AC 234335

FST-CR20-0241178-T

State of Connecticut	:	Appellate Court
v.	:	State of Connecticut
Michelle Troconis	:	June 18, 2024

State's Opposition to Defendant's Petition for Review

Pursuant to Practice Book §§ 66-6 and 78a-1, the State of Connecticut-appellee opposes the defendant's petition for review of the order of the trial court, *Randolph*, *J*., denying bail during the pendency of her appeal. In support of her petition, the defendant contends that the court abused its discretion in denying bail because the court "made no findings . . . that custody was necessary to provide reasonable assurance of her appearance in court pending the outcome of her appeal." Petition for Review: 1; see id., 7, 9. The defendant further contends that this Court should remand her case to the trial court "for a hearing on conditions of release during the pendency of the appeal" with direction to apply the standards for making pretrial bail determinations set forth in *State* v. *Pan*, 345 Conn. 922 (2022), in deciding what factors for release can be taken into account.[1] Petition for Review: 9.

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[1] On the cover page of her petition, the defendant indicates that "oral argument [is] requested." (Capitalization altered.) Petition for Review. Although the defendant is entitled to expedited appellate review of the trial court's bail determination; see Practice Book § 78a-1; this Court should decide the matter on the papers without a hearing because the defendant has made no showing why oral argument is necessary to resolve her petition for review. See Petition for Review: 1-

This Court should deny the defendant's petition and uphold the trial court's bail determination for two primary reasons. First, contrary to the defendant's assertion, the trial court reasonably exercised its discretion, pursuant to General Statutes § 54-63f, in denying her request for an appeal bond after considering and rejecting her argument that the court should set an appellate bond in the amount of $2 million with special conditions, including that she remain in Connecticut during the pendency of the appeal. By denying the defendant's request for an appellate bond with special conditions, the trial court necessarily found that no amount of bail could reasonably assure her appearance in court. Second, the trial court's discretionary decision was reasonable based on two facts, of which the trial court was well aware and presumably took into account in denying an appeal bond: (1) the defendant stands convicted of five felonies, including conspiracy to commit murder, which the court reasonably could have viewed as a serious and violent offense; and (2) the court imposed a total effective sentence of 20 years of incarceration, execution suspended after 14 and ½ years, a significant amount of jail time that increases the risk of flight during the pendency of the defendant's appeal.

Alternatively, if this Court grants the petition and remands the case to the trial court for a new bail hearing, it should deny the defendant's request to direct the trial court to apply *Pan* in deciding whether to set an appellate bond for two reasons. First, the defendant waived any claim that *Pan* applies to postconviction bail determinations by failing to raise it below. Second, even if the claim was not waived, the standards set forth by our Supreme Court in *Pan*

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9 (including boilerplate request for "oral argument" on cover page without explaining elsewhere why it is necessary).

plainly apply to *pretrial* bail determinations, not *postconviction* bail determinations where, as here, all of the facts bearing on whether to grant an appeal bond already have been developed throughout the trial and sentencing proceedings.

I. Brief history of the case

The defendant, Michelle Troconis, conspired with Fotis Dulos to kill Dulos's wife, Jennifer Farber Dulos. On May 24, 2019, Fotis Dulos killed his wife at her home in New Canaan. Shortly after killing the victim, Dulos began the process of covering up the crime with the help of the defendant.

As a result of the defendant's role in the killing and her participation in the cover up, the state charged her with six crimes: conspiracy to commit murder, in violation of General Statutes §§ 53a-48 and 53a-54a; hindering prosecution, in violation of General Statutes § 53a-166; two counts of tampering with physical evidence, in violation of General Statutes § 53a-155; and two counts of conspiracy to tamper with physical evidence, in violation of General Statutes § 53a-48 and 53a-155.

On March 1, 2024, following trial, *Randolph*, *J*., presiding, the jury convicted the defendant of all counts. On May 31, 2024, the court imposed a total effective sentence of 20 years of incarceration, execution suspended after 14 and ½ years, followed by 5 years of probation.[2]

II. Specific facts relied upon

From the time of the defendant's arrest on June 3, 2019 until her conviction on March 1, 2024, she remained at liberty after posting $2.1

[2] Before sentencing the defendant, the court dismissed one of the two counts of conspiracy to tamper with physical evidence.

million in surety bonds. The defendant was compliant with the conditions of her pretrial release during that time.

