

**STATE OF CONNECTICUT**

**RETURN DATE: January 20, 2026**

CHRIS TAYLOR, an individual,	)	<b>SUPERIOR COURT</b>
	)	
Plaintiff,	)	<b>JUDICIAL DISTRICT OF</b>
	)	<b>NEW LONDON</b>
vs.	)	
	)	
TOWN OF EAST LYME, DAN	)	<b>December 12, 2025</b>
CUNNINGHAM, in his individual and	)	
official capacity; ERIK QUINN, in his	)	
individual and official capacity	)	
	)	
Defendants.	)	
_____	)	

**COMPLAINT**

**FIRST COUNT      VIOLATION OF C.G.S SEC. 31-51m**

(AGAINST THE TOWN OF EAST LYME)

1. Plaintiff CHRIS TAYLOR is a citizen of the United States and a resident of East Lyme, Connecticut. At all times relevant to the complaint, Plaintiff was a part-time firefighter employed by the Town of East Lyme in the Flanders Fire Department and fire chief for the Flanders Fire Department, which is part of the East Lyme Fire Department. Plaintiff's position as fire chief for the Flanders Fire Department is a volunteer position.

2. At all times relevant to the complaint, Defendant Town of East Lyme, was a municipal employer as defined by Connecticut General Statutes § 7-467 and a political subdivision of the State of Connecticut. The Town of East Lyme is also an employer within the meaning of that

term under§ 31-51m and§ 31-51q of the Connecticut General Statutes.

3. At all times relevant to the complaint, Defendant Dan Cunningham served as the First Selectman for the Town of East Lyme. In said capacity, Defendant Dan Cunningham was responsible for hiring, firing, and oversight of Plaintiff's work as the volunteer fire chief.

4. In 2023 and 2024, it became well known that other career and unionized firefighters who were employed by the Town of East Lyme in the Flanders Fire Department and Niantic Fire Department, along with First Selectman Defendant Dan Cunningham, desired to completely unionize the Flanders Fire Department and eliminate the volunteer positions, including Plaintiff's volunteer position as fire chief for the Flanders Fire Department.

5. In order to further their objectives, other career and unionized firefighters who were employed by the Town of East Lyme in the Flanders Fire Department and Niantic Fire Department made unfounded accusations of Plaintiff being untrustworthy, dishonest, and being lax in the maintenance and purchasing of equipment. At all times relevant to the complaint, Plaintiff performed his duties competently, honestly, and with diligence.

6. In or about January of 2024, Plaintiff found two firefighters who were employed by the Town of East Lyme in Plaintiff's office without consent (having opened a locked door) and searching his desk without consent. Plaintiff, in exercising his first amendment rights, immediately told them to leave his office.

7. Shortly thereafter, Plaintiff was notified by First Selectman Defendant Dan Cunningham that Plaintiff was being placed on administrative leave pending an investigation of a complaint of "harassment" against Plaintiff by a town employee. It was reported to Plaintiff that a town employee was made to feel uncomfortable upon arrival at work on January 17, 2024 and that Plaintiff used foul language. Plaintiff was also notified by First Selectman Defendant Dan

Cunningham that the town retained an independent investigator to review the complaint.

8. Shortly after alleged incident, Plaintiff was notified by First Selectman Defendant Dan Cunningham that as part of the administrative leave, Plaintiff was to stay off of town property, not talk to any town employees, and was suspended as a part-time employee. Plaintiff was subjected to negative and embarrassing press-reports. His reputation was publically tarnished. He was denied his constitutional right to vote in person on Town property. He was also denied the opportunity to have a relationship with his daughters who also town employees.

9. Plaintiff's children were teased by schoolmates who saw the embarrassing press-reports. This information was reported to Plaintiff and caused him emotional distress.

10. Plaintiff was also ordered to attend Employee Assistance Program session for "anger management issues" and was requested to waive his privacy rights under HIPAA by sharing the anger management session notes with the Town HR Manager.

11. Plaintiff was disciplined and subjected to a "sham" investigation for having done nothing wrong. Other witnesses and Plaintiff were never interviewed by the investigator. No action was ever taken against the two Town employees who burglarized Plaintiff's office and searched his desk without consent.

12. Plaintiff felt isolated and shamed by the allegations against him and was not given an opportunity to clear his name. Plaintiff has been constructively and effectively terminated from his employment. Based on the foregoing, the Town, through the actions of First Selectman Defendant Dan Cunningham, Plaintiff was retaliated against, subjected to harassment, intimidated, threatened, disciplined, and ultimately constructively terminated from his employment due to his protected speech in violation of C.G.S. § 31-51m.

13. As a direct and proximate result of the Town's unlawful actions, the Plaintiff has

suffered damages, the loss of wages based on the Town's unjust suspension and constructive termination of Plaintiff.

**COUNT TWO: VIOLATION OF C.G.S. SECTION 31-51g (AGAINST THE TOWN OF EAST LYME)**

1-13. Paragraphs 1 through 13 of Count One are hereby incorporated as Paragraphs 1 through 13 of Count Two as if fully set forth herein.

