

<b>DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO</b> 1437 Bannock Street Denver, Colorado 80202	DATE FILED June 10, 2026 4:39 PM FILING ID: C7413E20DE088 CASE NUMBER: 2026CV32135  <b>▲ COURT USE ONLY ▲</b>
<b>Plaintiff:</b> DONALD ZUCKERMAN, <i>an individual</i> ,  v.  <b>Defendants:</b> OFFICE OF ECONOMIC DEVELOPMENT AND INTERNATIONAL TRADE, <i>a Colorado governmental entity</i> ; ARIELLE BRACHFIELD, <i>an individual</i> ; and EVE LIEBERMAN, <i>an individual</i> .	
<i>Attorney for Plaintiff:</i> VOLYA LAW OFFICE, PLLC Maxim N. Belovol, Reg. No. 61182 700 N Pennsylvania, Ste. 1005 Denver, CO 80203 Telephone: (303) 351-2243 Email: max@coloradoemploymentlawyer.org	Case Number:  Division:
<b>COMPLAINT WITH JURY DEMAND</b>	

Plaintiff Donald Zuckerman, by and through undersigned counsel, Volya Law Office, PLLC, files his Complaint with Jury Demand, and in support thereof states and alleges as follows:

**PARTIES**

1. Plaintiff Donald Zuckerman is an individual who resides at 2500 Vine St., Denver, CO 80205.
2. Defendant Office of Economic Development and International Trade (“OEDIT,” the “Commission,” or the “Film Commission”) is a Colorado governmental entity with a principal place of business in 1600 Broadway, Ste. 2500, Denver, Colorado 80202.
3. Upon information and belief, Defendant Arielle Brachfield (“Brachfield”) is a resident of the State of Colorado.
4. Upon information and belief, Defendant Eve Lieberman (“Lieberman”) is a resident of the State of Colorado.

## **JURISDICTION AND VENUE**

5. This Court has subject matter jurisdiction over this action pursuant to Colo. Const. Art. VI, Section 9, which provides that district courts have general jurisdiction and original jurisdiction in all civil cases.

6. This Court has personal jurisdiction over Defendant Colorado Office of Economic Development and International Trade because it is a state government agency with its principal place of business in Colorado.

7. Venue is proper in this Court pursuant to C.R.C.P. 98(c)(1) because Plaintiff was employed by Defendant Colorado Office of Economic Development and International Trade within Denver County, and the acts giving rise to the claims set forth herein occurred in Denver County, Colorado.

8. This Court has personal jurisdiction over Arielle Brachfield, because upon information and belief, Defendant is a resident of the state of Colorado.

9. This Court has personal jurisdiction over Defendant Lieberman, because upon information and belief, Defendant is a resident of the state of Colorado.

10. This Court has personal jurisdiction over Defendant Lieberman pursuant to C.R.S. § 13-1-124(1)(b) as a result of Defendant's tortious actions inside and directed into the State of Colorado, and because such tortious actions were willful and wanton.

## **PROCEDURAL HISTORY**

11. Plaintiff Donald Zuckerman timely filed his Charges of Discrimination with the Equal Employment Opportunity Commission (the "EEOC").

12. Plaintiff timely provided Notice of Potential Claims to the Office of the Attorney General regarding Plaintiffs' claims against the State of Colorado and its employees, pursuant to C.R.S. § 24-10-109.

13. On March 25, 2026, the EEOC issued a Determination and Notice of Rights, issuing Plaintiff a notice of his right to sue. *Exhibit 1*, Notice of Right to Sue.

14. Plaintiff timely files this Complaint within 90 days of March 25, 2026.

## **GENERAL ALLEGATIONS**

15. Around or about May of 2011, Plaintiff was hired by Defendant OEDIT as the Director of the Office of Film, Television, and Media, also known as the Film Commissioner.

16. Plaintiff held the position of Film Commissioner from May 2011 until his termination on September 15, 2025.

17. Plaintiff was born on December 12, 1945, and was 79 years old at the time of his termination.

18. Throughout his employment, Plaintiff performed his job satisfactorily.

19. Plaintiff was celebrated internally and externally as a mentor and a significant driver of Colorado's film economy.

20. Plaintiff initiated the effort to bring the Sundance Film Festival to Colorado and played a major role in ultimately securing the festival.

### ***Change in Supervision and Initial Performance Improvement Plan***

21. Approximately two and one-half years before his termination, Defendant Eve Lieberman became the Executive Director of OEDIT and began supervising Plaintiff.

