

DOCKET NO. NNH-CR23-0250215-S <sup>1</sup>	:	SUPERIOR COURT
	:	
STATE OF CONNECTICUT	:	J.D. OF NEW HAVEN
	:	
v.	:	AT NEW HAVEN
	:	
PAUL BOYNE	:	OCTOBER 3, 2025

**INCORPORATED<sup>2</sup> SUPPLEMENT TO  
DEFENDANT'S OBJECTION  
TO STATE'S MOTION FOR JOINDER**

Pursuant the Court's August 15, 2025 Interim Order Regarding State's Motion for Joinder, Defendant Paul Boyne re-asserts his Objection to the State's Motion for Joinder on the basis, *inter alia*, that Docket No. NNH-CR23-0250215-S (the "Groton case") is not properly before this Court insofar as all offenses charged against Defendant therein allegedly occurred within the New London J.D., making it the only proper venue to try that case. Specifically, as requested by the Court (Brown, J.), Defendant herein responds to the State's assertion during argument, on July 31, 2025, that Defendant waived his right to have the Groton case heard in the New London J.D. by not earlier seeking transfer of that case to the New London J.D.

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<sup>1</sup> On September 10, 2025, the Clerk's Office advised via e-mail that "the Boyne files have been transferred in as NNH files," providing a corresponding change in docket numbers that substitutes "NNH" for "N23N." Mr. Boyne's objection, filed on July 30, 2025, used the N23N designation.

<sup>2</sup> On or about November 1, 2023, the Court (Harmon, J.) granted defense motions that all motions, requests, notices, etc. filed in the instant matter to be adopted and incorporated into Docket Nos. NNH-CR23-0250216-S and NNH-CR23-0250217-S (previously N23N)

## RELEVANT FACTUAL BACKGROUND

Defendant currently has the following three cases pending before this Court:

Docket No.	Offense Location	Offense's GA	Offense's J.D.
NNH-CR23-0250215-S	Groton <sup>3</sup>	GA 10	New London J.D.
NNH-CR23-0250216-S	Hamden <sup>4</sup>	GA 7	New Haven J.D.
NNH-CR23-0250217-S	Hamden <sup>5</sup>	GA 7	New Haven J.D.

The Groton case and the two Hamden cases fall, in the first instance, within the jurisdiction of GA 10 and GA 7, respectively.<sup>6</sup>

On October 20, 2023, following extradition from Virginia (his state of residence at all times relevant hereto) to Connecticut, Defendant was presented in GA 23 and arraigned in all three cases. 10/20/23 Tr. at 2. On that date and continuing to the present, New Haven State's Attorney John P. Doyle Jr. has been the lead prosecutor. *Id.* 1. Recently, Attorney Doyle offered some information about (but did not actually say why) Defendant being presented and arraigned in New Haven. "[S]ome several years ago, prior to be[ing] appointed [State's Attorney] here in New Haven," he had been assigned to handle all matters relating to Defendant on a statewide basis, per a decision of the Advisory Board of the State's Attorneys. 7/31/25 Tr. at 24-25.

At the conclusion of the arraignment, the Court (Calistro, J.), which apparently did not alert to the fact that none of the files were properly before it (*i.e.*, in GA 23), advised the cases would be transferred "across the street" to Part A in New Haven J.D.

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<sup>3</sup> Exhibit (Ex.) A (Groton Case Information Sheets) at 1.

<sup>4</sup> Ex. B (Hamden Case Ending -216-S Information Sheets) at 1.

<sup>5</sup> Ex. C (Hamden Case Ending -217-S Information Sheets) at 1.

<sup>6</sup> See <https://www.jud.ct.gov/directory/jdga.htm> (Judicial directory of towns and corresponding courthouses).

10/20/23 Tr. at 12; see Ex. A at 1 (“transfer to part A”)<sup>7</sup>; *but cf.* Note 1, *supra*. All three cases have since proceeded in New Haven J.D. up to the present.

During the first year of these proceedings, Assigned Counsel Alice Osedach-Powers and Jenn Buyske represented Defendant. Review of the record indicates that at some point in mid-2024, the instant matters were referred to Your Honor. See *e.g.*, 6/24/24 Tr. (taking up Defendant’s Motion to Dismiss); *but see* P.B. § 44-15(b) (cases are not to be assigned for trial until discovery is complete). On July 15, 2024, the Court (Brown, J.) denied Defendant’s Motion to Dismiss. On September 9, 2024, approximately 11 months after Defendant’s arraignment, defense counsel moved for a competency evaluation (C.G.S. § 54-56d) due to, *inter alia*, Defendant’s reported belief that retired Supreme Court Justice Joette Katz “is controlling the Court, the State Attorneys, and also us[, his attorneys.]” 9/9/24 Tr. at 2. Although the Court ordered the evaluation (see *Id.* 3), Defendant refused to participate, and, on October 31, 2024, the Court found him competent to stand trial. (Ex. A at 4). That same day, the Court granted Defendant’s oral motion to remove his Assigned Counsel.

On November 12, 2024, Defendant filed a *pro se* appearance. Six days later, **Defendant filed, *inter alia*, a Motion to Change Venue seeking to have venue in the Groton case changed from GA 23/New Haven J.D. to GA 10/New London J.D.**

Ex. D.<sup>8</sup> Defendant argued the case has “no nexus to GA23/New Haven JD other than Jack Doyle’s folly.” *Id.*<sup>9</sup>

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<sup>7</sup> This is a somewhat open question where the Clerk’s file indicates potential *ex parte* communication between State’s Attorney Doyle and Judge Calistro, on or about March 30, 2023, concerning a *pro se* motion Defendant had filed (prior to his arrest).

<sup>8</sup> Significantly, as the record now establishes, the State, namely the New Haven State’s Attorney, knew full well that the Groton case did not belong in New Haven but continued

Three days after Defendant filed his *pro se* motion, APD Kelly Billings appeared on his behalf. (Ex. A, p. 1 of 8). APD Denis J. O'Malley III appeared shortly thereafter. On November 26, 2024, Defendant's counsel withdrew all pending motions, including *pro se* motions, in order to familiarize themselves with the case before proceeding.

On or about December 11, 2024, Defendant, who had been in continuous custody since his July 23 arrest in Virginia, moved, through counsel, to modify his bond. On or about January 10, 2025, the Court granted the motion, and, less than one week later, Defendant posted a 7% cash bond and was released.

On February 11, 2025, Defendant, through counsel and pursuant to *State v. Lenarz*, 301 Conn. 417 (2011), moved to have all three cases dismissed in light of the State's invasion of the attorney-client privilege when it obtained and at least partially reviewed hundreds of e-message communications exchanged between Defendant and prior counsel.<sup>10</sup> The Court held an initial hearing, on February 14, during which both parties called witnesses. At the State's request, a second hearing day was held on March 10. Ex. E. Both sides filed supplemental briefs, on March 27, and, on April 7, the Court (Brown, J.) denied Defendant's motion. On April 28, the Chief Justice denied Defendant's public interest appeal application.

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to say nothing (*i.e.*, mispresent through omission), including when subsequently appointed defense counsel withdrew all pending motions until able to familiarize themselves with the files. *But see* RPC 3.3-Candor toward the Tribunal; *State v. Owen*, 331 Conn. 658, 668 (2019) ("prosecutors are held to an even higher standard than other attorneys").

<sup>9</sup> Defendant also moved to have venue in the two Hamden cases changed to "GA9/Middlesex JD," apparently confusing Hamden for Haddam, which sits within GA 9/Middlesex J.D.

<sup>10</sup> Predecessor counsel had filed a *Lenarz* motion, on September 26, 2024, that was among those withdrawn on November 26.

During the pendency of the aforementioned proceedings, the undersigned appeared in lieu of Attorney O'Malley, joining Attorney Billings. Since then, Defendant's team has endeavored to familiarize itself with and advance Defendant's case as expeditiously as possible (accounting for other client- and work-related responsibilities and obligations). This has included, in significant part, reviewing the discovery received previously and resolving discovery issues (that, as of this filing, remain outstanding; see P.B. § 44-15(b)). In this regard, when the parties appeared for a remote pretrial, on May 27, 2025, approximately one month after the *Lenarz* matter concluded, Defendant raised the predicate issue of the Groton case not being properly before the New Haven J.D. in the first instance. This was done in the context of questioning whether the State, as State's Attorney Doyle had indicated, intended to move to join the cases for trial.

