

**IN THE UNITED STATES DISTRICT COURT FOR
THE STATE OF MARYLAND**

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2021 AUG -6 P 3:20

DEAFUEH MONBO
JUAHDI MONBO

Plaintiffs

v.

ELIZABETH C. LEAMING (individually and
in her official capacity; JACK W. FISCHER,
(individually and in his official capacity);
BARRY F. ARMATA (individually and in his
official capacity); MARK STABILE
(individually and in his official capacity), and
TAMMY FLUET (individually and in her
official capacity)

Defendants

* Civil Action No: **PWG 21CV1996**

* **JURY TRIAL DEMANDED**

* * * * *

INDEX TO COMPLAINT

	<u>Page</u>
NATURE OF THE ACTION	3
PARTIES	4
CO-CONSPIRATORS ACTING IN CONCERT	6
CONSTITUTIONAL PROVISIONS, STATUTES, AND RULES INVOLVED.....	7
FACTUAL BACKGROUND	10
I. Plaintiff Deafueh remained unlawfully detained for a total of one hundred and four (104) hours after a warrantless arrest and without a probable cause determination	10
II. Plaintiff Juahdi remained unlawfully detained for a total of eighty-six (86) hours after a warrantless arrest and without a probable cause determination	11
III. Lack of probable cause rendered Plaintiffs' warrantless arrests invalid	13
IV. Prosecution was not supported by probable cause so Defendants forged probable cause documents then filed them in Plaintiffs' cases	14
V. Defendants deprived Plaintiffs of equal protection, equal privileges, and immunities due to racial animus	16
VI. The unlawful June 7, 2021 Re-Arrest Warrants were invalid and violated Plaintiffs' due process and equal protection rights	20
VII. Defendants acted in absence of authority and jurisdiction in direct violation of constitutional guarantees	24
VIII. The Court can only be effective, fair, and just if it is allowed to function as the laws prescribed	25
IX. Plaintiffs suffered emotional distress and trauma caused by the Defendants' extreme and outrages conduct.	26
CAUSE OF ACTION	32
INDEX TO EXHIBITS.....	34

COMPLAINT

DEAFUEH MONBO and JUAHDI MONBO (hereinafter "PLAINTIFFS"), in their Complaint for Actual Damages, Declaratory Judgment, and Injunctive Relief, allege and state to this honorable Court as follows:

NATURE OF THE ACTION

1. PLAINTIFFS bring this action against the Defendants to redress the deprivation of well-established rights secured to them by the Fourth and Fourteenth Amendments of the Constitution of the United States of America, and the Connecticut Rules of Criminal Procedures.

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §1331, 42 U.S.C. §1985, 42 U.S.C. §1986, and Federal Declaratory Judgment Act, 28 U.S.C. §2201, §2202.

3. This Court has general and/or specific personal jurisdiction over Defendants pursuant to 28 U.S. Code § 1332(a).

4. Venue is proper in the district pursuant to 28 U.S.C. § 1391.

PARTIES

Plaintiffs:

5. At all times relevant, Plaintiff JUAHDI MONBO ("JUAHDI") was a resident of the State of Massachusetts or the State of Maryland. Plaintiff Juahdi is a Ph.D. candidate with specialties in Immunology and Virology. Plaintiff Juahdi also holds a Master's Degree in Biotechnology. Plaintiff Juahdi began her scientific career after graduating college at age 20 when she was awarded a Pre-Doctoral Intramural Research Training Fellowship at the National Institutes of Health. Plaintiff Juahdi is a published scientist who has dedicated over twenty (20) years of research efforts towards finding therapies for viral diseases and cancer. Plaintiff Juahdi is an African-American professional with no prior criminal history.

6. At all times relevant, Plaintiff DEAFUEH MONBO ("DEAFUEH") was a resident of the State of Maryland. Plaintiff Deafueh is a licensed Certified Public Accountant (CPA). Plaintiff Deafueh has been a CPA since the young age of 25. Plaintiff Deafueh also holds a Master's Degree which she also obtained at the age of 25. Plaintiff Deafueh is the first person in the United States to hold both a CPA license and a Master's Degree at the age of 25. Plaintiff Deafueh is widely recognized for her professional authority on accounting subject matters and professional expertise in accounting and financial management practices. Plaintiff Deafueh has been recognized as International Person of the Year by the International Biographical Centre of England in 1999 at the age of 27. Plaintiff Deafueh has also been recognized as "Who's Who in America's Finance & Industry" by Marquis Who's Who's, a renowned publisher of the top business professionals and achievers from the United States and around the world in 2000 at the age of 28. Plaintiff Deafueh has also served as an adjunct Accounting Professor of Howard Community College from 2002 – 2004, where she instructed college students on principles of accounting. Plaintiff Deafueh is the author of Accounting 101 Made Easy: Principles of Accounting I,

published in 2002 at the age of 30. Plaintiff Deafueh is also a business owner and has owned multiple businesses since the age of 29. Today, Plaintiff Deafueh does business throughout the United States and internationally. Plaintiff Deafueh advises key government agencies and corporate management on accounting best practices. Plaintiff Deafueh's clients include billion-dollar institutions. Plaintiff Deafueh is an African-American professional with no prior criminal history.

Defendants:

7. Defendant JACK FISCHER is a resident of the State of Connecticut. Jack Fischer is sued in his official and individual capacity. Jack Fischer is a Criminal Court Judge in Danielson, Connecticut (Geographical Area No. 11) and is the presiding Judge in Plaintiffs' respective cases.

8. Defendant BARRY ARMATA is a resident of the State of Connecticut. Barry Armata is sued in his official and individual capacity. Barry Armata is a Civil Court Judge in Rockville, Connecticut (Geographical Area No. 19).

9. Defendant MARK STABILE is a resident of the State of Connecticut. Mark Stabile is sued in his official and individual capacity. Mark Stabile was the State Prosecutor for Danielson, Connecticut in September 2019.

10. Defendant ELIZABETH LEAMING is a resident of the State of Connecticut. Elizabeth Leaming is sued in her official and individual capacity. Elizabeth Leaming is the successor State Prosecutor for Danielson, Connecticut, assigned to the Plaintiffs' case after Defendant Mark Stabile was removed from Plaintiffs' cases.

11. Defendant TAMMY FLUET is a resident of the State of Connecticut. Tammy Fluet is sued in her official and individual capacity. Tammy Fluet is the Deputy Chief Clerk at the Danielson Courthouse.

CO-CONSPIRATORS ACTING IN CONCERT

12. Each of the Defendant has acted in concert with various co-conspirators in the interference of civil rights and the deprivation of equal protection of the law as alleged in this complaint. Plaintiffs are informed and believe, and on this basis allege, that at all times herein mentioned, each of the Defendants was co-conspirator of each of the other Defendants and in doing the civil rights violations and illegal activities against the Plaintiffs described herein, was acting within the course and scope of their authority as co-conspirators with the permission and consent of their Co-Defendants and, further, that the Defendants and each of them have authorized, ratified, and approved the acts of the other Defendants with full knowledge of those acts. Defendants are properly deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Plaintiffs.

CONSTITUTIONAL PROVISIONS, STATUTES, AND RULES INVOLVED

13. **Fourth Amendment**

The Fourth Amendment requires that judicial probable cause where a warrantless arrest has occurred. The U.S. Supreme Court, in *Gerstein v. Pugh*, 420 U.S. 103, 95 S. Ct. 854, 43 L. Ed. 2d 54 (1975), mandated that persons arrested without a warrant and held by the police must be given a preliminary hearing to determine if there is probable cause. In *County of Riverside v. McLaughlin*, 500 U.S. 44, 111 S. Ct. 1661, 114 L. Ed. 2d 49 (1991), the Court made it a constitutional requirement that a prompt judicial determination of probable cause follow a warrantless arrest. It ruled that a determination must be made without unreasonable delay, and in no event later than forty-eight hours after arrest. Therefore, all state and federal warrantless arrests must comply with the holdings of *Gerstein* and *County of Riverside*.

14. **Fourteenth Amendment**

"No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of the law; nor deny to any person within its jurisdiction the equal protection of the laws."

15. **42 U.S.C § 1985 — Conspiracy to Interfere with Civil Rights**

(2) If two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws;

(3) A conspiracy involving two or more persons for the purpose of depriving, directly or indirectly, a person or class of persons of the equal protection of the laws and an act in furtherance of the conspiracy which causes injury to a person or property, or a deprivation of any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

16. **42 U.S.C § 1986 — Action for Neglect to Prevent**

Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title, are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action.

CONNECTICUT PRACTICE BOOK

17. **Rule 3.8 (1) Special Responsibilities of a Prosecutor**

The prosecutor in a criminal case shall refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause.

18. **Section 36-11 — Information and Complaint; Use**

All felonies shall be prosecuted by information. All misdemeanors, violations, and infractions shall be prosecuted by information or complaint. In all jury cases, and in all other cases on written request of the defendant, the prosecuting authority as of course shall issue an information in place of the uniform summons and complaint. (P.B. 1978-1997, Sec. 616.)

19. **Section 36-15 — Filing and Availability of Information**

The information or complaint shall be filed with the clerk and be available for inspection by the defendant or counsel for the defendant. Upon written request, a copy thereof shall be furnished without charge to the defendant or counsel for the defendant. (P.B. 1978-1997, Sec. 620.)

20. **Section 37-2 — Information and Materials to Be Provided to the Defendant Prior to Arraignment**

Prior to the arraignment of the defendant before the judicial authority to determine the existence of probable cause to believe such person committed the offense charged or to determine the conditions of such person's release pursuant to Section 38-4, the prosecuting authority shall provide the defendant or counsel with a copy of any affidavit or report submitted to the Court for the purpose of making such determination.

21. **Section 37-12(a) — Defendant in Custody; Determination of Probable Cause**

If a defendant has been arrested without a warrant and has not been released from custody by the time of the arraignment or is not released at the arraignment pursuant to Section 38-4, the judicial authority shall, unless waived by the defendant, make an independent determination as to whether there is probable cause for believing that the offense charged has been committed by the defendant. Unless such a defendant is released sooner, such probable cause determination shall be made no later than forty-eight hours following the defendant's arrest. Such determination shall be made in a non-adversary proceeding, which may be ex parte based on affidavits. If no such probable cause is found, the judicial authority shall release the defendant from custody.

22. **Section 38-19 — Violation of Conditions of Bail; Order to Appear**

Upon application by the prosecuting authority alleging that a defendant has violated the conditions of release, a judicial authority may, if probable cause is found, order that the defendant appear in Court for a hearing upon such allegations. Said order shall be served upon the defendant (1) by delivering a copy to the defendant personally, (2) by leaving it at his or her usual place of abode with a person of suitable age and discretion then residing therein, (3) by mailing it by registered or certified mail to the defendant's last known address, or (4) by serving the order upon the defendant's counsel who shall notify the defendant of the order and the hearing date. If service is made pursuant to (4) above and such service proves insufficient to give the defendant notice, then service shall be made as otherwise provided in this section. (P.B. 1978-1997, Sec. 682.)

FACTUAL BACKGROUND

NOTE: Factual background section does not contain all the facts and circumstances known to the Plaintiffs about this matter. It was prepared solely to litigate this Complaint.

Fourth Amendment Violations

23. The Fourth Amendment requires that judicial probable cause where a warrantless arrest has occurred. The U.S. Supreme Court, in *Gerstein v. Pugh*, 420 U.S. 103, 95 S. Ct. 854, 43 L. Ed. 2d 54 (1975), mandated that persons arrested without a warrant and held by the police must be given a preliminary hearing to determine if there is probable cause. In *County of Riverside v. McLaughlin*, 500 U.S. 44, 111 S. Ct. 1661, 114 L. Ed. 2d 49 (1991), the Court made it a constitutional requirement that a prompt judicial determination of probable cause follow a warrantless arrest. It ruled that a determination must be made without unreasonable delay, and in no event later than forty-eight hours after arrest. Therefore, all state and federal warrantless arrests must comply with the holdings of *Gerstein* and *County of Riverside*.

I. Plaintiff Deafueh remained unlawfully detained for a total of one hundred and four (104) hours after a warrantless arrest and without a probable cause determination.

24. Around noon on Friday, September 13, 2019, Plaintiff Deafueh was illegally arrested by Trooper Ethan Tanksley, Trooper James Esposito, and Trooper Leroux in Killingly, Connecticut without a warrant.