22. Approximately two and one-half years before his termination, Defendant Lieberman placed Plaintiff on a Performance Improvement Plan ("PIP").

23. Approximately two weeks after the PIP was imposed and Zuckerman's response denying the claims in the PIP, Defendant Lieberman filed a report stating that Plaintiff had reformed.

### ***Accounting Error Disclosure and Retaliation***

24. In April 2023, Plaintiff made a good faith disclosure when Plaintiff's office identified and documented an approximately \$747,816 miscredit to the Film Office account.

25. Colorado's Senior Budget Analyst Jenna Culver described that funds she mistakenly allocated to OEDIT were the result of a "legislative whoopsie."

26. Deputy Film Commissioner Kelly Baug flagged the accounting error in email communications with Ms. Culver.

27. Ms. Culver initially maintained that the funds were available for incentives, and the amount continued to appear on three months of accounting monthly reports.

28. After an Economic Development Commission-approved project reached the accounting department, Ms. Culver called and admitted the error.

29. Plaintiff pressed for an accurate correction of the accounting error and transparent reporting.

30. Plaintiff's duties as Film Commissioner included oversight, administration, and lawful stewardship of state incentive funds, including funds derived from legislative appropriations and interest-generated public monies administered through OEDIT's accounting systems.

31. On April 12, 2023, Lindsay Finlayson, Director of Operations at OEDIT, attempted to blame Plaintiff for the accounting error.

32. Ms. Finlayson falsely reported Plaintiff to Jonathan Bray, the Governor's Office Controller.

33. Mr. Bray warned that "reports" would be filed, "painting a bullseye" on Plaintiff's chest.

34. Ms. Finlayson rejected Plaintiff's proposal to go back to the Colorado Economic Development Commission to correct the record.

35. Ms. Finlayson instead pushed to pull money from the operations account and form a committee to triage Film Office projects.

36. The Film Office cooperated and promptly canceled one project to eliminate the overspending.

37. Despite the budget crisis being resolved, Ms. Finlayson excluded Plaintiff from a directive to his staff, issued prior to a retreat, to prepare a comprehensive project list.

#### ***Age-Based Harassment***

38. Beginning in or around August 2024, Lieberman subjected Plaintiff to a hostile work environment that included pervasive age-based harassment.

39. Lieberman frequently asked Plaintiff when he was leaving his job or when he would be retiring.

40. Brachfield, who was positioned as the Interim Film Commissioner and was seeking Plaintiff's position, also asked Plaintiff "When do you plan to retire?"

41. Brachfield made repeated inquiries regarding the Plaintiff's retirement and departure, reinforcing age-based pressure placed on Plaintiff.

42. Plaintiff stated he had no intention of leaving until his work was finished, specifically referencing his desire to continue working on the Sundance Film Festival project.

#### ***Conflicts Disclosure Form Incident***

43. On or about August 2025, Plaintiff was directed to complete a Governor's Office Conflicts Disclosure Statement regarding his outside professional projects.

44. Plaintiff completed the form in good faith.

45. Plaintiff verbally disclosed that he had non-conflicting projects that were entirely out of state and out of the country.

46. Lieberman expressed disappointment rather than relief about the lack of conflicts.

47. Defendant Lieberman accused Plaintiff outright, stating, “I don't believe you are telling the truth.”

48. Defendant Lieberman then pivoted to a series of speculative questions, asking, “Well, who is paying you? Someone must be paying you.”

### ***Termination***

49. On or about September 12, 2025, Plaintiff was invited to a call with Defendant Lieberman and the Director of OEDIT Human Resources.

50. During the call, Defendant Lieberman told Plaintiff that he had yelled at someone. Zuckerman asked Lieberman who he yelled at, and Lieberman replied “I’m not telling you.”

51. Defendant Lieberman referenced a prior PIP as purported justification for the accusation, despite that plan having been resolved without any finding of misconduct.

52. Plaintiff had not yelled at anyone.

53. There was no investigation of the allegations against Plaintiff or of Plaintiff’s response.

54. Plaintiff was offered the option to resign or be discharged.

55. Plaintiff did not resign.

56. On or about September 15, 2025, Plaintiff was discharged from his position as Film Commissioner.

57. Plaintiff’s position was filled by Brachfield, who is substantially younger than Plaintiff and not in Plaintiff’s protected class.