The parties next appeared (remotely) on July 2, 2025. Again, Defendant announced an intention to raise the improper venue issue in opposition to any effort by the State to join the Groton matter for trial. 7/2/25 Tr. at 63 ("we talked about this last time"). State's Attorney Doyle "agree[d] with Attorney Bussert" that the Groton case did not fall within the New Haven J.D. like the two other cases. *Id.* 66-67. He claimed, without substantiation, to have "addressed" with predecessor counsel that all three cases would be tried in New Haven because "I'm going to be handling Mr. Boyne's matters whether they're here [properly in the New Haven J.D.] or they're in New London and in the interest of judicial economy we kept them all here." *Id.* 67.<sup>11</sup>

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<sup>11</sup> To date, the State has still not substantiated when and in what form it "addressed" the matter with prior counsel. Similarly, nothing in the record indicates or suggests that the State consulted with the Court, let alone received permission for, efforts to ensure "judicial economy."

The State filed its Motion for Joinder on July 21, 2025. Defendant filed his Objection on July 30. Defendant argued, *inter alia*, that the Groton case is not properly before the New Haven Judicial District in the first instance.

On July 31, 2025, the Court held a hearing on the State's joinder motion. During that hearing, the State argued Defendant had "impliedly waived [the venue issue] by continuously consenting to venue in New Haven for almost two years" and "waived it by expressed rule of practice to raise it in these three docket numbers." 7/31/25 Tr. 18-19 (citing P.B. §§ 41-4, 41-5, and 41-24). The State argued that, by filing other motions in New Haven J.D., defendant "acceded" to this court as the proper venue and thus failed to fulfill an accused person's "affirmative duty" to challenge improper venue "without unreasonable delay." *Id.* 19. In short, the State's argument is: "We're here. We are where we are. . . . You can't put the toothpaste back in the tube." *Id.* 18.

As noted above, it was during the July 31 hearing that Attorney Doyle offered insight into why Defendant was produced in GA 23 for arraignment on the Groton charges. Significantly, the information was only offered after the question was put to the State (because co-counsel's argument did not address it). Acknowledging as he had on July 2 that New London is proper venue for the docket ending in -215, Attorney Doyle did add that prior to Defendant being arraigned in New London he (the State's Attorney) spoke to the New London State's Attorney, and the two decided amongst themselves that State's Attorney Doyle "would handle the matter that happened out of the New London Judicial District." 7/31/25 Tr. at 25. To be clear, however, there is no claim or indication that the New London State's Attorney was aware of, or concurred with,

State's Attorney Doyle proceeding with the Groton-New London case in GA 23-New Haven, as opposed to GA 10-New London.

Having heard from the parties, the Court, on August 15, 2025, ordered supplemental briefing on the "waiver issue as to a claim of improper venue." Ex. F. By e-mail from the Clerk dated September 10, that deadline was extended to today.

### **LEGAL STANDARD**

Article First, § 21 of the State constitution mandates that the right to a jury trial "shall remain inviolate." That language guarantees that the jury in a criminal case must be selected from a pool of jurors from the judicial district in which the offense allegedly took place. "[U]nder the common law persons accused of crime, with few exceptions, must be tried in the county wherein the crime was committed, and are entitled to trial by jury drawn from the county.... [I]n criminal prosecutions, trial by a jury of the county is one of the essential features of trial by jury as it existed when our State Constitution was adopted." *State v. McCoy*, 5 Conn. Supp. 506, 510 (Com. Pl. 1938). "[T]he weight of authority in construing a constitutional provision such as ours that 'the right of trial by jury shall remain inviolate,' is that the common-law rule of trial by jury of the county was an *essential feature* of the right of trial by jury under the common law . . . and that it is protected by such constitutional provision." *Id.* 511 (emphasis added). "From time immemorial in this state, the community unit which is the basis for the source of a jury array is that of a county...." *State v. Townsend*, 167 Conn. 539, 551 (1975).

Accordingly, General Statutes § 51-352(a) provides that "[e]ach person charged with any offense shall be tried in the judicial district in which the offense was committed,

except when it is otherwise provided.”<sup>12</sup> The phrase “except when it is otherwise provided” means “except when otherwise regulated by statute.” See *State v. Meehan*, 62 Conn. 126 (1892); see, e.g., C.G.S. § 51-352(b) (a theft may be prosecuted either in the J.D. in which the property was stolen or to which the accused transported property). Section 51-352(a) codifies the longstanding “general rule of the common law” that “all offenders charged with crimes must be tried in the county where the crimes were committed.” *McCoy*, 5 Conn. Supp. at 508. Note that, where the General Statutes use the word “county” to refer to the venue for the Superior Court, it is to “be construed to mean a judicial district established pursuant to section 51-344.” C.G.S. § 51-342.

Practice Book § 36-13(4) mandates that all criminal informations contain a “plain, concise and definite” statement “that such crime was committed in a **particular judicial district or geographical area**, or at a **particular place within such judicial district or geographical area**.” (Emphasis added). A criminal case can be transferred from the judicial district in which the offense occurred to a foreign judicial district only upon motion. C.G.S. § 51-353; see also P.B. § 41-23(b) (transfer requires defendant’s consent).

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<sup>12</sup> See also C.G.S. § 51-348(c) (“For the prompt and proper administration of judicial business, any matter and any trial can be heard in any courthouse *within a judicial district* . . . .” [emphasis added]).



## ARGUMENT

There are three points on which the parties seem to agree (or, at least, cannot reasonably disagree):

1. The Groton case (-215), which concerns blog writings posted while Defendant resided in Virginia, includes alleged misconduct that connects Defendant to Groton, where the complainant resided.
2. The Town of Groton sits within the New London J.D.
3. The only proper venue for prosecution of the Groton case, at least in the first instance, is the New London J.D. See C.G.S. § 51-352(a) ("Each person charged with any offense shall be tried in the judicial district in which the offense was committed, except when it is otherwise provided."); 7/2/25 Tr. at 66-67; 7/31/25 Tr. at 25; see *also* P.B. § 41-23(b) (transfer requires defendant's consent).

Given State's Attorney Doyle's belated candor with the Court, it is also seemingly beyond dispute (*i.e.*, the only reasonable conclusion that can be drawn) that the Groton case is at 235 Church Street in New Haven because that is where his office happens to be located, that is, this Court is the forum of greatest convenience for him. After all, unnamed powers-that-be within the Division of Criminal Justice purportedly decided years ago that Attorney Doyle would handle any-and-all charges against Defendant wherever they were brought within the state. 7/31/25 Tr. at 24-25. Nothing else in the record explains why the New Haven State's Attorney disregarded § 51-352(a)'s clear mandate that the Groton case be brought in New London J.D.; why he bypassed the normal recourse of moving for transfer from New London J.D. to a different J.D.

pursuant to § 51-353; or why he transplanted the Groton case to New Haven without a word to the Court.

Unfortunately for the State, that is not how this works. If the State preferred that the case proceed somewhere besides GA 10/New London J.D., § 51-353 required **it** to move the Court to effectuate that transfer. See *also* P.B. § 41-23(b) (transfer requires defendant's consent). Cases are not transferred from one J.D. to another (*i.e.*, forum shopping) on prosecutorial whims (*e.g.*, preferring to avoid travelling on I-95).

In *State v. McCarroll*, No. L18WCR110137936S, 2012 WL 1004337 (Conn. Super. Ct. Mar. 8, 2012), the defendant moved to transfer her case from Bantam to Hartford, where she resided, because she lacked private transportation and public transportation was not available between Hartford and Bantam. In other words, the defendant sought transfer for the sake of convenience vis-à-vis avoiding long distance travel to attend court hearings. Unsurprisingly, the State objected, arguing “the defendant’s **inconvenience is not enough to warrant change of venue in criminal cases.**” *Id.* \*1 (emphasis added). The court denied the motion. *Id.* \*2.

The constitutional guarantee that *a defendant's right* to a trial by jury “shall remain inviolate” includes as a core component that such jury be pulled from the Judicial District in which the offense allegedly occurred. *McCoy*, 5 Conn. Supp. at 511. It necessarily follows that if a defendant's convenience is insufficient grounds to transfer a case from one J.D. to another, then convenience of the prosecution, which enjoys absolutely no constitutional protections, is surely an inappropriate basis for depriving a defendant of his right to a local jury. This is so particularly where a defendant has not consented to transfer or explicitly waived that right. It is even more so where a

defendant relies on that right before the trial court when opposing the State's efforts to violate that right.

