

HHD-CN 26-5094974-S

RETURN DATE: : SUPERIOR COURT
BROOKE GOFF : J.D. OF HARTFORD
V. : AT HARTFORD
ERIC REINKEN : AUGUST 24, 2026

WRIT

TO ANY PROPER OFFICER:

GREETINGS, by the authority of the State of Connecticut, you are hereby commanded to summon the Defendant to appear before the Superior Court for the Judicial District of Hartford to be held at 95 Washington, Street, Hartford, Connecticut, on _____, 2026, said appearance to be made by said Defendant or attorney by filing a written statement of appearance with the Clerk of said court on or before the second day following said return date of _____, 2026 then and there to answer unto BROOKE GOFF, in a civil action wherein the plaintiff complains as set forth in the attached Complaint.

And you are further commanded to attach or garnishee the property, goods or estate of the Defendant to the value of \$ _____ Dollars wherever located.

Donna Pare of 628 Hebron Avenue, Glastonbury, Connecticut, is recognized in the sum of \$250.00 to prosecute this action.

Hereof, fail not, but with this Writ and your doings thereon, make due service and return.

Dated at _____, Connecticut this ____ day of _____, 2026.

**THE PLAINTIFF,
BROOKE GOFF**

By

Jared M. Alfin, Esq.
Hassett & George, P.C.
945 Hopmeadow Street
Simsbury, CT 06070
Telephone No.: (860) 651-1333
Facsimile No.: (860) 651-1888
Juris No. 407894

HHO-CV26-5094974-S

RETURN DATE: : SUPERIOR COURT
BROOKE GOFF : J.D. OF HARTFORD
V. : AT HARTFORD
ERIC REINKEN : AUGUST 24, 2026

COMPLAINT

I. FACTS:

1. Plaintiff, **BROOKE GOFF** ("Plaintiff") resides in West Hartford, Connecticut.
2. Defendant, **ERIC REINKEN** ("REINKEN") resides at 101 Bowman Drive North, Greenwich, CT, 06831, and has a place of business at 1100 Summer Street, HARTFORD, CT 06905. Reinken is a lawyer licensed to practice law in the State of Connecticut and owns and controls the Reinken Law Firm as defined below.
3. Reinken owns and controls **THE REINKEN LAW FIRM** (the "Reinken Firm") has a place of business at 1100 Summer Street, HARTFORD, CT 06905. The Reinken Law Firm provides personal injury legal services and competes with the Plaintiff's personal injury practice in the State of Connecticut.
4. **DANIELLE DIBERARDINI-ALBRECHT** ("DIBERARDINI-ALBRECHT") is a lawyer licensed to practice law in the State of Connecticut and is employed by the Reinken Law Firm.
5. **FRANK ZACHMAR**("ZACHMAR") is a lawyer licensed to practice law in the State of Connecticut and is employed by the Reinken Law Firm.

6. Plaintiff is a practicing attorney licensed in the State of Connecticut and currently owns and operates a well-known personal injury law firm known as Goff Law Group.

7. Plaintiff was previously employed as a paralegal at the Reinken Law Firm from approximately 2009 to 2016.

8. Plaintiff's employment relationship with the Reinken Law Firm ended on or about March 2016.

9. At all relevant times, Reinken supervised and managed the Reinken Law Firm's employees.

10. At all relevant times, the Reinken Law Firm employed multiple attorneys and at least one paralegal in addition to Reinken.

11. On or about June 3, 2025, Zachmar sent a real photograph of the Plaintiff in a firm-wide text message to all the employees of the Reinken Law Firm, including Reinken and made derogatory comments about Plaintiff.

12. In response to Zachmar's text message, Reinken then took that photograph of the Plaintiff and created a digital alteration of the photograph depicting Plaintiff holding a penis or phallic object, with an unknown substance on her face.

