEN
V. : AT MERIDEN
WILLOW BROOK WELLNESS, LLC : MARCH 19, 2025
Dba VERANZO CONNECTICUT, LLC

REVISED 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 December 19, 2023. A Fact-Finding Investigation took place on April 22, 2025. A Release of Jurisdiction was requested and obtained on December 1, 2025 to preserve the statute of limitations.
2. At all times mentioned herein, the Plaintiff, Roberta Wilcox Smith (hereinafter, "Plaintiff"), remains a resident of the Town of Glastonbury in the state of Connecticut.
3. The Defendant in this matter, VZL Staffing Services (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, "The Dispensary").

5. Plaintiff commenced her employment with the Defendants in June of 2022, as a full-time Receptionist after being hired by the Defendants.
6. At all relevant times, the Plaintiff performed her work at or above satisfactory levels.
7. Plaintiff's personnel file provided by the Defendants contained no write-ups or documented performance issues until her termination on September 22, 2023 due to being in violation of Section 3.2 in the Employee Handbook, Attendance.
8. 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 her employment.
9. At all relevant times, Plaintiff's Regional Retail Director at the Defendants was Gary Krol, Jr.
10. The Plaintiff countless times expressed her interest in becoming a Cannabis Advisor, which would have advanced her career while working for the Defendants.
11. Gary Krol, Jr., made it clear to the Plaintiff and management of the Defendants that the Plaintiff would never be elevated to the role of Cannabis Advisor.
12. The Plaintiff was required to train male co-workers throughout her period of employment and was passed over for advanced positions.

13. The Plaintiff deserved to be promoted earlier and should have been but for being held back by the actions of the Defendants.
14. The Plaintiff was not promoted until July 19, 2023 while male employees she trained had been promoted before her without justification including Raymond Grabowski, Drew Durant, Keanu Gutierrez, Angel Anaya, Angel Sierra, Sean Stolte, Joe Vertucci and Forrest Bishop.
15. Gary Krol Jr. was not a witness nor was he brought in to testify by the CHRO.
16. Gary Krol Jr. was terminated by the Defendants for cause on July 26, 2024 due to engaging in financial impropriety.
17. Ms. Jordan Monstrelis, Human Resources, was terminated on April 17, 2024 for performance issues.

Count I: Conn. Gen Statute 46a-60 (Sexual Harassment):

18. Plaintiff repeats and re-alleges paragraphs one through seventeen as it fully set forth herein as paragraphs one through seventeen of this the First Count.
19. The Plaintiff was present at work on June 28, 2023 when a male co-worker, Dondre Taylor, said to her after guessing her ethnicity "All Korean things taste good," "but I mean . . . is it true? Do all Korean things taste good?"
20. Melinda Slater another employee during this interaction stated "Yeah, even the p***y."

21. Pharmacist, David T. Morizio, who was present when these statements were made apologized to the Plaintiff thereafter, for the sexual nature and inappropriateness of Dondre Taylor's statements.
22. Pharmacist David T. Morizio spoke to Dondre Taylor about the inappropriate nature of his statements, as they had made Ms. Wilcox-Smith visibly uncomfortable.
23. Raymond Grabowski, a General Manager brought Dondre Taylor's statement, which constituted, sexual and racial harassment to the attention of the Defendants, which prompted an investigation on June 30, 2023.
24. Dondre Taylor was also reported of sexual harassment during this time by another employee of the Defendants, Alison Reilly.
25. Alison Reilly 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."
26. Gary Krol, Jr., called the Plaintiff and told her she should have been able to handle the situation herself, accusing her of making a "big deal out of nothing" and that the Defendants "were not a me too" employer.
27. During the investigation Dondre Taylor and the Plaintiff continued to have overlapping shifts at work.

28. Drew Durant, another employee of the Defendants and personal friend of Dondre Taylor, learned that an investigation had been commenced against Dondre Taylor and began a pattern of telling co-workers that he was going to physically assault the Plaintiff.
29. Drew Durant openly threatened to have his sister assault the Plaintiff in the Defendant's parking lot.
30. The Defendants were aware of the physical threats being made by Drew Durant as early as August 23, 2023 from Ms. Stephanie Navarrate, an Agent in Charge, Allison Reilly and Eligah Oulette, an Assistant General Manager.
31. Alison Reilly reported to Ms. Jordan Monstrelis of Human Resources in writing that Drew Durant "declared that he hated Robbie [the Plaintiff] so much that he wanted to drag her out back by her hair and smash her face in." Alison Reilly reported "I do not feel safe at work with Drews behavior."
32. The Plaintiff missed time from work because she was afraid for her safety at the Defendants.
33. The Plaintiff sent a message to her manager, Vincent Bucchieri during this time stating "I don't feel safe working without a manger present . . . I don't want to miss any time

from work, but due to the continued escalation of the situation my safety is my number one concern.”