14. Plaintiff's discussions with the two Town employees who burglarized Plaintiff's office and searched his desk without consent and Plaintiff's expressed desire to be free from unlawful searches constituted an exercise of free expression guaranteed by the First Amendment to the United States Constitution and Sections 3, 4 and 14 of Article First of the Constitution of the State of Connecticut.

15. The Town fabricated reasons to terminate Plaintiff in order to cover up its true motivation for desiring to terminate Plaintiff's employment and eliminate the position of volunteer fire chief.

16. Based on the foregoing, the Town, through the actions of First Selectman Defendant Dan Cunningham, Plaintiff was retaliated against, subjected to harassment, intimidated, threatened, disciplined, and ultimately constructively terminated from his employment due to his protected speech in violation of C.G.S. § 31-51m.

17. The aforesaid actions of the Town were malicious, intentional, willful, wanton and /or in reckless disregard for Plaintiff's rights.

18. As a direct and proximate result of the Town's unlawful actions, the Plaintiff has suffered damages, including mental anguish, severe emotional distress, humiliation, and embarrassment, loss of employment and income, damage to his personal and professional

reputations, loss of enjoyment of life, attorney's fees and court costs.

**COUNT THREE: VIOLATION OF 42 U.S.C. § 1983: FIRST AMENDMENT  
VIOLATIONS (AGAINST THE TOWN OF EAST LYME, and DAN  
CUNNINGHAM, in his individual and official capacities)**

1-18. Paragraphs 1 through 18 of Count Two are hereby incorporated as Paragraphs 1 through 18 of Count Three as if fully set forth herein.

19. Defendant Dan Cunningham has been employed by the Town of East Lyme and, at all relevant times, acted as the First Selectman for the Town of East Lyme. In seeking the suspension and seeking the termination of Plaintiff based on the “sham” investigation, Defendant Dan Cunningham acted as the official policy maker of the Town of East Lyme.

20. At all times referred to herein, Defendant Dan Cunningham was acting under color of law.

21. Plaintiff's discussions with the two Town employees who burglarized Plaintiff's office and searched his desk without consent and Plaintiff's expressed desire to be free from unlawful searches constituted an exercise of free expression guaranteed by the First Amendment to the United States Constitution and Sections 3, 4 and 14 of Article First of the Constitution of the State of Connecticut.

22. Defendants fabricated reasons to terminate Plaintiff in order to cover up its true motivation for desiring to terminate Plaintiff's employment and eliminate the position of volunteer fire chief.

23. Based on the foregoing, Defendants retaliated against Plaintiff, subjected him to harassment, intimidated, threatened, disciplined, and ultimately constructively terminated his employment due to his protected speech in violation of the First Amendment as enforced by 42

U.S.C. § 1983.

24. The aforesaid actions of the Defendants were malicious, intentional, willful, wanton and /or in reckless disregard for Plaintiff's rights.

25. Based on the foregoing, Defendants Town of East Lyme and Dan Cunningham, by the use of their authority and power inherent in their titles and positions as conferred upon them by the Town of East Lyme, and through their acts and the acts of their subordinates whose conduct and activities they directed, engaged in a continuing course of retaliatory conduct against the Plaintiff. Their conduct in this regard was substantially motivated by the Plaintiff's protected speech. In so doing, Defendants Town of East Lyme and Dan Cunningham deprived the Plaintiff of his rights, privileges or immunities secured by the Constitution, specifically the right to free speech all in violation of the First Amendment as protected by 42 U.S.C. § 1983.

26. As a direct and proximate result of the Town's and Defendant Dan Cunningham's unlawful actions, Plaintiff has suffered damages, including mental anguish, severe emotional distress, humiliation, embarrassment, loss of employment and income, damage to his personal and professional reputations, loss of enjoyment of life, attorney's fees and court costs.

**COUNT FOUR: VIOLATION OF 42 U.S.C. SECTION 1983: PROCEDURAL DUE PROCESS VIOLATIONS PROPERTY INTEREST (AGAINST THE TOWN OF EAST LYME, and DAN CUNNINGHAM, in his individual and official capacities)**

1-26. Paragraphs 1 through 26 of Count Three are hereby incorporated as Paragraphs 1 through 26 of Count Four as if fully set forth herein.

27. Plaintiff had a recognized property interest in his job pursuant to the Town Charter and Ordinance and there was a requirement of good cause to terminate his employment.

28. Defendants fabricated reasons to terminate Plaintiff in order to cover up its true motivation for desiring to terminate Plaintiff's employment and eliminate the position of volunteer fire chief. In so doing, Plaintiff was subjected to a "sham" investigation for having done nothing wrong. Other witnesses and Plaintiff were never interviewed by the investigator. No action was ever taken against the two Town employees who burglarized Plaintiff's office and searched his desk without consent.