25. Plaintiff Deafueh was taken to the Troop D Police Station in Danielson, where Plaintiff Deafueh was illegally detained and stayed overnight.

26. On Saturday, September 14, 2019, Troopers transported Plaintiff Deafueh to the York Correctional Institution, where Plaintiff Deafueh was again unlawfully detained.

27. Plaintiff Deafueh was detained for more than 48 hours after a warrantless arrest. During this period, the Court did not hold a probable cause hearing, in violation of the Fourth Amendment and Plaintiff's fundamental right to Due Process.

28. On Monday, September 16, 2019, approximately seventy (70) hours after Plaintiff Deafueh's warrantless arrest and while Plaintiff Deafueh was still in custody, Plaintiff Deafueh was brought before Defendant Jack Fischer for arraignment.

29. Instead of releasing Plaintiff Deafueh from custody and dismissing her case Defendant Jack Fischer set a \$20,000 bail for Plaintiff Deafueh.

30. After the Arraignment, Defendant Jack Fischer ordered Plaintiff Deafueh to remain in custody.

31. Plaintiff Deafueh was returned to the York Correctional Institution and was further detained on a warrantless arrest and without a probable cause determination hearing in reckless disregard for Plaintiff Deafueh's Fourth Amendment rights.

32. Plaintiff Deafueh remained detained at the York Correctional Institution until Tuesday, September 17, 2019.

33. In all, from September 13, 2019 through September 17, 2019, Plaintiff Deafueh remained unlawfully detained for a total of one-hundred and four (104) hours after a warrantless arrest and without a probable cause determination hearing in violation of the Fourth Amendment and in violation of the Supreme Court's holding in *Gerstein* and *County of Riverside*.

II. Plaintiff Juahdi remained unlawfully detained for a total of eighty-six (86) hours after a warrantless arrest and without a probable cause determination.

34. On Saturday, September 14, 2019, around 6:30 a.m., Plaintiff Juahdi was illegally arrested without a warrant by Trooper Howard Smith.

35. Plaintiff Juahdi was taken to the Troop D Police Station in Danielson, where she was illegally detained.

36. Thereafter, Plaintiff Juahdi was transported to the York Correctional Institution, where she was again unlawfully detained.

37. Plaintiff Juahdi was detained for more than 48 hours after a warrantless arrest. During this period, the Court did not hold a probable cause hearing, in violation of the Fourth Amendment and Plaintiff's fundamental right to Due Process.

38. On Monday, September 16, 2019, more than fifty (50) hours after Plaintiff Juahdi's warrantless arrest and while Plaintiff Juahdi was still in custody at the York Correctional Institution, Plaintiff Juahdi was brought before Defendant Jack Fischer for arraignment.

39. Instead of releasing Plaintiff Juahdi from custody and dismissing her case, Defendant Jack Fischer set a \$10,000 bail for Plaintiff Juahdi.

40. After the Arraignment, Defendant Jack Fischer ordered Plaintiff Juahdi to remain in custody.

41. Plaintiff Juahdi was returned to the York Correctional Institution and was further detained on a warrantless arrest and without a probable cause determination hearing in reckless disregard for Plaintiff Juahdi's Fourth Amendment rights.

42. Plaintiff Juahdi remained detained at the York Correctional Institution until Tuesday, September 17, 2019.

43. In all, from September 14, 2019 through September 17, 2019, Plaintiff Juahdi remained unlawfully detained for a total of eighty-six (86) hours after a warrantless arrest and without a probable cause determination hearing in violation of the Fourth Amendment and the Supreme Court's holding in *Gerstein* and *County of Riverside*.

III. Lack of probable cause rendered Plaintiffs warrantless arrests invalid.

44. Motivated by racial animus against African-Americans, Defendants Jack Fischer, Mark Stabile, and Barry Armata conspired to initiate criminal proceedings on September 16, 2019 against Plaintiff Deafueh and Plaintiff Juahdi when they knew that the State of Connecticut lacked probable cause.

45. In December 2019, Defendant Elizabeth Leaming took over Plaintiffs' respective cases after Defendant Mark Stabile was removed from Plaintiff cases. Instead of dismissing Plaintiffs' cases for lack of probable case, Defendant Elizabeth Leaming too, acting in concert with the other defendants, conspired to continue to unlawfully prosecute Plaintiffs without probable cause.

46. In the absence of an independent determination of probable cause within 48 hours of warrantless arrests, both Plaintiff Deafueh's and Plaintiff Juahdi's cases should have been dismissed on September 16, 2019 by the Court as a matter of law.

47. Therefore, all orders of the Danielson Court after September 16, 2019 are void, and of no legal force or effect.

48. The Danielson Court and its Court Officials lack jurisdiction over Plaintiff Deafueh and Plaintiff Juahdi.

49. Plaintiffs continue to suffer irreparable harm by Defendants' ongoing failure to dismiss these illegal criminal proceedings. As of July 29, 2021, almost two years after Plaintiffs' warrantless arrests, Plaintiffs' cases had appeared on the docket twenty (20) times despite Plaintiffs filing Motions to Dismiss for lack of probable cause. **Exhibit 1, Exhibit 2, Exhibit 3, and Exhibit 4**

IV. Prosecution was not supported by probable cause so Defendants forged probable cause documents then filed them in Plaintiffs' cases.

50. On March 31, 2021, Plaintiffs obtained copies of their files from the Danielson Court Clerk's Office.

51. Upon examination of the documents in their files, Plaintiffs discovered that Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, Mark Stabile, and Tammy Fluet had placed fake "Probable Cause Documents" into Plaintiffs' case files. **Exhibit 5 and Exhibit 6**

52. The fake "Probable Cause Documents" contained a fictitious signature of a Judge "Armata, J". **Exhibit 5 and Exhibit 6**

53. However, Plaintiffs noticed that a Judge by the name of Barry Armata shows up in Rockville, Connecticut (Geographical Area No. 19). **Exhibit 7, Exhibit 8, and Exhibit 9**

54. Barry Armata does not handle criminal cases.

55. Barry Armata is a Civil Judge who works in the Tolland Judicial District.

56. Barry Armata handles civil cases in the following towns, which make up Geographical Area No. 19: Andover, Bolton, Columbia, Coventry, Ellington, Hebron, Mansfield, Sommers, Stafford, Tolland, Union, Vernon, and Willington. **Exhibit 10**

57. Barry Armata has never been assigned to Plaintiffs' cases.

58. Barry Armata does not have authority or jurisdiction in Danielson, Connecticut (Geographical Area No. 11), where Plaintiffs' cases are pending.

59. **The fake "Probable Cause Documents" were supposedly signed by a judge named "Armata, J" on a Sunday (9/15/2019) when the Danielson Courthouse was closed.**

60. Of additional importance, Plaintiffs' bail amounts of \$10,000 and \$20,000 can be found on the fake "Probable Cause Documents," which were signed and dated on Sunday, September 15, 2019. However, Defendant Jack Fischer did not set Plaintiffs' bails until Monday,

September 16, 2019. Plaintiffs' bail amounts should not have been known on September 15, 2019, because their arraignments had not taken place yet.

61. The "Probable Cause Documents" were forged after the Plaintiffs' arraignments to keep Plaintiffs' cases opened.

62. Other falsified information found within Plaintiff Juahdi's "Probable Cause Document" are listed here: 1) Trooper Bryan Stadnicki who electronically signed the affidavit in Plaintiff Juahdi's case was not on the scene when Plaintiff Juahdi was arrested. 2) Two different troopers (TFC Bryan Stadnicki and TFC "E") signed the affidavit in Plaintiff Juahdi's case using the same badge number #1014.

63. Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, Mark Stabile, and Tammy Fluet conspired to falsify and forge "Probable Cause Documents" then filed the fake "Probable Cause Documents" in Plaintiffs' cases for the purpose of denying Plaintiffs equal protection of the law.

64. Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, Mark Stabile, and Tammy Fluet knowingly and intentionally filed with the Clerk's Office forged "Probable Cause Documents" containing material false statements, and fictitious signatures of a Judge "Armata, J".

65. Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, Mark Stabile, and Tammy Fluet knew that they acted in clear absence of jurisdiction and outside their judicial capacity when they knowingly and intentionally forged the "Probable Cause Documents".

66. Additionally, since the purported determination of probable cause comes from a forged document which contains a fictitious signature of a Judge or the signature of a Judge who does not have authority or jurisdiction in Geographical Area 11, all orders of the Danielson Court after September 16, 2019 are void, and of no legal force or effect.

67. When Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, Mark Stabile, and Tammy Fluet, and acted intentionally and knowingly to deprive Plaintiff Deafueh and Plaintiff Juahdi of their constitutional rights, they exercised no discretion or individual judgment; they no longer acted as Officers of the Court, but as "ministers" of their own prejudices.

68. Defendants Jack Fischer and Barry Armata's oath of office includes the undertaking to uphold the laws and Constitution of the United States. When Defendants Jack Fischer and Barry Armata violated such undertakings as they have done in Plaintiffs' cases, they lost jurisdiction, resulting in their orders being VOID, and they themselves have committed treasonable offenses against the United States.

Fourteenth Amendment Violations

69. The *Fourteenth Amendment* to the Constitution provides that "no state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty or property, without due process of law; nor to deny any person within its jurisdiction the equal protection of the laws."

V. Defendants deprived Plaintiffs of equal protection, equal privileges, and immunities due to racial animus.

70. Plaintiffs are African-American professionals who were unlawfully arrested in Danielson, a Connecticut town in which blacks make up only one-percent (1%) of the population.

71. Due to racial animus, Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, and Mark Stabile deviated from the Rules of Criminal Procedures governed by the United States Constitution, and as a result violated Plaintiffs' Due Process and Equal Protection Rights.

72. The Supreme Court has held that practically all the criminal procedural guarantees of the Bill of Rights—the Fourth, Fifth, Sixth, and Eighth Amendments—are fundamental to state criminal justice systems and that the absence of one or the other particular guarantees denies a suspect or a defendant due process of law under the Fourteenth Amendment.

73. Plaintiff Deafueh and Plaintiff Juahdi, have been disenfranchised by Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, and Mark Stabile as outlined below in **A-E**:

A. Violation of Section 37-12(a), Connecticut Practice Book

74. Connecticut Practice Book, Section 37-12 prescribes the time when the judicial authority must make an independent determination as to whether there is probable cause for believing that the offense charged has been committed by a person arrested without a warrant.

75. In violation of Section 37-12, on September 16, 2019, Plaintiff Deafueh and Plaintiff Juahdi were brought before Defendant Jack Fischer for in-custody arraignments. However, no probable cause hearing was held.

76. Plaintiff Deafueh remained detained for one hundred and four hours (104) without a probable cause hearing. Plaintiff Juahdi, on the other hand, remained detained for eighty-six (86) hours without a probable cause hearing.

77. As a result, Plaintiffs' Due Process rights have been violated.

B. Violation of Section 37-2, Connecticut Practice Book

78. Connecticut Practice Book, Section 37-2 prescribes that prior to the arraignment the Prosecutor must provide the accused with a copy of any affidavit or report submitted to the Court for the purpose of making such determination.

79. In violation of Section 37-2, Defendant Mark Stabile never provided Plaintiff Deafueh and Plaintiff Juahdi with copies of any affidavit or report submitted to the Court for the purposes of making probable cause determination prior to the September 16, 2019 arraignment of Plaintiff Deafueh and Plaintiff Juahdi. Thus, Defendants violated Section 37-2 of the Connecticut Practice Book, and Plaintiffs' Due Process and Equal Protection rights.

C. Violation of Section 36-11 and Section 36-15, Connecticut Practice Book

80. On September 14, 2019, Plaintiff Juahdi was arrested without a warrant. On September 16, 2019, Defendant Mark Stabile initiated criminal proceedings against Plaintiff Juahdi without probable cause, alleging that Plaintiff Juahdi had committed a felony and a misdemeanor.

81. The Court did not conduct a proceeding – or preliminary hearing – where the State of Connecticut was required to present enough evidence to establish probable cause to believe that Plaintiff Juahdi committed any crime.

82. Felony prosecutions may proceed only after a judge or grand jury determines that there is probable cause to believe that the specific individual charged committed specific crimes. This is done either by information presented for examination and approval by a judge, or by indictment after a grand jury hearing and vote. In Plaintiff Juahdi's case, there is no grand jury indictment and no information.