58. Brachfield directly benefited from Plaintiff’s termination, as she temporarily assumed Plaintiff’s role shortly thereafter.

59. Upon information and belief, Defendant Brachfield aligned herself with Defendant Lieberman’s efforts to remove Plaintiff and supported the justification ultimately used to terminate Plaintiff.

### ***Post-Termination Defamatory Conduct***

60. After Plaintiff’s discharge, Defendant Lieberman sent a “blast email” to everyone in Plaintiff’s email address book announcing his departure.

61. The email stated, “Donald Zuckerman is no longer employed at OEDIT,” publicly indicating that he was terminated and implying that it was for cause.

62. Other similarly situated members of OEDIT’s leadership did not have their terminations publicized via email in this manner.

63. Defendant Lieberman called members of the Economic Development Commission to inform them of Plaintiff's discharge.

64. In these phone calls, Defendant Lieberman led Plaintiff's former colleagues and Commission members to believe that Plaintiff had been fired for an egregious act.

65. Defendant Lieberman led people to believe that Plaintiff had committed acts so heinous that she could not repeat them.

66. Defendant Lieberman's statements conveyed to third parties, including industry partners and Commission members, that Plaintiff had engaged in serious misconduct, including conduct suggestive of sexual impropriety.

67. Defendant Lieberman's statements, and her implications therein, were false.

68. Defendant Lieberman knew her statements were false when she made them.

69. Defendant Lieberman's actions were designed to place Plaintiff in an unfavorable light and interfere with his future employment.

#### ***Omission from Sundance Award***

70. In October 2025, OEDIT received the Tom Clements Award for its successful Sundance bid.

71. Despite Plaintiff's instrumental role in securing the Sundance Film Festival for Colorado, including his leadership in initiating the bid and participation in contract negotiations, Defendant OEDIT omitted Plaintiff from the list of contributors when it received the Tom Clements Award.

72. In the months immediately following the successful bid, Plaintiff remained in his position as Film Commissioner and continued to actively work on matters relating to the Sundance Film Festival on behalf of OEDIT, including working on finalizing the contract between the State of Colorado and the Sundance Institute.

#### **CLAIMS FOR RELIEF**

##### **COUNT I. AGE DISCRIMINATION IN VIOLATION OF 29 U.S.C.S. § 623** *(against Defendant Colorado Office of Economic Development and International Trade)*

73. Plaintiff incorporates by reference and realleges the allegations in the foregoing paragraphs as if fully set forth herein.

74. Plaintiff was at least 40 years old at all relevant times.

75. Plaintiff was 79 years old at the time of his termination on September 15, 2025.

76. Plaintiff was qualified for his position as Film Commissioner.

77. Plaintiff performed his job satisfactorily throughout his 14-year tenure as Film Commissioner.

78. Plaintiff was celebrated internally and externally as a mentor and a significant driver of Colorado's film economy.

79. Plaintiff contributed to bringing the Sundance Film Festival to Colorado.

80. Plaintiff suffered an adverse employment action, specifically his termination.

81. Plaintiff was terminated from his position as Film Commissioner on September 15, 2025.

82. The adverse employment action occurred under circumstances giving rise to an inference of age-based discrimination.

83. Beginning in or around August 2024, Defendant Lieberman frequently asked Plaintiff when he was leaving his job or when he would be retiring.

84. Arielle Brachfield, who was seeking Plaintiff's position, also asked Plaintiff "When do you plan to retire?"

85. These retirement inquiries were age-based comments directed at Plaintiff because of his age.

86. Plaintiff's position was filled by Arielle Brachfield, who is substantially younger than Plaintiff and not in Plaintiff's protected class.

87. Following Plaintiff's disclosure of the accounting error in April 2023 and the retirement inquiries beginning in August 2024, Defendant OEDIT's treatment of Plaintiff abruptly shifted from years of praise to sudden performance concerns.

88. The stated reason for Plaintiff's termination-that he had yelled at someone-was false and pretextual.

89. Plaintiff had not yelled at anyone.

90. Defendant OEDIT conducted no investigation of the allegations against Plaintiff. The failure to conduct any investigation before terminating a long-tenured executive further demonstrates that the stated reason for termination was pretextual.

91. The temporal proximity between the retirement inquiries and Plaintiff's termination supports an inference of age-based discrimination.

92. As a direct and proximate result of Defendant OEDIT's age discrimination, Plaintiff has suffered damages including lost wages, lost benefits, emotional distress, and damage to his professional reputation.