On March 1, following the defendant's conviction, the trial court increased her bail to $6 million. As a result of the court's bail increase, the defendant was taken into custody and placed in York Correctional Institution pending sentencing.

On May 31, 2024, the trial court conducted the defendant's sentencing hearing at which numerous individuals spoke on behalf of each party, including the victim's mother and children and the defendant's friends and family members. In addition to hearing from the foregoing individuals, the court noted that it had read a presentence investigation report (PSI) prepared by the Office of Adult Probation before the hearing. The court also heard argument from counsel regarding an appropriate sentence.

After hearing from counsel, the court imposed a total effective sentence of 20 years of incarceration, execution suspended after 14 and ½ years, followed by 5 years of probation. Before imposing the defendant's sentence, the court noted that it had taken into account "the nature and circumstances of the offense," among other things.[3] Tr. 5/31/24 (excerpt): 1; Appendix: 13. The court also remarked that it had considered the defendant's character, background, and history in fashioning an appropriate sentence. Id.

After imposing sentence, counsel for the defendant requested that the court allow the defendant to remain at liberty on bail during the pendency of her appeal, arguing as follows:

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[3] The state has appended an excerpt of the transcript of proceedings from 3:19 p.m. to 3:40 p.m. on May 31, 2024 to its opposition to the petition for review.

> ATTORNEY SCHOENHORN: Judge, I'm going to orally state that [the defendant] does intend to appeal, and I'll ask the Court to set a reasonable bond. I will state that . . . the appeal bond that the Court set was not something that [the defendant] or her family were able to meet. I'm asking for something more in line with what she had been released on bond for, for the last five years.
>
> I would note that, after Your Honor went on vacation, the State asked for additional conditions, which included making her move to Connecticut. My position, Your Honor is, the Court obviously took that into consideration when it set that high bond, that she was a resident of Connecticut, because that's what the State had then argued.
>
> I'm asking that if she's going to be released, that the Court set a $2 million bond, but with a condition that she reside in Connecticut, and not leave without permission. And –
>
> THE COURT: Well, the Court is going to decline to set an appeal bond. It's not a constitutional right. Have the defendant sign a notice of right to appeal. We'll stand adjourned.

Tr. 5/31/24 (excerpt): 9; Appendix: 21.[4]

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[4] The defendant notes that the state did not argue at the sentencing hearing that "custody was necessary to provide reasonable assurance of her appearance in court pending the outcome of her appeal." Petition for Review: 1. The state emphasizes, however, that: (1) the defendant did not file a written motion for postconviction bail; (2) consequently, the state did not file a memorandum objecting to the defendant's request for an appeal bond; and (3) the trial court denied defense counsel's oral request for an appeal bond and adjourned court after

III. Legal grounds relied upon

A. The trial court reasonably exercised its discretion in denying bail during the pendency of the defendant's appeal.

A criminal defendant has no constitutional right to post-conviction bail. *State* v. *Vaughn*, 71 Conn. 457, 460 (1899). Under General Statutes § 54-63f and the common law, the decision as to whether to grant or deny an appeal bond, in cases such as this, lies within the sound discretion of the trial court. *State* v. *McCahill*, 261 Conn. 492, 507-08, 511 (2002). Although the trial court has inherent authority to admit convicted persons to bail, this power should be exercised "with great caution and rarely . . . be allowed when the crime is serious." *State* v. *Vaughn*, supra, 71 Conn. 460-61; accord *Gold* v. *Newman*, 211 Conn. 631, 639 n.3 (1989); *State* v. *Menillo*, 159 Conn. 264, 269 (1970); *State* v. *Chisolm*, 29 Conn. Supp. 339, 341 (1971). In addition, "[t]he right of a defendant who has been convicted in the trial court to be released on bail while [her] appeal is pending is not nearly as great as [her] right to such release while awaiting trial, because the conviction has removed the presumption of innocence." *Gold* v. *Newman*, supra, 211 Conn. 693 n.3; accord *State* v. *Patel*, 327 Conn. 932, 948 (2017).

