

**TOWN OF GROTON
POLICE DEPARTMENT**

**INTERNAL AFFAIRS
INVESTIGATION**

C25-012

September 29, 2026

DLG

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COMPLAINT: On July 17, 2025, SeanPaul Reyes submitted a Civilian Complaint with Sergeant Eric Korteweg regarding an incident involving Bryan Fahey, a Connecticut State Police Sergeant, at Fahey's residence located at [REDACTED] on July 11, 2025, which resulted in Reyes' arrest.

ABSTRACT OF ALLEGATION: Mr. Reyes' complaint alleges that the Groton Police Officers who responded to the incident failed to act on his complaint against Bryan Fahey; that he was unlawfully arrested; that officers abused their authority; that his arrest was an act of retaliation; that his increased bond was an act of retaliation; and that officers violated his First Amendment rights.

APPLICABLE RULE(S): General Order 1.01, Law Enforcement Function
General Order 1.02 Limits of Authority
General Order 5.07 Arrest Processing

**DISCOVERY OF ADDITIONAL RULE(S)
VIOLATION(S):** None

SUBJECT OF COMPLAINT: Groton Police Department Officers

DATE/TIME OF INCIDENT: July 11, 2025, at approximately 1652 hours.

LOCATION OF INCIDENT: [REDACTED]

DATE COMPLAINT RECEIVED: On or about January 7, 2026

ASSIGNED INVESTIGATOR: Attorney Eric P. Daigle

BACKGROUND

On July 11, 2025, at approximately 1652 hours, Groton Police received a 911 call from Connecticut State Police Sergeant Bryan Fahey. Fahey advised the dispatcher what was going on, and several Officers responded to the scene. Dispatch was made aware that a gun was involved, so multiple units responded, including two Sergeants.

Upon arrival, officers separated Fahey from Reyes and Glover while speaking with all parties involved. While speaking with Reyes, officers viewed the video footage that Reyes and Glover had obtained, which Reyes claimed showed Fahey spitting in his face.

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While investigating the incident, the Groton Police Department learned that on July 11, 2025, SeanPaul Reyes and Tahiem Glover drove to [REDACTED] in the town of Groton, Connecticut, to film content for Reyes' YouTube channel Long Island Audit. The address is the residence of Connecticut State Police Sergeant Bryan Fahey. Reyes stated that he was attempting to gather content for a story involving Sergeant Fahey's overtime while working for the CSP, and what Reyes deemed "cooking the books."

On that date, it was determined that Sergeant Bryan Fahey and SeanPaul Reyes had a history. Sergeant Fahey has been the subject of SeanPaul Reyes and his social media account, Long Island Audit, in the past. Long Island Audit posted videos of at least two encounters between Sergeant Fahey and Reyes at the Connecticut State Police Headquarters in Middletown, Connecticut.¹

Reyes and Glover arrived at Fahey's residence in a truck equipped with a large LED screen playing a loop of Reyes' past encounters with Sergeant Fahey. They parked the truck in the cul-de-sac, began filming, and walked up the long driveway towards Sergeant Fahey's residence. Reyes rang the doorbell, and when Fahey answered, Fahey advised Reyes and Glover to "get off my property." Fahey repeated his request while Reyes questioned him about overtime. Reyes and Glover began moving away from the residence as Fahey returned inside.

A few minutes later, Fahey exited his residence with a pistol in his hand and approached Reyes and Glover, demanding that the pair leave his property. The recording made by Glover shows that while Reyes and Glover were walking from Fahey's front door, Reyes turned back toward the house when Fahey re-emerged with his firearm. Fahey approached the pair as they neared the split in the shared driveway and got within inches of Reyes as he continued to walk the pair down the driveway, at times chest to chest with Reyes. At some point during the exchange, Reyes claimed that Fahey spit in his face.

After the Groton Police Officers spoke with those involved, Reyes and [REDACTED] were placed under arrest and transported to the Groton Police Department, where they were charged with Breach of Peace in the Second Degree and Voyeurism with malice. An additional charge of Criminal Trespass in the First Degree was added after consultation with the New London State's Attorney's Office. Reyes and [REDACTED] were each processed and later released on bond.

On July 12, 2025, Long Island Audit posted a video entitled "I almost lost my life", in which Reyes provided viewers with his version of what occurred on July 11, 2025.² **(Exhibit A)**

On July 13, 2025, Long Island Audit posted an edited version of the encounter with Fahey and the subsequent contact with the Groton Police Officers on his YouTube channel. The video, entitled

¹ October 14, 2021, LIA link <https://www.youtube.com/watch?v=eDVza-StEaM&t=11s>

June 18, 2023, LIA link

https://www.youtube.com/watch?v=EmT8SWuIjKE&list=PL3rOdLNrXYrrdOAxXgxo0Y6TSU5i_eVxw&index=7

² https://www.youtube.com/live/M2q_GnO9UYA

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“Unhinged Cop SPITS In My Face, Draws His GUN & I Get Arrested? UNREAL.” **(Exhibit B)**

On July 17, 2025, Reyes returned to the Groton Police Department and requested to file a civilian complaint against “every Officer present at the time of the incident” for:

- Unlawful arrest
- Failure to establish probable cause (Goes along with unlawful arrest)
- First Amendment violation
- Retaliation through arrest and increase in bond
- Abuse of authority
- Any other misconduct

After consulting with the State’s Attorney’s office in New London since July 14, 2025, an arrest warrant was approved on August 28, 2025, charging [REDACTED] with Disorderly Conduct. The arrest warrant was signed by the State’s Attorney John Fahey on August 28, 2025, and [REDACTED] turned himself in at the Groton Police Department on August 29, 2025.

COMPLAINANT STATEMENT(S)

On July 17, 2025, SeanPaul Reyes filed a civilian complaint at the Groton Police Department about his interactions with, and subsequent arrest by, Groton Police Officers. Reyes met with Groton Police Sergeant Eric Korteweg and provided a dictated statement to the Sergeant, stating,

On July 11th, I went to Trooper Fahey's residence as a journalist to ask him questions. He told me to leave and I left. Trooper Fahey went inside his residence as I was leaving. Trooper Fahey came back outside with a gun in his right hand, charged me, got in my face and bumped me. He then proceeded to spit in my face and in my mouth. Trooper Fahey was on the phone with 911 and told 911 that I had threatened to kill him, which was not true. Groton police arrived. I informed them I wanted to press charges against Trooper Fahey. I was told that spitting in someone's face is not an assault by a Groton police sergeant. I was then subsequently arrested for breach of peace, voyeurism, and criminal trespass. I'm demanding all Groton police officers involved be investigated for unlawful arrest, failure to establish probable cause, First Amendment violation and retaliation by not only arresting me but raising my bond from 10,000 to 75,000. I'd also like the officers present investigated for abuse of authority and other misconduct warranted. This statement is truthful.

(Exhibit C)

Reyes captured video of his interaction with Sergeant Korteweg on his recording device and posted it to his YouTube channel on July 20, 2025, with the title “Submitting IA complaint & FOIA regarding Sgt. Fahey incident”³ **(Exhibit D)**

³ https://www.youtube.com/watch?v=haHsDmsq1_w

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Sergeant Korteweg also recorded his interaction with Reyes with his Body Worn Camera (BWC) and preserved it for the file. **(Exhibit E)**

On April 27, 2026, Attorney Eric Daigle and Investigator Timothy Webster interviewed SeanPaul Reyes via video conference call. The interview was part of an administrative investigation into allegations SeanPaul Reyes made related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. The interview was audio-recorded and transcribed. The relevant portions of the interview are summarized below **(Exhibit F, SeanPaul Reyes interview transcript; Exhibit G, SeanPaul Reyes interview recording)**.⁴

Mr. Reyes owns and founded Long Island Audit, a media company incorporated and based in New York. According to Reyes, the company is focused on government accountability: *“It's a media company that I started five years ago, meant to promote transparency and accountability in government, highlight issues within law enforcement. Specifically law enforcement, district attorney's offices”* **(Ex. F, page 2)**

Mr. Reyes records and posts his interactions with government employees, including law enforcement officers, on his social media accounts. When asked what percentage of his audit involve law enforcement officers, Reyes responded, *“If you want me to give you a percentage, I would say 90 to 95% involve some sort of law enforcement officer”* **(Ex. F, page 4)**

Mr. Reyes explained the rationale behind focusing on law enforcement officers by stating,

“Well, I think it's important because I don't think there's a lot of focus on law enforcement officers. I think law enforcement officers across the country, they have unions that protect them and in my experience, they get away with ... There's a lack of accountability, a lack of transparency in law enforcement. This thin blue line brotherhood of don't tell. And I've interviewed law enforcement officers, police chiefs, ex police chiefs, current, former, and they tell me the same thing. That there's a unspoken rule or I guess spoken that you don't turn on each other. And law enforcement officers are a needed job in our society and it's an important job and I think people want to be safe and secure in their communities and I think that they give a little too much leeway to law enforcement officers. And my job is to report on that, expose that, and to make sure that they're held accountable the best way I can” **(Ex. F, page 4)**

Mr. Reyes stated that while conducting his audits over the last five (5) years, he has been arrested approximately eleven (11) times.

Mr. Reyes was asked if he has ever gone to anyone's home during his audits, and he advised that

⁴ In preparation for and during the interview, Mr. Reyes agreed not to record or distribute the video, which he did on his YouTube page. This is discussed in the credibility assessment section below: “Fahey Incident Interview They DON'T Want You To See!” <https://www.youtube.com/watch?v=9LH72bB8Sic>

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he has done it a few times in the past, including the Nassau County Police Commissioner, the Nassau County District Attorney, and a New Jersey law enforcement officer. Reyes advised that he would go to the residence with his billboard truck to ask questions and to peacefully protest. **(Ex. F, page 4-5)**

Mr. Reyes was shown a copy of the Civilian Complaint form that he filed with Groton Police Sergeant Korteweg on July 17, 2025, and he acknowledged that it was accurate.

Mr. Reyes was asked if he had ever met Bryan Fahey or Fahey's family prior to the July 11, 2025, incident, and he replied, *"I've never met his family. I have interacted with Mr. Fahey, I believe, on two different occasions prior to that date in person"* **(Ex. F, page 8)**

Mr. Reyes explained that he had two (2) prior encounters with Fahey at the Connecticut State Police Headquarters, one during the summer of 2021, and the other during the summer of 2023. (Both of these encounters were recorded and posted on the Long Island Audit YouTube channel.) Mr. Reyes went on to acknowledge that there are pending lawsuits between him and Fahey stemming from both encounters at CSP headquarters, and that they have been *"put on hold"* while the current criminal proceedings remain active. **(Ex. F, page 10)**

Mr. Reyes was asked to describe the Fahey property:

Eric Daigle:

Okay. And can you describe to me Mr. Fahey's property from your perspective?

Sean Paul Reyes:

Mr. Fahey lives on a cul-de-sac and there is a driveway, a long shared driveway that branches off into two different residences, one residence to the left and Bryan Fahey's to the right.

Eric Daigle:

Okay. And can you view Mr. Fahey's residence from the cul-de-sac or from the roadway?

Sean Paul Reyes:

I don't think you could see the actual house. Maybe through the trees. There's trees there. I'm not sure if you can ... Definitely can't see it clearly, but I would assume in the wintertime when there's no leaves, that you'd be able to see it more clearly. So I think it's possible to see it. I don't remember if it's clearly visible or not. I don't remember it being clearly, clearly visible, but ...

Eric Daigle:

Okay. And from your estimation, could you estimate the length of the driveway?

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Sean Paul Reyes:

I believe in the police report, they said it was like 250 feet or something like that. I would agree; I guess. I don't know exactly. It was a very long driveway.

(Ex. F, page 11)

When asked why he went to Bryan Fahey's residence on July 11, 2025, Reyes explained that he was there to ask Fahey questions about his overtime, *"I went there to ask questions about his overtime. I had received information regarding overtime and that his overtime was in excess."* **(Ex. F, page 12)**

Mr. Reyes went on to explain that he accessed the Connecticut Comptroller's website and believed that Fahey's overtime was "extremely high." Mr. Reyes summarized by stating: *"So yeah, I just went there to ask questions and to protest as well. That's why I brought my billboard truck. I did bring the billboard truck to protest as well."* **(Ex. F, page 13)**

Mr. Reyes acknowledged that there were not any active investigations into Fahey's overtime, and that to his knowledge, he was the only one investigating it: *"I have tried to conduct my own investigation. There has not been any investigation done to my knowledge regarding the overtime"* **(Ex. F, page 13)**

Mr. Reyes was asked if his investigation into excessive overtime included anyone else and he replied that he was also looking at three (3) or four (4) other State Troopers, but he had not been to their residences yet,

"Well, yeah, there's three or four additional state police officers. I have some sources inside the Connecticut State Police Department who sent me an internal memo, internal email, congratulating Bryan Fahey on his retirement. And in that retirement, there was three other individuals that they were congratulating. I looked into their overtime as well, and they seemed to be getting over \$100,000 in overtime a year for the last three years as well. So, the investigation focused on them too. But again, I'm not getting any sort of response from the Connecticut State Police, unfortunately. So, I'm going to have to try and figure out a way to get that information. Force them to hand over that information, I should say" **(Ex. F, page 14)**

Mr. Reyes acknowledged that his associate, Tahim Glover, was recording the July 11, 2025, interaction with Fahey and the Groton Police officers. Reyes further acknowledged that the video that was posted online (Exhibit B) was edited; however, the editing was limited to what he classified as behind-the-scenes or dead air. *"Yes, that is correct. I edit my videos that I post on my varied social media platforms for various reasons, but the main reason is brevity, to be concise, dead air, things like that. Never for anything out of substance. I believe the difference if you look... Because you have the original. So, if you look the difference between the original and the one I posted, it just cuts out the beginning part where I'm talking to my cameraman, like behind the scenes stuff"* **(Ex. F, page 16)**

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Mr. Reyes recalled what occurred on July 11, 2025, while at Fahey's residence,

- After arrival, he took some time to explain to his cameraman (Glover) that they should be on the lookout for "No Trespassing" signs.
- Discussed that people knock on doors all the time, salesmen and journalists, for example.
- Recognized the Private driveway sign but did not believe that to constitute a "No Trespassing" sign.
- Instructed Glover to start filming as they walked the driveway towards Fahey's house.
- Took the "quickest" path to the house, which was across the lawn.
- Knocked on the door.
- Stepped off the porch, possibly ten (10) to fifteen (15) feet away.
- Started to ask questions, but Fahey advised that there was a "no trespassing" sign posted.
- Tells Fahey that there was no sign posted.
- Fahey tells him and Glover, "You need to leave."
- Starting to back away, believes it was less than two (2) seconds after Fahey's command.
- Has to motion to Glover to "Come on" because he had not started to move right away.
- Walking backward, still trying to address Fahey.
- Fahey goes inside and closes the door.
- Turns and walks back across the grass towards the street.
- Hears yelling from behind him.
- Turns to see Fahey walking towards them with a phone to his ear.
- Hears Fahey say "I have a gun. I have a gun in my hand."

(Ex. F, page 17-18)

Reyes explained that he had Glover continue filming the interaction and that he began walking backward as Fahey approached with his gun. Reyes stated that he did not feel safe, so he kept his hands up and told Fahey he did not have any weapons. *"So, from the moment I saw him with the firearm, I made sure to face him, but I continuously moved backwards with my cameraman. He got in my face; he started chest bumping me. That's when he spit my face and, in my mouth, and I made it to the end of the driveway"* **(Ex. F, page 19)**

When asked if he expected the reaction from Fahey, Reyes stated that he did not, *"I did not expect him to come outside and chase me down with a gun in his hand and bump me and spit my face and engage in the sort of behavior that he engaged in now, the criminal behavior, quite frankly, that he engaged in"* **(Ex. F, page 19)**

Mr. Reyes was asked to consider the scenario from Fahey's perspective and asked if he believed that Fahey had any reason for concern in his presence:

Eric Daigle:

And from his perspective, do you believe he had any reason to be concerned that you were on his property?

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Sean Paul Reyes:

No. I mean, I don't think anybody goes to anybody's house with a camera. He saw the camera. I don't think anybody... At least I assume he did. I don't think anybody goes to anybody's house with a camera to do them harm. In the two interactions that I had with Mr. Fahey, he was the aggressor. He was the person that put his hands on me. I never once used any sort of aggression, not even speaking to him have I really used any aggression. I've ever cursed at him. So, the answer is no, and the reason is I have never given him a reason in the two times that we've interacted to fear for his safety whatsoever. I've never sent him any death threats. I've never done anything to him personally that would make him fear... That I believe that would make him fearful of me in any way."

(Ex. F, page 20)

Mr. Reyes explained that when the Groton Police arrived on scene, they “acted like I was the bad guy” and that they were protective of Fahey. Reyes stated he believed this because the Groton Police Chief was a former Trooper who supervised Fahey⁵. Reyes expressed that the Officers seemed to be blaming him for the interaction: “They said, ‘Well, you knew it was going to be a battery.’ I said, ‘All I did was knock on his door and I immediately left.’ And ‘Well, you knew this is what...’ Basically to the effect of you wanted this, or this is what the outcome you were hoping.” **(Ex. F, page 20)**

Mr. Reyes was asked about his general complaint and whether he spoke with everyone on scene: “I spoke with the majority of them, I would say. I don't know if I spoke to every single one. I believe there was a female officer I did not speak to at all. I asked her for her name and badge number. Other than that, there wasn't really interactions. The name was Romanski, was the main officer and then the sergeant. I forget his name though” **(Ex. F, page 23)**

When asked if Officer McKechnie (female officer) was among the officers included in his complaint, Reyes stated, “Well, I guess it would depend on the investigation. If the investigation shows she's part of some sort of conspiracy to... I guess the overall arching theme of my complaint and what I'm alleging as far as misconduct is that the Groton Police Department, because of their relationship or because of who Fahey is as a law enforcement officer, who the police chief is, Luis Fusaro, who has ties with Fahey, I believe that they conspired... Whether overtly or not, they conspired in order to arrest me and not arrest the person who actually broke the law. I don't know if you know this, but as you know, [REDACTED] was arrested” **(Ex. F, page 24)**

Mr. Reyes believed that his arrest was retaliation for going to Fahey's house because one of the officers on scene was overtly critical of the billboard truck, “So, when you have a law enforcement officer who is overtly criticizing me for the billboard truck being there, and he sees it as something other than what it is a First Amendment protected activity, to me that makes it seem like they're retaliating against my First Amendment, my First Amendment right to knock on that door and ask questions as a journalist” **(Ex. F, page 24)**

⁵ Allegations that the Groton Police Chief supervised Fahey are a fact that is disputed and not accurate.

