

DOCKET NO. **D03D-CR21-0192188-S** : SUPERIOR COURT
STATE OF CONNECTICUT : JUDICIAL DISTRICT OF DANBURY
v. : AT DANBURY GA # 3
SeanPaul REYES : SEPTEMBER 8, 2021

DEFENDANT’S MOTION TO RETURN SEIZED PROPERTY (CELL PHONE)

The undersigned, SeanPaul Reyes, proceeding pro-se, requests that the cell phone seized by the Danbury Police at the time of his arrest in Danbury, Connecticut on July 15, 2021 be returned to him.

The defendant was arrested by Officer Farrell of the Danbury Police Department for Criminal Trespass 1st degree and Breach of Peace, on July 15, 2021, while the defendant was filming in the public areas of the Danbury City Hall, as the defendant is employed as a full time videographer;

The defendant requests that his cell phone be returned for the following reasons:

1. At the time of the defendant’s arrest on July 15, 2021 at City Hall in Danbury his Samsung Galaxy Z Fold 2 was seized WITHOUT a search warrant by Officer Farrell;
2. The defendant has been advised that the video he was filming just before and at the of his arrest has already been removed from his phone by the State;
3. Thus, there is no further evidentiary value of the cell phone to the State and the State can no longer justify depriving the defendant of his business cell phone;

**ORAL ARGUMENT REQUESTED
TESTIMONY MAY BE REQUIRED**

4. The defendant has other content of his cell phone that he needs immediately in connection with the operation of his business and the longer the cell phone is held as evidence the more financially damaged the defendant becomes;

WHEREFORE, the defendant requests that this court issue an order requiring the State to forthwith return his cell phone to him immediately.

Respectfully submitted,

SeanPaul Reyes

ORDER

The foregoing motion having been heard by the Court, is hereby ORDERED:

GRANTED / DENIED

By the Court,

Judge

CERTIFICATION OF SERVICE

A copy of the foregoing motion has been hand-delivered to the following party of record this _____ day of SEPTEMBER, 2021 pursuant to P.B. Section 10-12:

- Office of the State's Attorney
Danbury Superior Court GA # 3
146 White Street
Danbury, CT 06810

SEAN-PAUL REYES