

NO.: CR17-0690177S-S : SUPERIOR COURT
STATE OF CONNECTICUT : G.A. # 14
v. : AT HARTFORD
LAUREN HAIDON : APRIL 3, 2023

MOTION FOR DISCLOSURE OF RECORDS

Pursuant to Connecticut General Statutes § 54-142a(f)(1), the petitioner, **Brendan Danaher**, hereby represents that he is a defendant in a civil lawsuit pending in the United States District Court for the District of Connecticut, **Lauren Haidon v. Town of Bloomfield, et al**, Case Number: 3:19-cv-00119 (SRU), in which the plaintiff, Lauren Haidon, alleges Constitutional violations, including claims for false arrest and malicious prosecution, by the petitioner. (See Amended Complaint, attached hereto as **Exhibit A**.) More particularly, the plaintiff in the civil action alleges that the petitioner/defendant “instigated a criminal prosecution against Ms. Haidon and intentionally and unlawfully had Ms. Haidon arrested in violation of the Fourth and Fourteenth Amendments to the United States Constitution.” (See **Exhibit A**, Counts Two and Five , ¶ 70, ¶ 101.) Plaintiff further alleges that the defendant did not have probable cause to charge Ms. Haidon with Custodial Interference in the First Degree and no reasonable officer would and/or could believe that probable cause existed to

charge Ms. Haidon with Custodial Interference in the First Degree. (See Exhibit A, Count Five, ¶ 107.)

Although the petitioner previously obtained some portions of the criminal court file related the matter via a similar motion filed in 2019 and Court Order, dated August 9, 2019 (*Baldini, J.*), the State's Attorney's file was not disclosed. As the information and materials contained in the State's Attorney's file, including but not limited to any motion for a Franks hearing and/or motion to dismiss filed by plaintiff's criminal attorney are relevant and essential to the proper presentation of the defense in the civil proceeding ***scheduled to commence trial on September 11, 2023***, the petitioner moves for an order authorizing and requiring the State's Attorney's Office or any person charged with retention and control of all police and court records relative to the arrest, arraignment and prosecution of Lauren Haidon in this Court between February of 2017 to the present, to disclose such records and to certify as to the authenticity of same.

It is respectfully submitted that the petitioner herein is specifically authorized by statute to obtain the disclosure of the records requested. See, State v. Anonymous, 237 Conn. 501, 513-14 (1996). Connecticut General Statutes § 54-142a(f) provides an exception to the non-disclosure of records, which reads, in part: "Upon motion properly brought, the court ... may order disclosure of such records (1) to a defendant in an action for false arrest arising out of the proceedings so erased"

WHEREFORE, the petitioner, **Brendan Danaher**, respectfully requests that this Court grant his Motion for Disclosure of Records and Order disclosure by the State's Attorney's Office of its file.

PETITIONER,
Brendan Danaher

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