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Reyes expressed his belief that the Groton Police Officers arrested him because he was engaging in his First Amendment-protected activity. Reyes also advised that all the original charges against him have been dismissed, and he has been cited with a “different” criminal trespassing charge. Mr. Reyes again expressed his belief that his arrest was in retaliation for going to Fahey’s residence, *“So, it seems to me like there was no probable cause for any of their charges that they tried to get me with. And I think it was done in retaliation against me”* (Ex. F, page 24)

Mr. Reyes was asked to identify the officer who made the comment about the billboard truck, and he stated that it was Officer Romanski. (Ex. F, page 25)

Mr. Reyes was asked about the signs that he observed on July 11, 2025. Regarding the Private Road sign, Reyes stated that he believed that it simply meant there was no outlet or turnaround, and that it was not for “through” traffic. Reyes advised that he has never seen a sign like that before.

Mr. Reyes was asked about the No Trespassing sign that Officers found on the ground, and he stated that he did not see the sign and that he was not advised of its existence until he viewed the Groton BWC footage. Mr. Reyes also stated that when he reviewed his camera footage, he never observed the No Trespassing sign.

Mr. Reyes also pointed out that none of the Groton Police Officers questioned him about the presence of the No Trespassing sign,

“And then from the footage, and multiple officers didn't see it. And again, I think it's important to know for the record that none of the officers, even though they did find this at the scene, none of these officers thought it was wise to question me about a sign, this particular sign before arresting me.

Again, I think that's one more thing that, in my opinion, if he thought that I saw the sign or took down the sign, I guess, something he should at least question me about, "Did you see the sign?" The sign exists. And just to be clear, I did show the video to one of the sergeants on the scene as well, so I don't know”

(Ex. F, page 27)

Mr. Reyes was asked if he showed the Groton Sergeant the video in its entirety and he advised that he showed him the video from where he was at Fahey’s front door to the point when Fahey spit in his face. Reyes stated that the reason he was showing the Sergeant the video was because of the allegation that Fahey had spit in his face.

Mr. Reyes acknowledged that he was arrested for Criminal Trespass, Breach of Peace, and Voyeurism. When asked who he believed the arresting officer to be, Reyes stated, *“I believe Romanski was the arresting officer. I believe he's the one that processed me. I can say that. [REDACTED] was also arrested for the same charges, but I believe one of the sergeants, I don't*

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recall his name, was the one that told him to arrest me” (Ex. F, page 28)

Mr. Reyes was asked about his complaint and to explain what had occurred when he advised the Officers that he wished to press charges against Fahey for spitting in his face. Reyes advised that the Sergeant who ordered his arrest (Sgt. Bedard) told him that spitting was only considered assault if someone spits on law enforcement, *“Well, yeah. So, the one supervisor who ultimately ordered my arrest, he had told me that it's only a crime to spit on somebody or it's only an assault to spit on somebody if it's a law enforcement officer” (Ex. F, page 28)*

Mr. Reyes stated that he recalled that the Sergeant mentioned that he had “breached the peace” and expressed his belief that the officers did not investigate his complaint, only Fahey’s complaint.

Mr. Reyes was asked if he was given the opportunity to provide a written statement and he stated that he was not, *“No, we were never asked to provide a written statement. It was just, “You just put your hands behind your back, you're under arrest.” And I thought I was under arrest for breach of peace. That was my understanding. And when I got to the police station, I was told felony voyeurism, breach of the peace and criminal trespassing and that my bond was going to be 10,000, yeah” (Ex. F, page 29)*

Mr. Reyes was asked about his allegation that his arrest was unlawful because the Groton Police failed to establish probable cause.

In response to the Criminal Trespassing charge, Mr. Reyes stated that his belief that the officers failed to establish probable cause was based in the fact that the charge was dismissed when he went to court, he was never given “prior notice” by Bryan Fahey that he was not welcome on the property, there was no “signage”, and that when Fahey advised him to leave the property, he did in fact leave. **(Ex. F, page 29)**

Mr. Reyes went on to state that he believed the police reports were “vague,” which leads him to believe that the officers were *“trying to figure a way to charge me with whatever they can”, and “But from what I've seen, it doesn't seem like they really move into this very fact-driven narrative. It's more of a subjective narrative that's meant to paint a picture in a way that doesn't reflect reality” (Ex. F, page 30)*

In response to the Breach of Peace charge, Mr. Reyes stated that his belief that the officers failed to establish probable cause was based on the fact that he believes that the charge must involve a “public area” and that the incident took place in a private area. **(Ex. F, page 30)**

In response to the Voyeurism charge, Mr. Reyes stated that his belief that the officers failed to establish probable cause was based on the fact that he believes that there was no expectation of privacy on Fahey’s behalf: *“And lastly, the felony voyeurism, I believe that was probably the most egregious of all the charges. Felony voyeurism, again, in regards to filming somebody where they don't have an expectation of privacy” (Ex. F, page 30)*

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Mr. Reyes concluded by expressing his belief that because the charges were dismissed, there was no probable cause, *"But I think even more telling that they didn't have any sort of probable cause or any of the elements were met is that the prosecutor dismissed all of those charges against me, every single one of them that were dismissed"* (Ex. F, page 30)

Mr. Reyes also expressed his concern that he did not feel that the Groton Police Officers completed a thorough investigation,

"So, I mean, they didn't even do enough of an investigation to, they had the Ring camera footage. They could have done a more thorough investigation on. There was no pressing violence that on my part, at least, that needed to be resolved. They could have done more exhaustive investigation on this.

They could have watched the video fully, "Let me see the complete video on your phone, Mr. Reyes. Let me talk to Mr. Glover. Let me get his account. Let's look at everything. Let's take the Ring camera footage. Let's look at that."

They could have done an investigation that probably would have ended the same way, because again, I believe that they're just trying to do this on their own and make this up and do what they need to do." (Ex. F, page 30)

When asked if he was aware that the Groton Police were receiving guidance from the State's Attorney's office, Mr. Reyes stated that he had no idea of the guidance that was provided by the SA's office; however, he noted that he was aware that the New London State's Attorney recused himself from the prosecution. Mr. Reyes stated that he was aware that the officers on scene were communicating with Chief Fusaro regarding his bond, *"I know that I was told that they were communicating with the police chief in regards to my bond and the charges. So, I know there was some sort of level of communication with the police chief, Luis Fusaro, who's a former Connecticut state trooper."* (Ex. F, page 31)

Mr. Reyes was asked about his complaint that he was retaliated against by the Groton Police by increasing his bond, *"I think the lack of probable... I'll just button it up with saying I believe that the parties involved, the party being involved being a law enforcement officer who worked with the police chief, I believe the fact that I was arrested on baseless charges that don't reflect in the police report whatsoever or in law, that the investigation was half-assed, for lack of a better term."* (Ex. F, page 31)

When asked if he knew anything about the bond process or if he knew why his bond may have been increased, Mr. Reyes stated that he was originally advised by an officer that his bond was \$10,000.00 and then the same officer came back later and advised him that the bond was increased to \$75,000.00 and that the decision was coming from the top, *"I would say that my knowledge comes directly from the fact that they told me 10,000 and then came back and told me 75 and 50, for [REDACTED], after speaking with somebody up high or who I assumed to be the police chief."* (Ex. F, page 33)

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Mr. Reyes acknowledged that he did not understand the procedures law enforcement used when setting bonds. Mr. Reyes further acknowledged that he was residing in New York at the time he was arrested and that he also had a felony conviction on his criminal record.

Mr. Reyes was advised that with regard to appearance bonds, police departments are guided by policy as well as guidance by the State's Attorney's Office. Mr. Reyes responded by stating, *"That's my understanding as well. And just for the record, I'd like to just state that I have been arrested two other additional times in the State of Connecticut and both of those times I had a felony conviction and both of those times I was not a resident of Connecticut. And each time one was a promise to appear, and one was \$10,000 bond"* (Ex. F, page 34)

When asked whether those arrests in Connecticut involved misdemeanor or felony crimes, Mr. Reyes stated they involved misdemeanor crimes.

Mr. Reyes was asked to discuss his allegation that the Groton Police violated his First Amendment rights, and he advised that the arrest itself violated his First Amendment rights: *"I believe they retaliated against me based on my speech. They did not like that I was being critical of a law enforcement officer. They did not like that I went to a law enforcement officer's residence and knocked on his door. They have a relationship with this law enforcement officer as a member of their community and not just their community as far as Groton, but the law enforcement officer community"* (Ex. F, page 36)

Regarding his allegation that the Groton Police abused their authority, Mr. Reyes stated, *"I think everything I've said... Yeah. I think everything I've said during this whole interview is part of how they abused their authority, and that's basically it. I mean, I don't think I have anything else additional to add as far as an abuse of authority other than that"* (Ex. F, page 37)

Mr. Reyes was asked about his request that the Groton Police Officers be investigated for "any other misconduct," and he stated that the investigation may uncover additional violations based on telephone logs or email communications.

Mr. Reyes was asked if any of the officers were rude or impolite, and he stated that some were more compassionate and others were skeptical, believing he (Reyes) was the issue. (Ex. F, page 37)

Mr. Reyes expressed his belief that officers did not like that he went to Fahey's residence and parked the billboard truck in the street, *"And Romanski and the other sergeant seemed to have some sort of built-in animus towards me regarding my actions, which I believe are First Amendment protected. But other than that, I've dealt with worse."* (Ex. F, page 38)

Mr. Reyes was asked about his criminal prosecution and his understanding of the charges being dismissed, and he advised that the charges were dismissed and that the charge of criminal trespass first degree was reduced to criminal trespass third degree. Mr. Reyes stated that he did not know

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why the charges were dismissed, and he stated that he believed that the prosecutor did not have a basis to charge him: *"I guess the easiest way to say that I don't think he dismissed the charges under the kindness of his heart because he likes me. I think he made an analysis based on a state's attorney that he did not have the elements to prosecute any of the charges that I was really charged with, but that's me speaking for him, not really what he said."* (Ex. F, page 39)

Mr. Reyes was asked about the statement Bryan Fahey provided, saying he and his family have been the subject of threats because of videos posted of their past interactions. Mr. Reyes denied that he threatened Fahey or his family and condemned anybody threatening law enforcement, *"So for people to be sending people or even law enforcement or anybody, government officials death threats is something that I abhor and I don't support whatsoever. I condemn it if that's true, but I don't necessarily believe everything that he says. But I mean, he knows that I've never sent him a death threat, so he knows that."* (Ex. F, page 40)

Mr. Reyes was asked if he has ever seen any comments on his videos regarding threats towards Fahey, and he replied, *"I've never seen anyone threatening anybody, but that's probably because YouTube has auto moderation that if you threaten somebody in a public comment section like that, they're going to take it down nine times out of 10."* (Ex. F, page 40)

Mr. Reyes was asked about Fahey's statement that his address was "leaked" online, and he denied that he was responsible: *"No, I go to great lengths to make sure that no matter who's, and this is documented throughout all of my video interactions at law enforcement officers or public officials' residences, is that I make it a point to blur out any street signs, address information, anything of that. I've never shared anybody's personal address information online, and not necessarily because it's illegal, just one of my policies. I don't do that."* (Ex. F, page 41)

Mr. Reyes acknowledged that he was aware that [REDACTED] was arrested by warrant for Disorderly Conduct and that he did not understand the State's Attorney's involvement in the process when a police officer is involved. Mr. Reyes was asked about his complaint, specifically where he noted that [REDACTED] was not arrested, and he stated,

"Again, they didn't even take a statement from me as a victim of an alleged crime. I'm alleging that he committed a crime. He spat my face. They saw evidence of that. Again, whether it's assault or not, I would argue if he had some sort of disease, it could've been an assault. There's a lot of things that could've been a breach of the peace. Maybe not, it's not public, but there's definitely a charge there. Obviously, he was charged with something. So, I just think that there was never an investigation done to my side of it. And whether he was arrested on the spot or not, policy be damned. I don't think that the law enforcement officer should get special treatment."

If I was arrested on the spot, I was arrested without a warrant. They could've just sent us both, "Hey, he go back inside, you. He's trespassing you from the property, don't go back on his property." And they could have investigated this after, but it

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seemed to me that they wanted to inflict damage to me that day and my cameraman, unfortunately, because I really had nothing to do with it other than taking a job.”
(Ex. F, page 42)

Finally, Mr. Reyes was asked if he knew why Mr. Glover had not filed a complaint against the Groton Police Officers and he stated that he believes that it has been “traumatic” for Glover, and that he was just a guy who took a job and ended up getting charged with a sex crime, *“So it's kind of been traumatic for him that's a sex crime that he was in the news for. He's just some innocent guy that was charged with a sex crime basically and given a bond and had to go to court”* (Ex. F, page 43)

Mr. Reyes also noted that [REDACTED] applied for AR (accelerated rehabilitation) and that he is waiting for the decision.

SUBJECT/ WITNESS STATEMENT(S)

Officer Jacob Romanski

On April 1, 2026, Attorney Eric Daigle and Investigator Timothy Webster interviewed Groton Police Department Officer Jacob Romanski in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations SeanPaul Reyes made related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. Romanski was represented during the interview by the Police Department’s Union President, Mike McCarthy, and Union Vice President Jesse Comeau. The interview was recorded and transcribed. The relevant portions of the interview are summarized below (**Exhibit H, Officer Jacob Romanski interview transcript; Exhibit I, Officer Jacob Romanski interview recording**).

Romanski has been employed by the Groton Police Department for approximately four (4) years and is currently assigned to the patrol division.

Throughout the interview, Officer Romanski provided limited insight into his role during the interaction with Reyes. Romanski was asked whether he had ever met Bryan Fahey or anyone in his family before July 11, 2025, and he stated that he had not. Officer Romanski was asked if he had ever responded to the Fahey residence for any reason, and he stated, *“I believe I did, yes.”* (**Ex. H, page 4**)

When asked to explain, Romanski stated, “I can’t, no.” When questioned why he could not explain, Romanski stated, *“I think I went for... It was an alarm or something like that. I don't recall.”* (**Ex. H, page 4**)

When asked if he had ever done patrol checks of Fahey’s residence, Romanski stated “I don’t recall.”

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Romanski was asked to recall how he was made aware of the incident at Fahey's residence.

Investigator Webster:

Okay. Do you recall how you were made aware of the incident at Fahey's residence?

Jake Romanski:

Through the radio.

Investigator Webster:

Okay. And do you remember what they broadcast?

Jake Romanski:

No.

Investigator Webster:

Okay. You don't know what you were going to?

Jake Romanski:

I know what I was going to. I just don't know verbatim what I was sent to.

Investigator Webster:

Okay. Tell me what you were going to.

Jake Romanski:

A disturbance, possible fight, possibly involving a gun.

(Ex. H, page 5)

Romanski acknowledged that he was the first officer on scene and that he observed three males, later identified as Fahey, Glover, and Reyes. Romanski stated that Reyes was "*loud and animated*", and that he asked if anyone had any weapons on them. Romanski stated that both Reyes and Glover said they did not; however, he could not recall whether he patted them down. Romanski stated that another responding officer took Fahey's gun and secured it.

Romanski was asked about the truck and LED screen that was on scene, and what was displayed. Romanski advised, "*I believe it was something with Mr. Fahey and Mr. Reyes having an incident in the past.*" **(Ex. H, page 7)**

Attorney Daigle tried to get Romanski to provide more in-depth answers as to what his actions were while on scene,

Attorney Eric Daigle:

Okay. No trick questions here. I was trying to get a little more detail out of you, that's all. As you talked about, you said you arrived on the scene and you said here

they initially refused to identify themselves. Tell me about that.

*Jake Romanski:
They refused to identify themselves. I mean...*

*Investigator Webster:
Did you ask them for ID? Did you ask them their names?*

*Jake Romanski:
Yes.*

*Investigator Webster:
Which one?*

*Jake Romanski:
I mean, I believe I asked them both. I don't know who was first, second.*

*Investigator Webster:
I'm sorry. Let me be clear. I don't mean who you asked first. I mean, did you ask them, "Hey, can you give me your ID?" Or did you ask them, "What's your name, sir?"*

*Jake Romanski:
I guess I don't recall which one I did. I think I did both.
(Ex. H, page 9)*

Romanski stated that both Glover and Reyes refused to identify themselves and that he (Romanski) did not have any reasonable articulable suspicion to ID them. Romanski was asked if Reyes or Glover explained why they were at Fahey's house, and Romanski stated, "No."

Romanski was asked if Reyes told him what his involvement with Fahey was; Romanski responded, "No. Involvement as in what." The question was made clearer to Romanski,

*Investigator Webster:
Okay. So, when I'm asking you if he explained what was going on, did you ask him what was going on?*

*Jake Romanski:
Yes.*

*Investigator Webster:
Okay. And what did he say?*

Jake Romanski:

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Well, I can recall when I got there that he was saying he was shouting about Mr. Fahey spitting his face. And then in my mind, I just went to, "All right, let's separate everybody."