13. Diberardini-Albrecht viewed the photo as altered by Reinken and commented, "HAHAHAHAHAHAHAHA"

14. Zachmar commented "I don't think she's ever had a cock in her hands"

15. Reinken responded, "It a big one for sure"

16. Reinken distributed this altered photograph via a text message group chat to multiple employees of The Reinken Law Firm and the comments were all on the office group chat for Reinken employees to see.

17. Reinken and his employees had sent other text messages that ridiculed and disparaged the Plaintiff.

18. The Plaintiff subsequently received the text messages, and others, from an employee of the Reinken Law Firm that also received these text messages since, upon information and belief, it was sent to virtually all the employees in the firm.

19. When the Plaintiff informed Reinken that she had received the text messages, Reinken's very first response showed no concern for the Plaintiff's emotional well-being, made no effort to condemn or distance himself from the communications, and offered no initial apology.

20. Indeed, Reinken's initial response was to question the Plaintiff about who had sent her the messages, reflecting his indifference to the harm they caused or the seriousness of his and his employees' appalling, conscious-shocking and shameful misconduct.

21. Reinken subsequently sent an email apologizing to the Plaintiff. Reinken's written apology to Plaintiff clearly demonstrates that he authored and intentionally disseminated the defamatory, inappropriate and outrageously disgusting text message to third parties.

22. The altered photograph and accompanying comment were false and defamatory and the statements and image falsely portrayed Plaintiff in matters concerning her personal life, sexual conduct, and sexual orientation.

23. At no time did Plaintiff authorize, consent to, or have knowledge of the creation or distribution of the altered photograph or the accompanying comment prior to the paralegal's disclosure.

24. The publication of the altered photograph and accompanying comment to Reinken's employees subjected Plaintiff to ridicule, contempt, and humiliation.

25. The altered photograph and accompanying comments placed Plaintiff in a false light by creating a false and highly offensive impression of Plaintiff's character, conduct, and personal life.

26. As a licensed attorney, Plaintiff's professional reputation is of paramount importance to her career and livelihood. As licensed attorneys, the Reinken exhibited deplorable and inexcusable conduct that is contrary to their ethical duties and professionalism

that members of the Connecticut bar are expected to possess.

27. Reinken acted in his capacity as owner and principal of The Reinken Law Firm when he created and distributed the altered photograph and accompanying comments.

28. Reinken's actions were taken within the scope of his authority and control over his firm's business operations and employees.

29. Reinken is vicariously liable for actions of his employees that were undertaken in connection with Reinken's business and involved communications with his firm's employees.

COUNT I DEFAMATION PER SE

30. Plaintiff realleges and incorporates by reference paragraphs 1 through 29.

31. Reinken, by creating and distributing the digitally altered photograph depicting the Plaintiff holding a penis, with an unknown substance on her face, together with the accompanying statement by Reinken's employee that the Plaintiff had never held a "cock" because she is a lesbian, Reinken and his employees published a false and defamatory statement of fact concerning the Plaintiff by falsely portraying her as depicted in the image.

32. The altered photograph and accompanying comment were published to third parties, specifically multiple employees of The Reinken Law Firm, including at least two participating attorneys.

33. The publication was made without privilege or authorization.

34. The statements were of and concerning Plaintiff, as Plaintiff was identifiable in the photograph and explicitly referenced in the accompanying comment.

35. The statements were false in that they misrepresented Plaintiff's conduct and character through the defamatory alteration and accompanying sexually explicit commentary.

36. The statements are defamatory per se because they:

- a. Falsely impute to Plaintiff conduct and characteristics relating to her sexual conduct and sexual orientation in a manner calculated to subject her to public ridicule and contempt; and
- b. Injure Plaintiff in her profession as a licensed attorney by subjecting her to humiliation and undermining her professional reputation.

37. The defamatory statements are actionable per se, and injury to Plaintiff's reputation is conclusively presumed by law.

38. Reinken and employees of the Reinken Law Firm acted with actual malice or reckless disregard for the truth in creating and publishing the altered photograph and accompanying comment.