83. An independent determination of probable cause was never made in Plaintiff Juahdi's alleged felony case. Consequently, Defendant Mark Stabile did not present an information to the Court.

84. However, Section 36-11 of the Connecticut Practice Book requires felonies to be prosecuted by information.

85. In fact, no information was ever filed with the Clerk's Office in Plaintiff Juahdi's case, in direct conflict with Section 36-15 of the Connecticut Practice Book.

86. Under Connecticut and Federal law, in any felony case, a warrantless arrest or a criminal complaint is not enough to require the accused to stand trial for a felony charge.

87. Therefore, Defendants Jack Fischer, Mark Stabile, Barry Armata, and Elizabeth Leaming illegally committed Plaintiff Juahdi to trial when they denied her substantial legal and constitutional rights to a probable cause hearing on the alleged felony charge.

88. Defendants Jack Fischer, Barry Armata, Mark Stabile, and Elizabeth Leaming violated Plaintiff Juahdi's Fourteenth Amendment rights and Sections 36-11 and 36-15 of the Connecticut Practice Book.

89. Plaintiff Juahdi's case should have been dismissed on September 16, 2019 as a matter of law.

D. Violation of Rule 3.8 (1), Connecticut Practice Book

90. Rule 3.8 (1) of the Connecticut Practice Book prescribes that the prosecutor in a criminal case shall refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause.

91. Defendants Mark Stabile, Elizabeth Leaming, and their co-conspirators continued to prosecute charges against Plaintiffs that they knew were not supported by probable cause.

92. Defendants Mark Stabile and Elizabeth Leaming had a constitutional obligation to dismiss Plaintiff Deafueh and Plaintiff Juahdi's cases for lack of probable cause.

E. Violation of the Equal Protection Clause -- Fourteenth Amendment

93. The Fourteenth Amendment's Equal Protection Clause requires states to practice equal protection. Equal protection forces a state to govern impartially without drawing distinctions between individuals solely on differences that are irrelevant to a legitimate governmental objective. Thus, the Equal Protection Clause is crucial to the protection of civil rights.

94. Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, and Mark Stabile have violated the Equal Protection Clause of the Fourteenth Amendment and have violated Plaintiff Deafueh and Plaintiff Juahdi's guaranteed equal protection rights.

95. Defendants Elizabeth Leaming, Jack Fischer, Barry Armata, and Mark Stabile have deprived Plaintiff Deafueh and Plaintiff Juahdi equal protection of the law.

VI. The unlawful June 7, 2021 Re-Arrest Warrants were invalid and violated Plaintiffs' due process and equal protection rights.

96. It must be noted that Plaintiffs' cases were initiated in September 2019 and since then Plaintiffs, who live in Maryland, have not missed a court date in Connecticut.

97. In anticipation of Plaintiffs' Evidentiary Hearing on their respective pending Motion to Dismiss for lack of probable cause, Plaintiffs requested to receive signed Subpoena and Deposition Orders from Defendant Jack Fischer and Bills of Particulars from Defendant Elizabeth Leaming on June 7, 2021.

98. On May 17, 2021, Plaintiffs notified the Danielson Court in writing that they were not available on June 7, 2021 after all. Defendant Elizabeth Leaming was served with a copy of Plaintiffs' notices. **Exhibit 11 and Exhibit 12**

99. The Danielson Court had eighteen (18) days advance notice that Plaintiffs would not be available on June 7, 2021. Hence, the Court should have scheduled a new Pre-Trial date.

100. On June 7, 2021, Defendant Tammy Fluett and Jennifer Barry filed falsified Re-Arrest Warrant applications and made false allegations that Plaintiffs failed to appear to Court even though Defendant Elizabeth Leaming and the Court already knew eighteen (18) days in advance that Plaintiffs would not appear at Court on June 7, 2021.

101. The Re-Arrest Warrant applications were not only falsified, but also invalid and unlawful because the Court lacked probable cause.

102. Moreover, the Re-Arrest Warrant applications contained material misstatements and omissions and were not signed and filled out by the appropriate persons. **Exhibit 13 and Exhibit 14**

103. Jennifer Barry falsely signed the Re-Arrest Warrant applications as the "Deputy Assistant State's Attorney" and "Prosecutor" when she is neither the Deputy Assistant State's Attorney nor the Prosecutor in Plaintiffs' cases.

104. Jennifer Barry has no connection to Plaintiffs' cases. Defendant Elizabeth Leaming, on the other hand, is the Deputy Assistant State's Attorney and Prosecutor in Plaintiffs' cases.

105. Although Defendant Elizabeth Leaming was present at the Danielson Courthouse on June 7, 2021, she asked Jennifer Barry, who does not have any connection to Plaintiffs' cases, to apply for the falsified Re-Arrest Warrants.

106. Alternatively, Defendant Elizabeth Leaming and/or her co-conspirators forged Jennifer Barry's signature.

107. Defendant Elizabeth Leaming wanted to conceal the fact that she and Defendant Jack Fischer were falsely issuing warrants for Plaintiffs' re-arrest to create fraudulent new charges in Plaintiffs' cases so that the State of Connecticut could continue to prosecute charges against Plaintiffs.

108. The information and statements in the June 7, 2021 Re-Arrest Warrant applications were false and inaccurate. The affidavits provided by Defendant Tammy Fluet in support of the Re-Arrest Warrant applications were false and showed reckless disregard for the truth.

109. Defendant Tammy Fluet falsely signed affidavits to accompany the Re-Arrest Warrant application in which she swore under the penalty of perjury that the "Warrant/Summons/Ticket was served on the accused charging the commission of the following offenses, motor vehicle violation(s) or infraction(s)..."

110. In actuality, Plaintiffs were never served with any warrants, summons, or tickets on or before June 7, 2021.

111. Furthermore, Defendant Tammy Fluet improperly swore before Ariana Quintero, a temporary paralegal. The Re-Arrest Warrant applications required Defendant Tammy Fluet to make sworn statements before a Judge, Clerk, or Commissioner of the Superior Court.

112. Ariana Quintero does not have the authority to legally authenticate sworn statements for a Re-Arrest Warrant application.

113. The Re-Arrest Warrants were unconstitutional and brought in bad-faith.

114. Moreover, Section 38-19 of the Connecticut Practice Book states that "Upon application by the prosecuting authority alleging that a defendant has violated the conditions of release, a judicial authority may, if probable cause is found, order that the defendant appear in court for a hearing upon such allegations".

115. Defendant Jack Fischer violated Plaintiffs' Due Process rights and Section 38-19 of the Connecticut Practice Book when he issued the Re-Arrest Warrants on June 7, 2021, without first holding a hearing on such allegations made by Tammy Fluet and Jennifer Barry.

116. Defendant Jack Fischer acted in the absence of jurisdiction when he signed the invalid Re-Arrest Warrants, charged Plaintiffs with "Failure to Appear", and increased the bail amount to \$30,000 for Plaintiff Juahdi and \$60,000 for Plaintiff Deafueh without probable cause and without holding a hearing.

117. Defendants Elizabeth Leaming, Jack Fischer, and Tammy Fluet conspired with Jennifer Barry and Ariana Quintero to apply for and issue the invalid Re-Arrest Warrants, thereby violating Plaintiffs' Fourth Amendment, Due Process, and Equal Protection Rights.

118. Defendants Elizabeth Leaming, Jack Fischer, Tammy Fluet, and their co-conspirators acted outside the scope of their authority and in absence of all jurisdiction over Plaintiffs when they intentionally applied for and issued the falsified Re-Arrest Warrants.

119. Defendants conspired to illegally commit Plaintiffs to trial by unlawfully adding fraudulent Failure to Appear charges to Plaintiffs' cases after Plaintiffs had filed Motions to Dismiss for lack of probable cause.

120. On June 7, 2021 Defendants Jack Fischer, Tammy Fluet, and Elizabeth Leaming issued unlawful Re-Arrest Warrants without probable cause in Plaintiffs' cases that should have been dismissed on September 16, 2019 for lack probable cause.

121. The actions of the Defendants have threatened Plaintiffs' liberty and freedom, and violated Plaintiffs' rights to Fundamental Fairness.

VII. Defendants acted in absence of authority and jurisdiction in direct violation of constitutional guarantees.

122. Defendants were acting as co-conspirators under the color of law, outside the scope of their authority, and in absence of all jurisdiction over Plaintiffs when Defendants (1) failed to hold a probable cause hearing within 48 hours after a warrantless arrest, (2) forged and falsified court records in criminal proceedings, and (3) continued to prosecute Plaintiffs for charges which Defendants know are not supported by probable cause and no probable cause hearing was held.

123. The acts and omissions of Defendants were intentional and occurred with willful and wanton disregard and reckless indifference to the constitutionally protected civil rights of Plaintiffs.

124. Defendants conspired to obstruct the course of justice in Plaintiffs' cases pending in the Danielson Court, and interfered with the equal protection of the law.

125. Defendants conspired for the purpose of preventing, impeding, hindering, obstructing the dismissal of Plaintiffs' cases in order to continue the unlawful criminal proceedings against Plaintiffs, who are African-Americans with no previous criminal record.

126. Each Defendant acting as co-conspirator neglected to prevent the furtherance of the conspiracy to deprive Plaintiffs of well-established rights secured to them by the Fourth and Fourteenth Amendments of the Constitution of the United States of America and the Connecticut Rules of Criminal Procedures.

VIII. The Court can only be effective, fair, and just if it is allowed to function as the laws prescribed.

127. The Court should be an unbiased, but methodical "creature" which is governed by the Rules of Criminal Procedure and the United States Constitution.

TABLE 1: Summary of the unconstitutional acts of the Defendants acting in concert with co-conspirators in furtherance of the violations of the Provisions, Statutes, and Rules overseen by Constitutional law.

No.	Unconstitutional Acts of Defendants	Provisions, Statutes, and Rules Violated
1	Detained Plaintiffs for more than 48 hours without an independent determination of probable cause after a warrantless arrest	Fourth Amendment Conn. Practice Book, Section 37-12(a)
2	Prosecuted charges against Plaintiffs that are not supported by probable cause	Fourteenth Amendment Conn. Practice Book, Rule 3.8 (1)
3	Deprived Plaintiff of a preliminary hearing in an alleged felony case	Fourth Amendment
4	Before arraignment, Defendant failed to provide Plaintiffs with a copy of any affidavit or report submitted to the Court for the purpose of making a probable cause determination	Fourth Amendment Fourteenth Amendment Conn. Practice Book, Rule 37-2
5	Prosecuted an alleged felony charge against Plaintiff without an information; Information not filed with Clerk's Office	Conn. Practice Book, Section 36-11 Conn. Practice Book, Section 36-15
6	Falsified Re-Arrest Warrant applications	Fourteenth Amendment
7	Issued Re-Arrest Warrants against Plaintiffs without probable cause	Fourteenth Amendment
8	Increased Plaintiffs' bail amounts without holding a hearing	Fourteenth Amendment Conn. Practice Book, Section 38-19
9	Filed false "Failure to Appear" charges on June 7, 2021 in proceedings that should have been dismissed for lack of probable cause on September 16, 2019	Fourth Amendment Fourteenth Amendment

IX. Plaintiffs suffered severe emotional distress and trauma caused by Defendants' extreme and outrageous conduct.

128. Defendants conspired for the purpose of preventing, impeding, hindering, obstructing the dismissal of Plaintiffs' cases in order to continue the unlawful criminal proceedings against Plaintiffs, who are African-Americans with no previous criminal record.

129. As a result of Defendant's activities and reckless disregard for the United States Constitution and the Laws described herein, Plaintiffs suffered economic and non-economic damages, including, but not limited to, severe emotional distress, damage to reputation, and loss of earnings and economic opportunities.

FIRST CAUSE OF ACTION

Declaratory Relief That Forging or Falsifying Court Documents for the Purpose of Obstructing the Course of Justice is Unconstitutional

(Against All Defendants)

I.

130. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

131. There is no Judge by the name of "Armata, J" in the State of Connecticut.

132. Defendants knowingly and intentionally forged a fictitious signature of a Judge and knowingly conspired in using such fictitious signature of a Judge, for the purpose of authenticating a proceeding and for the purpose of authenticating probable cause documents, knowing such signature to be false and fictitious. Defendants filed with the Clerk's Office forged "Probable Cause Documents" containing material statements that they knew to be false.

133. For the reasons stated above, Plaintiffs are entitled to a declaratory judgment pursuant to 28 U.S.C. § 2201 that forging or falsifying court documents for the purpose of obstructing the course of justice is unconstitutional.