(Ex. H, page 11)

Romanski advised that he eventually got Reyes to calm down by "Taking a step back and breathing and saying, 'All right, let's go over what's going on.'" **(Ex. H, page 11)** Romanski was asked to explain what Reyes told him, and he stated, "I don't recall." Romanski was asked to review his report to help him answer the questions.

Romanski was asked the same question after reviewing his report and he read from his report, "*Reyes explained that Fahey had spit his face and he wanted him arrested. Reyes stated that he had gone to Fahey's house after obtaining the address where he intended to ask questions regarding an incident involving Fahey and his workplace. Reyes claimed he was asked to leave and did so by backing up slowly. He also stated that he did not see any no trespassing signs on the property. Reyes again emphasized that Sergeant Fahey had spit in his face.*" **(Ex. H, page 12)**

When asked if he took any investigative steps when Reyes advised that Fahey had spit in his face, Romanski stated "*Yeah, I believe we asked to see his camera footage.*" **(Ex. H, page 13)**

Attorney Eric Daigle:

I'm sorry. He makes an allegation against Mr. Fahey. Did you do anything to investigate that allegation that he spit in his face?

Jake Romanski:

Yeah. Yes.

Attorney Eric Daigle:

What was that?

Jake Romanski:

I mean, talking to him, I guess, yeah.

Attorney Eric Daigle:

Okay. What was that? What did you do?

Jake Romanski:

I believe it was more, so Sergeant DeAngelo asked him about the spit and to show him the spit, and I was standing there.

(Ex. H, page 13)

Romanski was asked if he, specifically, took any investigative steps regarding Reyes' allegation about Fahey spitting in his face, and he responded, "*I'm going to say no.*" **(Ex. H, page 15)**

Romanski was asked about the No Trespassing sign that he documented in his report,

Investigator Webster:

You documented in there that you observed a metal sign located approximately 10 feet off the edge of the driveway and into the wooded area past the manicured portion of the property. Do you see that?

Jake Romanski:

Yes.

Investigator Webster:

Okay. Were you looking for a sign?

Jake Romanski:

Yeah. Yes. No. Yeah.

Attorney Eric Daigle:

Which one is it?

Jake Romanski:

Back towards the road.

Attorney Eric Daigle:

Do you remember what led you to go over there?

Jake Romanski:

I just don't recall if it was, I talked to Sergeant Bedard first or talked to him first or if I saw for... I don't recall.

Attorney Eric Daigle:

That's what we're trying to get to. Did somebody say to you during the course of your duties, "Hey, can you go see if there's a sign or..."

(Ex. H, page 17)

Union representative requested a brief break to speak with Romanski in private. Upon their return, Romanski was asked the same question.

Investigator Webster:

So, let's just go back to where we left off, because it got a little confusing. So, I had asked you about page two of your report and the fact that you observed a metal sign. So, I'm trying to get it. I asked you if you were looking for that sign. Did someone give you a task to say, "Hey, look it, there was a sign?" Talk to me about

that. Why would you write that in there?

Jake Romanski:

Because it was there, because there was a sign there.

Investigator Webster:

Okay. But my question was, were you looking for it?

Jake Romanski:

I don't recall if I was looking for it or told. I just, I saw it there.

Investigator Webster:

Okay. So, what brought to your attention? Was it shiny? Could you visibly see it, just walking by?

Jake Romanski:

Yes.

Investigator Webster:

Okay. Do you understand why that's important?

Jake Romanski:

Yes.

Investigator Webster:

Okay. Why is it important?

Jake Romanski:

Because he was charged with no trespassing.

Investigator Webster:

Okay. And if you could see it, could someone else have seen it?

Jake Romanski:

Yes.

(Ex. H, page 18-19)

Romanski was asked about the sign and why he reported that the sign appeared to have originally been affixed to a nearby tree but had since fallen and was lying face up on the ground. Romanski stated that he believed this due to “*The way it was laying*” on the ground.

Romanski was asked if he advised anyone about the sign, and he stated that he and Sergeant Bedard had a conversation about it but could not recall the circumstances. Romanski was also asked if he advised Officer McKechnie about the sign while she was taking a statement from Fahey, and he

stated that he could not recall.

Romanski was asked about his report, in which he documented that after observing the sign, he placed it in the grass along the driveway. Romanski acknowledged that he moved the sign and then placed it back where it was when Sergeant Bedard photographed it.

Romanski was asked if he knew who installed the No Trespassing sign, and he stated that he did not. Romanski acknowledged that he never asked the question.

Romanski was asked about Fahey's Ring camera, and he advised that he became aware after he left the scene; however, he did not recall who provided the information. Romanski was asked if he ever reviewed the Ring camera footage, and he replied, "*I don't recall.*" (Ex. H, page 24)

Romanski was asked about the arrest of Reyes and [REDACTED]

Investigator Webster:

Let's just back up. If you look at your report, it says, "After Sergeant DeAngelo and Sergeant Bedard spoke with both parties, it was determined that Reyes and [REDACTED] would be placed in custody." Who determined that they would be placed in custody?

Jake Romanski:

Sergeant DeAngelo.

Investigator Webster:

Sergeant DeAngelo, it was his decision?

Jake Romanski:

Yes.

Investigator Webster:

Okay. And did he tell you to place the cuffs on Reyes?

Jake Romanski:

Yes.

Investigator Webster:

Okay. He told you he's under arrest. Did he tell you what he was under arrest for?

Jake Romanski:

No.

(Ex. H, page 25-26)

Romanski stated that he could not recall if Reyes made any statements or comments during his

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transport to Groton Police Department.

Romanski stated that he was not involved in determining what Reyes and [REDACTED] were charged with. (Ex. H, page 27)

Romanski stated that he had no involvement in determining the bond amount for Reyes and [REDACTED] (Ex. H, page 27)

Romanski stated that he was aware Reyes' bond was increased; however, he did not know why or whose decision it was. Romanski was asked if he recalled how Reyes reacted when he was advised that his bond was increased to \$75,000.00, and he stated that he could not recall.

Romanski was asked if he took a statement from Reyes or Glover, and he stated that he did not. Romanski additionally advised that he did not know if anyone else took a statement from Reyes or Glover.

Romanski acknowledged that he heard Reyes claim that Fahey spit in his face and wanted him arrested. Romanski also acknowledged that he did not take any steps to investigate that claim. (Ex. H, page 32)

Romanski was asked several closing questions regarding Reyes' complaint,

Attorney Eric Daigle:

Okay. He states in his complaint that somebody told him that that was not considered an assault. Did you overhear that?

Jake Romanski:

No.

Attorney Eric Daigle:

Did you tell him that?

Jake Romanski:

No.

(Ex. H, page 33)

Attorney Eric Daigle:

Okay. He claims that his arrest was unlawful and that the officers failed to establish probable cause, but I believe we've clarified that you did not have that responsibility.

Jake Romanski:

Yes.

(Ex. H, page 33)

Attorney Eric Daigle:

He alleges that officers violated his First Amendment rights. Do you know what he's talking about?

Jake Romanski:

No.

Attorney Eric Daigle:

So, First Amendment can be a lot of things, right? Recording officers in the performance of their duties along with other areas. At any time, did you take any steps to stop him from recording?

Jake Romanski:

No.

Attorney Eric Daigle:

Did you tell him to stop recording?

Jake Romanski:

No.

Attorney Eric Daigle:

Do you know of anybody on scene that stopped him from recording?

Jake Romanski:

I don't know.

(Ex. H, page 33-34)

Attorney Eric Daigle:

Okay. He alleges that his bond increase was retaliatory in nature. We kind of talked about the bond where it increased. Was there anybody telling you that the bond was increased with anything related to retaliation, specifically that they didn't like Reyes or they wanted the bond to be increased on him based on what he does or how he does it?

Jake Romanski:

No.

Attorney Eric Daigle:

During the course of the arrest processing, was there any discussion of favoritism towards Sergeant Fahey?

Jake Romanski:

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No.

Attorney Eric Daigle:

Any discussion of disliking Reyes as a First Amendment auditor?

Jake Romanski:

No.

Attorney Eric Daigle:

Any discussion of his arrest being retaliatory in nature?

Jake Romanski:

No.

(Ex. H, page 34)

Officer Jenna McKechnie

On April 1, 2026, Attorney Eric Daigle and Investigator Timothy Webster interviewed Groton Police Department Officer Jenna McKechnie in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations SeanPaul Reyes made related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. Romanski was represented during the interview by the Police Department's Union President, Mike McCarthy, and Union Vice President Jesse Comeau. The interview was recorded and transcribed. The relevant portions of the interview are summarized below (**Exhibit J, Officer Jenna McKechnie interview transcript; Exhibit K, Officer Jenna McKechnie interview recording**).

Officer McKechnie has been employed by the Groton Police Department for approximately five and a half (5 1/2) years and is currently assigned to the patrol division. Officer McKechnie serves as a Field Training Officer (FTO) and is assigned as a School Resource Officer at Groton Middle School.

Officer McKechnie stated that she has never met Bryan Fahey or his wife; however, she did state that she met Fahey's son [REDACTED] while working at Groton Middle School in 2024. (**Ex. J, page 4-5**)

Officer McKechnie stated that she has done patrol checks at the Fahey residence in the past. McKechnie believed she conducted five (5) patrol checks in 2023 because of threats Fahey had received. (**Ex. J, page 6**)

McKechnie confirmed that she was working the evening shift on July 11, 2025, and that she was dispatched to Fahey's residence located at [REDACTED]. McKechnie was asked if she recalled how the call was dispatched, and she reviewed her report prior to stating, "An off-duty Connecticut state trooper called reporting an auditor trespassed on

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his property, and we were advised that a firearm was involved” (Ex. J, page 12)

Officer McKechnie was asked what she observed upon arrival, and she stated, *“I got out of my car. I walked straight to a man standing in the driveway. One of the driveways that I saw straight ahead, and he was on the phone and there was no other officers with him, so I immediately went to him. That male was later identified as Bryan Fahey. My sergeant came next to us, and Brian started to tell us what was going on, and then we walked down towards his residence, and we stood in the driveway, and we talked about what happened, what was going on. I obtained the statement from him and then I left” (Ex. J, page 12)*

When asked if she saw Reyes while on scene, Officer McKechnie stated that she observed Reyes and Glover speaking with other officers by the “billboard truck.”

Officer McKechnie recalled that Fahey advised her that he and Reyes have had encounters in the past and that Reyes has never been to his (Fahey’s) residence before. McKechnie stated that Fahey reported that there were “hundreds” of threats against him online, and that the State’s Attorney’s office was aware. McKechnie stated that Fahey reported Reyes knocked on his door and filmed the interaction when Fahey told Reyes and Glover to get off his property.

Officer McKechnie stated, *“He said he shut the door. He went upstairs to grab a firearm from his safe. He came back down. He said it was in his right hand and that he ultimately put it behind his right leg when he went outside, told Sean that he had a firearm and he walked them off the property while screaming at them to get the fuck off of his property. I believe at that point from Fahey that Sean and Tahim were backing away filming and saying that they were off of his property, that they were off his property. And Brian was like, “You get the fuck off of my property.” I believe I don’t think Sean and Tahim were aware that Fahey’s property is that entire driveway and that he allows his neighbor to use that portion of it because it’s a Y shaped” (Ex. J, page 13-14)*

When asked why she believed that Reyes and Glover were not aware that they were of Fahey’s property, McKechnie stated, *“They kept saying, ‘We’re off your property,’ while they were standing in the driveway, “We’re off your property,” according to Fahey” (Ex. J, page 14)*

Officer McKechnie stated that she decided to obtain a written statement from Fahey regarding the incident. Officer McKechnie stated that Fahey explained what had occurred, and she summarized his statement. McKechnie stated that after completing the statement, Fahey reviewed it and signed the statement form.

Officer McKechnie was asked if she ever spoke with Reyes or Glover and she stated that when she first arrived on scene, Reyes asked her for her name and badge number. McKechnie stated that she did not have any further interaction with either Reyes or Glover.

Jenna McKechnie:

When I first got on scene, Reyes asked me for my name and my badge number.

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*Tim Webster:
Just in passing because you were walking?*

*Jenna McKechnie:
Walking towards Brian.*

*Tim Webster:
Okay.*

*Jenna McKechnie:
And I said Officer McKechnie 157.*

*Tim Webster:
And you provided him with your information?*

*Jenna McKechnie:
He said, "Thank you." And then I walked over to Brian.*

*Tim Webster:
Did you talk to Reyes about the incident at all?*

*Jenna McKechnie:
No.*

*Tim Webster:
Did you have any further contact with Reyes?*

*Jenna McKechnie:
No.*

*Tim Webster:
How about with Glover?*

*Jenna McKechnie:
No.*

*Tim Webster:
So, you had no contact other than providing Reyes with your name and badge number?*

*Jenna McKechnie:
Yes.*

(Ex. J, page 17-18)

Officer McKechnie was asked about the signs on Fahey's property, which she noted in her report,

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and whether she spoke to Fahey about the signs. McKechnie stated that she did recall speaking with Fahey about a sign that had fallen.

Jenna McKechnie:

I believe it was when we were walking down the driveway, I observed the signs.

Eric Daigle:

Which one, not trespassing?

Jenna McKechnie:

No, the private road, dead end, no turnaround.

Eric Daigle:

Okay.

Jenna McKechnie:

And I mentioned, "You have all these signs. Why would anyone think that they could walk down here?" And they just started going on, him and his wife talking about the past with Reyes. And that's when he explained to me that he gives his neighbors access to that driveway up to [REDACTED] but that it was all his property.

Eric Daigle:

Okay.

Jenna McKechnie:

And then he mentioned that he had a no trespassing sign, but that he just noticed it had fallen at the end of his driveway.

Eric Daigle:

Just noticed when you're walking by or how did you take that to mean?

Jenna McKechnie:

So, I said, "Did it fall? When did it fall?" And he said, "I don't know." And he was saying... I don't know if he did it. I'm not saying Sean did it, but at some point, that sign was up is what Fahey was explaining to me.

(Ex. J, page 20)

Officer McKechnie was asked if she confirmed that Fahey had installed the No Trespassing sign, and she stated that she did not. **(Ex. J, page 21)**

Officer McKechnie was asked about Fahey's Ring camera, and she stated that she watched the videos after Fahey uploaded them to the community link. McKechnie was asked what she recalled from watching the video, and she stated, "I don't recall everything, but I recall him walking out, Brian walking out of the house, and I saw the firearm in his right hand, and then behind his leg while he was walking, and then the camera kind of didn't get all the way up to the driveway" **(Ex.**

J, page 23)

Officer McKechnie was asked if she recalled speaking with Fahey about Reyes spitting allegation, and she replied, *"Well, Fahey had told me without even asking that he was spitting while he was talking. And at some point, I said, 'Did you intentionally spit on him or were you just spitting because you're yelling?' And he said, 'I don't believe I spit on him intentionally.' And so, in the statement, I believe it's somewhere in there where I talked to him about that, but he, I believe, said foaming. He was foaming at the mouth"* (Ex. J, page 24)

Officer McKechnie stated that she was not involved in determining the charges against Reyes and [REDACTED], the arrest of Reyes or [REDACTED] or determining bond for Reyes and [REDACTED] (Ex. J, page 26)

Officer McKechnie was advised of Reyes' civilian complaint, then asked several questions,

Tim Webster:

Okay. Reyes claims that his arrest was unlawful, that officers failed to establish probable cause, that officers violated his First Amendment rights, that his arrest and bond increase were retaliatory in nature and that officers abused their authority. As far as you know or aware of, was Reyes' arrest unlawful?

Jenna McKechnie:

No.

Tim Webster:

Okay. Did anyone discuss with you what probable cause was used to arrest Reyes and [REDACTED]?

Jenna McKechnie:

No.

Tim Webster:

Okay. Was the arrest of Reyes and [REDACTED] based on anything... This is from your point of view. Was the arrest of Reyes and [REDACTED] based on anything other than probable cause?

Jenna McKechnie:

No.

Tim Webster:

Favoritism towards Fahey?

Jenna McKechnie:

No.

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*Tim Webster:
Dislike of the auditor?*

*Jenna McKechnie:
No.*

*Tim Webster:
Retaliatory in nature?*

*Jenna McKechnie:
No.*

(Ex. J, page 29)

Sergeant Tyler DeAngelo

On April 1, 2026, Attorney Eric Daigle and Investigator Timothy Webster interviewed Groton Police Department Sergeant Tyler DeAngelo in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations made by SeanPaul Reyes related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. DeAngelo was represented during the interview by the Police Department's Union President, Mike McCarthy, and Union Vice President Jesse Comeau. The interview was recorded and transcribed. The relevant portions of the interview are summarized below **(Exhibit L, Sergeant Tyler DeAngelo interview transcript; Exhibit M, Sergeant Tyler DeAngelo interview recording)**.

Sergeant DeAngelo has been employed by the Groton Police Department for approximately ten (10) years. DeAngelo was promoted to Sergeant in 2023 and has been a canine handler since 2021.

Sergeant DeAngelo stated that he has never met Bryan Fahey or his wife and, prior to the July 11, 2025, incident, did not recall responding to Fahey's residence for any calls for service.