Unable either (i) to legitimately contend that the Groton case (-215) is properly before this Court or (ii) to persuasively recast State's Attorney Doyle's effective admission that he brought the case in New Haven because he felt like it, the State attempts to lay fault at Defendant's feet for not sooner moving to correct its admitted procedural, constitutionally violative malfeasance. In the State's estimation, it is Defendant's fault that the New Haven State's Attorney had him produced to GA 23 for arraignment in a Groton-New London matter. It is Defendant's fault that the New Haven State's Attorney failed to adhere to his higher duty of candor to the Court (*ante*) by never bringing the issue to the Court's attention until pressed on the point just the other month. Using the State's artful analogy, it opened the toothpaste; it made a sticky mess of things; and it asks the Court hold Defendant responsible for cleaning up the mess. The State is wrong, as will be explained in turn.

First, Defendant is compelled to call the Court's attention to the disquieting message that the State's actions and position convey with respect to unchecked prosecutorial power. The State is not so subtly inviting this Court to condone conscious disregard for constitutionally-rooted procedural rules by one of the state's 13 highest law enforcement officials. *But cf. State v. Parris*, 352 Conn. 652 (2025) (New Haven State's Attorney engaged in prosecutorial impropriety requiring reversal of murder conviction).<sup>13</sup> Respectfully, this Court must, at a minimum, reject this devil's bargain. To do otherwise

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<sup>13</sup> Notable as to timing, the improper closing argument at issue in *Parris* was given in January 2023. See Olivia Perrault, *New Haven man sentenced to 45 years in prison for 2019 murder*, WTNH (Apr. 6, 2023) (jury found guilty on 1/15/23).

would serve to encourage others within the Division of Criminal Justice to ignore, if not outright flaunt, the Rule of Law and violate defendants' rights, obfuscating long enough so as to be able to turn back on defendants and argue: "It's too late to do anything about it." Such a proposition is wholly untenable.

Having said this, Defendant has not waived his state constitutional and statutory right to have the Groton case (-215) heard in the New London J.D., where he is entitled to a jury empaneled from the local community. Criminal course "indulge every reasonable presumption against waiver of fundamental constitutional rights and will not presume acquiescence in the loss of fundamental rights. In addition, a waiver of a fundamental constitutional right is not to be presumed from a silent record." *State v. Gore*, 288 Conn. 770, 777 (2008) (citations and ellipses omitted). The State's various arguments about the purported waiver or consent to venue in New Haven are unavailing. See 7/31/25 Tr. at 18 (Defendant "impliedly waived [venue] by continuously consenting to venue in New Haven for almost two years").

The compelled appearance of an accused (incarcerated from July 2023 to January 2025, no less) at a court hearing that it would be a crime to fail to attend is not properly characterized as consent to anything, much less a voluntary waiver. To the State's position that by not *sooner* objecting to the admittedly improper venue of the Groton case Defendant waived any right to do so, the record simply does not support that argument.

As detailed above, in the first 11 months of this case, Defendant's relationship with counsel deteriorated to the point that not only did they rely on asinine rhetoric with which they took exception to formally question his legal competency, but this Court,

having deemed him competent, quite reasonably granted Defendant's request to remove them from the case. Within three weeks, Defendant moved *pro se* for a change of venue. As to the Groton case (-215), Defendant astutely argued that it was only before this Court because of "Doyle's folly" (Ex. D) — a position Attorney Doyle essentially conceded through his belated candor to the Court eight months later.

Upon being assigned, new counsel withdrew **all** pending pleadings and proceeded on a "first things first" basis. Understandably, given their elderly, infirm client had then been detained for roughly 18 months, counsel first sought bond modification to facilitate Defendant's release. Counsel then sought to have all three cases dismissed in light of another troubling instance of the State exceeding the bounds of prosecutorial propriety by way of accessing attorney-client communications produced in violation of the express terms of a judicial warrant. Where an evidentiary hearing on that motion occurred three days after it was filed, the time of ultimate resolution was impacted, in large measure, by State action, namely requested a second evidentiary hearing to present testimony it could have presented at the first. See Ex. E.

The undersigned appeared contemporaneous to the *Lenarz* issue's resolution. Where a cursory review of the record made clear the State's inappropriate conduct, the issue of the Groton case being in New Haven was raised during the May 27 remote pretrial. In particular, the defense was transparent in asserting that if the State sought to join the pending matters for trial, then it intended to object because the Groton case was impermissibly in New Haven. The defense reiterated its intentions at the next court appearance. 7/2/25 Tr. at 63 ("we talked about this last time").

Significant about this history is State's Attorney Doyle agreement that the Groton case did not fall within the New Haven J.D. like the two other cases. 7/2/25 Tr. at 66-67. Despite this unavoidable, long overdue acknowledgment, the State moved for joinder, on July 21, 2025, without addressing it. Indeed, neither "Groton" nor "New London" appear anywhere in the State's motion.

All of this is to say, the State's waiver claim is incredibly misleading and, on a basic level, objectively false where Defendant did raise the issue *pro se* in November 2024.

Next, the State argues, pursuant to Practice Book Sections 41-24, 41-5 and 41-4, that Defendant technically waived his right to have this case transferred to the proper J.D. by failing to so move within ten days of the first pretrial. 7/31/25 Tr. at 21-22. In view of the State's concession one year, eight months and 13 days after arraignment (10/20/2023 – 7/2/2025) that the Groton case (-215) was properly brought in New London and the unavoidable conclusion that the New Haven State's Attorney consciously disregarded its obligations in that regard (in violation of Defendant's rights), it takes real chutzpah to rely on this administrative rule.<sup>14</sup> Regardless, the State's argument is a classic example of form over function.

In the fair exercise of their administrative discretion, courts routinely, and understandably, look beyond the Practice Book rules on which the State relies given the recognized realities of litigating criminal cases. If anything, by the State's logic these rules should operate to preclude its "untimely" joinder motion.

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<sup>14</sup> See *Dobrzeńiecki v. Salisbury*, No. 11 C 7956, 2012 WL 1531278, at \*14 n12 (N.D. Ill. Apr. 27, 2012) ("a Yiddish word, means 'brazenness' or 'gall'"; citation omitted).

At the July 31, 2025 hearing, the State cited *State v. Orsini*, 187 Conn. 264 (1982) for the proposition that “venue requirements are created for the convenience of the litigants and may be waived by failure to assert the statutory privilege [in a] timely fashion.” 7/31/25 Tr. at 19. Again, this reliance is misplaced, for several reasons.

First, the untimeliness problem in *Orsini* stemmed from the defendant not raising the issue before the trial court at all, challenging venue only on appeal. 187 Conn. 269-70; accord *State v. Evans*, 9 Conn. App. 349, 354 (1986) (citing *Orsini* in rejecting claim made for the first time on appeal). That is clearly distinguishable from the instant situation.

Where the *Orsini* court’s comment cites “77 Am. Jur. 2d, Venue § 45,” review of that treatise, specifically the cited section, shows that it concerns civil actions — each of the 24 cases § 45 cites appears to be a state civil action, and none is a Connecticut case.<sup>15</sup> In one Connecticut civil matter that cites *Orsini* in quoting the “timely fashion” language, the Appellate Court observed: “the commissioner did not raise the issue of venue in her objection to the respondent’s application for a temporary injunction.” *In re Shonna K.*, 77 Conn. App. 246, 256 (2003); see also *Cleveland v. U.S. Printing Ink, Inc.*, 21 Conn. App. 610, 618 (1990) (“claim was presented for the first time on appeal to the compensation review division”), *aff’d*, 218 Conn. 181 (1991). That too is clearly distinguishable from this situation. Regardless, just like the State of Connecticut here, parties to a civil action do not enjoy the constitutional rights and protections afforded criminal defendants. Reliance on American Jurisprudence, 2d is thus similarly inapt.

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<sup>15</sup> 77 Am. Jur. 2d, Venue § 45 last accessed via Westlaw on 10/3/2025.

Turing to *Orsini* and the question of whether venue could be implicitly waived, the Court's review is properly seen as *dicta* inasmuch as it found that the defendant was prosecuted in a proper venue. *Orsini* involves a theft of firearms that occurred in Middlesex County, after which the stolen guns were delivered to New Haven County. *Id.* at 269 n3. Based on the facts of that case, venue was found to be proper in either Middlesex or New Haven (C.G.S. § 54-77), rendering prosecution in Middlesex proper. See also *State v. Troconis*, No. FSTCR190148553T, 2021 WL 1595638 (Conn. Super. Ct. Mar. 19, 2021) (alleged misconduct in Stamford-Norwalk and Hartford Judicial Districts). Where the State concedes that the instant Groton case (-215) is properly brought in New London J.D., it is difficult to see how to squares its position with the facts and holding set forth in *Orsini*.