II.

134. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

135. Defendants knowingly and intentionally falsified and issued Re-Arrest Warrants for the purpose of adding fraudulent Failure to Appear charges to Plaintiffs' cases to continue the unlawful proceedings, after Plaintiffs had filed Motions to Dismiss for lack of probable cause.

136. Plaintiffs have been injured and damaged, and have suffered a severe violation of their Constitutional Rights as a result of the falsified Re-Arrest Warrants.

137. For the reasons stated above, Plaintiffs are entitled to a declaratory judgment pursuant to 28 U.S.C. § 2201 that it is unconstitutional to use, attempt to use, possess, obtain, accept, to provide any forged, counterfeit, altered, or falsely made document for the purpose of authenticating a Re-Arrest Warrant application, or tender in evidence any such falsified or invalid document, knowing such document to be false.

138. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

SECOND CAUSE OF ACTION

Declaratory Judgment that Defendants Conspired to Interfere with Plaintiffs' Civil Rights – 42 U.S.C. § 1985

(Against All Defendants)

139. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

140. 42 U.S.C. § 1985(3) make it unlawful for two or more persons to conspire for the purpose of depriving, directly or indirectly, a person or class of persons of the equal protection of the laws and an act in furtherance of the conspiracy which causes injury to a person or property, or a deprivation of any right or privilege of a citizen of the United States.

141. Each of the Defendants has acted in concert with various co-conspirators in carrying out the deprivation of civil rights and civil rights abuses against Plaintiffs, who are African-Americans, for the purpose of directly depriving Plaintiffs the equal protection of the laws and other guaranteed constitutional rights in a criminal proceeding.

142. Defendants have authorized, ratified and approved the acts of the other Defendants with full knowledge of those acts to violate Plaintiffs' Fourth, and Fourteenth amendments rights guaranteed to them by the United States Constitution.

143. Plaintiffs have been injured and damaged, and are suffering severe violations of their Constitutional rights.

144. Defendants are liable to Plaintiffs for Declaratory and Injunctive Relief for violation of the Plaintiffs' Constitutional rights.

145. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

THIRD CAUSE OF ACTION

Declaratory Judgment that Defendants Neglected to Prevent – 42 U.S.C. § 1986

(Against All Defendants)

146. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

147. At any time, Defendants could have dismissed their unlawful cases, but they neglected to do so. Instead, Defendants conspired to continue the unlawful prosecution of charges against Plaintiffs for almost two years without probable cause in violation of the U.S. Constitution.

148. Plaintiffs have been injured and damaged, and are suffering irreparable harm.

149. Defendants are liable to Plaintiffs for Declaratory and Injunctive Relief for violation of the Plaintiffs' Constitutional rights.

150. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

FOURTH CAUSE OF ACTION

Declaratory Relief That Defendants Violated Plaintiffs' Fourth Amendment Rights

(Against All Defendants)

151. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

152. The Fourth Amendment of the United States Constitution guarantees persons, including Plaintiff Deafueh and Plaintiff Juahdi, the right to be free from deprivations of their liberty without due process of law.

153. At all times relevant hereto, it was the duty of Defendants to act reasonably and in compliance with the Fourth Amendment of the Constitution.

154. At all times relevant hereto, the Defendants were acting in absence of all jurisdiction in violation of federal and state laws.

155. The facts described herein constitute violations of several rights guaranteed to Plaintiffs by the United States Constitution.

156. Defendants are liable to Plaintiffs for Declaratory and Injunctive relief for violation of the Plaintiffs' Constitutional rights.

157. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

FIFTH CAUSE OF ACTION

Declaratory Relief That Defendants Violated Plaintiffs' Fourteenth Amendment Rights

(Against All Defendants)

158. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

159. The Fourteenth Amendment of the United States Constitution guarantees persons, including Plaintiff Deafueh and Plaintiff Juahdi, the Right to equal protection of the law and due process of law.

160. At all times relevant hereto, the Defendants' duty was to act reasonably and in compliance with the Fourteenth Amendment of the Constitution.

161. At all times relevant hereto, the Defendants were acting in absence of all jurisdiction over Plaintiffs in violation of federal and state laws.

162. The Defendants' acts and omissions were intentional and occurred with willful and wanton disregard and reckless indifference to the constitutionally protected civil rights of the Plaintiffs.

163. The facts described herein constitute violations of several rights guaranteed to Plaintiffs by the United States Constitution.

164. Defendants are liable to Plaintiffs for Declaratory and Injunctive Relief for violation of the Plaintiffs' Constitutional rights.

165. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

SIXTH CAUSE OF ACTION

Injunctive Relief

(Against All Defendants)

166. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

167. The United States Constitution guarantees Plaintiff Deafueh and Plaintiff Juahdi the right to equal protection of the law and due process of law. Plaintiffs are faced with severe ongoing civil rights abuses and threats of unlawful loss of liberty and freedom.

168. Plaintiffs are entitled to an injunction prohibiting the Defendants from any further activities violating well-established constitutional rights guaranteed to Plaintiffs by the Fourth Amendment, Fourteenth Amendment, and the Connecticut Rules of Criminal Procedure.

169. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

SEVENTH CAUSE OF ACTION
Intentional Infliction of Emotional Distress

(Against All Defendants)

170. Plaintiffs re-allege and incorporate by reference each and every allegation in each and every aforementioned paragraph as if fully set forth herein.

171. Such activities are an intentional infliction of emotional distress through extreme and outrageous conduct which would be condemned by virtually everyone in the United States, and which is conduct which exceeds all bounds usually tolerated by decent society and are of a nature which is especially calculated to cause and did cause mental distress of a very serious kind to the Plaintiff Deafueh and Plaintiff Juahdi.

172. Plaintiffs repeat and re-allege their claims for Actual Damages, Declaratory Relief and Injunctive Relief.

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38, Plaintiffs respectfully demand a trial by jury on all issues properly triable by a jury in this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendants as follows:

- 1) A judgment that each of the Defendants is liable to the Plaintiffs under the legal theories set forth in the above alleged Count 1 through Count 7;
- 2) Declaratory judgment that each of the Defendants have violated Plaintiffs' well-established and protected constitutional rights as set forth in the United States Constitution;

- 3) Declaratory judgment that forging or falsifying court documents for the purpose of obstructing the course of justice is unconstitutional;
- 4) Declaratory judgment that Defendants conspired to interfere with Plaintiffs' civil rights pursuant to 42 U.S.C. § 1985;
- 5) Declaratory judgment that Defendants neglected to prevent pursuant to 42 U.S.C. § 1986;
- 6) Declaratory judgment that Defendants violated Plaintiffs' Fourth Amendment rights;
- 7) Declaratory judgment that Defendants violated Plaintiffs' Fourteenth Amendment rights;
- 8) Injunctive Relief;
- 9) That each of the Defendants is liable to the Plaintiffs for unlawfully causing them emotional distress and pain and suffering;
- 10) That each of the Defendants is liable to the Plaintiffs for actual damages to Plaintiffs in the amount of \$22,000,000.00 or more; and
- 11) That Plaintiffs have such other, and further relief as this Court may deem just and proper.

This the 6th Day of August 2021

[REDACTED]

[REDACTED]

EXHIBIT LIST

This complaint is supported by the following attached exhibits.

<u>EXHIBIT NO.</u>	<u>DESCRIPTION OF EXHIBIT</u>
Exhibit 1	Plaintiff Deafueh's case appeared twenty times on docket as of June 29,2021
Exhibit 2	Plaintiff Juahdi's case appeared twenty times on docket as of June 29, 2021
Exhibit 3	Page one of Motion to Dismiss for Lack of Probable Cause in Plaintiff Deafueh's case
Exhibit 4	Page one of Motion to Dismiss for Lack of Probable Cause in Plaintiff Juahdi's case
Exhibit 5	Forged and Fake "Probable Cause Document" filed in Plaintiff Deafueh's case
Exhibit 6	Forged and Fake "Probable Cause Document" filed in Plaintiff Juahdi's case
Exhibit 7	List of Superior Court Judges in the State of Connecticut
Exhibit 8	Judges in Rockville, Connecticut (Geographical Area No.19) – Tolland
Exhibit 9	Assignment of Judges – September 2, 2019 to September 6, 2020
Exhibit 10	Towns that make up Geographical Area No. 19 -- Tolland Judicial District
Exhibit 11	May 17, 2021 Notice to Danielson Court in Plaintiff Deafueh's case
Exhibit 12	May 17, 2021 Notice to Danielson Court in Plaintiff Juahdi's case
Exhibit 13	The falsified June 7, 2021 Re-Arrest Warrant application in Plaintiff Deafueh's case
Exhibit 14	The falsified June 7, 2021 Re-Arrest Warrant application in Plaintiff Juahdi's case

EXHIBIT 1



State of Connecticut Judicial Branch



Tuesday,
June 29, 2021
Docket Search
by Court Location

Tuesday,
June 29, 2021
Docket Search
by Defendant

Pending Cases
Search by Defendant

Pending Cases
Search by Docket Number

Convictions Search
by Defendant

Convictions Search
by Docket Number

Attorney/Firm Case List

Attorney/Firm Look-up
Numbers

GA Court Phone
Numbers

JD Court Phone
Numbers

Home

Pending Case Detail

Information is accurate as of June 29, 2021 04:50 AM

Defendant Information

Last, First: MONBO D [REDACTED]
Birth Year: [REDACTED]

Represented By:
Times on the Docket: 20

Docket Information

Docket No: [REDACTED] 342-S Arresting Agency: CSP TROOP D
Companion:
Program:
Arrest Date: 9/13/2019
Court: Danielson GA 11 and JD Bond Amount: \$20,000 (This case only)
Bond Type: Professional Surety
Miscellaneous: (Released From Custody)

Activity: Rearrest Ordered

Re-Arrest
Ordered: 6/7/2021

Current Charges

Statute	Description	Class	Type	Occ	Offense Date	Plea	Verdict Finding
[REDACTED]	[REDACTED]	1	9/13/2019	Not Guilty	Not Guilty	Not Guilty	Not Guilty

[Register with Connecticut Statewide Automated Victim Information and Notification \(CT SAVIN\)](#)

CT SAVIN is a free, confidential service that gives crime victims and members of the community information about an offender's court case.

Back

[Attorneys](#) | [Case Look-up](#) | [Courts](#) | [Directories](#) | [Educational Resources](#) | [E-Services](#) | [FAQ's](#) | [Juror Information](#) | [Media](#) | [Opinions](#) | [Opportunities](#) | [Self-Help](#) | [Home](#)

[Common Legal Terms](#) | [Contact Us](#) | [Site Map](#) | [Website Policies](#)

Copyright © 2021, State of Connecticut Judicial Branch

EXHIBIT 2



State of Connecticut Judicial Branch



Tuesday,
June 29, 2021
Docket Search
by Court Location

Tuesday,
June 29, 2021
Docket Search
by Defendant

Pending Cases
Search by Defendant

Pending Cases
Search by Docket Number

Convictions Search
by Defendant

Convictions Search
by Docket Number

Attorney/Firm Case List

Attorney/Firm Look-up
Numbers

GA Court Phone
Numbers

JD Court Phone
Numbers

Home

Pending Case Detail

Information is accurate as of June 29, 2021 04:50 AM

Defendant Information

Last, First: MONBO J [REDACTED]

Birth Year: [REDACTED]

Represented By:

Times on the Docket: 20

Docket Information

Docket No: [REDACTED] 344-S

Companion:

Program:

Court: Danielson GA 11 and JD

Arresting Agency: CSP TROOP D

Arrest Date: 9/14/2019

Bond Amount: \$10,000 (This case only)

Bond Type: Ten Percent

Miscellaneous:

(Released From Custody)

Activity: Rearrest Ordered

Re-Arrest

Ordered: 6/7/2021

Current Charges

Statute	Description	Class	Type	Occ	Offense Date	Plea	Verdict Finding
[REDACTED]	[REDACTED]	1		9/14/2019		Not Guilty	
[REDACTED]	[REDACTED]	1		9/14/2019		Not Guilty	

[Register with Connecticut Statewide Automated Victim Information and Notification \(CT SAVIN\)](#)

CT SAVIN is a free, confidential service that gives crime victims and members of the community information about an offender's court case.

