

DOCKET NO. **U04W-CR-21-0495162-S** : SUPERIOR COURT
STATE OF CONNECTICUT : JUDICIAL DISTRICT OF WATER
v. : AT WATERBURY GA # 4
SEAN-PAUL REYES : JULY 21, 2021

DEFENDANT’S MOTION TO DISMISS

The undersigned, Sean-Paul Reyes, proceeding pro-se, requests that the Information charging him with Criminal Trespass in the 1st Degree, in violation of Connecticut General Statute 53a-107.

The defendant was arrested by Officer O’Toole of the Waterbury Police Department for Criminal Trespass 1st degree, on May 19, 2021, while the defendant was filming in the public lobby of the United States Post Office at 235 Grand Street in Waterbury, as allowed by USPS regulations contained within Poster 7 (Rules and Regulations Governing Conduct on Postal Service Property), as the defendant is employed as a full time videographer;

The defendant requests that this matter be dismissed for the following reasons:

1. This court does not have subject matter jurisdiction in this matter as the Waterbury Police Department does not law enforcement jurisdiction on federal (postal) property;
2. The customer service manager at the United States Postal Service in Waterbury, met with the defendant several days after his arrest at the post office and confirmed that the defendant had every right to film in the lobby of the post office;

**ORAL ARGUMENT REQUESTED
TESTIMONY MAY BE REQUIRED**

WHEREFORE, the defendant requests that the court grant this motion for the reasons stated
Therein and for such other reasons that may be advanced upon a full hearing and argument on
the merits thereof

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 JULY, 2021 pursuant to P.B. Section 10-12:

- Office of the State's Attorney
Waterbury Superior Court GA # 4
400 Grand Street
Waterbury, CT 06702

SEAN-PAUL REYES