In closing, Defendant wishes to shift attention to the Judiciary. While the record is unambiguous as to what the New Haven State's Attorney did here, the reality is that Defendant was produced for arraignment in GA 23, on October 20, 2023, and the Court failed to recognize that the Short Form Informations made clear that arraignment was required in GA 10 (and GA 7). Respectfully, the State's wrongheaded efforts to transfer accountability for its actions onto Defendant do, on some level, implicate the fair administration of justice. While courts should be able to rely on counsel's candor, including not being subject to misrepresentation by omission, they and their personnel do bear oversight responsibility. Such considerations further show that any attempt to lay blame at Defendant's feet for the State's conduct is wholly misplaced.

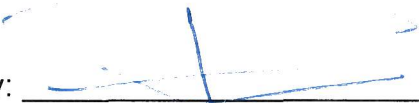


## **CONCLUSION**

There can be no reasonable disagreement the Groton case belongs in the New London J.D. What the record shows transpired here should give all concerned officers of the court considerable pause. Defendant has not foregone the right and opportunity to invoke the well-established protections discussed herein, and the Court cannot condone the State's efforts to unilaterally and unapologetically deprive him of the same. Defendant requests only that the Court require the State to prosecute the Groton case within the strictures of the General Statutes and the state Constitution. This requires that the State's joinder motion be denied and the Groton case be transferred to its right place in the New London J.D. immediately.

## **ORAL ARGUMENT REQUESTED**

Respectfully submitted,  
THE DEFENDANT

  
By: \_\_\_\_\_

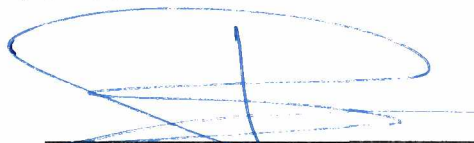
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### CERTIFICATION

This is to certify that a copy of the foregoing has been delivered via electronic mail to the following this 3rd day of October 2025:

John Doyle, SA (John.Boyle@ct.gov)  
Gregory Borrelli, ASA (Gregory.Borrelli@ct.gov)  
State's Attorney's Office for the  
Judicial District of New Haven  
235 Church Street  
New Haven, CT 06510



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Todd Bussert, JN 446397  
Commissioner of the Superior Court

# Ex. A

STATE OF CONNECTICUT  
SUPERIOR COURT

DOB: 06/04/1961

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

YES

10/20/2023

GA23 - NEW HAVEN

DOCKET NO.: N23N-CR23-0250215-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that

BOYNE PAUL

8105 CREEKVIEW DRIVE, SPRINGFIELD, VA 22153

Did commit the offenses recited below:

Count: 1 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: GROTON  
On or About: 12/13/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 2 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: GROTON  
On or About: 12/13/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 3 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: GROTON  
On or About: 12/13/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)SEE OTHER SHEETS  
FOR ADDITIONAL COUNTS X

DATE

SIGNED (PROSECUTING AUTHORITY)

## COURT ACTION

DEFENDANT ADVISED OF RIGHTS BEFORE PLEA

(JUDGE)

OCT 20 2023  
(DATE)

BOND

250,000

SURETY

ELECTION

☐ CASH☐ COURT☒ JURY☐ ATTY. ☐ PUB. DEFENDER

GUARDIAN

REDUCTION

B.O.

APPEAL

ELECTION WITHDRAWN DATE

☐ SEIZED  
PROPERTY

COUNT NO.	PLEA DATE	PLEA	PLEA WITHDRAWN DATE	NEW PLEA	VERDICT FINDING	FINE	JAIL	ADDITIONAL DISPOSITION
1	11/1/23	PF No						
2	11/1/23	PF No						
3	11/1/23	PF No						

DATE

OTHER COURT ACTION

JUDGE

CONTINUANCES

OCT 20 2023

PD APPOINTED

CHRISTO

DATE

PURPOSE

REASON

transfer to Part A

1. 11/1

Part A

PO ISSUED (54-1K)

2.

transport

add 1051 24 hour lockdown

3. 11/14/23

if A remains in CT

4. 12/20/23

post bond in court only

5. 2/5/24

do not possess firearms

6. 3/12/24

ammunition

7. 4/9/24

stay 100 yards away from

8. 4/16/24

victim's family members

9. 4/10/24

stay away from all victims

10. 8/3/24

FINE PAID

RECEIPT NO.

MITTINUS DATE

TRIAL TOWN

☐ SEE REVERSE  
SIDE

PROSECUTOR ON ORIGINAL DISPOSITION

REPORTER ON ORIGINAL DISPOSITION

SIGNED CLERK

SIGNED JUDGE

STATE OF CONNECTICUT  
SUPERIOR COURT

DOB: 06/04/1961

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

YES

10/20/2023

GA23 - NEW HAVEN

DOCKET NO.: N23N-CR23-0250215-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that

BOYNE PAUL

8105 CREEKVIEW DRIVE, SPRINGFIELD, VA 22153

Did commit the offenses recited below:

Count: 4 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: GROTON  
On or About: 12/13/2021 In Violation Of CGS/PA No: 53a-181c(a4)Count: 5 E-STALKN-FEAR DEATH TO PERSON Type/Class: F/D At: GROTON  
On or About: 12/13/2021 In Violation Of CGS/PA No: 53a-181f(a1A)Count: 6 E-STALKN-EMTL DISTRS TO PERSN Type/Class: F/D At: GROTON  
On or About: 12/13/2021 In Violation Of CGS/PA No: 53a-181f(a2A)

SEE OTHER SHEETS FOR ADDITIONAL COUNTS	DATE	SIGNED (PROSECUTING AUTHORITY)
---	------	--------------------------------

## COURT ACTION

DEFENDANT ADVISED OF RIGHTS BEFORE PLEA

(JUDGE)

(DATE)

BOND

SURETY

ELECTION

☐ CASH☐ COURT☒ JURY☐ ATTY. ☐ PUB. DEFENDER

GUARDIAN

REDUCTION

B.O.

APPEAL

ELECTION WITHDRAWN DATE

☐ SEIZED☐ PROPERTY

COUNT NO.	PLEA DATE	PLEA	PLEA WITHDRAWN DATE	NEW PLEA	VERDICT FINDING	FINE	JAIL	ADDITIONAL DISPOSITION
4	11/1/23	PF NG						
5	11/1/23	PF NG						
6	11/1/23	PF NG						

DATE	OTHER COURT ACTION	JUDGE	CONTINUANCES
			DATE PURPOSE REASON
10/26/23	Attorney Appearance filed (Whalen)		1. 4/26/24 XYVPT PM
10/24/23	State's Demand for notice of Alibi Defense		2. 6/3/24 MHY
11/1/23	Order entered per Harmon, J.		3. 6/24/24 MHY
10/24/23	State's Notice of Intention to offer DNA Evidence		4. 7/16/24 MHY
11/1/23	Order entered per Harmon, J.		5. 8/27/24 MHY
10/24/23	State's Request for disclosure and inspection		6. 8/12/24 XY
11/1/23	Order entered Per Harmon, J.		7. 9/9/24 MHY
10/24/23	Motion for Appantment of Assigned counsel		8. 10/10/24 MHY
			9. 10/23/24 MHY
			10. 10/31/24 MHY

FINE PAID	RECEIPT NO.	MITTIMUS DATE	TRIAL TOWN	<input type="checkbox"/> SEE REVERSE SIDE
PROSECUTOR ON ORIGINAL DISPOSITION	REPORTER ON ORIGINAL DISPOSITION	SIGNED CLERK	SIGNED JUDGE	

Bourne, Paul  
N33N-CR23-0250215-S

1/26/24 Motion for Clarification

IV 2 6 2024 Withdrawn before Brown, J.

IV 2 6 2024 Defendant withdraws all pending motions filed by prior counsel or the defendant without waiving any claims therein, before, Brown, J.

NOV 2 6 2024 Court notes prohibition against hybrid representation, Brown, J.

IV 2 6 2024 Court notes that speedy trial time periods tolled. Brown, J.

State v. Paul Boyne

N23U-CR73-0050215-5

1/6/24 Response to State's Objection to the Defendant's Motion to Dismiss re: The Stalking Statutes are Unconstitutionally Overbroad and Vague and Not In Compliance with U.S. Supreme Court Law

1/31/24 Court Finds defendant competent to stand trial per Brown, J.