Sergeant DeAngelo confirmed that he was working the evening shift on July 11, 2025, and that he was on the road when he heard the call for the incident at Fahey's residence located at [REDACTED]. [REDACTED] Sergeant DeAngelo was asked if he recalled how the call was dispatched, and he stated, *"I believe the radio traffic was dispatch, there was a disturbance reported between a Connecticut State Trooper and a First Amendment auditor. That was verbatim what was told to us. It was also included that the state trooper had a firearm and that the First Amendment auditor was trespassing on his property."* **(Ex. L, page 5)**

Sergeant DeAngelo explained that he was the shift commander for the evening and that Sergeant Bedard was assigned as the patrol supervisor. Sergeant DeAngelo further explained that Sergeant Bedard, as shift supervisor, took control of the incident at Fahey's residence.

Sergeant DeAngelo was asked what he observed when he arrived on scene; he stated, *"Sure.*

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Officer Romanski and Officer Brillon were there along with Sergeant Bedard. They were speaking with two males, which were later identified as Mr. Reyes and Mr. Glover. They were recording. They had cell phones attached to some type of handheld device basically to make it a distance from them. They also had a large billboard truck that had a screen attached to the side of it. It was very large and it clearly depicted an incident between Mr. Reyes and a Connecticut State Trooper. It was not portraying him in a positive light, and that was on a continuous loop. And I just stood back and let my officers deal with Mr. Reyes until he started to engage me in conversation.” (Ex. L, page 6)

Sergeant DeAngelo stated that when Reyes engaged him in conversation, he introduced himself to Reyes and Glover and noted that Reyes appeared a little agitated, was speaking loudly, and was sweating. Sergeant DeAngelo recalled that Reyes explained that he and Glover were journalists and that they were at Fahey’s residence working on a story involving Fahey and a scandal involving overtime. Sergeant DeAngelo stated that Reyes informed him that Fahey exited his residence with a firearm and escorted them off the property, “*And at no point did Mr. Reyes's or Mr. Glover say that Mr. Fahey had the firearm or pointed it at them or threatened them. He was just holding it in his hand down by his side. And then also during that interaction, Mr. Fahey escorted them off the property in a chest-to-chest manner. And during this, Mr. Reyes stated that Mr. Fahey spit in his face and pointed to his right cheek. While we were conversing about that, I did not see any spit on Mr. Reyes's face. In fact, the only thing I did see on his face, like I said prior, was just sweat. It was a hot day out and it was summertime. I was sweating as well*” (Ex. L, page 6-7)

Sergeant DeAngelo stated that Reyes informed him that he captured the incident on his recording device and agreed to share the video with him,

Tyler DeAngelo:

Also, he indicated he had the interaction on video. I asked Mr. Reyes if he was willing to show us that video interaction, and he indicated he would agree to that, and he subsequently stopped his video to show me a portion of his recording.

Eric Daigle:

Let me just ask you a follow-up with that because he's alleging a First Amendment claim against you and the officers. And at that point, did you order him to stop recording?

Tyler DeAngelo:

I did not.

Eric Daigle:

Did you take the phone away from him at any time?

Tyler DeAngelo:

I did not.

(Ex. L, page 7)

Sergeant DeAngelo explained that when he viewed the video on Reyes' phone, he observed only a small portion of it. Sergeant DeAngelo explained that Reyes fast-forwarded the video to the point of Fahey exiting his residence with the firearm. Sergeant DeAngelo explained that he observed Fahey backing Reyes down the driveway in a chest-to-chest manner, and the two men exchanging words. Sergeant DeAngelo stated that he did observe Fahey spitting,

Eric Daigle:

Based on your review, just in your interpretation, what you saw at that time, did you conclude that Sergeant Fahey had spit on Mr. Reyes?

Tyler DeAngelo:

It appeared that he spit. I couldn't tell exactly where it landed or what direction it was in, but it did appear that he spit, yes.

Eric Daigle:

Thank you for clarification. So that he did spit, whether it was on him, you didn't have evidence of that then?

Tyler DeAngelo:

Correct. Correct.

(Ex. L, page 9)

Sergeant DeAngelo stated that he had limited interaction with Fahey and recalled introducing himself to Fahey and his wife while Officer McKechnie was taking a written statement from Fahey. Sergeant DeAngelo stated that he recalled Fahey stating that he was spitting; however, he stated that he was spitting because he was yelling at Reyes. Sergeant DeAngelo also stated that he recalled that Fahey made mention of past threats that he received online because of his interactions with Reyes.

Sergeant DeAngelo was asked whether he was aware of any past interactions between Reyes and Fahey, and he stated that he remembered the Groton Police doing patrol checks at Fahey's residence based on threats he had received. Sergeant DeAngelo did not recall when this occurred or how long the officers did the checks. **(Ex. L, page 11)**

Sergeant DeAngelo was asked to explain why there were no attempts to collect evidence of spit from Reyes, and he stated, *"It's not something we would generally do unless it was something I observed or that I believe that there was evidence to swab. He did bring that up, but as I previously stated, I didn't observe anything on his face other than sweat."* **(Ex. L, page 13)** Sergeant DeAngelo stated that he did request medical services respond for Reyes; however, Reyes declined treatment.

Sergeant DeAngelo was asked about the signs that he noted in his incident report, and he stated,

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“Yeah. So, I believe it was when I was walking up to Officer McKechnie and Mr. Fahey, or maybe it was on the way. I can't remember exactly what point, but I believe it was when I was walking up the driveway to speak with them. There was two rather large yellow signs. I don't remember if they were on the left or on the right, but they were along the driveway, clearly posted and they stated private road dead end, no turnaround. I also later learned from Sergeant Bedard and Officer Romanski that there was a private property, no trespassing sign that was in the area as well at the base of the tree. I did observe that on the left side of the driveway face up. It was lying in some grass at the base of a tree on the edge of the driveway. And to my to my understanding, Mr. Fahey believed that that sign was still affixed to the tree. He had stated that at some point.” (Ex. L, page 14)

Sergeant DeAngelo was asked if he or anyone else established who owned or installed the Private Road or No Trespassing signs.

Tim Webster:

You're aware that this is a shared driveway with an easement for, I believe it's ■■■, Fahey lives at ■■■, neighbor lives at ■■■ to the left?

Tyler DeAngelo:

I don't know the exact number, but I do know when you're going up the shared driveway that Mr. Fahey's property is ■■■■.

Tim Webster:

Okay. At any point, did anyone establish if Fahey had installed those signs or the neighbor installed the signs?

Tyler DeAngelo:

Not that I can recall on scene.

Tim Webster:

Okay. You're not aware if any officers asked Fahey if they were his signs or he freely mentioned that they were his signs?

Tyler DeAngelo:

I think there was a discussion who had it and when it happened. I'm not sure. And I can't definitively say that that occurred.

(Ex. L, page 15)

Sergeant DeAngelo acknowledged that Reyes and ■■■■ were arrested on scene and charged with Breach of Peace, Voyeurism, and criminal Trespassing. Sergeant DeAngelo advised that he and Sergeant Bedard decided what to charge Reyes and ■■■■ with after discussing the circumstances. *“We agreed that there was probable cause and we did have a discussion about the charges and what we believed to fit at that very moment. So, I guess you could say it was a cultivation of both of our decisions.” (Ex. L, page 16)*

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Sergeant DeAngelo went on to explain that while he and Sergeant Bedard agreed that there was some type of Trespassing that occurred, they did not know which statute to charge Reyes and [REDACTED] with until speaking with the State's Attorney, *"No. So, we agreed that there was some level of apparent trespassing. We were unsure exactly. There was a lot to unpack here. We did agree that there was some level of trespassing that had occurred, and that was later determined by the state's attorney's office that that was the applicable charge"* (Ex. L, page 17)

Sergeant DeAngelo was asked to explain what he believed was the probable cause for arresting Reyes and [REDACTED] with Voyeurism. *"So, as I stated, the first sections States with malice, we discussed with malice, we had the facts that Mr. Reyes traveled over state lines. They had a history of interactions with each other to the point where State Trooper, Mr. Fahey, had to call another police department to do patrol checks at his house and that they also had an ongoing civil dispute. The next section, knowingly photographs. I don't think it can be disputed that Mr. Reyes was unknowingly photographing or filming. He had several cameras there and at no point disputed filming. The next section talks about without the knowledge and consent of such other person.*

While the other person is not in plain view, I stated in my report, I estimated Mr. Fahey's residence to be about 200 yards off the roadway. His residence could not be observed from plain view from the roadway in the public area. He also didn't consent to being filmed. He told him to get the F off of his property continuously. And it did not appear he even knew he was being filmed. He was pretty homed in on getting him off of the property as quickly as he could. The next section talks about under circumstances where such person has a reasonable expectation of privacy. Again, that was the curtilage of his residence that could not be viewed from the public area. That was the probable cause we discussed." (Ex. L, page 20)

Sergeant DeAngelo went on to explain that they did not believe that Fahey's residence and driveway were a "public" area based on the distance from the street and the fact that it was hidden from view by trees.

Sergeant DeAngelo acknowledged that he has never charged anyone with Voyeurism. (Ex. L, page 21)

Sergeant DeAngelo explained how the State's Attorney's office became involved with this investigation and arrest. *"We had conversed it on scene and through part of my duties as stated as a shift commander, you are to keep your administration in the loop with critical incidents. I would consider this maybe not a critical incident. However, there was an officer from another agency involved. That's something that your administration is going to want to know about. The chief of police and I had a phone conversation, and he consulted with the state's attorney's office because there's a memo that was distributed by our state's attorney's office."* (Ex. L, page 21)

Sergeant DeAngelo was asked about the bond that he set for Reyes and [REDACTED] and he stated, *"Yes. I don't recall the exact monetary value that I set, but I do recall that I placed a cash surety bond on Mr. Reyes and a non-surety bond on [REDACTED]."* (Ex. L, page 23)

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When asked why the bond was increased, Sergeant DeAngelo explained that it was based on the additional Criminal Trespassing charge and that the Chief had advised the State's Attorney's office that they uphold the \$75,000.00 bond. *"So, the considerations would be the new charge. In addition to that, this is Groton Police General Order 5.07. This would be Section N, which is bond subsection two. This is something that I referenced when we're talking about bonds, as any shift commander would. When considering whether to release an individual on bond, this is verbatim, the supervisor shall consider the arrested individual's length of residency in the community. B, the person's connection with the community. C, the record of arrest, convictions, and history of failure to appear in court. And D, the safety to the victim and arrested person."* (Ex. L, page 23)

Sergeant DeAngelo stated that he also considered Reyes criminal history, which included a felony charge in New York. (Ex. L, page 24)

Sergeant DeAngelo was asked about Reyes' complaint against Fahey and why a statement was not taken from Reyes. Sergeant DeAngelo explained, *"At that point, I can't say why it was or wasn't taken. There was a lot to unpack and the evidence at face value didn't appear that... Let me put it this way. I should say Sergeant Bedard and I didn't disagree that something had occurred, but we felt as though that there needed to be a further investigation based on the fact that I only had a portion of the video from a cell phone and I understood that there was a statement taken from Mr. Fahey as well as some doorbell footage that I had not observed at that point, to my knowledge. And there was more to unpack whether or not Mr. Fahey would be arrested. It was something that we needed to further investigate."* (Ex. L, page 25)

Sergeant DeAngelo acknowledged that a statement probably should have been taken from Reyes, *"I'm not making an excuse per se, but Sergeant Bedard had things he was dealing with. I was talking to the chain of command and were trying to meet everything together and it's something that should have been done and wasn't."* (Ex. L, page 26)

Sergeant DeAngelo was asked whether he believed there was enough probable cause to arrest Fahey at the time of the incident, and he stated that he did not. *"So, I felt as though there needed to be a further investigation, and basically Sergeant Bedard arrested Mr. Reyes and [REDACTED], and I felt as though we needed further investigation of what Mr. Reyes was alleging. And we didn't have much evidence of such on the scene at that very time, and then obviously more evidence was introduced into the situation at which point we did make that decision."* (Ex. L, page 26)

Sergeant DeAngelo further explained why he believed [REDACTED] was not charged on scene, saying he would have wanted to see Reyes' unedited video, which he had agreed to provide to investigators.

Sergeant DeAngelo stated that a decision was made to move forward with drafting an arrest warrant for [REDACTED] for [REDACTED] based on the fact that he spit in Reyes' face. Sergeant DeAngelo stated that Reyes never provided the unedited version, but he was able to view a version that Reyes posted on his YouTube page that showed a "zoomed-in" version. *"I think it was the fact that the additional evidence that was provided essentially by Mr. Reyes on his social*

media account that had a zoomed in perspective, and it also showed an entirety of what appeared to be a start to finish video. I can't say that for sure because I still haven't seen an unedited version, but it appeared to be zoomed in and that Mr. Fahey did in fact spit in Mr. Reyes's face.” (Ex. L, page 31)

Sergeant DeAngelo was advised that Reyes claimed in his civilian complaint that when he requested to press charges against Fahey, he was advised spitting was not considered an assault. Sergeant DeAngelo was asked if that was something he advised Reyes, and he stated, *“That's something Sergeant Bedard told him.” (Ex. L, page 31)*

Sergeant DeAngelo stated that he had read Reyes' civilian complaint and, when asked, said he did not agree with Reyes' claim that his arrest was unlawful or that they failed to establish probable cause.

Sergeant DeAngelo was asked about Reyes' claim of First Amendment violations,

Eric Daigle:

And when he says First Amendment rights, in your mind, what's that entailing?

Tyler DeAngelo:

I can't speak to his perception on what he believes, but I would conclude that he believes I was interfering with his First Amendment right to film, I suppose, which we've already discussed that was not done on my behalf.

Tim Webster:

At no point did you order anyone to tell him to stop filming?

Tyler DeAngelo:

Absolutely not.

Tim Webster:

Did you tell him to stop filming?

Tyler DeAngelo:

No.

(Ex. L, page 33)

Sergeant DeAngelo denied that Reyes' bond was increased as retaliation and that officers abused their authority.

Eric Daigle:

And I think that the last one is really the... So just in conclusion, Mr. Reyes is alleging that his arrest was very focused on three areas. Number one, that it was favoritism towards Sergeant Fahey and any of your officers or yourself have any

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favoritism towards Sergeant Fahey that night?

Tyler DeAngelo:

No.

Eric Daigle:

That it was a dislike of him as a First Amendment auditor. Is there any comments or information that you're aware of that any of your officers treated him differently because he was a First Amendment auditor?

Tyler DeAngelo:

No.

Eric Daigle:

And finally, that it was retaliatory in nature that you were acting to retaliate as law enforcement officer against the way he treats law enforcement officers, any information that supported that?

Tyler DeAngelo:

No.

(Ex. L, page 34-35)

Sergeant Devon Bedard

On April 1, 2026, Attorney Eric Daigle and Investigator Timothy Webster interviewed Groton Police Department Sergeant Devon Bedard in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations made by SeanPaul Reyes related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. Bedard was represented during the interview by the Police Department's Union President, Mike McCarthy, and Union Vice President Jesse Comeau. The interview was recorded and transcribed. The relevant portions of the interview are summarized below **(Exhibit N., Sergeant Devon Bedard interview transcript; Exhibit O, Sergeant Devon Bedard interview recording)**.

Sergeant Bedard has been employed by the Groton Police Department for approximately nine (9) years and is currently assigned to the patrol division. Sergeant Bedard is also assigned as the traffic supervisor and as the Marine Unit supervisor on the accident reconstruction team. Sergeant Bedard was promoted to the rank of Sergeant in August of 2024.

Sergeant Bedard stated that he has never met Bryan Fahey or his wife and, prior to the July 11, 2025, incident, did not recall responding to Fahey's residence for any calls for service.

Sergeant Bedard stated that he was aware of a request for patrol checks at the Fahey residence in the past, but he has never been to the residence. **(Ex. page 3)**

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Sergeant Bedard confirmed that he was working the evening shift on July 11, 2025, and that he heard units being dispatched to Fahey's residence located at [REDACTED]. [REDACTED] Bedard recalled, *"At first, it was a call for an auditor in an argument with an off-duty trooper. Units started responding, lights and sirens. I told them to slow it down because it was just an argument at that point, and I had no knowledge of any previous interactions between the two at that time. Then it was mentioned that there was a firearm involved, and we stepped it up to that code three response."* (Ex. page 4)

Sergeant Bedard was asked if he was requested to respond and he stated, *"I went at that point because an off-duty police officer was involved, and me being the supervisor on duty, it was my responsibility to go and make sure that that was handled properly. I was already on another call, and I removed myself from that call to go to this."* (Ex. page 5)

Sergeant Bedard was asked what he observed when he arrived on scene, and he advised that several officers were already on scene and speaking with Reyes, Glover, and Fahey. *"So, I believe there were already three officers on scene, two of which were with Mr. Reyes and his cameraman. And then I believe the third officer was with Sergeant Fahey at that time. So, because there were already two with those two and then one with him, I went to Sergeant Fahey. So, I approached him first."* (Ex. page 5)

Sergeant Bedard stated that he believed it was best to separate Fahey and Reyes, so he requested Fahey accompany him back toward his residence. Sergeant Bedard stated that Fahey explained what had occurred: *"He was telling me that he's been dealing with Reyes and members of Long Island Audit for approximately one year. He said that he had received death threats from either Reyes or people associated with Reyes. I'm not sure if that's Long Island Audit itself or followers of that YouTube channel, but he did say that he had received death threats. He said that they were in the middle of a civil lawsuit, which the state's attorney already had all the information for that for. He said that they had come to his house unannounced, were recording him. He asked them to leave, which they did not. And he said that he had the entire incident on his Ring doorbell camera."* (Ex. page 6)

Sergeant Bedard stated that after hearing a summary version from Fahey, he returned to the cul-de-sac and noted that Sergeant DeAngelo was speaking with Reyes, so he allowed him to continue to gather that information while he dealt with one of the officer's camera issues.