## **COUNT II. DEFAMATION**

*(against Defendant Eve Lieberman, in an individual capacity)*

93. Plaintiff incorporates by reference and realleges the allegations in the foregoing paragraphs as if fully set forth herein.

94. Defendant Lieberman made defamatory statements concerning Plaintiff.

95. After Plaintiff's discharge, Defendant Lieberman sent a "blast email" to everyone in Plaintiff's email address book announcing his departure.

96. Defendant Lieberman called members of the Economic Development Commission to inform them of Plaintiff's discharge.

97. In these phone calls, Defendant Lieberman led Commission members to believe that Plaintiff had been fired for an egregious act.

98. Defendant Lieberman led people to believe that Plaintiff had committed acts so heinous "that she could not repeat them."

99. Defendant Lieberman's statements gave the impression to several community partners that Plaintiff had been embroiled in some sort of sexual controversy.

100. Defendant Lieberman published the defamatory statements.

101. Defendant Lieberman published the statements through a "blast email" to Plaintiff's contacts.

102. Defendant Lieberman published the statements through phone calls to Economic Development Commission members.

103. The statements were communicated to third parties who understood them to refer to Plaintiff.

104. Defendant Lieberman acted with actual malice.

105. Defendant Lieberman's statements were false.

106. Defendant Lieberman knew her statements were false when she made them.

107. Plaintiff had not engaged in any sexual misconduct or other heinous conduct.

108. Defendant Lieberman made the statements with knowledge of their falsity.

109. The statements imputed serious sexual misconduct to Plaintiff.

110. In the context of the entertainment industry and the "Me Too" movement, allegations of sexual misconduct are particularly damaging to one's professional reputation.

111. The statements were on their face and without extrinsic proof unmistakably recognized as injurious to Plaintiff.

112. The statements were specifically directed at Plaintiff.

113. Other similarly situated members of OEDIT's leadership did not have their terminations publicized via email and phone calls in this manner.

114. As a direct and proximate result of Defendant Lieberman's defamatory statements, Plaintiff has suffered damages including severe damage to his professional reputation, potential blacklisting from the film industry, emotional distress, and interference with his future employment prospects.

### **COUNT III. DEFAMATION PER SE**

*(against Defendant Eve Lieberman, in an individual capacity)*

115. Plaintiff incorporates by reference and realleges the allegations in the foregoing paragraphs as if fully set forth herein.

116. Defendant Lieberman made defamatory statements concerning Plaintiff.

117. After Plaintiff's discharge, Defendant Lieberman sent a "blast email" to everyone in Plaintiff's email address book announcing his departure.

118. Defendant Lieberman called members of the Economic Development Commission to inform them of Plaintiff's discharge.

119. In these phone calls, Defendant Lieberman led Commission members to believe that Plaintiff had been fired for an egregious act.

120. Defendant Lieberman led people to believe that Plaintiff had committed acts so heinous that she could not repeat them.

121. Defendant Lieberman's statements gave the impression to several community partners that Plaintiff had been embroiled in some sort of sexual controversy.

122. Defendant Lieberman published the defamatory statements.

123. Defendant Lieberman published the statements through a "blast email" to Plaintiff's contacts.

124. Defendant Lieberman published the statements through phone calls to Economic Development Commission members.

125. The statements were communicated to third parties who understood them to refer to Plaintiff.

126. Defendant Lieberman acted with actual malice.

127. Defendant Lieberman's statements were false.
128. Defendant Lieberman knew her statements were false when she made them.
129. Plaintiff had not engaged in any sexual misconduct or other heinous conduct.
130. Defendant Lieberman made the statements with knowledge of their falsity.
131. The statements are actionable per se.
132. The statements imputed serious sexual misconduct to Plaintiff.
133. The statements imputed conduct incompatible with Plaintiff's profession as a film industry executive and Film Commissioner.
134. In the context of the entertainment industry and the "Me Too" movement, allegations of sexual misconduct are particularly damaging to one's professional reputation.
135. The statements were on their face and without extrinsic proof unmistakably recognized as injurious to Plaintiff.
136. The statements were specifically directed at Plaintiff.
137. Other similarly situated members of OEDIT's leadership did not have their terminations publicized via email and phone calls in this manner.
138. As a direct and proximate result of Defendant Lieberman's defamatory statements, Plaintiff has suffered damages including severe damage to his professional reputation, potential blacklisting from the film industry, emotional distress, and interference with his future employment prospects.