1/31/24 Per clarification by Brown, J., the following will be added to the minutes: "pursuant to defendant's request, court informs DOC of defendant's request to be housed at McDougall C.I."

1/31/24 Defendant's Oral Motion to Remove Counsel

1/31/24 Granted per Brown, J.

1/31/24 Appearance Attorney Kelly Billings

1/12/24 Appearance of Paul Boyne

1/12/24 Motion for Immediate Hearing

1/20/24 Withdrawn before Brown, J.

1/15/24 Motion to Disqualify Brown, J.

1/20/24 Withdrawn before Brown, J.

1/15/24 Motion to Disqualify <sup>(PMS)</sup> Displace SA Doyle

1/20/24 Withdrawn before Brown, J.

1/15/24 Motion to Dismiss

1/20/24 Withdrawn before Brown, J.

1/18/24 Motion to Change Venue

1/26/2024 Withdrawn before Brown, J.

1/18/24 Motion for Clarification

1/26/2024 Withdrawn before Brown, J.

1/18/24 Motion for Clarification

1/26/2024 Withdrawn before Brown, J.

1/22/24 Motion to Compel Discovery

1/26/2024 Withdrawn before Brown, J.

1/25/24 Motion for Declaratory Judgment

1/26/2024 Withdrawn before Brown, J.

DATE	OTHER COURT ACTION	JUDGE
		N23NCR23 02502155
		Bayne Paul
0/26/23	Motion for Bill of Particulars OFF	
10/20/23	Motion to Compel Scientific Test Results	
1/1/23	Order Granted per Harmon, J.	
0/26/23	Request for Disclosure	
1/1/23	Order Entered per Harmon, J.	
0/26/23	Motion to Dismiss TT	
0/26/23	Motion to Preserve Evidence	
1/1/23	Order entered per Harmon, J.	
0/26/23	Motion to Suppress Evidence TT	
0/26/23	Motion to Suppress Identifications TT	
0/26/23	Motion to Suppress Statements TT	
0/26/23	Motion for Disclosure of Uncharged Misconduct	
1/1/23	order entered per Harmon, J.	
11/1/23	SPD appointed per Harmon, J.	
11/1/23	Pro Ferma Not guilty / jury election entered before Harmon, J.	
11/1/23	Defendant to not incite violence against any of the victims through blogging or social media post, ordered per Harmon, J.	
1/8/23	Attorney Appearance filed (Kirshbaum)	
1/9/23	Motion for Appointment of Assigned counsel.	
2/7/23	Defendant's Request for Disclosure	
2/20/23	Order Entered per Harmon, J.	



DATE	OTHER COURT ACTION	JUDGE
		N23NCR23025021SS
		Paul Boyne
12/1/23	Motion for Permission to Provide Discovery materials to defendant.	
12/20/23	Granted, victims information to be reduced per Harmon, J	
10/20/2023	Conditions of Release ordered per Celistro, J. at arraignment: <ol style="list-style-type: none"> <li>1. Bond to be posted only at court.</li> <li>2. If defendant resides in the state of Connecticut: GPS/IPS and 24/7 lockdown.</li> <li>3. Possess no firearms/ammunition</li> <li>4. Stay away from the work locations of each of the complainants mentioned in the protective orders except for scheduled court appearances in that particular jurisdiction.</li> <li>5. Stay 100 yards away from the family members of the complainants mentioned.</li> </ol>	
11/31/24	Motion for Bill of Particulars OFF	
2/14/24	Defendant's Motion to Modify Bond	
3/12/24	Order entered per Harmon, J.	
3/12/24	Bond Reduced to \$25,000 c/s per Harmon, J. If posted, conditions of Release: <ol style="list-style-type: none"> <li>1. call into bail once every two weeks</li> <li>2. Comply with terms and conditions of all Protective Orders.</li> </ol>	

N23NCR2302502158

Boyne, Paul.

2/12/24 Motion to Dismiss.

7/15/24 Denied per Brown, J.

5/12/24 Memorandum of Law in support of Motion to Dismiss

1/8/24 Motion For Speedy Trial

1/9/24 Denied per Harmon, J.

1/8/24 Motion to Suppress Defendant's Statements

1/8/24 Motion For Notice of Uncharged Offenses

1/9/24 Defendant's Oral Motion re: 7% cash bail Denied per Harmon, J.

1/30/24 State's Objection to Defendant's Motion to Dismiss

1/17/24 Response to the State's Objection to Defendant's Motion to Dismiss

7/22/24 Request For Essential Facts

2/24/24 Appendix Addendum, Defendant's Motion to Dismiss

7/12/24 Defendant's Motion to Modify Bond

7/15/24 Denied per Brown, J.

7/15/24 Ruling on Defendant's Motion to Dismiss

1/15/24 Application for AR

1/16/24 AR Eligibility

1/12/24 Application for AR denied per Harmon, J.

State v. Paul Boyne

NR2N-CR23-0250215-5

7/31/24 Application for Waiver of Fees, Costs and Expenses and Appointment of Counsel on Appeal

8/19/24 Granted by Harman, J.

1/2/24 Motion to Dismiss re: The Stalking Statutes are Unconstitutionally Overbroad and Vague and Not in Compliance with U.S. Supreme Court Law

1/2/24 Memorandum in Support of Motion to Dismiss re: The Stalking Statutes are Overbroad and Vague and Unconstitutionally as Applied to this Case

1/28/24 Defendant's Renewed Motion to Modify Bond

1/5/24 State's Objection to Defendant's Second Motion to Dismiss

1/5/24 Defendant's Motion to Suppress Tangible Evidence

1/6/24 Appeal AC47988

1/9/24 Oral motion by defense counsel for an evaluation per C.G.S. 54-56d before Brown, J.

1/9/24 Granted per Brown, J.

1/9/24 3 Attachments Filed as Supplements to Defendant's Motion to Suppress Tangible Evidence

1/18/24 Defendant's Motion to Suppress Tangible Evidence

1/27/24 Defendant's Motion to Dismiss

# Ex. B

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

YES

10/20/2023

GA23 - NEW HAVEN

DOCKET NO.: N23N-CR23-0250216-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that

BOYNE PAUL

8105 CREEKVIEW DR, SPRINGFIELD, VA 22153

Did commit the offenses recited below:

Count: 1 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 10/01/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 2 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 10/01/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 3 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 10/01/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)SEE OTHER SHEETS  
FOR ADDITIONAL COUNTS ☒

DATE

SIGNED (PROSECUTING AUTHORITY)

## COURT ACTION

DEFENDANT ADVISED OF RIGHTS BEFORE PLEA

(JUDGE)	(DATE)	BOND 250.000	SURETY	<input type="checkbox"/> CASH	<input type="checkbox"/> COURT	<input checked="" type="checkbox"/> JURY
<input type="checkbox"/> ATTY. <input type="checkbox"/> PUB. DEFENDER	GUARDIAN	REDUCTION	B.O.	APPEAL	ELECTION WITHDRAWN DATE	<input type="checkbox"/> SEIZED PROPERTY

COUNT NO.	PLEA DATE	PLEA	PLEA WITHDRAWN DATE	NEW PLEA	VERDICT FINDING	FINE	JAIL	ADDITIONAL DISPOSITION
1	11/1/23	PF N						
2	11/1/23	PF N						
3	11/1/23	PF N						

DATE	OTHER COURT ACTION	JUDGE	CONTINUANCES
CT 2-0-2023	PD APPOINTED	CAUSHTO	
	transfer to Part A		1. 11/1/23 Part A
	PO ISSUED (54-1K)		2. + transport
	- next at court only, if bond is posted and def to reside in CT: GPS/IPS w/ 24/7 lockdown.		3. 11/14/23 NY
	- stay 100 yards away from home and work of victims and their families		4. 12/20/23 NY
	- possess no weapons or ammo		5. 2/6/24 NY
	- stay away exception: scheduled court dates		6. 3/12/24 NY
			7. 4/9/24 NY
			8. 4/16/24 NY
			9. 4/19/24 NY
			10. 6/3/24 NY

FINE PAID	RECEIPT NO.	MITTIMUS DATE	TRIAL TOWN	<input type="checkbox"/> SEE REVERSE SIDE
PROSECUTOR ON ORIGINAL DISPOSITION	REPORTER ON ORIGINAL DISPOSITION	SIGNED CLERK	SIGNED JUDGE	