29. Plaintiff felt isolated and shamed by the allegations against him and was not given an opportunity to clear his name. Plaintiff has been constructively and effectively terminated from his employment.

30. Defendants Town of East Lyme and Dan Cunningham thus deprived Plaintiff of his property interest in his continued employment with the Town without affording him due process of law in violation of the Fourteenth Amendment of the United States Constitution, 42 U.S.C. §1983.

31. The aforesaid actions of the Defendants were malicious, intentional, willful, wanton and /or in reckless disregard for Plaintiff's rights.

32. As a direct and proximate result of the Town's and Defendant Dan Cunningham's unlawful actions, Plaintiff has suffered damages, including mental anguish, severe emotional distress, humiliation, embarrassment, loss of employment and income, damage to his personal and professional reputations, loss of enjoyment of life, attorney's fees and court costs.

**COUNT FIVE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
(AGAINST THE TOWN OF EAST LYME, DAN CUNNINGHAM AND  
ERIK QUINN, in their individual and official capacities)**

1-32. Paragraphs 1 through 32 of Count Four are hereby incorporated as Paragraphs 1 through 32 of Count Five as if fully set forth herein.

33. At all times referred to herein, Defendant Erik Quinn was employed by the Town of East Lyme as Deputy Fire Marshal. Defendant Erik Quinn falsely accused Plaintiff of wrongdoing in connection with the purchasing and use of equipment, intentionally placed him in a false light to the Town and public, and made defamatory and false statements regarding Plaintiff to the investigator, creating an impression based on false information that Plaintiff had engaged in wrongdoing.

34. Defendants Town of East Lyme and Dan Cunningham ratified the statements of Defendant Erik Quinn without conducting any fair investigation and deprived Plaintiff of his property interest in his continued employment with the Town without affording him due process of law, subjecting him to a “sham” investigation, and engaged in a continuing course of retaliation against Plaintiff for exercising his right to free speech and effectively terminated his employment in a public forum. Defendants' intentional and reckless conduct was extreme and outrageous.

35. As a result of Defendants conduct, the Plaintiff has and continues to suffer damages including but not limited to mental anguish, severe emotional distress, humiliation, embarrassment and loss of enjoyment of life.

**COUNT SIX: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS (AGAINST THE TOWN OF EAST LYME, DAN CUNNINGHAM AND ERIK QUINN, in their individual and official capacities)**

1-35. Paragraphs 1 through 35 of Count Five are hereby incorporated as Paragraphs 1 through 35 of Count Six as if fully set forth herein.

36. Defendant Erik Quinn falsely accused Plaintiff of wrongdoing in connection with the purchasing and use of equipment, intentionally placed him in a false light to the Town and public, and made defamatory and false statements regarding Plaintiff to the investigator, creating an

impression based on false information that Plaintiff had engaged in wrongdoing.

37. Defendants Town of East Lyme and Dan Cunningham ratified the statements of Defendant Erik Quinn without conducting any fair investigation and deprived Plaintiff of his property interest in his continued employment with the Town without affording him due process of law, subjecting him to a “sham” investigation, and engaged in a continuing course of retaliation against Plaintiff for exercising his right to free speech and effectively terminated his employment in a public forum. Defendants' intentional and reckless conduct was extreme and outrageous.

38. As a result of Defendants conduct, the Plaintiff has and continues to suffer damages including but not limited to mental anguish, severe emotional distress, humiliation, embarrassment and loss of enjoyment of life.

39. Defendants' conduct in the effective termination the Plaintiff's employment was unreasonable and created an unreasonable risk of causing Plaintiff emotional distress.

40. Plaintiff's distress was foreseeable and severe enough that it might result in illness or bodily harm.

41. As a result of Defendants conduct, the Plaintiff has and continues to suffer damages including but not limited to mental anguish, severe emotional distress, humiliation, embarrassment and loss of enjoyment of life.

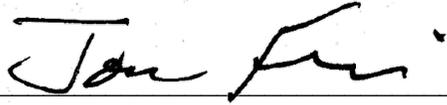
**WHEREFORE, PLAINTIFF CLAIMS A TRIAL BY JURY, JUDGMENT AGAINST DEFENDANTS JOINTLY AND SEVERALLY AND DAMAGES AS FOLLOWS:**

1. Compensatory economic and non-economic damages, including loss of back pay and benefits, future economic losses, emotional distress, harm to reputation and loss of enjoyment of life;

2. Punitive damages pursuant to 42 U.S.C. § 1981a, Conn. Gen. Stat. § 31-51q and common law;
3. Interest pursuant to Conn. Gen. Stat. § 37-3a and Costs;
4. Reinstatement, lost wages and benefits and other equitable relief pursuant Conn. Gen. Stat. § 31-51m;
5. Attorneys' fees and costs pursuant to 42 U.S.C. § 1988, Conn. Gen. Stat. § 31-51q and § 31-51m; and
6. Such other relief in law or equity the court deems appropriate.

DATED: December 11, 2025

By:



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