In reviewing whether the trial court abused its discretion, the issue is not whether this Court would have reached the same conclusion in the exercise of its own judgment, "but only whether the trial court acted reasonably." *State* v. *DeLeon*, 230 Conn. 351, 363 (1994). "As with any discretionary action of the trial court, appellate review requires every reasonable presumption in favor of the action,

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finding defense counsel's proffered reasons insufficient. See Tr. 5/31/24 (excerpt): 9; Appendix: 21.

and the ultimate issue is whether the trial court could reasonably conclude as it did." (Internal quotation marks omitted.) *State* v. *Jackson*, 334 Conn. 793, 811 (2020). "In general, abuse of discretion exists when a court could have chosen different alternatives but has decided the matter so arbitrarily as to vitiate logic, or has decided it based on improper or irrelevant factors." (Internal quotation marks omitted.) *State* v. *O'Brien-Veader*, 318 Conn. 514, 555 (2015).

Here, the trial court reasonably exercised its discretion, pursuant to General Statutes § 54-63f, in denying the defendant's request for an appeal bond after considering and rejecting her argument that the court should set postconviction bail in the amount of $2 million with special conditions, including that she remain in Connecticut during the pendency of her appeal. By denying the defendant's request for a bond with special conditions, the trial court necessarily found that no amount of bail could reasonably assure her appearance in court. See General Statutes § 54-63f (convicted defendant "may be released pending final disposition of the case, unless the court finds custody to be necessary to provide reasonable assurance of [her] appearance in court"). Although the trial court did not expressly reference or incorporate the statutory language of § 54-63f when denying the defendant's request for an appellate bond with special conditions, the court's consideration and rejection of defense counsel's argument itself carries the implicit conclusion that the statutory criteria have been met. See *State* v. *Henderson*, 312 Conn. 585, 597-600 (2014) ("talismanic recital of specific words or phrases" not required; only issue before court was whether extended incarceration and lifetime supervision would best serve public interest; must presume trial court properly applied law); *State* v. *Kuncik*, 141 Conn. App. 288, 294-95 (trial court presumed to know law and apply it correctly), cert. denied, 308 Conn. 936 (2013).

Moreover, the trial court's decision to deny postconviction bail was reasonable based on two facts, of which the trial court was well aware and presumably took into account when denying her request for an appeal bond. First, the defendant no longer has the presumption of innocence and stands convicted of five felonies, including conspiracy to commit murder, which Judge Randolph reasonably could have viewed as a serious and violent offense. See *State* v. *Moran*, 264 Conn. 593, 610 (2003) (recognizing that conspiracy to commit murder is "serious" crime); see also *State* v. *Menillo*, supra, 159 Conn. 269 ("[postconviction] bail is entirely disassociated from the preconviction presumption of innocence . . . and should be granted with great caution"). Second, the court imposed a total effective sentence of 20 years of incarceration, execution suspended after 14 and ½ years, a significant amount of jail time that creates a greater risk of flight than before the defendant was convicted and sentenced. See *State* v. *Patel*, supra, 327 Conn. 948 (recognizing that "once a defendant is properly found guilty of a crime . . . the incentive to flee appreciably increases").

Finally, as previously set forth, the *only* substantive claim that the defendant presented to the trial court in support of her oral request for an appellate bond was that the court reasonably could assure her appearance by granting bail in the amount of $2 million, conditioning her release on a requirement that she remain in Connecticut, and requiring that she request permission before leaving the state during the pendency of her appeal. See Tr. 5/31/24 (excerpt): 9; Appendix: 21. In seeking an appellate bond, however, the defendant never raised any claim about the complexity of her appeal, the number of issues that she intended to raise, or that "there will be an inordinate and extended delay before an appeal can be briefed, argued and decided." Petition for Review: 6-7. Because these arguments were never presented to the trial court, this Court should not consider them. See *State* v. *Stavrakis*,

88 Conn. App. 371, 383 (2005) ("impossible for the court to abuse its discretion on a ruling that it was never asked to make"); see also *State* v. *Jose G.*, 290 Conn. 331, 346 (2009) (trial court can be expected to rule only on those matters put before it); see also *State* v. *Brunetti*, 279 Conn. 39, 61 (2006) (discountenancing trial by ambush), cert. denied, 549 U.S. 1212 (2007).