[Back](#)

[Attorneys](#) | [Case Look-up](#) | [Courts](#) | [Directories](#) | [Educational Resources](#) | [E-Services](#) | [FAQ's](#) | [Juror Information](#) | [Media](#) | [Opinions](#) | [Opportunities](#) | [Self-Help](#) | [Home](#)

[Common Legal Terms](#) | [Contact Us](#) | [Site Map](#) | [Website Policies](#)

Copyright © 2021, State of Connecticut Judicial Branch

EXHIBIT 3

**IN THE SUPERIOR COURT
FOR THE STATE OF CONNECTICUT**

State of Connecticut	*	[REDACTED]	342-S
v.	*	GA: 11	
D [REDACTED] Monbo	*	PRETRIAL	
* * * * *	*		

MOTION TO DISMISS FOR LACK OF PROBABLE CAUSE

NOW COMES Defendant, D [REDACTED] Monbo pursuant to the Connecticut Practice Book and the Connecticut General Statute and moves this Court to dismiss the above-entitled complaint as there was **no independent determination of probable cause** to arrest for the offense charge made within (48) forty-eight hours of the defendant's arrest **without a warrant**.

FACTUAL BACKGROUND AND PROCEDURAL HISTORY

1. Defendant is a citizen of Maryland and a Maryland Certified Public Accountant (CPA) of twenty-four years.
2. On September 13, 2019, (over one year ago), the Defendant was arrested by police **without a warrant**.
3. On September 13, 2019, the State of Connecticut ("State") instituted a criminal prosecution against the Defendant, who had **no** prior arrests or convictions.
4. The State alleged Defendant committed criminal mischief 3rd degree, larceny 4th degree, breach of peace, interference with officer/resisting, interfering with emergency call and failing to comply with fingerprint.
5. On September 16, 2019, the first court day following the Defendant's arrest and while the Defendant was still in custody, the Defendant was brought before the Court and bail was set, **however, no probable cause hearing was held**.

EXHIBIT 4

**IN THE SUPERIOR COURT
FOR THE STATE OF CONNECTICUT**

State of Connecticut	*	[REDACTED]	344-S
v.	*	GA: 11	
J [REDACTED] Monbo	*	PRETRIAL	
* * * * *			

MOTION TO DISMISS FOR LACK OF PROBABLE CAUSE

NOW COMES Defendant, J [REDACTED] Monbo pursuant to the Connecticut Practice Book and the Connecticut General Statute and moves this Court to dismiss the above-entitled complaint as there was **no independent determination of probable cause** to arrest for the offense charge made within (48) forty-eight hours of the defendant's arrest **without a warrant**.

FACTUAL BACKGROUND AND PROCEDURAL HISTORY

1. Defendant is a citizen of Maryland and a Doctoral candidate.
2. On September 14, 2019, (over one year ago), the Defendant was arrested by police **without a warrant**.
3. On September 14, 2019, the State of Connecticut ("State") instituted a criminal prosecution against the Defendant, who had **no** prior arrests or convictions.
4. The State alleged Defendant committed burglary 3rd degree and criminal mischief 2nd degree.
5. On September 16, 2019, the first court day following the Defendant's arrest and while the Defendant was still in custody, the Defendant was brought before the Court and bail was set, **however, no probable cause hearing was held**.
6. Furthermore, prior to Defendant's first day before the Court, the Prosecutor **never** provided the Defendant with copies of any affidavit or report submitted to the Court for the

EXHIBIT 5

**PROBABLE CAUSE
DETERMINATION REQUEST**

JD-CR-94 Rev. 12-07
P.B. §§ 30-5, 37-12

STATE OF CONNECTICUT
SUPERIOR COURT
G.A. & JUVENILE MATTERS
www.jud.ct.gov



INSTRUCTIONS

TO OFFICER

1. Complete the Request in triplicate and bring to a judge within 48 hours of an arrest without a warrant of a defendant or juvenile who is not released from custody.
2. Complete the introductory language in the Finding by identifying the documents submitted in support of the Request.
3. Except as provided in paragraph 4, return the original of the executed Finding to the G.A. Clerk's Office prior to the defendant's arraignment. Retain one copy for your file and give the third copy, together with the documents submitted in support of the Request, to the State's Attorney's Office.
4. In the case of a juvenile admitted to a juvenile detention center, the original of the executed Finding should be delivered or faxed to the juvenile detention center where the juvenile was admitted and a copy retained in the program file.

FOR COURT USE ONLY

Supporting Affidavits Sealed

☐ Yes

☐ No

TO JUDGE

1. Verify the accuracy of the description and dates of the documents listed in the Finding.
2. Sign the Finding in triplicate. Return all copies of the Finding and of any documents submitted in support of the Request to the officer.

REQUEST FOR PROBABLE CAUSE DETERMINATION

TO: A Judge of the Superior Court

<input checked="" type="checkbox"/> G.A. NO. <u>11</u> AT: <u>Danielson</u>		<input type="checkbox"/> JUVENILE AT: _____	
DATE (Mo., day, yr.) <u>9/13/19</u>	TIME OF ARREST (A.M. or P.M.) <u>11:45 AM</u>	POLICE DEPARTMENT <u>CSP-D</u>	
NAME OF ACCUSED (Last, first, middle initial) <u>MONDO, D</u>		DEPARTMENT CASE NO. [REDACTED]	
ADDRESS (No., street, city and state) [REDACTED]			
OFFENSE TOWN <u>Killingly</u>	TOWN CODE <u>069</u>	SOCIAL SECURITY NO. [REDACTED]	DATE OF BIRTH (Mo., day, yr.) [REDACTED]

The undersigned officer requests that the attached affidavit(s) be reviewed for a determination of probable cause.

DATE AND SIGNATURE	DATE (Mo., day, yr.) <u>9/14/19</u>	SIGNED (Officer) <u>TEU J. L #537</u>
--------------------	--	--

FINDING

Upon review of the following document(s) identified as Arraignment Report & Affidavit and dated, 9/14/19

in affidavit form as submitted, the undersigned finds that:

- ☒ probable cause exists to believe that a criminal offense has been committed by the accused.
- ☐ there is no probable cause and accused is ordered released from custody.
- ☐ Based upon the finding of probable cause, the court, at this time, seals or limits disclosure of the following:
- ☐ The sealing or limits of disclosure is for a period of: _____
(not to exceed 2 weeks from the date of the probable cause determination)
- ☐ Disclosure is limited to following terms and conditions: _____

- ☐ The undersigned recommends review of the following document(s) _____

Sunday (Courthouse was closed) at the time of arraignment for sealing and/or limiting disclosure for the following reasons: _____

Armata, J
(fake signature of a judge)

DATE, TIME & SIGNATURE	DATE (Mo., day, yr.) <u>9/15/19</u>	AT (Time, A.M. or P.M.) <u>10:50 AM</u>	SIGNED (A judge of the Superior Court) <u>Armata, J (Armata, J)</u>
------------------------	--	--	--



STATE OF CONNECTICUT, DEPARTMENT OF PUBLIC SAFETY-
INVESTIGATION REPORT (DPS-302-E) (REVISED 2/3/06)

Page 2 of 5

BOND: \$20,000 Cash / Surety

HAS NO PREVIOUS RECORD: NO

CIRCUMSTANCES OF ARREST:

Bail information
should not have
been known on
09/14/2019

THE UNDERSIGNED, AN INVESTIGATOR HAVING BEEN DULY SWORN, DEPOSES AND SAYS THAT, I AM THE WRITER OF THE ATTACHED POLICE REPORT PERTAINING TO THIS INCIDENT NUMBER, THAT THE INFORMATION CONTAINED THEREIN WAS SECURED AS A RESULT OF (1) MY PERSONAL OBSERVATION AND KNOWLEDGE OR (2) INFORMATION RELAYED TO ME BY OTHER MEMBERS OF MY POLICE DEPARTMENT OR OF ANOTHER POLICE DEPARTMENT OR (3) INFORMATION SECURED BY MYSELF OR ANOTHER MEMBER OF A POLICE DEPARTMENT FROM THE PERSON OR PERSONS NAMED OR IDENTIFIED THEREIN, AS INDICATED IN THE ATTACHED REPORT. THAT THE REPORT IS AN ACCURATE STATEMENT OF THE INFORMATION SO RECEIVED BY ME.

INVESTIGATOR SIGNATURE: /TFC JAMES A ESPOSITO/	INVESTIGATOR I.D.#: 0537	REPORT DATE: 09/14/2019 08:36 pm
SUPERVISOR SIGNATURE: /SGT JOHN T GREGORZEK/	SUPERVISOR I.D.#: 0235	

Report signed
on 09/14/2019

EXHIBIT 6

PROBABLE CAUSE
DETERMINATION REQUEST

JD-CR-94 Rev. 12-07
P.B. §§ 30-5, 37-12

STATE OF CONNECTICUT
SUPERIOR COURT
G.A. & JUVENILE MATTERS
www.jud.ct.gov



INSTRUCTIONS

TO OFFICER

1. Complete the Request in triplicate and bring to a judge within 48 hours of an arrest without a warrant of a defendant or juvenile who is not released from custody.
2. Complete the introductory language in the Finding by identifying the documents submitted in support of the Request.
3. Except as provided in paragraph 4, return the original of the executed Finding to the G.A. Clerk's Office prior to the defendant's arraignment. Retain one copy for your file and give the third copy, together with the documents submitted in support of the Request, to the State's Attorney's Office.
4. In the case of a juvenile admitted to a juvenile detention center, the original of the executed Finding should be delivered or faxed to the juvenile detention center where the juvenile was admitted and a copy retained in the program file.

FOR COURT USE ONLY

Supporting Affidavits Sealed

☐ Yes

☐ No

TO JUDGE

1. Verify the accuracy of the description and dates of the documents listed in the Finding.
2. Sign the Finding in triplicate. Return all copies of the Finding and of any documents submitted in support of the Request to the officer.

REQUEST FOR PROBABLE CAUSE DETERMINATION

TO: A Judge of the Superior Court

<input checked="" type="checkbox"/> G.A. NO. <u>11</u> AT: <u>DANIELSON</u>	<input type="checkbox"/> JUVENILE AT: _____	
DATE (Mo., day, yr.) <u>9/14/19</u>	TIME OF ARREST (A.M. or P.M.) <u>9/14/19 0633am</u>	POLICE DEPARTMENT <u>CSF.D DANIELSON</u>
NAME OF ACCUSED (Last, first, middle initial) <u>MONBU, J</u>		DEPARTMENT CASE NO. [REDACTED]
ADDRESS (No., street, city and state) [REDACTED]		
OFFENSE TOWN <u>KILLINGLY</u>	TOWN CODE <u>069</u>	SOCIAL SECURITY NO. [REDACTED]
DATE OF BIRTH (Mo., day, yr.) [REDACTED]		

The undersigned officer requests that the attached affidavit(s) be reviewed for a determination of probable cause.

DATE AND SIGNATURE <u>09/14/19</u>	SIGNED (Officer) <u>TFC E. Badger #1014</u>
---------------------------------------	--

TFC "E"
Badge #1014

Upon review of the following document(s) identified as Arrest Report & Affidavit
and dated, 9/14/19

in affidavit form as submitted, the undersigned finds that:

- ☒ probable cause exists to believe that a criminal offense has been committed by the accused.
- ☐ there is no probable cause and accused is ordered released from custody.
- ☐ Based upon the finding of probable cause, the court, at this time, seals or limits disclosure of the following:

☐ The sealing or limits of disclosure is for a period of: _____
(not to exceed 2 weeks from the date of the probable cause determination)

☐ Disclosure is limited to following terms and conditions: _____

Armata, J

Sunday (Courthouse was closed) (fake signature of a judge)

- ☐ The undersigned recommends review of the following document(s) _____
at the time of arraignment for sealing and/or limiting
disclosure for the following reasons: _____

DATE, TIME & SIGNATURE <u>9/15/19</u>	DATE (Mo., day, yr.) <u>9/15/19</u>	AT (Time, A.M. or P.M.) <u>10:55 AM</u>	SIGNED (A judge of the Superior Court) <u>Armata, J</u>
--	--	--	--



INVESTIGATION REPORT (DPS-302-E) (REVISED 2/3/06)

Page 1 of 2

Report Type: [REDACTED]

Initial Report: ☐ Prosecutors Report: ☒ Supplement: ☐ Re-open: ☐ Assist: ☐ Closing: ☐

Attachments:

Statements: ☐ Teletype: ☐ Photos: ☐ Sketchmap: ☐ Evidence: ☐ Other: ☐

CFS NO [REDACTED]	INCIDENT DATE 09/14/2019	TIME 06:19	INCIDENT DATE 09/14/2019	TIME	PRIMARY OFFICER STADNICKI, BRYAN J.	BADGE NO 1014
INVESTIGATING OFFICER STADNICKI, BRYAN J.		BADGE NO 1014	TYPE OF EXCEPTIONAL CLEARANCE Not Applicable		CASE STATUS Closed by Arrest	
INCIDENT ADDRESS [REDACTED]				APARTMENT NO	TOWN CD T069	

ARRAIGNMENT REPORT & AFFIDAVIT
(WARRANTLESS ARREST)TFC Bryan Stadnicki
was not present during
arrest. Badge #1014

JUDICIAL DISTRICT OF WINDHAM

The undersigned, an officer of the Connecticut State Police Department, having been duly sworn, deposes and says: That I am the officer who prepared this police report. That the information contained therein was secured as a result of: (1) my personal observation and knowledge, or (2) information relayed to me by other members of my police department or of another organized police, or (3) information secured by myself or another member of an organized police department from the person or persons named or identified therein, as indicated in this attached report. That this report is an accurate statement of the information so received by me.