34. During this time, the verbal attacks continued by Drew Durant including public statements about her adaption, including that “she was not loved because her biological parents left her for adoption.”

35. The Defendants did nothing to make sure that Drew Durant did not work during the same time that the Plaintiff did nor did they take any action to make sure that Drew Durant was not on the premises when the Plaintiff was present for work.

36. Dondre Taylor was terminated on October 10, 2023 because he was a no-show at work in violation of the Defendant’s “attendance and punctuality policy” on October 6, 2023 and October 9, 2023.

37. Dondre Taylor’s termination was not related to his harassment of the Plaintiff and other female employees of the Defendant’s.

SECOND COUNT: Conn. Gen Statute 46a-60 (Retaliatory Discharge):

38. 1-17. Plaintiff repeats and re-alleges paragraphs one through seventeen as it fully set forth herein as paragraphs one through seventeen of this Second Count.

39. An investigation was initiated into Gary Krol Jr.’s, actions by the Defendants after complaints were raised by Mr. Raymond Grabowski concerning possible theft,

discriminatory actions against fellow employees, harassment, and promises/lies about promotions in August of 2023.

40. Dondre Taylor alleged that the Plaintiff recorded an individual who never entered the facility and was not a customer over a month beforehand when he was being terminated.

41. Dondre Taylor was not present when this alleged incident occurred.

42. The individual who was allegedly recorded was not known to the Defendants, never entered the Defendant's Dispensary and conducted no business with the Defendants.

43. The Defendants had performed their own investigation into this alleged recording which was led by General Manager Vincent Bucchieri and Ms. Jordan Monstrelis from Human Resources, and not one witness confirmed that any recording was done by the Plaintiff.

44. Defendants' General Manager did not believe that the Plaintiff made any such recording.

45. General Manager Vincent Bucchieri and Ms. Jordan Monstrelis reached the conclusion that the Plaintiff should not be terminated.

46. Mr. Allende the Director, People Business Partner, became involved in the investigation for some reason and did not issue a warning, nor suspension to the Plaintiff but instead proceeded to terminate her.
47. Mr. Allende confirmed the Plaintiff was in fact not terminated for attendance issues initially as reported but instead for allegedly being in violation of Section 3.9 in the Employee Handbook, Recording Devices in the Workplace.
48. Employees witnessed Ms. Ward, live streaming from inside of the Dispensary when actual costumer(s) and employees were present.
49. This incident was reported to the Defendants however, there is no evidence of an investigation being conducted or opened to determine the extent of what possible HIPAA violations, company rules and laws were broken.
50. Mr. Allende confirmed on April 22, 2025 that he was aware of this particular incident being reported to the Defendants but could not explain why there was no investigation ever conducted.
51. Defendants have evidence of other employees being in violation of Section 3.9 of the Defendant's Employee Handbook posting messages and photos on social media of them inside the Defendant's facility.

52. Defendants are aware of a sexually explicit message on company property posted by an employee.
53. Defendants took no action against any of these individuals, yet they were posted on social media and all in violation of Section 3.9 of the Defendant's Employee Handbook.
54. Plaintiff therefore charges the Defendants' with discrimination against her on the basis of sex, race, color, ancestry, opposition to discriminatory conduct subjecting her to sexual harassment and/or sexually hostile work environment, subjecting her to fear of physical harm, retaliating against her because of her complaints and terminating her all in violation of Conn. Gen Statute 46a-60.

WHEREFORE, the Plaintiff claims:

1. As such, Plaintiff requests that the court investigate this Complaint, secure for Plaintiff the rights as guaranteed under the above cited laws and secure any and all remedies the Claimant may be entitled to.

THE PLAINTIFF,
ROBERTA WILCOX-SMITH

By


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CERTIFICATION OF SERVICE

This is to certify that on March 19, 2026, the foregoing was sent via electronic mail to the following counsel of record:

Via Email: justin.theriault@jacksonlewis.com

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