In sum, the trial court's decision to deny the defendant's request for an appellate bond was reasonable because it was based on relevant factors and was neither arbitrary nor illogical. Thus, the trial court's decision must be upheld.

B. Alternatively, if this court remands this case for a new appellate bond hearing, the defendant's claims relating to *State* v. *Pan*, 345 Conn. 922 (2022), fail.

Alternatively, if this Court grants the petition and remands the case to the trial court for a new appellate bond hearing, it should deny the defendant's request to direct the trial court to apply *State* v. *Pan*, supra, 345 Conn. 922, in deciding whether to set an appellate bond for two reasons.

First, the defendant waived any claim that *Pan* applies to postconviction bail determinations by failing to raise this claim below or request that Judge Randolph conduct a *Pan* hearing before ruling on an appellate bond. See *State* v. *Bellamy*, 323 Conn. 400, 443 (2016) (observing that "waiver involves the intentional relinquishment or abandonment of a known right or privilege" in context of waiver by actions of counsel [Internal quotation marks omitted.]).

Second, even if the defendant's claim was not waived, it fails on the merits. In *Pan*, our Supreme Court adopted new procedural rules for bond modification motions relating to the amount of pretrial bail. *State* v. *Pan*, supra, 345 Conn. 952. Before setting forth the new

procedural rules, the Court explained that its primary purpose in creating the new procedure was to prevent an accused who is unable to post bond from enduring lengthy pretrial detention without due process. Id. (noting "that *pretrial detention* may carry very serious consequences in addition to, and as a result of, the defendant's loss of liberty" [Emphasis added.]). In adopting the new procedural protections in *Pan*, the Court explicitly stated that they were designed to effectuate the state constitutional right to pretrial bail. Id., 946. As previously noted, however, there is no state constitutional right to postconviction bail. *State* v. *Patel*, supra, 327 Conn. 948. Thus, *Pan*'s procedures unequivocally do not apply here.

Moreover, the procedures adopted in *Pan* were also meant to ensure that a trial court's pretrial bail determination had an adequate factual basis after giving the parties a full and fair opportunity to be heard. *State* v. *Pan*, supra, 345 Conn. 956-59. Nowhere in *Pan* did our Supreme Court state or imply that its decision was meant to apply to postconviction bail determinations where, as here, all of the facts bearing on whether to grant an appeal bond already have been developed through a jury trial, PSI, and sentencing hearing. Accordingly, contrary to the defendant's suggestion, *Pan* plainly applies to *pretrial* bail determinations, not *postconviction* bail determinations.

IV. Conclusion

This defendant's petition for review should be denied.

Respectfully submitted,
State of Connecticut

By: /s/ Robert J. Scheinblum
Senior Assistant State's Attorney
Appellate Bureau
Office of the Chief State's Attorney
300 Corporate Place
Rocky Hill, CT 06067
Tel: (860) 258-5807
Fax: (860) 258-5828
Juris No.: 401626
Robert.Scheinblum@ct.gov
dcj.ocsa.appellate@ct.gov

FST-CR20-0241178T	: SUPERIOR COURT
STATE OF CONNECTICUT	: G.A. #1
v.	: AT STAMFORD, CONNECTICUT
TROCONIS, MICHELLE	: MAY 31, 2024

TRANSCRIPT OF PROCEEDINGS
EXCERPT
3:19 TO 3:40

BEFORE THE HONORABLE KEVIN A RANDOLPH, SENIOR JUDGE

A P P E A R A N C E S :

Representing the State of Connecticut:

ATTORNEY MICHELLE MANNING
ATTORNEY STEVEN MCGUINNESS
Office of the State's Attorney
123 Hoyt Street
Stamford, Connecticut 06905

Representing the Defendant:

ATTORNEY JON L. SCHOENHORN
ATTORNEY AUDREY FELSEN
Jon L. Schoenhorn & Assoc., LLC
108 Oak Street, #1
Hartford, Connecticut 06106

Recorded By:
S. Jerry-Collins

Recorded and Transcribed By:
Lisa Franchina
Sarah Siladi
Melanie Pinto
S. Jerry-Collins
Court Recording Monitor
123 Hoyt Street
Stamford, Connecticut 06905

1 THE COURT: The Court has heard the remarks of
2 counsel; the remarks from family members; the remarks
3 from what the Court would consider, victims of the
4 crime. Almost always there is no single appropriate
5 sentence, otherwise the legislature would have
6 designated a single appropriate sentence for every
7 offense.
8 The charges here are conspiracy to commit
9 murder, which is a class B felony. The legislature
10 has set the sentencing range, not less than one year,
11 nor more than 20 years, which means the legislature
12 contemplated in some instances, sentences of no more
13 than a year, and in the same instance, sentences of
14 20 years.
15 The legislature has given the judiciary a range.
16 Conspiracy to tamper with physical evidence is a
17 class D felony; maximum five years. Tampering with
18 physical evidence, a class D felony; maximum five
19 years. Hindering prosecution is a class C felony,
20 not less than one year, nor more than ten years.
21 The Court relies on what the law states, and
22 what the law allows to be proper considerations in
23 setting a sentence. The Court relies on the nature
24 and circumstances of the offense, and the history,
25 and background, and character of the offender.
26 After such consideration, the Court turns to
27 what are called the traditional purposes of

1 sentencing. Specific deterrents, general deterrents,
2 punishment, incapacitation, rehabilitation,
3 vocational or educational training, and medical
4 treatment.
5 Those factors are not all given equal weight,
6 depending on the nature and circumstances of the
7 offense, and the history, background, and character
8 of the offender. The Court does not take sides. If
9 the Court knew possibly any one of you, and had a
10 bond with any one of you, this Court would not have
11 tried that case.
12 It's not the Court's role to side or favor one
13 side or another. Sentencing in many ways, is a
14 dispassionate exercise. The Court has no bond with
15 any individual who spoke today, or any other
16 individual involved in the case. The Court cannot
17 develop the passions that one side or the other has.
18 In State versus Huey, that's 199 Connecticut 121
19 and 126, a 1986 case, the Connecticut Supreme Court
20 held that the Sentencing Court may consider
21 information that would be inadmissible at trial, for
22 the purpose of sentencing.
23 That same Court held that evidence of crimes for
24 which the defendant was indicted, but neither tried
25 nor convicted may be considered. Well, the word
26 indicted, and the process of indictment is not
27 generally employed in Connecticut. Essentially, that

1 means, where there has been a finding of probable
2 cause, but there has been no trial or no conviction.
3 Additionally, as a matter of due process, the
4 Court may consider information that has a minimum
5 indicia of reliability. Now that minimum indicia of
6 reliability is not limited to unfavorable
7 information. The Court can consider favorable
8 information that has a minimum indicia of
9 reliability.
10 The Court certainly considers the victim impact
11 statements. Every victim has the right to be heard
12 before the Court sentences a defendant. That's part
13 of the Connecticut Victims' Bill of Rights, which is
14 read every day in every courthouse here in
15 Connecticut.
16 The Court would clarify what it perceives as
17 perhaps, a misconception of what the Court's role is.
18 The Court does not deliberate with the jury. The
19 Court does not deliberate on the evidence at all.
20 The Court hears the evidence, as the evidence comes
21 into the record.
22 So, when you hear that the Court has a view of
23 the evidence, the Court has no view of the evidence.
24 What the Court has a verdict, and what could have
25 been the reasonable, and logical inferences from the
26 evidence that was adduced. The Court would not know
27 what the jury discussed over those many hours.