**COUNT IV. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
*(against Defendants Eve Lieberman and Arielle Brachfield, in their individual capacities)*

139. Plaintiff incorporates by reference and realleges the allegations in the foregoing paragraphs as if fully set forth herein.
140. Defendant Lieberman's conduct was extreme and outrageous.
141. Defendant Brachfield's conduct was also extreme and outrageous.
142. Defendant Brachfield participated in the age-based pressure campaign against Plaintiff by repeatedly questioning his retirement plans while actively seeking to replace him.
143. Defendant Brachfield knowingly participated in a process that resulted in Plaintiff's termination based on false allegations, without investigation, despite her awareness of Plaintiff's longstanding performance and reputation.

144. Defendant Brachfield acted with intent to cause or with reckless disregard of the probability of causing Plaintiff severe emotional distress by participating in conduct designed to force Plaintiff from his role and damage his professional standing.

145. Defendant Lieberman made false accusations that Plaintiff had yelled at someone.

146. Defendant Brachfield's conduct, in coordination with Defendant Lieberman, was intended to facilitate his removal and her advancement.

147. On or about September 12, 2025, over a phone call, Defendant Lieberman offered Plaintiff the choice to resign or be fired without conducting any investigation.

148. In the same phone conversation, Defendant Lieberman informed Plaintiff that his planned travel to Cincinnati for the Association of Film Commissioners International ("ACFI") annual meeting had been cancelled, despite Plaintiff's scheduled participation and planned meetings with prominent industry leaders, further undermining Plaintiff's professional reputation and standing in the film industry.

149. Defendant Lieberman terminated Plaintiff on September 15, 2025.

150. After Plaintiff's termination, Defendant Lieberman sent a "blast email" to everyone in Plaintiff's email address book announcing his departure.

151. Defendant Lieberman called members of the Economic Development Commission and led them to believe Plaintiff had committed acts so heinous that she could not repeat them, giving the impression of sexual misconduct.

152. Defendant Lieberman omitted Plaintiff from the list of contributors to the Tom Clements Award for the Sundance Film Festival achievement, despite Plaintiff's instrumental role.

153. Defendant Lieberman's statements and conduct were willful and wanton.

154. Other similarly situated members of OEDIT's leadership did not have their terminations publicized in this manner.

155. Defendant Lieberman acted with intent to cause severe emotional distress or with reckless disregard for the probability of causing severe emotional distress.

156. Defendant Lieberman knew her statements were false.

157. Defendant Lieberman knew her statements would damage Plaintiff's reputation and career.

158. Defendant Lieberman's actions were designed to place Plaintiff in an unfavorable light and interfere with his future employment, and his career over his life.

159. Plaintiff suffered severe emotional distress.

160. Plaintiff suffered severe mental and emotional distress regarding his now-tarnished legacy.

161. Plaintiff suffered damage to his professional reputation and career prospects.

162. Plaintiff faces potential blacklisting from the film industry.

163. Defendant Lieberman's conduct was the proximate cause of Plaintiff's severe emotional distress.

164. As a direct and proximate result of Defendant Lieberman and Defendant Brachfield's extreme and outrageous conduct, Plaintiff has suffered severe emotional distress and related damages, including anxiety, loss of professional identity, and damages to his lifelong reputation in the film industry.

165. Plaintiff's distress has been exacerbated by the public nature of Defendant's false statements and the resulting harm to his standing among colleagues, industry partners, and prospective employers.

166. Given Plaintiff's decades-long career and prominence in the industry, the reputational harm is lasting and has impaired his ability to secure future professional opportunities.

**COUNT V. RETALIATION IN VIOLATION OF C.R.S. SECTION 24-31-1204**  
*(against Defendant Colorado Office of Economic Development and International Trade)*

167. Plaintiff incorporates by reference and realleges the allegations in the foregoing paragraphs as if fully set forth herein.

168. Plaintiff engaged in protected activity.

169. In April 2023, Plaintiff's office identified and documented an approximately \$747,816 miscredit of public funds to the Film Office account.

170. As Film Commissioner, Plaintiff had direct responsibility for oversight, administration, and lawful stewardship of state incentive funds, including funds derived from legislative appropriations and interest-generated public monies administered through OEDIT's accounting systems.

171. Plaintiff pressed for an accurate correction of the accounting error and transparent reporting.

172. Plaintiff's efforts were aimed at preventing and exposing misuse and misallocation of public funds.

173. Plaintiff acted in good faith by raising concerns internally, advocating for accurate corrections of the accounting error, and insisting on transparent reporting to ensure that public funds were not unlawfully expended, misallocated, or falsely reported.

