

PRELIMINARY STATEMENT OF THE ISSUESJD-SC-38 Rev. 4-26
P.B. § 63-4

CONNECTICUT JUDICIAL BRANCH

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1. Complete this form and e-mail a copy to all counsel and self-represented parties. (See Practice Book Section 62-7)
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Name of case(s) State of Connecticut v. SeanPaul Reyes	Docket number(s) AC 50408
Party on whose behalf the statement is filed (If you are representing yourself, please write your own name.) Defendant, SeanPaul Reyes	
Address of filer Jon L. Schoenhorn & Associates, LLC -- 108 Oak Street, Hartford, CT 06106-1514	
E-mail address of filer casemanagement@schoenhorn.com	Telephone number of filer 860-278-3500

Preliminary issues to be presented (See Practice Book Section 63-4 (a) (1))

1. Did the state fail to prove all elements of criminal trespass in the third degree (Conn. Gen. Stat. § 53a-109(a)(1) beyond a reasonable doubt?
2. Did the trial court erroneously equate a "Private Road" sign as the equivalent of a "No Trespassing" sign as adequate notice to prohibit entry by members of the public?
3. Did the trial court err in concluding that past "enmity" between the defendant and the homeowner based on pending civil litigation but no violence or threat of violence, constituted "knowledge" that the defendant was not privileged or licensed to approach the front door?
4. Did the trial court abuse its discretion in finding "good cause" to issue four standing criminal protective orders without prior notice to the defendant and without any evidence of violence, threats or any of the conduct enumerated in any of the protective orders themselves?
5. Did the trial court impose an illegal sentence by imposing a standing criminal protective order until 2099 without prior notice and without following any of the mandates of Conn. Gen. Stat. § 53a-217(a)(4)(A)?
6. Is the offense of criminal trespass in the third degree unconstitutionally vague as applied to the facts of this case?
7. Is the offense of criminal trespass in the third degree unconstitutionally overbroad in violation of the first amendment to the United States Constitution and Article I §§ 4 and 5 of the Connecticut Constitution as applied to the conduct of the defendant as an online journalist and First Amendment Auditor who approached the front door of the complainant to conduct an interview with a former state actor?
8. Does a "Private Road/Dead End/No Turnaround" sign apply to non-vehicular traffic?
9. Does a property owner on a shared right of way have the legal authority to bar entrants to the common easement?
10. Did the court adequately canvass the defendant before granting his permission to appear pro se at trial?
11. Did the court adequately canvass the defendant about waiver of his right to a jury trial?
12. Were there other statutory, constitutional and evidentiary errors that may present themselves after review of the record and transcript of the trial?

Certification

I certify that a copy of this document has been delivered to each other counsel of record, that I have included the names and e-mail addresses for counsel of record that were sent the document electronically, or the names and physical addresses for counsel of record that were sent or delivered a paper copy of the document, and that the document has been redacted or does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order, or case law, and complies with all applicable rules of appellate procedure.

Name and address of each party and attorney that copy was or will be mailed or delivered to*

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*If necessary, attach additional sheet or sheets with name and address which the copy was or will be mailed or delivered to.

Signed (Signature of attorney or self-represented party) ▶ Jon L. Schoenhorn (JN #101793)	Print or type name of person signing Jon L. Schoenhorn	Date signed 9/23/2026
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