1 What the Court can find is this: It was clear
2 during the jury charge, the jury instructions that
3 the Court instructed the jury that, it may draw any
4 reasonable and logical inferences from the facts
5 found to have been proven.
6 Based on the verdict, the jury could have found
7 the following reasonable and logical inferences.
8 Fotis Dulos was not home at Fort Jefferson Crossing
9 the morning of May 24th, when his wife was murdered.
10 But the defendant said he was home. When the
11 defendant admitted that he was not home, the
12 defendant, who had been angry about Dulos's talking
13 to other women, did not even ask him where he had
14 been.
15 The defendant who was angry that he had visited
16 his wife, did not ask him if he had visited her. In
17 fact, the defendant, as the Court remembers the
18 evidence, did not ask him anything. The jury could
19 draw a reasonable and logical inference that the
20 defendant knew where he was, and knew what he was
21 doing.
22 The defendant said, she saw Kent Mawhinney and
23 Fotus Dolus together in the office, at Fort Jefferson
24 Crossing on the morning of May 24th, but the
25 defendant did not see Fotis Dulos and Kent Mawhinney
26 in the office at Fort Jefferson Crossing on the
27 morning of May 24th.

1 There was a phone call made to Dulos's phone,
2 which Dulos left intentionally, at Fort Jefferson
3 Crossing. The defendant answered it, and the jury
4 could draw a reasonable and logical inference from
5 all of the evidence, that the defendant answered the
6 phone to make it appear that Dulos took the call
7 himself, on the morning of May 24th, at Fort
8 Jefferson Crossing, when he was really on his way to,
9 or in New Canaan.
10 When a police officer came to Fort Jefferson
11 Crossing soon after the murder, the defendant did not
12 even go to the door, even though her daughter, who
13 was not home, may have been the subject of that
14 conversation at the door.
15 Now, it is clear that the defendant cares deeply
16 for her daughter. The jury could draw a reasonable
17 and logical inference that the defendant did not go
18 to the door, because the defendant knew the reason
19 the officer was there, to find out more about the
20 disappearance of Jennifer Dulos.
21 These are reasonable and logical inferences from
22 the facts that were adduced at the case during the
23 trial. The defendant travelled through a part of
24 Hartford with Dulos, as he dumps the bloody clothing
25 of his wife. The jury could draw a reasonable and
26 logical inference that on the same day, the defendant
27 helped him pretend he was home in the morning. But

1 in the evening, accompanied him to get rid of the
2 evidence.
3 The defendant's DNA profile was found on one of
4 the bags disposed of in Hartford. The jury could
5 draw a reasonable and logical inference that the
6 defendant helped dispose of the evidence knowingly.
7 The jury could draw a reasonable and logical
8 inference that the defendant helped Fotus Dulos clean
9 up traces of evidence at 80 Mountain Spring Road,
10 because the defendant and Dulos were there together
11 cleaning, on the same day the Tacoma traveled to New
12 Canaan.
13 This is a flurry of irregular activity, all on
14 the same day. The jury could draw a reasonable and
15 logical inference that the activities of that day
16 were so irregular that, the defendant could not
17 possibly forget them in the span of two weeks. Even
18 if the jurors individually had doubts of the
19 defendant's guilt, each one of them ultimately
20 concluded that their doubts were not reasonable.
21 This is not a view of the Court's view of the
22 evidence. These are logical and reasonable
23 inferences that the jury could have drawn.
24 The Court is going to talk a little about the
25 philosophy of sentencing. Sentencing is not a
26 product of the Court's passions or prejudices. The
27 Court doesn't have a bond with anyone involved in the

1 case. It's a dispassionate exercise. The Court
2 cannot investigate the case. The Court could not
3 talk to the victims. The Court has no conversation
4 with the defendant, or the defendant's family.
5 So there are some questions that are age old.
6 Does the Court -- the sentencing Court adopt the
7 public opprobrium, the indignation of the community.
8 When does retribution turn into revenge? What's the
9 role of empathy? Should the Court exercise sympathy
10 for one side or another? These are age old
11 questions.
12 The Court relies on what the law says the Court
13 can consider; the nature and circumstances of the
14 offense, the history, background, and character of
15 the offender. Every exercise is not an either or
16 exercise. Often the good and the bad are true. What
17 is the purpose of the Court taking into
18 consideration, the victim impact statements.
19 Is that only for the purpose of sympathy? The
20 Court uses the Victim Impact statements to assign, in
21 its view, the proper weight to any one of those
22 traditional purposes of sentencing. Sentencing is
23 not arbitrary or capricious. It's not a matter of
24 how the judge feels that day.
25 The Court wants to also address what has become,
26 over the course of perhaps centuries, perhaps not, a
27 cliché. Michelle Troconis's life is in your hands.