STATE OF CONNECTICUT  
SUPERIOR COURT

DOB: 06/04/1961

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

YES

10/20/2023

GA23 - NEW HAVEN

DOCKET NO.: N23N-CR23-0250216-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that

BOYNE PAUL

8105 CREEKVIEW DR, SPRINGFIELD, VA 22153

Did commit the offenses recited below:

Count: 4 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 10/01/2021 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 5 E-STALKN-FEAR DEATH TO PERSON Type/Class: F/D At: HAMDEN  
On or About: 10/01/2021 In Violation Of CGS/PA No: 53a-181f(a)(1A)Count: 6 E-STALKN-EMTL DISTRS TO PERSN Type/Class: F/D At: HAMDEN  
On or About: 10/01/2021 In Violation Of CGS/PA No: 53a-181f(a)(2A)

SEE OTHER SHEETS FOR ADDITIONAL COUNTS		DATE		SIGNED (PROSECUTING AUTHORITY)	
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COURT ACTION									
DEFENDANT ADVISED OF RIGHTS BEFORE PLEA (JUDGE) _____ (DATE) _____				BOND		SURETY		<input type="checkbox"/> CASH <input type="checkbox"/> COURT <input checked="" type="checkbox"/> JURY <input type="checkbox"/> APPEAL <input type="checkbox"/> ELECTION WITHDRAWN DATE <input type="checkbox"/> SEIZED PROPERTY	
<input type="checkbox"/> ATTY. <input type="checkbox"/> PUB. DEFENDER		GUARDIAN		REDUCTION		B.O.			

COUNT NO.	PLEA DATE	PLEA	PLEA WITHDRAWN		VERDICT FINDING	FINE	JAIL	ADDITIONAL DISPOSITION
			DATE	NEW PLEA				
4	11/1/23	PF N						
5	11/1/23	PF N						
6	11/1/23	PF N						

DATE		OTHER COURT ACTION	JUDGE	CONTINUANCES		
				DATE	PURPOSE	REASON
10/26/23		Attorney Appearance filed (Whalen)				
10/26/23		Referenced motion filed		11/26/24	XYVPTM	
11/1/23		Order entered per Harmon, J.		2. 6/3/24	MHY	
11/24/23		State's Demand for notice of Alibi Defense		3. 6/24/24	MHY	
11/1/23		Order entered per Harmon, J.		4. 7/15/24	MHY	
10/24/23		State's notice of intention to offer DNA evidence		5. 8/25/24	MHY	
11/1/23		Order entered per Harmon, J.		6. 8/12/24	XV	
10/24/23		State's request for Disclosure and inspection		7. 9/9/24	MHY	
11/1/23		Order entered per Harmon, J.		8. 10/16/24	MHY	
10/31/23		Motion for Appointment of Assigned Counsel		9. 10/22/24	MHY	
				10. 10/31/24	MHY	

FINE PAID		RECEIPT NO.	MITTIMUS DATE	TRIAL TOWN	<input type="checkbox"/> SEE REVERSE SIDE
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PROSECUTOR ON ORIGINAL DISPOSITION	REPORTER ON ORIGINAL DISPOSITION	SIGNED CLERK	SIGNED JUDGE
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DATE	COURT ACTION	JUDGE
		Boyer, Paul
		W23NCR230250216-S
11/1/23	SPD appointed per Harmon, J	
11/1/23	Pro Forfeiture Not Guilty / Jury election entered before Harmon, J	
11/1/23	Defendant not to incite violence against any of the victims through blogging or social media post, ordered per Harmon, J	
11/8/23	Attorney Appearance Filed (Kirschbaum.)	
11/9/23	Motion for Appointment of Assigned Counsel	
2/7/23	Defendant's Request for Disclosure.	
2/20/23	Order Entered per Harmon, J.	
2/7/23	Motion for Permission to provide Discovery materials to Defendant	
2/20/23	Granted, victims information to be redacted per Harmon, J	
1/30/23	Conditions of Release order per Glisto, C. at arraignment:	
	1. Bond to be posted only at Court.	
	2. If defendant resides <sup>(20)</sup> in the state of Connecticut: GPS/IPS and 24/7 lockdown.	
	3. Possess no firearms/ammunition.	
	4. Stay away from the work locations of each of the complainants mentioned in the protective orders except for scheduled court appearances in that particular jurisdiction.	
	5. Stay <sup>100 yards</sup> away from the family members of the complainants mentioned.	
1/31/24	Motion for Bill of Particulars	
	OFF	

State v. Paul Bayne

1023N-CR23-0250216-5

1/14/24 Defendant's Motion to Modify Bond

5/12/24 Order entered per Harmon, J.

3/12/24 Bond Reduced to \$25,000 c/s per Harmon, J.  
if posted, conditions of Release:

1. Call into bail once every 2 weeks
2. Comply with terms and conditions of all protective Orders.

5/12/24 Motion to Dismiss

7/15/24 Denied per Brown, J.

3/12/24 Memorandum of Law in Support of Motion to Dismiss

1/6/24 Motion For Speedy Trial

1/17/24 denied per Harmon, J.

1/8/24 Motion For Notice of Uncharged Misconduct

7/1/24 Motion to Suppress Defendant's Statements

1/19/24 Defendant's Oral motion for 7% cash bail denied per Harmon, J.

1/30/24 State's Objection to Defendant's Motion to Dismiss

1/17/24 Response to the State's Objection to Defendant's Motion to Dismiss

5/22/24 Request for Essential Facts

2/24/24 Appendix Addendum, Defendant's Motion to Dismiss

7/12/24 Defendant's Motion to Modify Bond

1/15/24 Denied per Brown, J.



State v. Paul BOYNE

7/15/24 Ruling on Defendant's Motion to Dismiss 123N CR23 0250216 S

11/15/24 Application For AR

3/12/24 Order entered per Harmon, J.

7/16/24 AR Eligibility

3/12/24 Application for A.R. denied per Harmon, J.

1/31/24 Application for Waiver of Fees, Costs and Expenses and Appointment of Counsel on Appeal

8/19/24 Granted by Harmon, J.

1/2/24 Motion to Dismiss re: The Stalking Statutes are Unconstitutionally Overbroad and Vague and Not in Compliance with U.S. Supreme Court Law

1/2/24 Memorandum in Support of Motion to Dismiss re: The Stalking Statutes are Overbroad and Vague and Unconstitutional as Applied to this Case

1/28/24 Defendant's Renewed Motion to Modify Bond

1/5/24 State's Objection to Defendant's Second Motion to Dismiss

1/5/24 Defendant's Motion to Suppress Tangible Evidence

1/6/24 Appeal AC 47988

1/9/24 Oral motion by defense counsel for an evaluation per C.G.S. § 54-56d before Brown, J.

1/9/24 Granted per Brown, J.

1/9/24 3 Attachments filed as supplements to Defendant's Motion to Suppress Tangible Evidence

1/27/24 Defendant's Motion to Dismiss

State v. Paul Bayne

ND3N-CR23-0250216-S

1/16/24 Response to State's Objection to the Defendant's Motion to Dismiss re: the Stalking Statutes are Unconstitutionally Overbroad and Vague and Not In Compliance with U.S. Supreme Court Law

1/31/24 Court finds defendant competent to stand trial per Brown, J.

1/31/24 Per clarification by Brown, J., the following will be added to the motions: "pursuant to defendant's request, court informs DOC of defendant's request to be housed at McDougall CI."

1/31/24 Defendant's Oral Motion to Remove Counsel

1/31/24 Granted per Brown, J.

1/31/24 Appearance Attorney Kelly Billings

NOV 26 2024 Defendant withdraws all pending motions filed by prior counsel or the defendant without waiving any claims therein, before Brown, J.

NOV 26 2024 Court notes prohibition against hybrid representation

Brown, J.

NOV 26 2024 Court notes that speedy trial time periods are tolled

Brown, J.