DATE/TIME OF ARREST: 09/14/19 @ 0633 hours

LOCATION OF CRIME: Dayville, CT

ARRESTED: Monbu, J [REDACTED]

CHARGES: [REDACTED]

BOND: \$10,000.00 cash/surety

Bail information
should not have been
known on 09/14/2019TFC "E"
Badge #1014

THE UNDERSIGNED, AN INVESTIGATOR HAVING BEEN DULY SWORN, DEPOSES AND SAYS THAT: I AM THE WRITER OF THE ATTACHED POLICE REPORT PERTAINING TO THIS INCIDENT NUMBER. THAT THE INFORMATION CONTAINED THEREIN WAS SECURED AS A RESULT OF (1) MY PERSONAL OBSERVATION AND KNOWLEDGE; OR (2) INFORMATION RELAYED TO ME BY OTHER MEMBERS OF MY POLICE DEPARTMENT OR OF ANOTHER POLICE DEPARTMENT; OR (3) INFORMATION SECURED BY MYSELF OR ANOTHER MEMBER OF A POLICE DEPARTMENT FROM THE PERSON OR PERSONS NAMED OR IDENTIFIED THEREIN, AS INDICATED IN THE ATTACHED REPORT. THAT THE REPORT IS AN ACCURATE STATEMENT OF THE INFORMATION SO RECEIVED BY ME.		
INVESTIGATOR SIGNATURE: /TFC BRYAN STADNICKI/	INVESTIGATOR I.D.#: 1014	REPORT DATE: 09/14/2019 10:01 pm
SUPERVISOR SIGNATURE: /SGT JOHN T GREGORZEK/	SUPERVISOR I.D.#: 0235	Report signed on 09/14/2019

EXHIBIT 7



Superior Court Judges

Name	Address	Phone/Fax
Barbara D. Aaron	Juvenile Court 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
James W. Abrams	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Salvatore C. Agati	Judicial District Courthouse 300 Grand Street Waterbury, CT 06702	(203) 591-3340 (203) 596-4488
Jon M. Alander	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Michael A. Albis	J.D. & G.A. 9 Courthouse 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Linda Allard	Juvenile Court 920 Broad Street Hartford, CT 06106	(860) 244-7900 (860) 566-1658
Barry F. Armata	Judicial District Courthouse 69 Brooklyn Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
Matthew Edward Auger	Judicial District Courthouse 155 Church Street Putnam, CT 06260	(860) 928-7749 (860) 928-7076
Claudia A. Baio	Housing Court 121 Elm Street New Haven, CT 06510	(203) 789-7461 (203) 789-7539
Laura F. Baldini	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977

Barbara N. Bellis	Complex Litigation Docket 400 Grand Street Waterbury, CT 06702	(203) 236-8200 (203) 236-8205
Tejas Bhatt	Superior Court G.A. 19 20 Park Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
John F. Blawie	J.D. & G.A 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Elizabeth A. Bozzuto	Office of the Chief Court Administrator 231 Capitol Avenue Hartford, CT 06106	(860) 757-2100 (860) 757-2130
Barbara Brazzel-Massaró	J.D. & G.A. 3 Courthouse 146 White Street Danbury, CT 06810	(203) 207-8690 (203) 207-8689
Donna M. Wilkerson Brilliant	Juvenile Court 60 Housatonic Avenue Bridgeport, CT 06604	(203) 579-6544
Peter L. Brown	J.D. & G.A. 22 Courthouse 14 West River St., P.O. Box 210 Milford, CT 06460	(203) 283-8246 (203) 876-8072
Alice A. Bruno	Judicial District Courthouse 300 Grand Street Waterbury, CT 06702	(203) 591-3340 (203) 596-4488
Matthew J. Budzik	Judicial District Courthouse 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Mary-Margaret D. Burgdorff	J.D. & G.A. 7 Courthouse 54 West Main Street Meriden, CT 06451	(203) 238-6137 (203) 238-6423
Eugene R. Calistro, Jr.	Superior Court, G.A. 23 121 Elm Street New Haven, CT 06510	(203) 789-7461 (203) 789-7492
Harry E. Calmar	Judicial District Courthouse 70 Huntington Street New London, CT 06320	(860) 442-2977 (860) 447-8701
Suzanne E. Caron	J.D. & G.A. 15 Courthouse 20 Franklin Square	(860) 515-5050 (860) 515-5051

	New Britain, CT 06051	
Karyl L. Carrasquilla	Judicial District Courthouse(Family) 90 Washington Street Hartford, CT 06106	(860) 706-5060 (860) 706-5077
Patrick L. Carroll III	Office of the Chief Court Administrator 231 Capitol Avenue Hartford, CT 06106	(860) 757-2100 (860) 757-2130
Courtney M. Chaplin	Superior Court G.A. 19 20 Park Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
John Cirello	J.D. & G.A. 15 Courthouse 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
William F. Clark	J.D. & G.A 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Susan Quinn Cobb	Judicial District Courthouse 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Susan A. Connors	Judicial District Courthouse(Family) 90 Washington Street Hartford, CT 06106	(860) 706-5060 (860) 706-5077
Bernadette Conway	Juvenile Court 239 Whalley Avenue New Haven, CT 06511	(203) 786-0337 (203) 786-0327
John L. Cordani	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Robert A. D'Andrea	J.D. & G.A. 3 Courthouse 146 White Street Danbury, CT 06810	(203) 207-8690 (203) 207-8689
Michael R. Dannehy	Juvenile Court 920 Broad Street Hartford, CT 06106	(860) 244-7900 (860) 566-1658
Tracy Lee Dayton	Superior Court, G.A. 2 172 Golden Hill Street Bridgeport, CT 06604	(203) 579-6568 (203) 382-8408

Maureen D. Dennis	J.D. & G.A. 22 Courthouse 14 West River St., P.O. Box 210 Milford, CT 06460	(203) 283-8246 (203) 876-8072
Leo V. Diana	Regional Family Trial Docket 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Kevin C. Doyle	Superior Court, G.A. 2 172 Golden Hill Street Bridgeport, CT 06604	(203) 579-6568 (203) 382-8408
Nuala E. Droney	J.D. & G.A. 21 Courthouse 1 Courthouse Square Norwich, CT 06360	(860) 886-0144 (860) 823-1019
Lisa Grasso Egan	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
John B. Farley	J.D. & G.A. 15 Courthouse 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
Anna M. Ficeto	Judicial District Courthouse 300 Grand Street Waterbury, CT 06702	(203) 591-3340 (203) 596-4488
Jack W. Fischer	Superior Court G.A. 11 120 School Street Danielson, CT 06239	(860) 779-8500 (860) 779-8492
Matthew E. Frechette	J.D. & G.A. 9 Courthouse 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Tammy D. Geathers	J.D. & G.A. 15 Courthouse 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
Robert L. Genuario	J.D. & G.A. 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
David P. Gold	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977
Karen A. Goodrow	Judicial District Courthouse 235 Church Street	(203) 503-6830 (203) 789-6826

	New Haven, CT 06510	
Matthew D. Gordon	Judicial District Courthouse 300 Grand Street Waterbury, CT 06702	(203) 591-3340 (203) 596-4488
Mark T. Gould	J.D. & G.A. 22 Courthouse 14 West River St., P.O. Box 210 Milford, CT 06460	(203) 283-8246 (203) 876-8072
Ernest Green, Jr.	Judicial District Courthouse 155 Church Street Putnam, CT 06260	(860) 928-7749 (860) 928-7076
Auden C. Grogins	Juvenile Court 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
Jane K. Grossman	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Michael Gustafson	Superior Court, G.A. 23 121 Elm Street New Haven, CT 06510	(203) 789-7461 (203) 789-7492
H. Gordon Hall	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977
Gerald L. Harmon	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Donna Nelson Heller	J.D. & G.A 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Alex V. Hernandez	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Barbara A. Hoffman	Juvenile Court 978 Hartford Turnpike Waterford, CT 06385	(860) 440-5880 (860) 440-5885
Sheila A. Huddleston	Juvenile Court 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051

Bruce P. Hudock	J.D. & G.A 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Frank A. Iannotti	J.D. & G.A. 4 Courthouse 400 Grand Street Waterbury, CT 06702	(203) 236-8200 (203) 236-8205
Irene P. Jacobs	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Robyn Stewart Johnson	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977
Barbara Bailey Jongbloed	Judicial District Courthouse 70 Huntington Street New London, CT 06320	(860) 442-2977 (860) 447-8701
Michael P. Kamp	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
John F. Kavanewsky, Jr.	Juvenile Court 123 Hoyt Street Stamford, CT 06901	(203) 965-5315 (203) 965-5315
Maureen M. Keegan	J.D. & G.A. 15 Courthouse 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
Corinne L. Klatt	J.D. & G.A. 4 Courthouse 400 Grand Street Waterbury, CT 06702	(203) 236-8200 (203) 236-8205
Daniel J. Klau	UAPA Tax Appeals Docket 20 Franklin Square New Britain, CT 06051	(860) 515-5145 (860) 515-5146
Kimberly A. Knox	Judicial District Courthouse 70 Huntington Street New London, CT 06320	(860) 442-2977 (860) 447-8701
Ronald E. Kowalski, II	J.D. & G.A. 3 Courthouse 146 White Street Danbury, CT 06810	(203) 207-8690 (203) 207-8689
Hunchu Kwak	Judicial District Courthouse 70 Huntington Street	(860) 442-2977 (860) 447-8701

	New London, CT 06320	
Jason M. Lobo	Juvenile Court 920 Broad Street Hartford, CT 06106	(860) 244-7900 (860) 566-1658
Ann E. Lynch	Judicial District Courthouse 155 Church Street Putnam, CT 06260	(860) 928-7749 (860) 928-7076
Jennifer Macierowski	Judicial District Courthouse 69 Brooklyn Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
Shelley A. Marcus	Juvenile Court 239 Whalley Avenue New Haven, CT 06511	(203) 786-0337 (203) 786-0327
Michael G. Maronich	Juvenile Court 60 Housatonic Avenue Bridgeport, CT 06604	(203) 579-6544
Kimberly Massicotte	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977
Stephanie A. McLaughlin	J.D. & G.A. 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Kathleen E. McNamara	Superior Court G.A. 19 20 Park Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
Peter A. McShane	Superior Court, G.A. 12 410 Center Street Manchester, CT 06040	(860) 646-5874 (860) 645-7540
Maximino Medina, Jr.	J.D. & G.A. 3 Courthouse 146 White Street Danbury, CT 06810	(203) 207-8690 (203) 207-8689
John D. Moore	J.D. & G.A. 18 Courthouse 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
Margarita Hartley Moore	J.D. & G.A. 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389