1 Michelle Troconis's life is in her own hands. What
2 Michelle Troconis decides to do today, tomorrow, and
3 the next day, is up to her.
4 From what the Court has heard, she has a great
5 deal to offer. The Court has no control over what
6 her decisions will be. Her life is hers.
7 The following sentences are going to run
8 concurrently. On the count charged in conspiracy to
9 commit murder, 20 years, execution suspended after 14
10 and a half years to serve, five years' probation.
11 Tampering with physical evidence, five years,
12 execution suspended after four years, five years'
13 probation. Conspiracy to tamper with physical
14 evidence, five years execution suspended after four
15 year, five years' probation. The second count of
16 tampering with physical evidence, five years
17 execution suspended after four years, five years'
18 probation.
19 Hindering prosecution, five years execution
20 suspended after four years' probation -- after four
21 years, rather -- five years' probation.
22 Total effective sentence, 20 years, execution
23 suspended after 14 and one half years, five years'
24 probation
25 You will have an opportunity to challenge every
26 finding that the jury made, and every ruling that the
27 Court made.

1 Madam Clerk, you can give the defendant a notice
2 of right to appeal.
3 ATTY. SCHOENHORN: Judge, I'm going to orally
4 state that Ms. Troconis does intend to appeal, and
5 I'll ask the Court to set a reasonable appeal bond.
6 I will state that this -- the appeal bond that the
7 Court set was not something that Ms. Troconis or her
8 family were able to meet. I'm asking for something
9 more in line with what she had been released on bond
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11 I would note that, after Your Honor went on
12 vacation, the State asked for additional conditions,
13 which included making her move to Connecticut, and
14 remain within the bounds of Connecticut. My
15 position, Your Honor is, the Court obviously took
16 that into consideration when it set that high bond,
17 that she was not a resident of Connecticut, because
18 that's what the State had then argued.
19 I'm asking that if she's going to be released,
20 that the Court set a $2 million bond, but with a
21 condition that she reside in Connecticut, and not
22 leave without permission. And --
23 THE COURT: Well, the Court is going to decline
24 to set an appeal bond. It's not a constitutional
25 right. Have the defendant sign a notice of right to
26 appeal. We'll stand adjourned.
27 * * * * * * *

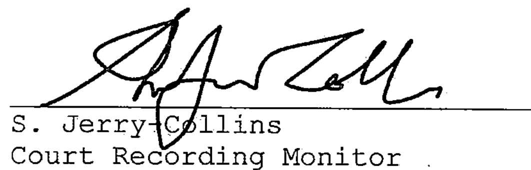
FST-CR20-0241178T	: SUPERIOR COURT
STATE OF CONNECTICUT	: G.A. #1
v.	: AT STAMFORD, CONNECTICUT
TROCONIS, MICHELLE	: MAY 31, 2024

E L E C T R O N I C

C E R T I F I C A T I O N

I hereby certify the electronic version is a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, G.A. #1,Stamford, Connecticut, before the Honorable Kevin Randolph, Senior Judge, on the 31st day of May, 2024.

Dated this 13th day of May, 2024 in Stamford, Connecticut.



S. Jerry Collins
Court Recording Monitor

Certification

Pursuant to Practice Book §§ 62-7 and 66-3, I certify that this document does not contain any names or personal identifying information the disclosure of which is prohibited, that it complies with all applicable rules of appellate procedure, no deviations were requested, that this motion contains **2,830** words, and that a copy hereof was sent electronically to: Jon L. Schoenhorn, Esq., Jon L. Schoenhorn & Associates, LLC, 108 Oak Street, Hartford, CT 06106-1514, Tel.: (860) 278-3500, Fax: (860) 278-6393, Email: Casemanagement@schoenhorn.com, on June 18, 2024.

/s/ Robert J. Scheinblum
Senior Assistant State's Attorney