Sergeant Bedard was asked about his report where he noted observing the private road signs, *"Sure. So, when I asked Sergeant Fahey to go back down his driveway so we could talk out of earshot of each other, so that way him and Reyes weren't continuing to escalate between each other. As we were walking down the driveway, it was approximately 200 to 300 yards down the driveway to the house, and it is a split driveway where there's another house adjoining the driveway, okay? As we were down that common shared driveway, there were two yellow ... They were private road, dead-end, no-turnaround signs."* (Ex. N, page 8)

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And then I was looking for any no-trespassing signs because Fahey was expressing that this was a trespassing. And I did look off to my left on that side of the driveway. I saw a ... I believe it was a black and white no-trespassing sign that had fallen from a tree where it was posted. It was no longer clearly posted, but if you were looking for it, you could see it.” (Ex. N, page 8)

Sergeant Bedard was asked if he observed the no trespassing sign before or after Officer Romanski removed it from the woods and placed it in the grass, and he stated that he noticed before it was removed. *“It was still in the brush. It was face up, and it was probably one to two feet in the brush right there. I left it because I wanted to take photos of it. Unfortunately, by the time the scene had calmed down, and I went to go back to get my camera, he had already taken it out, which is why in the photo I have him pointing to where he had pulled it out from.” (Ex. N, page 9)*

Sergeant Bedard was asked if the sign was visible while just walking up the driveway, and he stated, *“Yeah. If you were looking for it, you could see it. If you weren't looking for it, it was easy to pass by.” (Ex. N, page 9)*

Sergeant Bedard was asked if the signs were posted by Fahey or his neighbor, and he advised he had assumed that they were Fahey's because he (Fahey) had advised Reyes that it was posted no trespassing. (Ex. N, page 9-10)

Sergeant Bedard stated that he reviewed Fahey's Ring camera video and noted that once Fahey advised Reyes and Glover to leave, they did not show any immediacy: *“So, the timestamps state that at 16:51:34, Fahey answered the door and immediately asked them to get off his property, at which point they did start backpedaling, but I don't believe that they took immediacy to leave the property at that point. As he went back into the house to retrieve the firearm, he came back outside at 16:52:17, which is 43 seconds of time passing, and they were still within 15 feet of approximately of that front porch. So, they really weren't showing any immediacy to vacate the property after being asked by the homeowner, in my subjective opinion.” (Ex. N, page 12)*

Sergeant Bedard acknowledged that he requested Officer McKechnie to get a statement from Fahey about the incident, however, he stated that he was not present during the entire statement by Fahey. (Ex. N, page 14)

Sergeant Bedard was asked about the decision to arrest Reyes and [REDACTED] for Criminal Trespass, Breach of Peace, and Voyeurism and how these charges were determined to be applicable. Sergeant Bedard stated that he and Sergeant DeAngelo met to discuss what they had each learned from speaking with Fahey and Reyes. Sergeant Bedard advised that regarding Bryan Fahey, *“In my opinion, Sergeant Fahey is a sergeant. We were both sergeants on scene. If an arrest was to be made, we could always come back with a warrant, and I believe that that should have come from somebody above us, a higher rank. So, we immediately decided that if we need to arrest him by warrant, we absolutely can come back, [REDACTED], but we didn't want to take that action into our own hands at that time.” (Ex. N, page 15)*

Regarding Reyes and [REDACTED], Sergeant Bedard stated, *“On the other hand, with Reyes and [REDACTED]*

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we discussed different charges. I was the one that brought up voyeurism because the caveat with malice, I believe, fits. Given that malice could also include to cause embarrassment, which, in my, again, subjective opinion, is what he was there to do. Well, he says that he's a journalist and he was operating under the First Amendment. In my opinion, the totality of circumstances is what led us to those charges.” (Ex. N, page 15)

Sergeant Bedard was asked what he believed constituted probable cause to arrest Reyes and [REDACTED] for Voyeurism, and he replied, *“Sure. So, for voyeurism, it can't be in plain view. And in my opinion, his front lawn is not in plain view of the public. They had to walk past these no-trespassing signs, private-property signs down 2 to 300 yards of driveway outside of the view of the regular public from that cul-de-sac. They approached that front lawn. They knocked on his door, caught him by surprise, did not have his consent to be recording him.” (Ex. N, page 16)*

Sergeant Bedard added that it was his belief that Reyes and [REDACTED] acted with malice, and that their intent for the video was to *“trying to get a rise out of other people for the entertainment of their viewership” (Ex. N, page 16)*

Sergeant Bedard was asked what he believed constituted probable cause to arrest Reyes and Glover for Breach of Peace, and he replied that he based it on the fact that he believed Reyes went to Fahey's residence with to *“get a rise out of Sergeant Fahey,”* the previous history between Fahey and Reyes, and Reyes' knowledge of Fahey's temperament, *“So, he went there, in my opinion, looking for this negative response, looking to get this reaction. I believe that the box truck only added to that as far as trying to instigate rather than actually be a journalist and investigate.” (Ex. N, page 17)*

Sergeant Bedard was asked the same question regarding the Criminal Trespass charge and he replied, *“Yes. I felt that it fit. Sergeant DeAngelo wasn't 100% on it. We came back to the PD and discussed it later on in the sergeant's office while we were still trying to make sure that we had everything buttoned up. And then we spoke with Chief Fusaro, and he agreed that it fit.” (Ex. N, page 18)*

Sergeant Bedard stated that he was aware that Chief Fusaro had spoken with the State's Attorney's office, however, he was not aware of whose decision it was to add the criminal trespass charge, *“I don't know who ultimately made that decision. I felt that it fit, and then I know that the chief ended up agreeing that he believed it fit as well.” (Ex. N, page 19)*

Sergeant Bedard stated that he did not see the Reyes camera video of Fahey spitting and that Sergeant DeAngelo relayed that information to him, however, he did confirm that Fahey did mention it. (Ex. N, page 20-21)

Sergeant Bedard was asked about setting bonds for Reyes and [REDACTED] and he advised that Sergeant DeAngelo was the shift commander and that it was his responsibility to set bonds. (Ex. N, page 21-22)

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Sergeant Bedard was asked if Reyes ever requested to press charges against Fahey and he acknowledged that he did. When asked how he responded to Reyes, Sergeant Bedard stated, *“At first, I just shrugged. I didn't want to say too much because, as I said, myself and Sergeant DeAngelo already kind of had a plan established as far as action that we were going to take. And then that was when Reyes asked me if spitting was assault, which I stated it wasn't because I'm very black and white when it comes to reading the law. And I explained that. And of course, that was what he hung on. But we never said that we weren't going to address that. It was just at a later time that we came back [REDACTED].”* (Ex. N, page 23)

Sergeant Bedard advised that while he was speaking with Reyes, he advised him that the charge of assault did not fit. Sergeant Bedard stated that he advised Reyes that Fahey's actions would be considered Breach of Peace or Disorderly Conduct. Sergeant Bedard went on to state that he photographed Reyes' face but did not observe any evidence of spit. (Ex. N, page 24)

Sergeant Bedard was asked about obtaining a written statement from Reyes and Glover. Sergeant Bedard could not recall if he offered Reyes or Glover the opportunity to provide statements, however, he believed he may have. When advised that there were no statements in the files for Reyes or Glover, Sergeant Bedard was asked if he believed this was problematic and he advised,

Tim Webster:

Would you find that problematic?

Devon Bedard:

No, because I did also send Reyes a community request for his raw video file, so that way we would have that. A statement would also be good as well, but the raw video has the raw evidence of everything. And he never sent us the video.

Tim Webster:

Okay. But would you agree that a statement probably should have been taken?

Devon Bedard:

Sure.

Tim Webster:

Well, not sure. I mean, I'm asking if you agree. I mean, if you don't agree, you can say no.

Devon Bedard:

I would agree, a statement should have been taken.

Tim Webster:

Okay. As part of proper investigation?

Devon Bedard:

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For both sides, sure.

(Ex. N, page 26)

Sergeant Bedard was asked if he had probable cause to arrest Fahey for Disorderly Conduct on the day of the incident (July 11, 2025) and he stated that he believed that he did. When asked about the decision not to arrest [REDACTED] Sergeant Bedard stated, *"Because, as I said before, I believe that that decision should have come from somebody higher than me."* **(Ex. N, page 27)**

Sergeant Bedard was asked about the arrest warrant for [REDACTED], and he advised that he (Sergeant Bedard), Lieutenant Miner, and Sergeant DeAngelo each had a hand in drafting the warrant. Sergeant Bedard advised that at some point there was a "pause" with the warrant when the case was moved from New London to Windham. **(Ex. N, page 28)**

Sergeant Bedard was asked about the arrest warrant and what his probable cause focus was on, *"The fact that [REDACTED] had spit on Sean Reyes."* **(Ex. N, page 33)**

Sergeant Bedard was asked about Reyes' complaint and whether he believed Reyes statement that his arrest was unlawful; Sergeant Bedard stated, *"If it was unlawful, it wouldn't be going to trial."* **(Ex. N, page 33)**

Sergeant Bedard disagreed with Reyes' opinion that the Groton Police failed to establish probable cause for his arrest. **(Ex. N, page 33)**

Sergeant Bedard denied violating Reyes' First Amendment rights. Sergeant Bedard interpreted Reyes' First Amendment complaint as his arrest as a journalist but denied that anyone attempted to limit his ability to record the interaction. **(Ex. N, page 34)**

Sergeant Bedard was asked about retaliation towards Reyes,

Eric Daigle:

And the other allegation under the First Amendment that is going to apply, allegedly, is the retaliation application that you're retaliating against him for being a First Amendment auditor. Is any evidence that you or your people on scene took action against Mr. Reyes or [REDACTED] based on the facts he's a First Amendment auditor?

Devon Bedard:

No. We treated him exactly like we treat everybody else that we've arrested. We put his hands behind his back. We made sure to secure his property. It's not like we deleted any of his videos on his phones or anything like that. He gave me permission to go inside of his box truck and shut off the LED screens. Even Fahey was requesting that I have his car towed, and I said, "No, it's parked legally. It's going to remain here." After release, we gave them a ride back to the box truck and

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allowed them to drive away. So, we went out of our way to actually help them, not to retaliate against them.

(Ex. N, page 34-35)

Sergeant Bedard acknowledged that he had never arrested anyone for voyeurism. **(Ex. N, page 35)**

Sergeant Bedard was asked if he or any of the Groton officers showed favoritism towards Fahey, and he stated, *"I do not believe so. I think we handled it professionally."* **(Ex. N, page 35)**

Sergeant Bedard was asked if he or his officers treated Reyes and Glover differently because they were First Amendment Auditors and he stated, *"Nope. Like I said, I think that we went out of our way to actually treat them with respect."* **(Ex. N, page 35)**

Finally, Sergeant Bedard was asked if he or his officers retaliated against Reyes and Glover because of the work, they do by auditing law enforcement and he replied, *"No."* **(Ex. N, page 36)**

Officer Evan Hempel

On May 27, 2026, Investigator Timothy Webster interviewed Groton Police Department Officer Evan Hempel in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations made by SeanPaul Reyes related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. Hempel was represented during the interview by the Police Department's Union Vice President Jesse Comeau. The interview was recorded and transcribed. The relevant portions of the interview are summarized below **(Exhibit P, Officer Evan Hempel interview transcript; Exhibit Q, Officer Evan Hempel interview recording)**.

Officer Hempel has been employed by the Groton Police Department for approximately two (2) years. Hempel is assigned as a patrol officer.

Officer Hempel stated that he has never met Bryan Fahey or his wife and prior to the July 11, 2025, incident did not recall responding to Fahey's residence for any calls for service.

Officer Hempel confirmed that he was working the evening shift on July 11, 2025, and that he was on the road when he heard the call for the incident at Fahey's residence located at [REDACTED]. Officer Hempel was asked if he recalled how the call was dispatched and he stated that he was assigned to another call when he heard dispatch put the call to Fahey's residence out over the air. Hempel recalled, *"At my previous call, I was listening to the radio. Obviously, I heard the call come in. Don't remember the specifics of what exactly. I just remember hearing there was some sort of disturbance and there was a firearm involved. Then obviously, there was made aware that it was possibly a state trooper that was involved."* **(Ex. P, page 4)**

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Officer Hempel was asked what he observed when he arrived on scene, and he stated, *“So, I was the last one on scene. Both supervisors, as well as I want to say four, at least three or four other patrol officers, were already on scene. Mr. Reyes and Mr. Glover were both out at the end of the driveway already. They were standing by. Mr. Reyes was driving a big panel van with LED screens on it that was playing videos of what I recognized to be their previous interactions.”* (Ex. P, page 4-5)

Officer Hempel acknowledged that he had seen the YouTube video of Reyes and Fahey’s previous interaction, *“I was familiar with the general situation. I didn’t know that he lived in town, that Mr. Fahey lived in town. But I was loosely familiar with the previous... because it had gone somewhat viral on social media, so I knew that there was some issue with the state trooper. I didn’t know anything really beyond that.”* (Ex. P, page 5)

Officer Hempel explained that upon arrival, he stood by while the other officers interacted with Reyes and Glover; however, he realized that his BWC battery was running low. Officer Hempel stated that he sought out Sergeant Bedard, who was farther up the driveway toward Fahey’s residence. Sergeant Bedard advised Officer Hempel to return to his vehicle and charge his BWC battery prior to getting involved in any part of the investigation.

Officer Hempel stated that while he was waiting for his BWC battery to charge, several neighbors approached to ask what was going on.

Officer Hempel was asked if he spoke to Bryan Fahey or Fahey’s wife, and he stated that he did not. Officer Hempel was also asked if he made note of any signs in the driveway leading to Fahey’s residence and he stated that he did not. (Ex. P, page 7)

Officer Hempel stated that the only interaction he had with Reyes was when he arrived; Reyes was commenting on the number of officers on scene, and Officer Hempel stated that he explained that the officer’s presence was due to the call involving a gun. (Ex. P, page 7)

Officer Hempel stated that because he was fairly new to the job in Groton, he had no knowledge of previous patrol checks at Fahey residence.

Officer Hempel stated that he had not viewed Fahey’s ring camera video or Reyes’s video.

Officer Hempel stated that other officers on scene determined that there was probable cause to arrest both Reyes and [REDACTED], and that he was tasked with arresting, transporting, and processing Glover.

Officer Hempel stated that he did not have any part in determining the bond for either Reyes or [REDACTED].

Officer Hempel was asked several questions regarding Reyes’ complaint,

Tim Webster:

Okay. Reyes's civilian complaint states that he requested to press charges. Did you ever hear him say that?

Evan Hempel:

I couldn't remember what his exact verbiage was or if and when he specifically said that. No. I didn't interact with him very much.

(Ex. P, page 14)

Tim Webster:

Okay. And then so, Reyes is making the claim that his arrest was unlawful. That officers failed to establish probable cause. That officers violated his First Amendment rights. That his arrest and bond increased retaliatory in nature, and that officers abused their authority while on scene and arresting him. In your opinion, was Reyes' arrest unlawful?

Evan Hempel:

No.

(Ex. P, page 14)

Tim Webster:

Okay. Did anyone discuss with you what probable cause was used to determine that Reyes and [REDACTED] should be arrested?

Evan Hempel:

No. Yep. All the decisions are made outside of my scope of responsibility.

(Ex. P, page 14)

Tim Webster:

Okay. Are you aware of any First Amendment violations that you or any other officers may have committed or that you witnessed?

Evan Hempel:

No, sir.

(Ex. P, page 14-15)

Tim Webster:

Okay. Did you attempt to keep Reyes or Glover from recording?

Evan Hempel:

No, sir.

(Ex. P, page 15)

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Tim Webster:

Okay. Was the arrest of Reyes and [REDACTED] based on anything other than probable cause, favoritism towards Fahey, dislike of the auditor or retaliatory in nature?

Evan Hempel:

Not in my belief, sir.

(Ex. P, page 15)

Officer Christopher Brillon

On May 27, 2026, Investigator Timothy Webster interviewed Groton Police Department Officer Christopher Brillon in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations made by SeanPaul Reyes related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause and a violation of his First Amendment rights. Brillon was represented during the interview by the Police Department's Union Vice President Jesse Comeau. The interview was recorded and transcribed. The relevant portions of the interview are summarized below **(Exhibit R, Officer Christopher Brillon interview transcript; Exhibit S, Officer Christopher Brillon interview recording)**.

Officer Brillon has been employed by the Groton Police Department for approximately four (4) years. Brillon is assigned as a patrol officer.

Officer Brillon stated that he has never met Bryan Fahey or his wife and prior to the July 11, 2025, incident did not recall responding to Fahey's residence for any calls for service. Officer Brillon did confirm that he was aware that patrol checks were being done; however, he never conducted any, *"I was aware that we had to patrol check the residence for ... There's an issue with Mr. Fahey and some auditors, but I didn't personally go there."* **(Ex. R, page 4)**

Officer Brillon confirmed that he was working the evening shift on July 11, 2025, and that he was dispatched to a disturbance at Fahey's residence, *"First it was a disturbance with the trooper and the auditors and then it was ... As more information developed, the dispatcher said specifically there was a firearm involved."* **(Ex. R, page 5)**

Officer Brillon was asked what he observed when he arrived on the scene, and he stated, *"So I was the second one there. Officer Romanski was first. I saw him speaking to the auditors. They were standing there. They had a big box truck with a billboard on it, and it had some videos playing. So, he was kind of speaking to them, and then I saw Fahey was standing at the end of his driveway and he was on the phone with somebody. I don't really know who, but he still had his firearm. So, I just went up to him and whoever he was talking to on the phone, he just said that the two of those guys had trespassed on his property and didn't want to leave. So, I just secured the firearm for safety purposes because we obviously don't want that just hanging around. He also had no holster or anything that I saw. So, I just took it from him, unloaded it, and secured it in my car."* **(Ex. R,**

page 5)

Officer Brillon stated that while he was taking possession of Fahey's firearm, he overheard Fahey speaking with someone on his cell phone, *"Well, I guess what he told the person on the phone rather, just that they had showed up to his house and that he told them to leave and they weren't leaving."* (Ex. R, page 6)

Officer Brillon was asked if he interacted with Reyes and Glover and he advised that while Officer Romanski led the conversation with Reyes, he was standing by him. When asked what Reyes was saying, Officer Brillon responded that Reyes informed them that he was at Fahey's residence to investigate an overtime scandal involving Fahey, *"He specifically said he ran an auditing company, Long Island Audit. He said he was investigating this overtime scandal."* (Ex. R, page 7)

Officer Brillon stated that he had not viewed Fahey's ring camera video or Reyes's video.