174. Plaintiff's conduct constituted protected activity as it was aimed at stopping or preventing misuse, misallocation, or false accounting of public funds, regardless of whether a false claim had yet been submitted.

175. OEDIT management, including senior leadership, had actual knowledge of Plaintiff's protected activity through emails, calls, and meetings specifically addressing the accounting errors and Plaintiff's insistence on correction.

176. Deputy Film Commissioner Kelly Baug flagged the accounting error in email communications with Ms. Culver.

177. On April 12, 2023, Lindsay Finlayson, Director of Operations at OEDIT, responded to Plaintiff's disclosure by attempting to blame Plaintiff and falsely reporting him to Jonathan Bray.

178. Plaintiff suffered adverse employment actions.

179. On April 12, 2023, Ms. Finlayson falsely reported Plaintiff to Mr. Bray, who warned that "reports" would be filed, "painting a bullseye" on Plaintiff's chest.

180. Ms. Finlayson excluded Plaintiff from a directive to his staff to prepare a comprehensive project list, despite the budget crisis being resolved.

181. Defendant OEDIT imposed a procedurally irregular PIP on Plaintiff.

182. Plaintiff was terminated on September 15, 2025.

183. The protected activity was a contributing factor in the adverse employment actions.

184. The timeline shows that Defendant OEDIT's treatment of Plaintiff shifted immediately following his disclosure of the accounting error in April 2023.

185. Management rapidly recast Plaintiff from a celebrated mentor into a supposed "problem" to be documented and displaced.

186. The temporal proximity between Plaintiff's disclosure of the accounting error and the onset of adverse employment measures supports a finding that the protected activity was a contributing factor.

187. As a direct and proximate result of Defendant OEDIT's retaliation, Plaintiff has suffered damages including lost wages, lost benefits, emotional distress, and damage to his professional reputation.

**COUNT VI. WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY**  
*(against Defendant Colorado Office of Economic Development and International Trade)*

188. Plaintiff incorporates by reference and realleges the allegations in the foregoing paragraphs as if fully set forth herein.

189. Plaintiff was employed by Defendant OEDIT as the Director of the Office of Film, Television, and Media from May 2011 until September 15, 2025.

190. Plaintiff was discharged.

191. Plaintiff was discharged from his position as Film Commissioner on September 15, 2025.

192. The discharge violated a clear mandate of public policy.

193. Colorado has a clear public policy mandate regarding fiscal integrity and transparent government operations.

194. This public policy is reflected in the Colorado Constitution, statutes governing public funds, and the Colorado False Claims Act.

195. Plaintiff was discharged in retaliation for his good faith efforts to ensure accurate stewardship of public funds and transparent government operations.

196. In April 2023, Plaintiff reported and attempted to correct a documented accounting error of approximately \$747,816.

197. Plaintiff insisted on accurate, transparent reporting of the accounting error.

198. Defendant OEDIT discharged Plaintiff in retaliation for his protected disclosures.

199. The discharge was the proximate cause of Plaintiff's damages.

200. As a direct and proximate result of Defendant OEDIT's wrongful discharge, Plaintiff has suffered damages including lost wages, lost benefits, emotional distress, and damage to his professional reputation.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Donald Zuckerman respectfully requests that this Court grant him the following relief and enter judgment in his favor and against Defendants as follows:

- A. Back pay and actual damages in an amount to be shown at trial to compensate him for lost wages, benefits, and employment opportunities;
- B. Front pay in an amount to be shown at trial;
- C. Compensatory damages;
- D. Monetary damages as a result of Defendants' tortious actions in an amount to be determined at trial;
- E. Emotional distress damages as a result of Defendants' tortious actions in an amount to be determined at trial;

- F. Reasonable attorneys' fees and costs;
- G. Pre-judgment and post-judgment interest;
- H. Costs of this action, including expert witness fees;
- I. Compensation for taxes incurred;
- J. Injunctive relief; and
- K. For such other and further relief this Court deems just and proper.

**JURY DEMAND**

**Plaintiff Donald Zuckerman demands a trial by jury on all issues so triable.**

RESPECTFULLY SUBMITTED on this day of June 10, 2026.

**VOLYA LAW OFFICE, PLLC**

*/s/ Maxim N. Belovol*

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