Lisa K. Morgan	J.D. & G.A. 15 Courthouse 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
Ndidi Moses	Superior Court, G.A. 2 172 Golden Hill Street Bridgeport, CT 06604	(203) 579-6568 (203) 382-8408
Thomas G. Moukawsher	Complex Litigation Docket 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Kevin J. Murphy	J.D. & G.A. 9 Courthouse 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Margaret M. Murphy	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Shari A. Murphy	Superior Court, G.A. 10 112 Broad Street New London, CT 06320	(860) 443-8343 (860) 437-1168
Carla Nascimento	J.D. & G.A. 9 Courthouse 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Robert Nastri, Jr.	Judicial District Courthouse(Family) 90 Washington Street Hartford, CT 06106	(860) 706-5060 (860) 706-5077
John M. Newson	J.D. & G.A. 21 Courthouse 1 Courthouse Square Norwich, CT 06360	(860) 886-0144 (860) 823-1019
Tammy T. Nguyen-O'Dowd	Judicial District Courthouse(Family) 90 Washington Street Hartford, CT 06106	(860) 706-5060 (860) 706-5077
Gladys Idelis Nieves	Judicial District Courthouse 300 Grand Street Waterbury, CT 06702	(203) 591-3340 (203) 596-4488
Cesar A. Noble	Judicial District Courthouse 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Edward V. O'Hanlan	Superior Court, G.A. 10 112 Broad Street	(860) 443-8343 (860) 437-1168

	New London, CT 06320	
Leslie I. Olear	Regional Child Protection Session 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Vernon D. Oliver	J.D. & G.A. 9 Courthouse 1 Court Street Middletown, CT 06457	(860) 343-6570 (860) 343-6589
Sheila A. Ozalis	Complex Litigation Docket 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Angelica N. Papastavros	Superior Court G.A. 11 120 School Street Danielson, CT 06239	(860) 779-8500 (860) 779-8492
Carletha Parkinson	Judicial District Courthouse 69 Brooklyn Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
Robin Pavia	J.D. & G.A. 3 Courthouse 146 White Street Danbury, CT 06810	(203) 207-8690 (203) 207-8689
Chris Pelosi	J.D. & G.A. 18 Courthouse 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
W. Glen Pierson	Superior Court, G.A. 5 106 Elizabeth Street Derby, CT 06418	(203) 735-8695 (203) 734-6294
Sheila M. Prats	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977
Maureen Price-Boreland	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Kevin A. Randolph	J.D. & G.A. 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Sybil V. Richards	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826

Earl B. Richards, III	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Andrew W. Roraback	Judicial District Courthouse 300 Grand Street Waterbury, CT 06702	(203) 591-3340 (203) 596-4488
Stuart D. Rosen	J.D. & G.A. 7 Courthouse 54 West Main Street Meriden, CT 06451	(203) 238-6137 (203) 238-6423
Kevin S. Russo	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Norma I. Sanchez-Figueroa	Juvenile Court 1 Court Street Middletown, CT 06457	(860) 343-6570 (860)344-3038
Carl J. Schuman	Complex Litigation Docket 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Joseph B. Schwartz	J.D. & G.A. 4 Courthouse 400 Grand Street Waterbury, CT 06702	(203) 236-8200 (203) 236-8205
Hope C. Seeley	Superior Court G.A. 19 20 Park Street Rockville, CT 06066	(860) 896-4930 (860) 870-0394
Dan Shaban	J.D. & G.A. 18 Courthouse 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
Rupal Shah	Housing Court 80 Washington Street Hartford, CT 06106	(860) 756-7920 (860) 756-7925
David M. Sheridan	Judicial District Courthouse 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Kenneth L. Shluger	J.D. & G.A. 21 Courthouse 1 Courthouse Square Norwich, CT 06360	(860) 886-0144 (860) 823-1019
James Sicilian	Superior Court G.A. 19 20 Park Street	(860) 896-4930 (860) 870-0394

	Rockville, CT 06066	
Nada K. Sizemore	J.D. & G.A. 7 Courthouse 54 West Main Street Meriden, CT 06451	(203) 238-6137 (203) 238-6423
Walter M. Spader, Jr.	Housing Court 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
James Field Spallone	Superior Court, G.A. 5 106 Elizabeth Street Derby, CT 06418	(203) 735-8695 (203) 734-6294
Steven Spellman	Superior Court G.A. 11 120 School Street Danielson, CT 06239	(860) 779-8500 (860) 779-8492
Barry K. Stevens	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Elizabeth J. Stewart	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Hillary B. Strackbein	Judicial District Courthouse 70 Huntington Street New London, CT 06320	(860) 442-2977 (860) 447-8701
Carl E. Taylor	Juvenile Court 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
Mark H. Taylor	Judicial District Courthouse 95 Washington Street Hartford, CT 06106	(860) 548-2850 (860) 548-2887
Erika M. Tindill	J.D. & G.A. 7 Courthouse 54 West Main Street Meriden, CT 06451	(203) 238-6137 (203) 238-6423
Jessica Torres	Juvenile Court 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
Anthony D. Truglia, Jr.	J.D. & G.A. 3 Courthouse 146 White Street Danbury, CT 06810	(203) 207-8690 (203) 207-8689

Theodore R. Tyma	Superior Court, G.A. 5 106 Elizabeth Street Derby, CT 06418	(203) 735-8695 (203) 734-6294
Elpedio N. Vitale	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Thomas J. Welch	Judicial District Courthouse 1061 Main Street Bridgeport, CT 06604	(203) 579-7250 (203) 579-6928
Dawne G. Westbrook	Juvenile Court 25 School Street Rockville, CT 06066	
Gary J. White	J.D. & G.A. 1 Courthouse 123 Hoyt Street Stamford, CT 06905	(203) 965-5315 (203) 965-5389
Peter Emmett Wiese	J.D. & G.A. 15 Courthouse 20 Franklin Square New Britain, CT 06051	(860) 515-5050 (860) 515-5051
Omar A. Williams	J.D. & G.A. 14 Courthouse 101 Lafayette Street Hartford, CT 06106	(860) 566-3861 (860) 566-6977
Robin L. Wilson	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826
Michael Wu	J.D. & G.A. 18 Courthouse 50 Field Street Torrington, CT 06790	(860) 626-2190 (860) 626-2191
Robert E. Young	Judicial District Courthouse 235 Church Street New Haven, CT 06510	(203) 503-6830 (203) 789-6826

[Judges/Family Support Magistrates' Mail and Phone Directory](#)

EXHIBIT 8

Judges By Judicial District - Tolland

Name	Position	Matters Heard
------	----------	---------------

Superior Court

Judicial District Courthouse

69 Brooklyn Street, Rockville, CT 06066

Tel (860) 896-4930; Fax (860) 870-0394

→ Barry F. Armata	Superior Court Judge	JD and GA Matters
Jennifer Macierowski	Superior Court Judge	JD and GA Matters
Carletha Parkinson	Superior Court Judge	JD and GA Matters

Superior Court

G.A. 19 Courthouse

20 Park Street, Rockville, CT 06066

Tel (860) 896-4930; Fax (860) 870-0394

Tejas Bhatt	Superior Court Judge	JD and GA Matters
Courtney M. Chaplin	Superior Court Judge	JD and GA Matters
Kathleen E. McNamara	Superior Court Judge	JD and GA Matters
Hope C. Seeley AAJ	Superior Court Judge	JD and GA Matters
James Sicilian	Superior Court Judge	JD and GA Matters

Juvenile Court

25 School Street, Rockville, CT 06066

Tel (860) 872-7143; Fax (860) 871-1802

Dawne G. Westbrook AJ	Superior Court Judge	PJ- Civil/Criminal/Family/Juvenile Matters
------------------------------	----------------------	--

EXHIBIT 9

ASSIGNMENT OF JUDGES

September 2, 2019 through September 6, 2020

Pursuant to Section 51-164t of the General Statutes, the Chief Court Administrator has made the following assignments to the Divisions and Parts thereof established in Chapter 1 of the Practice Book.

Divisions and Parts

The Divisions, Parts thereof, and abbreviation of each Part are:

<u>Division</u>	<u>Part</u>	<u>Abbreviation of Part in Assignments</u>
Family Division	Part J (Juvenile matters including neglect, dependency, delinquency, families with service needs and termination of parental rights.)	juvenile
	Part S (Support and paternity actions.)	support
	Part D (All other family relations matters, including dissolution of marriage or civil union cases.)	dissolution
Civil Division	Part H (Summary process cases and all other landlord and tenant matters returnable to the judicial districts.)	summary process
	Part S (Small claims actions.)	small claims
	Part A (Administrative appeals.)	adm. appeals
	Part J (Jury matters.)	jury
	Part C (Court matters.)	G.A. court or J.D. court
Criminal Division	Part A (Capital felonies, class A felonies, and unclassified felonies punishable by sentences of more than twenty years.)	A

	Part B (Class B felonies and unclassified felonies punishable by sentences of more than ten years but not more than twenty years.)	B
	Part C (Class C felonies and unclassified felonies punishable by sentences of more than five years but not more than ten years.)	C
	Part D (Class D felonies and all other crimes, violations, motor vehicle violations, and infractions.)	D
Housing Division* (in judicial districts specified by statute)	Part H (Housing matters as defined by Section 47a-68 of the General Statutes.)	H

*NOTE: Housing matters (including certain civil actions, summary process actions, and certain small claims) in those judicial districts without a Housing Session, as specified by a statute, must be made returnable to a judicial district and not to a geographical area.

Family Division

All judges assigned to geographical area (G.A.) courthouses are authorized to adjudicate Family Division Part S (support) actions, notwithstanding the omission of any such specific assignment.

Civil Division

In addition to the specific assignments hereinafter made, all judges may adjudicate civil short calendar matters, administrative appeals, and small claims.

September 2, 2019 through September 6, 2020

JUDGES

ASSIGNMENT

AARON	Waterbury Courthouse for Juvenile Matters
ABERY-WETSTONE	New Britain J.D.
ABRAMS (C.A.J. for Civil Division Parts H (Summary Process); S (Small Claims); J (Jury Matters) and C (Court Matters))	New Haven J.D. Courthouse
AGATI	Waterbury J.D.
ALANDER	New Haven J.D. Courthouse
ALBIS (C.A.J. for Family Division Parts S (Support) and D (Dissolution))	Middlesex J.D.
ALEXANDER (C.A.J. for Criminal Division Parts A, B, C and D)	Bridgeport J.D. Courthouse
→ ARMATA	Tolland J.D.
AUGER	Windham J.D.
BAIO	New Haven J.D. Housing and Waterbury J.D. Housing
BALDINI	Hartford J.D. and G.A. 14 Courthouse
BELLIS	Waterbury – Complex Litigation Docket
BENTIVEGNA	Manchester G.A. 12
BHATT	Tolland J.D.
BLAWIE	Stamford-Norwalk J.D.
BOZZUTO	Deputy Chief Court Administrator
BRAZZEL-MASSARO	Danbury J.D.
BRILLANT	Bridgeport Courthouse for Juvenile Matters

DEWEY	Middlesex J.D.
DIANA	Middletown – Regional Family Trial Docket
DOYLE	Bridgeport G.A. 2
DRISCOLL (until 8/12/20)	Waterford Courthouse for Juvenile Matters
DRONEY	New London J.D.
DUBAY	Hartford J.D. Courthouse
EGAN	Bridgeport J.D. Courthouse
FARLEY	Tolland J.D.
FICETO	Waterbury J.D.
→ FISCHER, J.	Windham J.D.
FRECHETTE	Middlesex J.D.
GEATHERS	New Britain J.D.
GENUARIO	Stamford-Norwalk J.D.
GOLD	Hartford J.D. and G.A. 14 Courthouse
GOODROW	New Haven J.D. Courthouse
GORDON	Waterbury J.D.
GOULD	Ansonia-Milford J.D.
GRAHAM	Hartford J.D. and G.A. 14 Courthouse
GRAZIANI	Windham J.D.
GREEN	Windham J.D.
GROGINS	Waterbury Courthouse for Juvenile Matters
GROSSMAN	Bridgeport J.D. Courthouse
HARMON	Meriden J.D. and G.A. 7 Courthouse
HELLER	Stamford-Norwalk J.D.

TOLLAND JUDICIAL DISTRICT

(Administrative Judges can reassign judges to other assignments within a Judicial District when necessary.)

Tolland J.D. Courthouse (69 Brooklyn Street, Rockville)

Family Division Parts S (support) and D (dissolution);
Civil Division:

Rockville G.A. 19 (20 Park Street)

Criminal Division:

(G.A. 19 handles motor vehicle cases for the towns of Andover, Bloomfield, Bolton, Columbia, Coventry, East Hartford, East Windsor, Ellington, Enfield, Glastonbury, Hebron, Manchester, Mansfield, Marlborough, Somers, South Windsor, Stafford, Tolland, Union, Vernon and Willington.)