Officer Brillon stated that other officers on scene determined that there was probable cause to arrest both Reyes and [REDACTED] and that he and Officer Hempel arrested [REDACTED] (Ex. R, page 10)

Officer Brillon stated that he did not have any part in determining the bond for either Reyes or [REDACTED] (Ex. R, page 10)

Officer Brillon was asked several questions regarding Reyes' complaint,

Tim Webster:

In Reyes' civilian complaint, he states that he requested to press charges against Fahey for spitting in his face and was told that it was not considered an assault. Did you make that statement?

Chris Brillon:

No.

Tim Webster:

Okay. Did you overhear that statement?

Chris Brillon:

Yes.

Tim Webster:

Okay. Do you recall who said that?

Chris Brillon:

I believe it was Sergeant Bedard.

(Ex. R, page 11)

Tim Webster:

Okay. Reyes claims that his arrest was unlawful, that officers failed to establish probable cause, that officers violated his First Amendment rights and that his arrest and bond increase were retaliatory in nature and that officers, by virtue of all that, abused their authority. In your opinion, was Reyes' arrest unlawful?

Chris Brillon:

No.

(Ex. R, page 11-12)

Tim Webster:

Okay. And are you aware of any First Amendment violations that you or any other officers may have committed?

Chris Brillon:

No.

(Ex. R, page 12)

Tim Webster:

Okay. Did you attempt at any point to keep Reyes or Glover from recording?

Chris Brillon:

No.

(Ex. R, page 12)

Tim Webster:

Okay. And this is just basically a closing question. Was the arrest of Reyes and [REDACTED] based on anything other than probable cause?

Chris Brillon:

Only probable cause.

Tim Webster:

Okay. No favoritism towards Fahey?

Chris Brillon:

No.

Tim Webster:

Dislike of the auditors?

Chris Brillon:

No.

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Tim Webster:

Okay. And was it retaliatory in nature?

Chris Brillon:

No.

(Ex. R, page 13)

Chief Luis Fusaro

On May 27, 2026, Investigator Timothy Webster interviewed Groton Police Department Chief of Police Luis Fusaro in the conference room at the Groton Police Department in Groton, Connecticut. The interview was part of an administrative investigation into allegations made by SeanPaul Reyes related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. The relevant portions of the interview are summarized below **(Exhibit T, Chief Luis Fusaro interview transcript; Exhibit U, Chief Luis Fusaro interview recording)**.

Chief Fusaro has served as Chief of Police with the Groton Police Department for approximately eleven (11) years. Chief Fusaro stated that before joining Groton, he worked as a Connecticut State Trooper from 1994 through 2015.

Chief Fusaro stated that prior to July 11, 2025, incident, he may have met Fahey “in passing” since they were both employed for the Connecticut State Police. Chief Fusaro stated that he did not believe that Fahey ever worked directly under his command, *“I do not believe he ever worked directly for me.”* **(Ex. T, page 3)**

Chief Fusaro went on to explain that they could have been working in the same district; however, he did not recall Fahey working under his supervision: *“Not as far as I know. I don't ever recall him ever working for me. Certainly not in supervisor subordinate relations, but the state police chain of command, you could have a wide swath of people, but never directly for me, no.”* **(Ex. T, page 4)**

Chief Fusaro was asked if he recalled if he had ever been to Fahey’s residence socially and he stated that he has never had a personal relationship with Fahey, that he has never been to Fahey’s residence, and that Fahey has never been to his house, *“Nor do I recall ever being at a house party or with people during my state police career or post-state police career where we've been with our families. I don't know who his wife is. I don't know any of his connections other than is it conceivable that somewhere along the line we've crossed paths? Of course. We both live in Southeastern Connecticut. I know him to live in the town that I police. So, is it conceivable that we've crossed paths? Yes. But we have no personal or friendship, no association other than having both ... Well, now he's retired from the state police as well.”* **(Ex. T, page 4)**

Chief Fusaro stated that a Groton resident contacted him to ask what was happening on [REDACTED]

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██████████. Chief Fusaro stated that he was not aware of anything police-related, so shortly after, he checked the CAD remotely from his phone. Chief Fusaro did not recall whether the CAD remarks indicated the incident involved a State Trooper.

Chief Fusaro was asked if it was unusual for people from Groton to contact him on his cell phone to ask about calls,

Timothy Webster:

Okay. And would that be unusual for a resident of Groton to call you as the chief of police and ask you about something going on in their neighborhood?

Chief Fusaro:

It is not. It happens quite frequently. In fact, there's people who know me well, people that are either ... There's the town charter that prevents elected officials from contacting me directly. They're supposed to go through the town manager, but there's a lot of people that I know in town, people that I've had associations with through some employment that will contact me and say, "Hey, what's going on?" There's people that I know personally or professionally, but it's not an uncommon occurrence. It doesn't happen every day, but it does happen with some degree of regularity

(Ex. T, page 5)

Chief Fusaro was asked about patrol checks that had been done at the Fahey residence in the past and he advised that had received a request from the Commanding Officer of Troop E on February 3, 2023. Chief Fusaro provided a copy of the email request **(Exhibit DD)** which indicated that Troop H had received a threat against Fahey the previous evening.

Chief Fusaro also noted that patrol checks at Fahey's residence have been requested at least one other time, which he believed would have gone directly into the dispatch center of Groton PD on September 1, 2022. Chief Fusaro provided a copy of the CAD summary (Exhibit EE) for CFS# 2200024297. This summary includes a note under remarks indicating that State Police were made aware of threats against Fahey because of online videos featuring "a First Amendment activist from Long Island Audit."

Chief Fusaro also provided a copy of the documented patrol checks that Groton Police Officers have completed since 2022. **(Exhibit FF)** The document lists over sixty (60) patrol checks from June 6, 2022, through July 31, 2025.

Chief Fusaro was asked if it was unusual for this type of request, and he stated that it was not. Chief Fusaro also stated that "patrol checks" are a common request from non-law enforcement residents as well, *"And it's a common occurrence where a citizen will call here for a variety of reasons. Maybe they're going through a divorce or they're going to be away from their home for a period of time. They want patrol checks done. Our desk officer will enter it in; we'll do patrol*

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checks quite regularly. It's a service that we provide to our residents.” (Ex. T, page 8)

Chief Fusaro was asked about any discussions he had with Officers or supervisors who responded to the Fahey residence. Chief Fusaro explained that he recalled being briefed about the incident which led to the arrest of Reyes and Glover, *“I did have a conversation, learned that there was a disturbance, that there was a firearm involved, that multiple officers responded, that there was an off-duty state trooper at his house with his wife and his daughter. Someone came, that there had been signs posted. I knew that there had been a longstanding patrol check order, that there had been some disharmony, although didn't know the name of any of the people that were involved at this other than knowing that this was the home of an off-duty state trooper. So, I did speak with one of the sergeants at some point in time.” (Ex. T, page 8-9)*

Chief Fusaro stated that after he was briefed by Sergeant DeAngelo, he agreed to make contact with the State's Attorney's Office to inform them of the involvement of an off-duty State Trooper. Chief Fusaro explained that a recent memo from SA Narducci (**Exhibit GG**) indicated that notification was required whenever *“Investigations involving law enforcement personnel when there is a possibility that a crime has been committed.”*

Chief Fusaro stated that he also contacted the Eastern District Commanding Officer, Major Gregorzik; however, he was already aware of the incident. (**Ex. T, page 10**)

Chief Fusaro was asked if he had any involvement in determining the charges against Reyes and [REDACTED] and he stated that he recalled that the supervisors on scene had already settled on Voyeurism and Breach of Peace, but were not sure about a Trespassing charge, *“At my recollection, the initial charges were voyeurism, breach of peace. They hadn't settled on an appropriate criminal trespass charge at the time” (Ex. T, page 11)*

Chief Fusaro stated that he relayed this information to the Supervisory Inspector Hurley from the SA's office, who advised that they should hold Reyes and [REDACTED] on a high bond and that they would “stay” the bond: *“The inspector immediately said, 'Hold them on bond, put a high bond on them. We're going to stay whatever bond is on there. I'm going to contact the state's attorney right now, the state's attorney, Mr. Narducci.’ (Ex. T, page 11)*

Chief Fusaro stated that he eventually spoke with SA Narducci and provided him with details that had been relayed to him by the Sergeant, *“He took the information that I had and he said, "Criminal trespass in the first degree is absolutely warranted, validated that high bond was warranted that they were going to stay whatever bonds there were." Their phrase were going to stay the bond, which to me indicates that if a bail commissioner looks to change bonds, that they're going to keep it the same.” (Ex. T, page 11)*

Chief Fusaro was asked about the bond figures, and he stated that he believed that Inspector Hurley may have been the one to suggest starting the bond at \$50,000.00, *“Right off the bat, without having any criminal history or anything, I think they introduced \$50,000” (Ex. T, page 11)*

Chief Fusaro stated that he believed the \$75,000.00 bond was based on Reyes residing in New

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York as well as his criminal record, *“I think that was done right when we found out that he had ... The baseline was 75, I think because one had charges, one had felony convictions, the other one did not. The one that did not have any state at that and the other one was elevated. Okay. We had cursory conversations over the phone with the state's attorney. He indicated that they would stay the bond, that they felt comfortable that person should be held.”* (Ex. T, page 13)

Chief Fusaro was asked if the \$75,000.00 bond was unusual, and he stated that he did not feel that it was. Chief Fusaro explained that the duty to set bond is on the Supervisors, and that in these circumstances, the SA's office was going to uphold the figure.

Chief Fusaro was asked if the fact that Fahey was law enforcement had any relevance to the bond and he stated, *“The guidance and the charges an out of state individuals that came here, clearly traveled for a specific reason to confront Mr. Fahey that clearly were convicted felons based on the information. I haven't seen the rap sheets myself, but that was conveyed to me that there was a criminal history here. But none of it had to do with Fahey and his employment status, if that is your question.”* (Ex. T, page 14)

Chief Fusaro was asked about the Sergeant's decision not to arrest Fahey, and he stated that he recalled the Sergeant felt comfortable based on the information they had. Chief Fusaro stated that he leaves decisions like this to his officers, *“Yeah. Listen, police officers right now as we're speaking are making decisions out in the field. They make a decision whether it amounts to probable cause under speedy information to make an arrest or not. They can make those decisions and if they need guidance, they go to their supervisors. In this case, I happen to be alerted from an outside party. It seemed like the sergeants out there who I know to be both extremely competent, very skilled supervisors, were out there making a decision in the field based on firsthand information that they've collected themselves or the officers at the scene have collected based on information that's provided by the involved parties.”* (Ex. T, page 15)

Chief Fusaro was advised that Mr. Reyes alleged that his First Amendment rights were violated by the Groton Police, in part because he believes his arrest was retaliatory. Chief Fusaro responded by stating, *“So, as I know it, Fahey had an ongoing dispute with a person whom at that time I had no knowledge of that came to his home with his family there. He has posted signs out there indicating that he doesn't want people coming by. He's had frequent patrol checks by this agency as well as the state police out of concern for his and his family safety. I don't know what the retaliatory part of this would be. Nobody in this agency solicited someone to go up there. No one solicited a confrontation. No one encouraged that to occur. So, the decision to go to that house on that day was not made by anybody in this agency.”* (Ex. T, page 16)

Chief Fusaro discussed the perceived favoritism toward Fahey and disagreed, explaining that State Troopers he knew personally were arrested by Groton officers while he was Chief.

Chief Fusaro was asked if there was any other information that he wanted to share, and he made the following points,

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Regarding his relationship with Fahey

"I don't have any personal relationship with now Mr. Fahey. We did work in an organization of a thousand troopers and during my over 21 years of service, I knew a lot of people in that department. I worked in the academy for a number of years, so there was many people I came across. This is not someone that I've associated with. To say that I've never crossed paths would not be true either, but we are not close personal friends, never have been." (Ex. T, page 17)

Regarding the delay in [REDACTED] arrest

"I know there's some questions about the delay. I think it's important to point out that from the outset of this, these decisions were not made in a vacuum. Consultation was made with the state's attorney's office and that this ultimately this department had meetings immediately after this with representatives from the state's attorney's office to explore potential charges [REDACTED]." (Ex. T, page 17)

"So, whatever arrest was made did take some time because it ended up going from the state's attorney's office here, was transferred to Windham, but an arrest warrant affidavit was produced by this agency and actually reviewed ... It was done relatively quickly, but there was a relative delay in fleshing that out because of the change of venue, if you will." (Ex. T, page 17)

Regarding meetings that he held with the New London State's Attorney's office

"There was meetings here within days of the initial incident here to discuss the allegation that there was some additional incident that was spitting."

"On the 14th, which would've been that Monday, there was a subsequent meeting or discussed potential charges with the state's attorney the following Saturday. But then at that point in time is when there was a change that occurred and I learned that it was going to be transferred to another judicial district."

"But there was eventually a meeting held up in Windham County with State's Attorney Fahey, not to be confused with [REDACTED] involved in this, where we indicated we had information to share with them and we had a draft arrest warrant affidavit that had already been provided to the New London Judicial District. Discussions were had about how to go about that, what their feeling was as far as who should produce that, how it should be handled." (Ex. T, page 18)

When asked if the delay in arresting [REDACTED] had anything to do with the Groton Police not wanting to arrest [REDACTED], Chief Fusaro stated that during the meetings with the State's Attorney, he made it known that there appeared to be truth to Reyes's spitting allegation. Chief Fusaro indicated that

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there was some opposition to his point of view, however, he made it clear [REDACTED] because he did violate statute, *"I think that there came a point in time... I think it was appropriate. Obviously, his reaction was one of surprise when someone showed up at his front door. I can understand that. And certainly, those of us in this business that have had interactions with people that would cause us concern in our private life, that is certainly something where I totally understand that. Spitting was probably not the best way to address that. To be alarmed and annoyed and scared, I can understand that. But yes, we did at our direction, at my direction, we've continued to investigate it. The case was never closed"* (Ex. T, page 19)

Chief Fusaro provided DLG with specific dates or times relating to his conversations with the SA's office

July 11, 2025, 1830 and 1900 Telephone contact with SA's

July 14, 2025, meeting held at the Groton PD which included the Chief, the town Attorney, the Town Manager, SA Narducci, Inspector Hurley, Inspector Pickett, Captain Bee (Groton), and Lieutenant Miner (Groton)

July 19, 2025, meeting with SA Narducci, Chief Fusaro, and Deputy Chief Gately

August 21, 2025, meeting with SA Fahey, Chief Fusaro, DC Gately, Sergeant DeAngelo, Inspector Fagnoli, Inspector Curtis

August 29, 2025, Inspector Fagnoli arrived at Groton PD with the signed arrest warrant [REDACTED]

State's Attorney John Fahey

On September 25, 2026, Investigator Timothy Webster interviewed Attorney John Fahey who is the State's Attorney for the CT Judicial District of Windham, located in Danielson, CT. The interview was conducted via telephone and was recorded. The interview was part of an administrative investigation into allegations SeanPaul Reyes made related to his arrest on July 11, 2025. Reyes alleged that his arrest was unlawful, without probable cause, and a violation of his First Amendment rights. The relevant portions of the interview are summarized below (**Exhibit MM, Attorney John Fahey interview transcript; Exhibit NN, Attorney John Fahey interview recording**).

The interview concerns the criminal prosecution of Sean Paul Reyes stemming from an incident on July 11, 2025, in Mystic, Connecticut. The case was originally within New London's jurisdiction but was transferred to Windham due to a conflict-of-interest policy among the state's attorneys. The prosecutor explained that State's Attorney Narducci *"might've previously known Bryan as a Groton police officer, New London Police Department, whatever it was, wherever he was down there prior to going to the state police,"* and that Narducci *"just thought it best that he not deal with it as an appearance of impropriety rather than any actual impropriety at all."* (Ex.

MM, page 1) The transfer was thus precautionary rather than indicative of any actual misconduct.

The prosecutor grounded his authority to modify charges in a clear articulation of the standard governing prosecutorial discretion. He stated: *"The state's attorney, any prosecutor, has absolute discretion to change charges as they see fit."* (**Ex. MM, page 1**) Critically, he distinguished his role from that of the arresting officers, explaining that his obligation goes beyond the probable cause standard used at arrest: *"We have a little different role, which is it's not just an arrest on probable cause, which was what those three charges were there, but more I have to look forward to proving it either to a jury or a judge beyond a reasonable doubt."* (**Ex. MM, page1**)

This is a well-established principle of prosecutorial function. An officer's arrest requires only probable cause, not a reasonable belief that a crime was committed. A prosecutor, however, must evaluate whether the evidence can sustain a conviction under the far more demanding beyond-a-reasonable-doubt standard. The prosecutor explicitly acknowledged the original charges had probable cause support, stating near the end of the interview: *"I certainly don't think probable cause is a stretch as to those charges. It's just I have to prove it beyond a reasonable doubt."* (**Ex. MM, page 5**) His charge adjustments were therefore not a repudiation of the arrest, but a forward-looking evidentiary assessment of trial viability.