# Ex. C

STATE OF CONNECTICUT  
SUPERIOR COURT

DOB: 06/04/1961

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

YES

10/20/2023

GA23 - NEW HAVEN

DOCKET NO.: N23N-CR23-0250217-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that

BOYNE PAUL

8105 CREEKVIEW DR, SPRINGFIELD, VA 22153

Did commit the offenses recited below:

Count: 1 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 04/03/2022 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 2 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 04/03/2022 In Violation Of CGS/PA No: 53a-181c(a)(4)Count: 3 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN  
On or About: 04/03/2022 In Violation Of CGS/PA No: 53a-181c(a)(4)

SEE OTHER SHEETS FOR ADDITIONAL COUNTS X		DATE		SIGNED (PROSECUTING AUTHORITY)				
<b>COURT ACTION</b>								
DEFENDANT ADVISED OF RIGHTS BEFORE PLEA (JUDGE)				BOND \$300,000	SURETY			
(DATE) OCT 20 2023				REDUCTION 250,000	B.O. BTS			
<input type="checkbox"/> ATTY. <input type="checkbox"/> PUB. DEFENDER		GUARDIAN		<input type="checkbox"/> CASH <input type="checkbox"/> COURT <input checked="" type="checkbox"/> JURY	<input type="checkbox"/> APPEAL			
				ELECTION WITHDRAWN DATE <input type="checkbox"/> SEIZED PROPERTY <input type="checkbox"/>				
COUNT NO.	PLEA DATE	PLEA	PLEA WITHDRAWN DATE	NEW PLEA	VERDICT FINDING	FINE	JAIL	ADDITIONAL DISPOSITION
1	11/1/23	PF N/A						
2	11/1/23	PF N/A						
3	11/1/23	PF N/A						
DATE	OTHER COURT ACTION				JUDGE	CONTINUANCES		
OCT 20 2023	PD APPOINTED				CALISTO	DATE	PURPOSE	REASON
	transfer to Part A					1. 11/1		Part A
	PO ISSUED (54-1X)					2.	Trans.	
	apst ips/24 hr lockdown if					3. 11/14/23	xy	
	A remains in CT					4. 12/20/23	xy	
	post bond in court only					5. 2/6/24	xy	
	do not possess firearms/					6. 3/12/24	xy	
	ammunition					7. 4/9/24	xy	
	stay 100 yards away from all					8. 4/16/24	xy	
	family members					9. 4/19/24	xy	
	stay away from victims homes - A					10. 3/24	MHY	
FINE PAID	RECEIPT NO.	MITTIMUS DATE		TRIAL TOWN		<input type="checkbox"/> SEE REVERSE SIDE		
PROSECUTOR ON ORIGINAL DISPOSITION		REPORTER ON ORIGINAL DISPOSITION		SIGNED CLERK		SIGNED JUDGE		

STATE OF CONNECTICUT  
SUPERIOR COURT

DOB: 06/04/1961

ORIGINAL INFORMATION:

COURT DATE:

AT:

DISPOSITION DATE:

YES

10/20/2023

GA23 - NEW HAVEN

DOCKET NO.: N23N-CR23-0250217-S

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that

BOYNE PAUL

8105 CREEKVIEW DR, SPRINGFIELD, VA 22153

Did commit the offenses recited below:

Count: 4 STALKN 1ST-BASE OFF DEMOGRPHCS Type/Class: F/D At: HAMDEN

On or About: 04/03/2022

In Violation Of CGS/PA No: 53a-181c(a)(4)

Count: 5 E-STALKN-FEAR DEATH TO PERSON Type/Class: F/D At: HAMDEN

On or About: 04/03/2022

In Violation Of CGS/PA No: 53a-181f(a)(1A)

Count: 6 E-STALKN-EMTL DISTRS TO PERSN Type/Class: F/D At: HAMDEN

On or About: 04/03/2022

In Violation Of CGS/PA No: 53a-181f(a)(2A)

SEE OTHER SHEETS FOR ADDITIONAL COUNTS		DATE		SIGNED (PROSECUTING AUTHORITY)						
<b>COURT ACTION</b>										
DEFENDANT ADVISED OF RIGHTS BEFORE PLEA (JUDGE) _____ (DATE) _____				BOND <b>\$300000</b>	SURETY					
<input type="checkbox"/> ATTY. <input type="checkbox"/> PUB. DEFENDER				REDUCTION	<input type="checkbox"/> CASH <input type="checkbox"/> COURT <input checked="" type="checkbox"/> JURY					
GUARDIAN _____				B.O.	<input type="checkbox"/> APPEAL <input type="checkbox"/> ELECTION WITHDRAWN DATE _____					
					<input type="checkbox"/> SEIZED PROPERTY					
COUNT NO.	PLEA DATE	PLEA	PLEA WITHDRAWN DATE	NEW PLEA	VERDICT FINDING	FINE	JAIL	ADDITIONAL DISPOSITION		
4	10/1/23	PF NL								
5	11/1/23	PF NL								
6	11/1/23	PF NL								
DATE		OTHER COURT ACTION				JUDGE		CONTINUANCES		
								DATE	PURPOSE	REASON
10/26/23		Attorney Appearance filed (Whalen)								
10/26/23		Reference motion filed						1. 4/26/24	XVPTPM	
11/1/23		Order entered Per Harmon, J.						2. 6/3/24	MHY	
10/24/23		State's Demand for notice of Alibi Defense						3. 6/24/24	MHY	
10/24/23		State's notice of Intention to offer DNA Evidence						4. 7/15/24	MHY	
11/1/23		Order entered Per Harmon, J.						5. 8/12/24	MHY	
10/24/23		State's Demand for Disclosure and Inspection						6. 8/12/24	XV	
11/1/23		Order entered per Harmon, J.						7. 9/9/24	MHY	
10/31/23		Motion for Appointment of Assigned Counsel						8. 10/10/24	MHY	
11/1/23		Order entered per Harmon, J.						9. 10/22/24	MHY	
								10. 10/31/24	MHY	
FINE PAID		RECEIPT NO.		MITTIMUS DATE		TRIAL TOWN		<input type="checkbox"/> SEE REVERSE SIDE		
PROSECUTOR ON ORIGINAL DISPOSITION		REPORTER ON ORIGINAL DISPOSITION		SIGNED CLERK		SIGNED JUDGE				

DATE	COURT ACTION	JUDGE
		Bayne, Paul
		N23NCR230250217-S
11/1/23	SPD appointed per Harmon, J	
11/1/23	Pro Forma Not guilty/jury election entered before Harmon, J	
11/1/23	Defendant to not incite violence against any of the victims through blogging or social media post, ordered per Harmon, J	
11/8/23	Attorney Appearance, Filed (Kirschbaum)	
11/7/23	Motion for Appointment of Assigned counsel	
2/7/23	Defendant's Request for Disclosure	
1/20/23	Order Entered per Harmon, J.	
2/11/23	Motion for Permission to provide Discovery materials to defendant	
2/20/23	Granted, victims intervention to be rejected per Harmon, J	
2/20/23	Conditions of Release ordered per Calistro, J. at arraignment:	
	1. Bond to be posted only at court.	
	2. If the defendant resides in the state of Connecticut: GPS/IPS and 24/7 lockdown	
	3. Possess no firearms/ammunition.	
	4. Stay away from the work locations of each of the complainants mentioned in the protective orders, except for scheduled court appearances in that particular jurisdictions.	
	5. Stay 100 yards away from the family members of the complainants mentioned.	
1/31/24	Motion for Bill of Particulars OFF.	

State v. Paul Regre

N23N-CR23-C25621D-5

1/4/24

Defendant's Motion to Modify Bond

2/12/24 Order entered per Harmon, J.

3/12/24 Bond Reduced to \$25,000 c/s per Harmon, J.

if posted, conditions of Release:

1. Call into Bail Once Every 2 weeks

2. Comply with terms and conditions of all  
Protective Orders

2/12/24 Motion to Dismiss

2/15/24 Denied per Brown, J.

1/12/24 Memorandum of Law in Support of Motion to Dismiss

1/8/24 Motion for Speedy Trial

1/19/24 Denied per Harmon, J.

1/8/24 Motion to Suppress Defendant's Statements

1/8/24 Motion for Notice of Uncharged Allegations

1/12/24 Defendant's oral motion re: 7% cash bail denied per  
Harmon, J.

1/30/24 State's Objection to Defendant's Motion to Dismiss

1/17/24 Response to the State's Objection to Defendant's Motion to Dismiss

1/22/24 Request for Essential Facts

1/24/24 Appendix Addendum, Defendant's Motion to Dismiss

2/15/24 Ruling on Defendant's Motion to Dismiss

BOYNE, Paul

N23NCR2302502175

7/12/24 Defendant's Motion to Modify Bond

7/15/24 Denied per Brown, J.

11/15/24 Application for A.R.

3/12/24 Order entered per Harmon, J.

7/16/24 AR Eligibility

3/12/24 Application for AR Denied per Harmon, J.

4/31/24 Application for Waiver of Fees, Costs and Expenses and Appointment of Counsel on Appeal

8/19/24 Granted by Harmon, J.