39. Reinken and employees of the Reinken Law Firm knew the statements were false or acted with reckless disregard as to their truth or falsity and engaged in conduct unbecoming to the Connecticut bar as attorneys.

40. The Reinken Law Firm, through Reinken acting within the scope of his authority, is liable for the defamatory publication.

41. As a direct and proximate result of the defamatory statements and misconduct of Reinken, Plaintiff has suffered damages.

COUNT II FALSE LIGHT INVASION OF PRIVACY

1-41. Plaintiff realleges and incorporates by reference paragraphs 1 through 41 of Count One into Court Two as more fully set forth herein.

42. Reinken gave publicity to matters concerning Plaintiff by creating and distributing the altered photograph and accompanying comment to multiple employees of The Reinken Law Firm.

43. The altered photograph and accompanying comment placed Plaintiff in a false light before others.

44. The false light in which Plaintiff was placed would be highly offensive to a reasonable person.

45. The altered photograph falsely portrayed Plaintiff as engaging in conduct of a sexually explicit nature and falsely characterized her personal life and sexual conduct.

46. The accompanying comment reinforced the false portrayal by making explicit false statements regarding Plaintiff's sexual orientation and sexual experience.

47. The portrayal was highly offensive in that it:

- a. Depicted Plaintiff in a crude, sexually explicit, and demeaning manner;
- b. Falsely characterized Plaintiff's personal conduct and intimate life;
- c. Subjected Plaintiff to ridicule and humiliation before professional colleagues;
- d. Undermined Plaintiff's dignity and professional standing; and
- e. Exploited Plaintiff's sexual orientation for the purpose of mockery and derision.

48. A reasonable person in Plaintiff's position would find the portrayal highly offensive,

Outrageous, conscious-shocking, and objectionable.

49. Reinken and employees of the Reinken Law Firm acted with knowledge of or in reckless disregard as to the falsity of the portrayal and its highly offensive nature.

50. Reinken and employees of the Reinken Law Firm intended to place Plaintiff in a false light or acted with reckless disregard for the likelihood that Plaintiff would be placed in a false light.

51. Reinken acting within the scope of his authority, is liable for the false light invasion of Plaintiff's privacy.

52. As a direct and proximate result of the Reinken's invasion of Plaintiff's privacy through false light, Plaintiff has suffered damages.

WHEREFORE, Plaintiff seeks relief as follows:

A. On Count I (Defamation Per Se):

- General damages in an amount to be determined at trial;
- Punitive damages in an amount sufficient to punish Defendant and deter similar conduct;

B. On Count II (False Light Invasion of Privacy):

- Compensatory damages for humiliation and injury to Plaintiff's dignity in an amount to be determined at trial;
- Punitive damages in an amount sufficient to punish Defendant and deter similar conduct;

C. Pre-judgment interest as provided by law;

1. Post-judgment interest as provided by law;
2. Costs of suit as provided by law; and
3. Any other relief the Court deems just and proper.

**THE PLAINTIFF,
BROOKE GOFF**

By: _____

Jared M. Alfin, Esq.
Hassett & George, P.C.
945 Hopmeadow Street
Simsbury, CT 06070
Telephone No.: (860) 651-1333
Facsimile No.: (860) 651-1888
Juris No. 407894

RETURN DATE: : **SUPERIOR COURT**
BROOKE GOFF : **J.D. OF HARTFORD**
V. : **AT HARTFORD**
ERIC REINKEN : **AUGUST 24, 2026**

STATEMENT OF AMOUNT IN DEMAND

The amount in demand in the above captioned action is greater than \$15,000.00,
exclusive of interest and costs.

**THE PLAINTIFF,
BROOKE GOFF**

By:

Jared M. Alfin, Esq.
Hassett & George, P.C.
945 Hopmeadow Street
Simsbury, CT 06070
Telephone No.: (860) 651-1333
Facsimile No.: (860) 651-1888
Juris No. 407894