Attorney Fahey was questioned about the arrest [REDACTED], and he confirmed he signed the arrest warrant [REDACTED] on a [REDACTED] charge. He stated: *"It came as a [REDACTED] to me, and that's what I signed. I didn't change it to [REDACTED] That's what I signed."* (**Ex. MM, page 2**) He noted that disorderly conduct was the more appropriate charge given the circumstances on [REDACTED] own property, as opposed to breach of peace.

Attorney Fahey summarized that Mr. Reyes's trial was [REDACTED] over two days. The judge found Reyes guilty of Criminal Trespass Third and issued a written decision, with sentencing occurring on September 3rd. Attorney Fahey noted a significant procedural misstep by Reyes, who was self-represented: *"He did not file any post-trial motions before being sentenced."* (**Ex. MM, page 3**) Reyes elected to proceed immediately to sentencing, then filed post-trial motions five days later. Those motions were dismissed — not denied — because *"once a person is sentenced, except for a motion to correct an illegal sentence in very other limited circumstances, the Superior Court retains no jurisdiction over the case."* (**Ex. MM, page 3**)

Through counsel, Reyes subsequently filed a motion to correct an illegal sentence, arguing the standing criminal protective order (CPO) was improperly issued and that the firearms restriction should be removed. The prosecutor dismissed the firearms argument: *"He's a convicted felon and can't have a firearm anyways. So I don't know what that's about."* (**Ex. MM, page4**) The core legal issue is whether the judge had good cause to issue a standing CPO, given that Criminal Trespass Third is not among the enumerated offenses in the governing statute. The prosecutor stated the judge *"found good cause at the sentencing. I mean, he said those words and found good cause for the issuance of their standing criminal protective orders."* (**Ex. MM, page4**) A hearing on the motion is scheduled for October 29th.

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Standing CPOs remain in effect until 2099 in favor of Bryan, [REDACTED], [REDACTED], and [REDACTED] Fahey. Attorney Fahey speculated that Reyes's motivation for challenging the CPO and seeking a stay of probation is to resume his activities without risk of arrest: "*Mr. Reyes simply wants to go about his business and he's worried about getting arrested, as he has in the past, by going to places he probably shouldn't be.*" (Ex. MM, page 4) He noted the irony that Reyes stated at Bryan Fahey's restraining order hearing that "*he never wants to be near Bryan Fahey again.*" (Ex. MM, page 4) Reyes's probation remains active; a motion to stay it pending appeal has been filed with the appellate court, which the prosecution does not expect to succeed.

GROTON POLICE DEPARTMENT GENERAL ORDERS

Groton Police Department General Order #5.07 Arrest Processing Section B Arrests Without Warrant, subsection 1 Statute:

1. *Statute: Officers may effect criminal arrests and take into custody persons for whom probable cause exists to believe have committed a felony, and/or persons who have committed a misdemeanor in the presence of the officer or based on the "speedy information" of others. Refer to CGS § 54-1f.*

Groton Police Department General Order #5.07 Arrest Processing Section N, Bond, 1

1. *A prisoner is guaranteed reasonable bail under the Eighth Amendment of the United States Constitution, "Excessive bail may not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted." The on-duty Sergeant or higher-ranking supervisor shall have the authority to set a reasonable bond for the arrestee or to release the prisoner on a Written Promise to Appear. The supervisor will comply with Connecticut General Statutes § 54-63c, Release by Law Enforcement Officer. In the event that the arrestee cannot make bail, the on-duty supervisor shall contact a bail commissioner promptly per Connecticut General Statutes § 54-63c(a). All prisoners will be presented at court at the next court date after their arrest in compliance with Connecticut General Statutes § 54-1g.*
2. *When considering whether to release an individual on bond, the supervisor shall consider:*
 - a. *The arrested individual's length of residence in the community;*
 - b. *The person's connection with the community;*
 - c. *Record of arrests, convictions, and history of failure to appear in court; and*
 - d. *Safety to the victim(s) and arrested person.*

Groton Police Department General Orders #1.02, Limits of Authority, IV Procedure, A Legally Mandated Authority of Sworn Personnel

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1. Sworn Groton Police Department officers shall support and uphold the Constitutions of the United States and the State of Connecticut; laws and statutes of the United States and the State of Connecticut; the Charter and ordinances of the Town of Groton; and the policies, procedures, rules and regulations of the Groton Police Department.
2. Sworn Groton Police Department officers derive their power and authority from state and local law, as provided for in the General Statutes of the State of Connecticut and the Groton Town Charter.
3. Title 54 of the Connecticut General Statutes (Chapters 959* through 960*) details the legal authority of Connecticut law enforcement officers. Sworn Groton Police Department officers of the Groton Police Department shall enforce all state and federal laws, including the ordinances of the Town of Groton.

The Groton Police Department General Orders #1.02, Limits of Authority, IV Procedure, C Compliance with Constitutional Requirements, 9 Arrests with and without a Warrant section c, subsections 1 and 2

- (1) Police officers in the State of Connecticut may only make a warrantless misdemeanor arrest for on-sight violations of the law and/or based on “speedy information”, committed within the limits of their political subdivision. Officers may detain a person for a misdemeanor offense committed outside of their jurisdiction until an officer who has jurisdiction over the matter can make the arrest. Officers shall document an incident in which they detain a person outside of their jurisdiction.
- (2) Officers have authority to may make a felony arrest within the entire State of Connecticut. Sworn members of this agency will remain aware of elements of offenses which would constitute felony crimes and will bear in mind that an arrest for a felony must be based on probable cause and that the actual offense need not actually be witnessed in order for an arrest to be made. Officers shall complete an Arrest Report, and other required form(s), for each warrantless arrest made.

CONNECTICUT GENERAL STATUTES

Voyeurism

Sec. 53a-189a. Voyeurism: Class D or C felony. (a) A person is guilty of voyeurism when, (1) with malice, such person knowingly photographs, films, videotapes or otherwise records the image of another person (A) without the knowledge and consent of such other person, (B) while such other person is not in plain view, and (C) under circumstances where such other person has a reasonable expectation of privacy, (2) with intent to arouse or satisfy the sexual desire of such person or any other person, such person knowingly photographs, films, videotapes or otherwise records the image of another person (A) without the knowledge and consent of such

other person, (B) while such other person is not in plain view, and (C) under circumstances where such other person has a reasonable expectation of privacy, (3) with the intent to arouse or satisfy the sexual desire of such person, commits simple trespass, as provided in section 53a-110a, and observes, in other than a casual or cursory manner, another person (A) without the knowledge or consent of such other person, (B) while such other person is inside a dwelling, as defined in section 53a-100, and not in plain view, and (C) under circumstances where such other person has a reasonable expectation of privacy, or (4) with intent to arouse or satisfy the sexual desire of such person or any other person, such person knowingly photographs, films, videotapes or otherwise records the genitals, pubic area or buttocks of another person or the undergarments or stockings that clothe the genitals, pubic area or buttocks of another person (A) without the knowledge and consent of such other person, (B) while such genitals, pubic area, buttocks, undergarments or stockings are not in plain view, and (C) under circumstances where such other person has a reasonable expectation of privacy, whether such other person is or is not in a public place.

(b) For purposes of this section, “in plain view” does not include any view that is achieved by photographing, filming, videotaping or otherwise recording under or around a person's clothing, and “public place” means public place, as defined in section 53a-186.

Breach of Peace

Sec. 53a-181. Breach of the peace in the second degree: Class B misdemeanor. (a) A person is guilty of breach of the peace in the second degree when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person: (1) Engages in fighting or in violent, tumultuous or threatening behavior in a public place; or (2) assaults or strikes another; or (3) threatens to commit any crime against another person or such other person's property; or (4) publicly exhibits, distributes, posts up or advertises any offensive, indecent or abusive matter concerning any person; or (5) in a public place, uses abusive or obscene language or makes an obscene gesture; or (6) creates a public and hazardous or physically offensive condition by any act which such person is not licensed or privileged to do. For purposes of this section, “public place” means any area that is used or held out for use by the public whether owned or operated by public or private interests.

Criminal Trespassing

Sec. 53a-107. Criminal trespass in the first degree: Class A misdemeanor. (a) A person is guilty of criminal trespass in the first degree when: (1) Knowing that such person is not licensed or privileged to do so, such person enters or remains in a building or any other premises after an order to leave or not to enter personally

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communicated to such person by the owner of the premises or other authorized person; or (2) such person enters or remains in a building or any other premises in violation of a restraining order issued pursuant to section 46b-15 or a protective order issued pursuant to section 46b-16a, 46b-38c, 54-1k or 54-82r by the Superior Court; or (3) such person enters or remains in a building or any other premises in violation of a foreign order of protection, as defined in section 46b-15a, that has been issued against such person in a case involving the use, attempted use or threatened use of physical force against another person; or (4) knowing that such person is not licensed or privileged to do so, such person enters or remains on public land after an order to leave or not to enter personally communicated to such person by an authorized official of the state or a municipality, as the case may be.

ADDITIONAL INFORMATION

CRIMINAL PROSECUTION

By substitute information dated August 11, 2026, the State of Connecticut charged SeanPaul Reyes with one count of Criminal Trespass in the Third Degree, in violation of Connecticut General Statutes § 53a-109(a) (1). A trial was held before Judge J. Guarnieri on August 11th and 12th, 2026. The substitute information replaced the charges filed at the time of Reyes' arrest. The State did not proceed on the charges of Breach of Peace in the Second Degree and Voyeurism and reduced the charge of Criminal Trespass in the First Degree to Criminal Trespass in the Third Degree. Reyes waived counsel and represented himself, rejected the State's offer, entered a plea of not guilty, and elected to proceed to trial. Having considered the evidence submitted by the parties, including the testimony of Sergeant Devon Bedard, Officer Jenna McKechnie, Sergeant Tyler DeAngelo, Lieutenant David Miner, Taheim Glover, Kimberly Fahey, Bryan Fahey, Attorney Eric Daigle, and the defendant, as well as the exhibits offered into evidence by the parties and arguments of the parties, all in light of the applicable standards of law, the court found that the State of Connecticut met its burden of proof beyond a reasonable doubt on all elements of Criminal Trespass in the Third Degree in violation of C.G.S. § 53a-109(a)(1), and entered a Judgment of Guilty against the defendant, SeanPaul Reyes. **(Ex. KK – Substitute Information)**

a. Entry onto the Property.

The Court found beyond a reasonable doubt that on July 11, 2025, at approximately 4:50 p.m., the defendant entered the premises of [REDACTED] Bryan Fahey at [REDACTED], by walking up the Faheys' privately owned driveway to the front door of their home. The driveway is the sole means of access to the Faheys' residence from the street, is long and narrow, and is heavily wooded on both sides. The Faheys own the entire paved portion of the driveway and the maintained grassy areas on either side, and their neighbors use the driveway by easement. Just before 5:00 p.m., while being recorded on video by Taheim Glover, the defendant walked up the driveway, past a conspicuously posted "Private Road" sign, and rang the Faheys' doorbell.

b. Adequate Posting of the Premises.

The Court found beyond a reasonable doubt that the property was posted in a manner prescribed by law and reasonably likely to come to the attention of intruders. A sign reading "PRIVATE ROAD" and "DEAD END NO TURN AROUND" was conspicuously posted along the left side of the driveway, clearly visible from the sidewalk, on an undivided portion of the driveway owned by the Faheys, with the mailbox for house [REDACTED] at the curb. The Court found that the sign gave reasonable notice that the property was not open to anyone other than the residents, their visitors, and others with specific, legitimate reasons to be there connected to the residents. The Court rejected the defendant's argument that the sign required more specific or "talismanic" language and further rejected his argument that the sign applied only to motor vehicle traffic, noting that the defendant cited no legal authority to support that interpretation. Consistent with the State's closing argument, the Court also addressed two additional signs: a "Private Property No Trespassing" sign found lying on the ground in the brush approximately ten to fifteen feet from the Private Road sign, which the Court found was neither properly posted nor reasonably likely to come to the attention of intruders; and a second "Private Road" sign posted further along the driveway past the fork toward the neighbors' property, which the Court found too uncertain in its application to the Faheys' residence to satisfy the statutory posting requirement.

c. Knowledge That Entry Was Unlawful.

The Court found beyond a reasonable doubt that the defendant knew he was not licensed or privileged to enter the Faheys' property. The Court grounded this finding in several converging facts: the defendant acknowledged in his own testimony that he saw the Private Road sign and proceeded past it; the defendant and Bryan Fahey shared a longstanding enmity rooted in a 2021 interaction at the Connecticut State Police building involving physical contact, a second interaction in 2023, and a federal civil lawsuit filed against Fahey that remained pending on July 11, 2025; and the defendant arrived at the property with a billboard truck displaying a 14-foot video monitor calling for Fahey's termination from the Connecticut State Police. The Court further found that the defendant's mission, which he described in his closing argument as to "expose bad cops," and his true intention to set up a direct confrontation with Fahey, who he believed would shut the door in his face, further established that he knew he had no right or privilege to be on the property.

d. Rejection of Implied License Defense.

The Court rejected the defendant's claim that, as a journalist or member of the public, he held an implied license to knock on the Faheys' front door. While the Court accepted for purposes of argument that common law property principles may recognize an implied license for members of the public to approach a front door, it found that the defendant was not a solicitor, delivery person, or other member of the public with a specific and legitimate reason to enter the property. Given the documented enmity between the parties and the defendant's intent to expose Fahey as a purportedly "bad cop" and to stage and record a confrontation with him on the front step, the Court concluded he had no implied right or license.

e. Rejection of Explicit License Defense.

In a footnote to the Memorandum of Decision, the Court also rejected the defendant's claim, raised in his post-trial memorandum dated August 12, 2026, of an explicit license from the property owner under General Statutes § 53a-110. The Court found the claim unsupported by any credible evidence and found beyond a reasonable doubt that the defendant was not invited or authorized by the Faheys to come onto their property.

As the sole trier of fact in this bench trial, the Court served as the exclusive arbiter of witness credibility and the weight to be accorded to testimony. The Court's credibility determinations were central to its findings and are summarized below.

f. Credibility of the Defendant

The Court made several explicit adverse credibility findings against the defendant.

The Court rejected as "patently not credible" the defendant's claim that he held no animosity toward Bryan Fahey on July 11, 2025. The Court found this assertion directly contradicted by the totality of the evidence: the defendant's own description of Fahey as an aggressor in prior interactions, the pending federal civil lawsuit, the billboard truck and looping video calling for Fahey's firing, and the defendant's demeanor and comportment at trial while examining Fahey as a defense witness.

The Court also declined to credit the defendant's claim that he believed the "Private Road" sign applied only to motor vehicle traffic. The Court found that an objective, reasonable person would have understood the sign, and that the defendant, who was aware the sign was posted in a residential driveway with mailbox for house [REDACTED] at the curb, not on a public street, could not credibly claim otherwise.

The Court further rejected the defendant's claim that his status as a journalist or activist conferred any license or privilege to enter the property, while expressly declining to *draw any conclusions or make any findings regarding his journalistic bona fides*. The Court noted that even if it accepted his claimed status, it would not provide immunity for trespassing on property for which he lacked a license or privilege.

g. Testimony of Bryan Fahey

The Court noted that the defendant, who represented himself, called Bryan Fahey as a defense witness and examined him at trial. The Court observed that the defendant's demeanor and comportment during this examination reinforced its conclusion that a longstanding antagonism existed between the two men. The Court made no specific credibility findings regarding Fahey's testimony.

h. Judgment, Sentence, and Protective Orders.

On September 3, 2026, the Court found the defendant guilty and entered its Memorandum of Decision. At sentencing, [REDACTED], the State, and the defendant addressed the Court. The Court sentenced the defendant to three months, execution suspended, and one year of probation. The conditions of probation require the defendant to have no contact with the property owners, to stay away from the property, and to comply with the standing criminal protective orders.

The Court found good cause to issue four Standing Criminal Protective Orders protecting Bryan Fahey, [REDACTED]. Each order prohibits the defendant from contacting, harassing, or following the protected person, requires him to stay at least 100 yards away from the protected person and the protected person's home, and requires him to surrender or transfer all firearms and ammunition. The orders remain in effect until December 31, 2099.

I. Relevance to the Administrative Investigation.

The Court's decision bears directly on Reyes' allegations that Groton Police Officers arrested him without probable cause and in retaliation for protected First Amendment activity. Applying the standard of proof beyond a reasonable doubt, which is substantially higher than the probable cause standard applicable to the officers' arrest decision, the Court found that Reyes knowingly entered the Faheys' property without license or privilege, that his status as a journalist or activist did not authorize that entry, and that his purpose was to stage and record a confrontation with Fahey. These findings are consistent with the circumstances the Groton supervisors relied upon on July 11, 2025, including Reyes' entry onto secluded residential property while filming, the posted "Private Road" sign, the prior history between Reyes and Fahey, and the presence of the billboard truck. The conviction also undermines Reyes' assertion, made during his April 27, 2026 interview, that the disposition of his criminal charges demonstrated that the officers lacked probable cause.

Unauthorized Release and Monetization of The IA Interview

Despite agreeing in writing and verbally not to record the DLG interview conducted via Zoom on Monday, May 27, 2026, Mr. Reyes released a YouTube video entitled "*Fahey Incident Interview They DON'T Want You To See*" on June 21, 2026.⁶ The YouTube video appears to be his entire interview with DLG.