1/2/24 Motion to Dismiss re: The Stalling Statutes are Unconstitutionally Overbroad and Vague and Not In Compliance with U.S. Supreme Court Law

1/2/24 Memorandum in Support of Motion to Dismiss re: The Stalling Statutes are Overbroad and Vague and Unconstitutional as Applied to this Case

1/28/24 Defendant's Renewed Motion to Modify Bond

1/5/24 State's Objection to Defendant's Second Motion to Dismiss

1/5/24 Defendant's Motion to Suppress Tangible Evidence

9/6/24 Appeal AC 47988

1/9/24 Oral motion by defense counsel for an evaluation per C.G.S. § 54-56d before Brown, J.

1/9/24 Granted per Brown, J.

1/9/24 3 Attachments Filed as Supplements to Defendant's Motion to Suppress Tangible Evidence

1/18/24 Defendant's Motion to Suppress Tangible Evidence



State v. Paul Bayne

N33N-CR23-0250217-5

1/27/24 Defendant's Motion to Dismiss

1/16/24 Response to State's Objection to the Defendant's Motion to Dismiss re: The Statutory Statutes are Unconstitutionally Overbroad and Vague and Not In Compliance with U.S. Supreme Court Law

1/31/24 Court finds defendant competent to stand trial per Brown, J.

1/31/24 Per clarification by Brown, J., the following will be added to the minutes: "pursuant to defendant's request, court informs DOC of defendant's request to be housed at McDougall C.I."

1/31/24 Defendant's Oral Motion to Remove Counsel

1/31/24 Granted per Brown, J.

1/21/24 Appearance Attorney Kelly Billings

NOV 26 2024 Defendant withdraws all pending motions filed by prior counsel or the defendant without waiving any claims therein, before Brown, J.

NOV 26 2024 Court notes prohibition against hybrid representation,

Brown, J.

NOV 26 2024 Court notes that speedy trial time periods are tolled.

Brown, J.

# Ex. D

# SUPERIOR COURT

N23N CR23 250215/6/7

NEW HAVEN JD

STATE

GA23

V

BOYNE

14 NOVEMBER 2024

## MOTION CHANGE VENUE

DEFENDANT MOVES FOR CHANGE OF VENUE, AS THERE IS NO NEXUS TO GA23/NEW HAVEN JD OTHER THAN JACK DOYLE'S FOLLY. TWO SELF-DECLARED "VICTIMS" OF PUBLIC OPINION RESIDE IN GA9/MIDDLESEX JD, ONE IN GA10/NEW LONDON JD; DUE PROCESS DEMANDING THREE SEPARATE TRIALS.

WHEREFORE, VENUE BE CHANGED AS A MATTER OF LAW.

  
PAUL BOYNE

GA 23  
SUPERIOR COURT  
FILED

NOV 18 2024

CLERK'S OFFICE

Judicial District of New Haven  
SUPERIOR COURT  
FILED

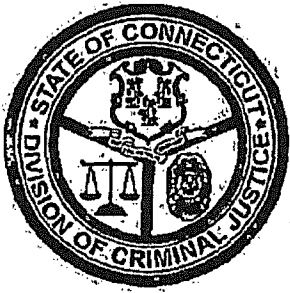
NOV 18 2024

CLERK'S OFFICE

CC: SADOYLE, 235 CHURCH ST NEW HAVEN, CT 06510,



# Ex. E



JOHN P. DOYLE JR.  
STATE'S ATTORNEY

State of Connecticut  
DIVISION OF CRIMINAL JUSTICE

OFFICE OF THE STATE'S ATTORNEY  
NEW HAVEN JUDICIAL DISTRICT

- JUDICIAL DISTRICT OF NEW HAVEN  
235 CHURCH STREET  
NEW HAVEN, CT 06510  
Tel. 203-503-8823 / Fax: 203-789-6400
- GEOGRAPHICAL AREA NO. 23  
121 ELM STREET  
NEW HAVEN, CT 06510  
Tel. 203-789-7455 / Fax: 203-789-7871
- GEOGRAPHICAL AREA NO. 7  
54 WEST MAIN STREET  
MERIDEN, CT 06451  
Tel. 203-238-6125 / Fax: 203-238-6592
- JUVENILE MATTERS OF NEW HAVEN  
239 WHALLEY AVENUE  
NEW HAVEN, CT 06511  
Tel. 203-786-0333 / Fax: 203-753-0527

March 5, 2025

Honorable Peter L. Brown  
235 Church Street  
New Haven, CT 06510

Attorney Kelly Billings  
Fairfield Judicial District  
1061 Main Street  
Bridgeport, CT 06604

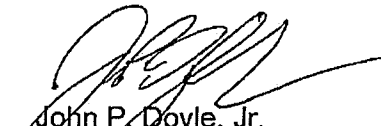
Attorney Denis O'Malley  
55 Farmington Avenue  
8<sup>th</sup> Floor  
Hartford, CT 06105

The State has determined that it needs to call an additional witness in the current hearing before the court. This witness will provide relevant testimony to the issues raised during the hearing and through the testimony of previous witnesses.

We have been endeavoring to arrange for this witness to testify who is located out of state. This witness will be able to provide relevant testimony to the issues raised in the current hearing and in defendant's motion. Travel arrangements are being made for this witness to be in court on Monday, March 10<sup>th</sup>.

I am additionally requesting a continuance in filing of briefs in order for the court to consider this testimony.

Sincerely,



John P. Doyle, Jr.  
State's Attorney

JPD/dk

# Ex. F

N23N CR23-0250215 S  
N23N CR23-0250216 S  
N23N CR23-0250217 S

: SUPERIOR COURT

STATE OF CONNECTICUT

: JUDICIAL DISTRICT OF  
: NEW HAVEN

V.

: AT NEW HAVEN

PAUL BOYNE

: AUGUST 15, 2025


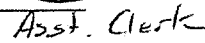
### **INTERIM ORDER REGARDING STATE'S MOTION FOR JOINDER**

On July 21, 2025, the State filed a Motion for Joinder regarding all the pending files in this case: N23N-CR23-0250215-S, N23N-CR23-0250216-S, and N23N-CR23-0250217-S. The defendant filed his Objection to the motion on July 30, 2025. The court heard oral argument on the motion on July 31, 2025. State argues that joinder is proper because the evidence that would be presented in each trial would be cross admissible. In the alternative, the State argues it can establish, by a preponderance of the evidence, that the defendant would not be substantially prejudiced by the joinder of these files in one trial pursuant to *State v. Boscarino*, 204 Conn. 714 (1987), and *State v. James A.*, 345 Conn. 599 (2022), cert. denied 143 S.Ct. 2473 (2023). The defendant argues that joinder is improper where the prosecution seeks to introduce presumptively prejudicial propensity evidence.

The defendant began his argument stating that docket N23N-CR23-0250215-S is not properly before this court in the New Haven JD. The State alleges that the conduct at issue occurred in the Town of Groton on or about December 13, 2021 through April 19, 2024. CGS 51-352(a) states "each person charged with any offense shall be tried in the judicial district in which the offense was committed, excepted when it is otherwise provided." The Town of Groton falls within the New London JD. The defendant was arraigned in the New Haven GA as to all

three files in October of 2023. The court notes that the State never filed a motion to transfer the file ending 215-S from the New London JD to the New Haven JD. The State contends that the defendant has waived the issue of improper venue by subjecting himself to the jurisdiction of the New Haven JD as to all three cases since his arraignment in New Haven GA 23 in October 2023. Neither party has had an opportunity to thoroughly brief the waiver issue as to a claim of improper venue. The defendant cited State v. Shane K., 228 Conn. App. 105 (2024), which the court did not find illustrative on the waiver issue presently before the court. During oral argument, the State referenced State v. Orsini, 187 Conn. 264, 269 (1982). In Orsini, the Court stated that venue requirements are created for the convenience of the litigants and may be waived by failure to assert the statutory privilege in timely fashion. 77 Am. Jur. 2d, Venue section 45. The defendant is clearly raising the venue issue before the court now. The issue becomes what is meant by “timely fashion.”

The court directs the parties to brief this issue and to file simultaneous briefs with the court not later than September 16, 2025. The court will hear further argument on the venue issue on the next court date of September 22, 2025. The court reserves ruling on the motion for joinder until the court resolves the venue issue raised by the defendant. SO ORDERED.

(Brown, J.)   
Hon. Peter L. Brown   
Judge Asst. Clerk