Westbrook (A.J.) (P.J.) (subject
to Rockville Courthouse for
Juvenile Matters)
Seeley (A.A.J.)
Farley
Armata
Bhatt
Chaplin
Sicilian
Macierowski

WATERBURY JUDICIAL DISTRICT

(Administrative Judges can reassign judges to other assignments within a Judicial District when necessary.)

Waterbury J.D. Courthouse (300 Grand Street)

Family Division Parts S (support) and D (dissolution);
Civil Division, except Part H (summary process):

Waterbury J.D. and G.A. 4 (400 Grand Street)

Criminal Division:

Ficeto (A.J.) (P.J. for Family
Division)
Roraback (A.A.J.)
Iannotti (P.J. for Criminal
Division)
Agati (P.J. for Civil Division)
Klatt
Bruno
Gordon
Coleman
Schwartz
Cutsumpas, Judge Trial Referee
Fasano, Judge Trial Referee
Resha, Judge Trial Referee
Schofield, Judge Trial Referee
Trombly, Judge Trial Referee

WINDHAM JUDICIAL DISTRICT

(Administrative Judges can reassign judges to other assignments within a Judicial District when necessary.)

Windham J.D. Courthouse (155 Church Street, Putnam)

Family Division Parts S (support) and D (dissolution);
Civil Division Parts A (adm. appeals), J (jury),
C (J.D. court), H (summary process) and S (small claims):

Danielson G.A. 11 (120 School Street)

Civil Division Part C (G.A. court); Criminal Division:

Graziani (A.J.) (P.J.)
J. Fischer (A.A.J.)
Spellman
Green
Auger
Swords, Senior Judge
Cole-Chu, Judge Trial Referee

EXHIBIT 10

Geographical Area No. 19 at Rockville



Serving the towns of Andover, Bolton, Columbia, Coventry, Ellington, Hebron, Mansfield, Somers, Stafford, Tolland, Union, Vernon, and Willington.

[G.A. Staff](#) | [Directions to Court](#) | [G.A. Map](#)


EXHIBIT 11

**IN THE SUPERIOR COURT
FOR THE STATE OF CONNECTICUT**


State of Connecticut	*	[REDACTED]	342-S
v.	*	GA: 11	
D [REDACTED] Monbo	*	PRETRIAL	
* * * * * * * * * * * *			

DEFENDANT'S COMMENTS

Defendant, D [REDACTED] Monbo hereby states as follows:

- 
1. Defendant is not available on June 7, 2021.
 2. Defendant has filed a Motion To Dismiss, a Motion to Suppress, and a Motion to Compel Bill of Particulars. Defendant has also requested an Evidential Hearing for both the Motion to Dismiss and the Motion To Suppress. Furthermore, Defendant specifically requested Subpoenas and an Order to take depositions of witnesses.
 3. As of the date of this filing, the Court has not issued the Subpoena Orders, and the Court has not issued the Orders for Defendant to take Deposition of witnesses. The Subpoenas and Depositions are required for Defendant's Evidential Hearing on the Motion to Dismiss and the Motion to Suppress.
 4. The Court can not set a "Motion" date when the Court has not issued the Subpoena Orders and the Orders for Defendant to take Deposition of witnesses which are required for Defendant's Evidential Hearing on the Motion to Dismiss and the Motion to Suppress.
 5. Additionally, Defendant has not received the requested Bill of Particulars from the Prosecutor despite filing a Motion to Compel Bill of Particulars, which is crucial to a proper defense.

2021 MAY 16 AM 11:03
SUPERIOR COURT
G.A. 11
DAMIELSON, J.



6. After Defendant has received the Bill of Particulars, and after records have been subpoenaed and witnesses have been deposed, then a date can be set for a "Motion."

[REDACTED]
D [REDACTED] Monbo, Defendant

May 17, 2021
Date



CERTIFICATE OF SERVICE

I hereby certify that a copy of the DEFENDANT'S COMMENT was mailed on May 17, 2021 to:

Beth Leaming
State's Attorney
State's Attorney Office, GA No. 11
120 School Street, Suite 208
Danielson, Connecticut 06239



[REDACTED]
D [REDACTED] Monbo, Defendant

May 17, 2021
Date

EXHIBIT 12

**IN THE SUPERIOR COURT
FOR THE STATE OF CONNECTICUT**

State of Connecticut

*

[REDACTED] 344-S

v.

*

GA: 11

J [REDACTED] Monbo

*

PRETRIAL

*

*

*

*

*

*

*

*

*

*

*


*

*

*

DEFENDANT'S COMMENTS

Defendant, J [REDACTED] Monbo hereby states as follows:

- 
1. Defendant is not available on June 7, 2021.
 2. Defendant has filed a Motion To Dismiss and a Motion to Compel Bill of Particulars. Defendant has also requested an Evidential Hearing for the Motion to Dismiss. Furthermore, Defendant specifically requested Subpoenas and an Order to take depositions of witnesses.
 3. As of the date of this filing, the Court has not issued the Subpoena Orders, and the Court has not issued the Orders for Defendant to take Deposition of witnesses. The Subpoenas and Depositions are required for Defendant's Evidential Hearing on the Motion to Dismiss.
 4. The Court can not set a "Motion" date when the Court has not issued the Subpoena Orders and the Orders for Defendant to take Deposition of witnesses which are required for Defendant's Evidential Hearing on the Motion to Dismiss.
 5. Additionally, Defendant has not received the requested Bill of Particulars from the Prosecutor despite filing a Motion to Compel Bill of Particulars, which is crucial to a proper defense.
 6. After Defendant has received the Bill of Particulars, and after records have been subpoenaed and witnesses have been deposed, then a date can be set for a "Motion."

[REDACTED]
J [REDACTED] Monbo, Defendant

May 17, 2021
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the DEFENDANT'S COMMENT was mailed on May 17, 2021 to:

Beth Leaming
State's Attorney
State's Attorney Office, GA No. 11
120 School Street, Suite 208
Danielson, Connecticut 06239



[REDACTED]
J [REDACTED] Monbo, Defendant

May 17, 2021
Date

EXHIBIT 13

RE-ARREST WARRANT AND APPLICATION

JD-CR-57 Rev. 2/09

C.G.S. §§ 54-1h, 54-2a, Pr Bk 38-21

STATE OF CONNECTICUT
SUPERIOR COURT

Instructions to Clerk: Obtain required signatures. Keep original in court file.

Warrant ordered
without a hearing

p. 1 of 2

Docket number [REDACTED] 342S	U.A.R./Summons/Ticket number [REDACTED]	G.A. 11	Held at 120 SCHOOL ST DANIELSON	Date warrant ordered 06/07/2021
Name of accused and A.K.A. [REDACTED]	Date of birth [REDACTED]	Race B	Sex F	Date of original arrest 09/13/2019
Last known address of accused [REDACTED]		Arresting agency name and code CSP TROOP D		

The undersigned, being duly sworn, deposes and says:

1. The above-entitled Warrant/Summons/Ticket was served on the accused charging the commission of the following offenses, motor vehicle violation(s) or infraction(s), as more fully appears in said Warrant/Summons/Ticket, or any Substituted and/or Amended Information which is hereby incorporated by reference:



Statute	Description	Class/Type
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2. The said accused was directed to appear in the above-entitled court for proceedings in said case.
 3. The accused failed to appear on 06/07/2021 when legally called according to the terms of his/her bail bond or promise to appear.
 4. The court ordered that a warrant be issued for the arrest of the accused for failure to appear and set the following conditions for release:

Bond increased without a hearing

Other:

Tammy Fluet

Fraudulent
new charge

Amount of bond: \$ 60000

Type of bond: Cash, Surety or 10%

5. As a result of paragraph #4 above, said accused, in addition to the underlying offenses set forth in paragraph #1 above, is now charged with an additional count of: **FAILURE TO APPEAR 2ND DEGREE/C.G.S. 53a-173**

Signed (Affiant) [Signature]	Date signed 6/7/21	Subscribed and sworn to before me on (Date) 6/7/21	Signed (Judge, Clerk, Commissioner of the Superior Court) [Signature]
---------------------------------	-----------------------	---	--

Application

Based upon the foregoing, the undersigned prosecuting authority makes application for the issuance of a warrant for the arrest of the accused.

Signed (Deputy Assistant State's Attorney)

[Signature]

Jennifer
Barry

Name of Prosecutor (Print)

Barry

Barry

Date signed

6/7/21

Finding
and
Warrant

The foregoing affidavit and Application for an arrest warrant having been submitted to and considered by the undersigned, the undersigned finds from said affidavit that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the re-arrest of the above-named accused.

To: Any proper officer of the State of Connecticut

By authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused and execute this warrant according to law.

Temporary Paralegal Ariana Quintero

Signed (A Judge of the Superior Court)

[Signature]

Name of Judge (Print)

J. FISCHER

Date signed

JUN 07 2021

Return on Arrest Warrant

State of Connecticut, county of

Warrant signed without a hearing

Date of service

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of the accused; and said accused was released pursuant to the court ordered conditions or is here in court for examination.

Attest (Officer's signature and title, if applicable)

Shield number

Department

Distribution: Officer gives 1 copy to defendant and returns 2 copies to clerk. Clerk forwards 1 copy to prosecuting authority and keeps 1 copy in court file.

EXHIBIT 14

RE-ARREST WARRANT AND APPLICATIONSTATE OF CONNECTICUT
SUPERIOR COURT

Warrant without a hearing

JD-CR-67 Rev. 2/09

C.G.S. §§ 54-1h, 54-2a, Pr. Bk. 38-21

Instructions to Clerk: Obtain required signatures. Keep original in court file.

p. 1 of 1

Docket number 344S	U.A.R./Summons/Ticket number [REDACTED]	G.A. 11	Held at 120 SCHOOL ST DANIELSON	Date warrant ordered 06/07/2021
Name of accused and A.K.A. [REDACTED]	Date of birth [REDACTED]	Race B	Sex F	Date of original arrest 09/14/2019
Last known address of accused [REDACTED]			Arresting agency name and code CSP TROOP D	

The undersigned, being duly sworn, deposes and says:

- The above-entitled Warrant/Summons/Ticket was served on the accused charging the commission of the following offenses, motor vehicle violation(s) or infraction(s), as more fully appears in said Warrant/Summons/Ticket, or any Substituted and/or Amended Information which is hereby incorporated by reference:



Statute	Description	Class/Type
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

- The said accused was directed to appear in the above-entitled court for proceedings in said case.
- The accused failed to appear on **06/07/2021** when legally called according to the terms of his/her bail bond or promise to appear.
- The court ordered that a warrant be issued for the arrest of the accused for failure to appear and set the following conditions for release:

Bond increased without a hearing

Other:

Tammy Fluet**Fraudulent new charge**Amount of bond: \$ **30000**Type of bond: **Cash, Surety or 10%**

- As a result of paragraph #4 above, said accused, in addition to the underlying offenses set forth in paragraph #1 above, is now charged with an additional count of: **FAILURE TO APPEAR 1ST DEGREE/C.G.S. 53a-172**

Signed (Affiant) <i>[Signature]</i>	Date signed 6/7/21	Subscribed and sworn to before me on (Date) 6/7/21	Signed (Judge, Clerk, Commissioner of the Superior Court) <i>[Signature]</i>
--	------------------------------	--	---

Based upon the foregoing, the undersigned prosecuting authority makes application for the issuance of a warrant for the arrest of the accused.

Application

Signed (Prosecutor Assistant State's Attorney)

*[Signature]***Jennifer Barry**

Name of Prosecutor (Print)

*[Signature]***Barry**

Date signed

6/7/21**Temporary Paralegal Ariana Quintero**

Finding and Warrant

The foregoing affidavit and Application for an arrest warrant having been submitted to and considered by the undersigned, the undersigned finds from said affidavit that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the re-arrest of the above-named accused.

To: Any proper officer of the State of Connecticut

By authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused and execute this warrant according to law.

Signed (A Judge of the Superior Court)

[Signature]

Name of Judge (Print)

J. FISCHER

Date signed

JUN 07 2021**Return on Arrest Warrant**

State of Connecticut, county of

Warrant signed without a hearing

Date of service

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of the accused; and said accused was released pursuant to the court ordered conditions or is here in court for examination.

Attest (Officer's signature and title, if applicable)

Shield number

Department

Distribution: Officer gives 1 copy to defendant and returns 2 copies to clerk. Clerk forwards 1 copy to prosecuting authority and keeps 1 copy in court file.