At the time of release, Mr. Reyes' Long Island Audit YouTube channel had more than 1.03 million subscribers, and the channel has since grown to 1.05 million subscribers and 2,200 uploaded videos. During our review, the video contained 19 ad segments, including a brand deal, in-stream videos, and bumper screens. As of September 24, 2026, the video has accumulated 266,000 views, 14,000 likes, and 2,656 comments.

Mr. Reyes additionally published clips from the interview to his YouTube Shorts, <https://www.youtube.com/shorts/5XVncjKfKRw>, which have accumulated 118,000 views, 4,400

⁶ <https://www.youtube.com/watch?v=9LH72bB8Sic>

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likes, and 303 comments. The content was also uploaded to Mr. Reyes's TikTok account, where he maintains 524,800 followers. The TikTok video has accumulated 52,900 views, 1,141 likes, and 89 comments; see <https://www.tiktok.com/t/ZTyFnoQjW/>.

Notably, the video includes Officer Fahey's home address at approximately 22:00, and Mr. Reyes left it unredacted in the released video. This is particularly significant given that Mr. Reyes stated during his interview that he never wants to dox anyone, which is why he edited the original video (**Exhibit B**) to remove Officer Fahey's address: *"And then also I edited, I blurred out Mr. Fahey's home. He has his home address posted right by his front door. I never want to dox anybody's home address or anything like that. So that was something also that was an edit made to the video, but I believe that was it."* (**Ex. F, p. 16.**)

Based on our research, YouTube compensates creators through an ad revenue-sharing model in which creators receive a decent percentage of the advertising revenue Google collects from their uploaded content. Payouts are calculated using a Revenue Per Mille (RPM) rate of \$0.50 to \$10.00 or more per 1,000 qualified views. A qualified view requires a viewer to watch at least 30 seconds of an advertisement, or the full duration if the ad is shorter, before the creator receives credit. Based on our research, creators in the legal-adjacent, activism, or real-world investigative niche, the category into which Long Island Audit falls, can average an RPM of \$2.00 to \$6.00 for long-form content. Videos longer than eight minutes carry no limit on the number of advertisement slots that can be placed, and each ad slot a viewer watches counts as a separate qualified view, multiplying potential earnings per viewer. Beyond AdSense revenue, creators can supplement income through brand sponsorships, with channels exceeding 100,000 subscribers earning an average of \$2,000 to \$50,000 per integrated sponsorship, as well as commission-based affiliate partnerships typically yielding 10–20% of sales generated through the creator's unique link or promotional code

The release of the DLG interview video is not an isolated occurrence. Mr. Reyes has published a substantial volume of content across his platforms, including YouTube long-form videos, YouTube Shorts, TikTok and more, referencing Sgt. Fahey, the underlying incident, previous incidents, and related proceedings, including trial testimony. The content spans more than four years. This body of content has collectively accumulated significant viewership and engagement across platforms, amplifying the reach of the subject matter well beyond any single upload. The sustained and repeated publication of this content reflects a deliberate and ongoing pattern of coverage directed at Sgt. Fahey and the events at issue in this matter.

It should also be noted that on September 1, 2026, Mr. Reyes posted a YouTube video entitled *"YouTube DEMONETIZED Long Island Audit...Is the Police Union Behind It,"*⁷ As of the date of this report, the video has accumulated 229,361 views, 14,000 likes, and 8,009 comments. In the video, Mr. Reyes formally announced the launch of his Patreon. He explains that Google enacted a widespread demonetization of creators within the police-watching niche. Demonetization under YouTube's policies ends a creator's access to Google's AdSense revenue. However, individual creator-company partnerships, such as Patreon subscriptions, are not affected by YouTube

⁷ https://www.youtube.com/watch?v=RIp_zcTTtx8

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demonetization, meaning Mr. Reyes can still generate revenue through alternative platforms despite the demonetization of his YouTube channel.

DISPUTED FACTS

Did Groton Police Officers fail to establish probable cause to arrest Reyes, therefore making his arrest unlawful in violation of Groton Police Department General Order #5.07 Arrest Processing Section B Arrests Without Warrant, subsection 1 Statute?

Did Groton Police Officers retaliate against Reyes by arresting him and increasing his bond from \$10,000.00 to \$75,000.00 in violation of Groton Police Department General Order # 5.07, Arrest Processing?

Did Groton Police Officers abuse their authority during their investigation and arrest of Reyes in violation of Groton Police Department General Order 1.02 Limits of Authority?

Did Groton Police officers take investigative, enforcement, or arrest action against Reyes because he engaged in constitutionally protected First Amendment activity, or were the officers' actions based on legitimate law-enforcement objectives independent of Reyes' speech or expressive conduct?

Did the Groton Police Officers commit any other acts of misconduct?

EXHIBITS

- A. - Reyes YouTube Video entitled "I Almost Lost My Life"
- B. - Reyes YouTube Video entitled "Unhinged Cop SPITS In My Face"
- C. - Reyes Civilian Complaint Form
- D. - Reyes YouTube video entitled "Submitting IA Complaint & FOIA Request"
- E. - Sergeant Korteweg BWC receiving complaint from Reyes
- F. - SeanPaul Reyes Interview transcript
- G. - SeanPaul Reyes Interview Audio recording
- H. - Officer Romanski Interview Transcript
- I. - Officer Romanski Interview Audio Recording
- J. - Officer McKechnie Interview Transcript
- K. - Officer McKechnie Interview Audio Recording
- L. - Sergeant DeAngelo Interview Transcript
- M. - Sergeant DeAngelo Interview Audio Recording
- N. - Sergeant Bedard Interview Transcript
- O. - Sergeant Bedard Interview Audio Recording
- P. - Officer Evan Hempel Interview Transcript
- Q. - Officer Evan Hempel Interview Audio Recording
- R. - Officer Christopher Brillon Interview Transcript
- S. - Officer Christopher Brillon Interview Audio Recording

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T. - Chief Fusaro Interview Transcript
U. - Chief Fusaro Interview Audio Recording
V. - Officer Romanski Incident Report
W. - Officer McKechnie Incident Report/ Fahey Statement
X. - Sergeant DeAngelo Incident Report
Y. - Sergeant Bedard Incident Report
Z. - Officer Romanski BWC (Scene)
AA1. - Officer McKechnie BWC part 1(Scene)
AA2. - Officer McKechnie BWC part 2 (Scene)
BB. - Sergeant DeAngelo BWC (Scene)
CC1. - Sergeant Bedard BWC Part (Scene)
CC2. - Sergeant Bedard BWC part 2 (Scene)
DD. - CSP 02/03/2023 Email Request for Patrol Checks at Fahey's
EE. - CAD summary CFS# 2200024297 09/01/2022
FF. - Groton PD CAD printout of documented Patrol Checks
GG. - SA Narducci memo 02/20/2025
HH. - Groton Police Department General Order 1.01 Appendix C
II. - Recording Police Activity
JJ. - Memorandum of Decision (September 3, 2026)
KK. - Substitute Information
LL. - Criminal Trial Transcripts
MM. - John Fahey Interview Transcript
NN. - John Fahey Interview Audio recording

RECOMMENDED FINDINGS

FINDING #1

Groton Police Department General Order #5.07 Arrest Processing Section B Arrests Without Warrant, subsection 1 Statute

Unlawful Arrest/ Probable Cause

EXONERATED

The investigation determined, by a preponderance of the evidence, that Groton police officers established arrested SeanPaul Reyes on July 11, 2025, and that the arrest was supported by probable cause consistent with Groton Police Department General Order #5.07, Arrest Processing Section B Arrests Without Warrant, subsection 1 Statute.

Based upon the interviews with the Groton police officers who responded to Fahey's residence on July 11, 2025, it was concluded that Sergeant Bedard and Sergeant DeAngelo were the Groton police officers responsible for determining that there was probable cause to arrest Reyes and [REDACTED].

Groton Police Department General Order 5.07 states, in part,

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1. *Statute: Officers may effect criminal arrests and take into custody persons for whom probable cause exists to believe have committed a felony, and/or persons who have committed a misdemeanor in the presence of the officer or based on the "speedy information" of others. Refer to CGS § 54-1f.*

CGS Title 54 Criminal Procedure Chapter 959 section 54-1f states,

Sec. 54-1f. (Formerly Sec. 6-49). Arrest without warrant. Pursuit outside precincts. (a) For purposes of this section, the respective precinct or jurisdiction of a state marshal or judicial marshal shall be wherever such marshal is required to perform duties. Peace officers, as defined in subdivision (9) of section 53a-3, in their respective precincts, shall arrest, without previous complaint and warrant, any person for any offense in their jurisdiction, when the person is taken or apprehended in the act or on the speedy information of others, provided that no constable elected pursuant to the provisions of section 9-200 shall be considered a peace officer for the purposes of this subsection, unless the town in which such constable holds office provides, by ordinance, that constables shall be considered peace officers for the purposes of this subsection.

The Groton Police Department policy reflects the State of Connecticut Title 54 statute, which authorizes law enforcement officers to make warrantless arrests of persons when probable cause exists. Mr. Reyes claims that his arrest by the Groton Officers was unlawful and that the Officers failed to establish probable cause.

Voyeurism

The Connecticut General Statute for Voyeurism, 53a-189a, lists four (4) different circumstances when a person may be charged. Three of those circumstances involve the “*intent to arouse or satisfy the sexual desire.*” Since this did not pertain to the investigation, Officers focused on the first circumstance, which has four elements

- (1) With malice, such person knowingly photographs, films, videotapes or otherwise records the image of another person.
- (2) Without the knowledge and consent of such other person.
- (3) While such other person is not in plain view.
- (4) Under circumstances where such other person has a reasonable expectation of privacy.

During his interview, Sergeant DeAngelo was asked what he believed was the probable cause to arrest Reyes and [REDACTED] for Voyeurism. Sergeant DeAngelo stated that he discussed the

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circumstances with Sergeant Bedard, and they concluded that the statute was applicable. Sergeant DeAngelo referred to the Voyeurism statute and advised,

“So, as I stated, the first section states with malice, we discussed with malice, we had the fact that Mr. Reyes traveled over state lines. They had a history of interactions with each other to the point where State Trooper, Mr. Fahey, had to call another police department to do patrol checks at his house and that they also had an ongoing civil dispute. The next section, knowingly photographs. I don't think it can be disputed that Mr. Reyes was unknowingly photographing or filming. He had several cameras there and at no point disputed filming. The next section talks about without the knowledge and consent of such other person.

While the other person is not in plain view, I stated in my report, I estimated Mr. Fahey's residence to be about 200 yards off the roadway. His residence could not be observed from plain view from the roadway in the public area. He also didn't consent to being filmed. He told him to get the F off of his property continuously. And it did not appear he even knew he was being filmed. He was pretty honed in on getting him off of the property as quickly as he could. The next section talks about under circumstances where such person has a reasonable expectation of privacy. Again, that was the curtilage of his residence that could not be viewed from the public area. That was the probable cause we discussed” (Ex. L, page 20)

Sergeant DeAngelo was asked if he considered this situation different than filming a public official in the performance of their duties in a public area and he stated that he did, explaining, “Yes. We didn't consider this to be in a public area at all. If Sergeant Bedard photographed the scene, and as I approximated my report, it was about 200 yards off the road. There's trees all on the driveway. The residence cannot be viewed from the public roadway.” (Ex. L, page 20)

During his interview, Sergeant Bedard was asked about the decision to cite Reyes and [REDACTED] for the charges listed and he advised that he and Sergeant DeAngelo discussed the circumstances, “I was the one that brought up the voyeurism because the caveat with malice, I believe, fits. Given that malice could also include to cause embarrassment, which, in my, again, subjective opinion, is what he was there to do. Well, he says that he's a journalist and he was operating under the First Amendment. In my opinion, the totality of circumstances is what led us to those charges” (Ex. N, page 15)

Sergeant Bedard was asked what he believed was the probable cause to arrest Reyes and [REDACTED] for Voyeurism and he stated,

Sure. So, for voyeurism, it can't be in plain view. And in my opinion, his front lawn is not in plain view of the public. They had to walk past these no-trespassing signs, private-property signs down 2 to 300 yards of driveway outside of the view of the regular public from that cul-de-sac. They approached that front lawn. They knocked on his door, caught him by surprise, did not have his consent to be

recording him.

And the question, I believe, really comes down to what was their intent with that video. I believe that the malice applies because given their past interactions, which, again, I didn't know at the time, but knowing what Long Island Audit does and all the officers that they record and post and what kind of reactions they're looking for, that's malice. That's people trying to get a rise out of other people for the entertainment of their viewership” (Ex. N, page 16)

Breach of Peace

The Connecticut General Statute for Breach of Peace in the Second Degree, 53a-181, states that a person is guilty of this crime when they have intent to cause inconvenience, annoyance, or alarm, or when they recklessly create a risk thereof. The statute cites six (6) circumstances and also defines the term “public space” as any area that is used or held out for use by the public whether owned or operated by public or private interests.

- (a) With intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person:
 - (1) Engages in fighting or in violent, tumultuous or threatening behavior in a public place
 - (2) Assaults or strikes another
 - (3) Threatens to commit any crime against another person or such other person's property
 - (4) Publicly exhibits, distributes, posts up or advertises any offensive, indecent or abusive matter concerning any person
 - (5) In a public place, uses abusive or obscene language or makes an obscene gesture
 - (6) Creates a public and hazardous or physically offensive condition by any act which such person is not licensed or privileged to do

Sergeant Bedard documented his belief that there was probable cause in his arrest report, dated 07/21/2025,

“As previously mentioned, Reyes and Glover arrived at the cul-de-sac adjoining Fahey's private driveway in a box truck affixed with a video LED-screen panel. The screen was playing a looped video of prior confrontations between Reyes and Fahey. The display appears intended to incite, alarm, or provoke the target of the

video display, especially since it does not appear to be related to Reyes' stated intention, which was to question Fahey about his overtime earnings” (Ex. Y, page 6)

During his interview with DLG, Sergeant Bedard stated that,

“So, he went there, in my opinion, looking for this negative response, looking to get this reaction. I believe that the box truck only added to that as far as trying to instigate rather than actually be a journalist and investigate” (Ex. N, page 17)

Criminal Trespassing

The Connecticut General Statute for Criminal Trespass in the First Degree, 53a-107, lists four (4) different circumstances that a person may be charged.

- (a) A person is guilty of criminal trespassing in the first degree when;
- 1- Knowing that such person is not licensed or privileged to do so, such person enters or remains in a building or any other premises after an order to leave or not to enter personally communicated to such person by the owner of the premises or other authorized person.
 - 2- Such person enters or remains in a building or any other premises in violation of a restraining order issued pursuant to section 46b-15 or a protective order issued pursuant to section 46b-16a, 46b-38c, 54-1k or 54-82r by the Superior Court.
 - 3- Such person enters or remains in a building or any other premises in violation of a foreign order of protection, as defined in section 46b-15a, that has been issued against such person in a case involving the use, attempted use or threatened use of physical force against another person.
 - 4- Knowing that such person is not licensed or privileged to do so, such person enters or remains on public land after an order to leave or not to enter personally communicated to such person by an authorized official of the state or a municipality, as the case may be.

Sergeant Bedard was asked about the Criminal Trespass First Degree charge and what he believed was the probable cause to arrest Reyes and [REDACTED]. Sergeant Bedard responded, *“Yes. I felt that it fit. Sergeant DeAngelo wasn't 100% on it. We came back to the PD and discussed it later on in the sergeant's office while we were still trying to make sure that we had everything buttoned up. And then we spoke with Chief Fusaro, and he agreed that it fit” (Ex. N, page 18)*

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Sergeant DeAngelo was asked about the Criminal Trespass First Degree charge and what he believed was the probable cause to arrest Reyes and [REDACTED]. Sergeant DeAngelo advised that he and Sergeant Bedard discussed the charge of Criminal Trespass, however, it was not decided upon until after Chief Fusaro spoke with the State's Attorney's office that it was added,

"We had conversed it on scene and through part of my duties as stated as a shift commander, you are to keep your administration in the loop with critical incidents. I would consider this maybe not a critical incident. However, there was an officer from another agency involved. That's something that your administration is going to want to know about. The chief of police and I had a phone conversation, and he consulted with the state's attorney's office because there's a memo that was distributed by our state's attorney's office.

At any time a... This is state's attorney Paul Narducci requested that the inspector assigned into a specific area be contacted, highlighted, and underlined as soon as possible if a major crime or incident occurs. The following situations when an inspector must be notified. I highlighted the section here verbatim. It says investigations involving law enforcement personnel when there's a possibility that a crime had been committed. So the chief of police spoke to a member of the state's attorney's office, and they advised us that the charge of criminal trespass first was fitting." (Ex. L, page 21-22)

Sergeant DeAngelo went on to describe the interaction with Chief Fusaro, *"So, I gave the chief basically the summary of the investigation. He spoke with the state's attorney's office, and then the chief called me back and advised me that was the applicable charge"* (Ex. L, page 22)

Chief Fusaro was interviewed and asked about the charges against Reyes and [REDACTED], specifically the Criminal Trespass charge, and he stated, that he eventually spoke with SA Narducci and provided him with details that had been relayed to him by the Sergeant, *"He took the information that I had and he said, "Criminal trespass in the first degree is absolutely warranted, validated that high bond was warranted that they were going to stay whatever bonds there were." Their phrase we're going to stay the bond, which to me indicates that if a bail commissioner looks to change bonds, that they're going to keep it the same"* (Ex. T, page 11)

The decision to arrest Reyes and [REDACTED] was made by Sergeant Bedard and Sergeant DeAngelo, therefore, the other officers listed that responded to this incident are not relevant to this part of Reyes' complaint.

Romanski was responsible for placing Reyes under arrest; however, it was at the direction of Sergeant Bedard. Romanski advised during his interview that it was Sergeant DeAngelo's decision, but according to BWC and reporting it would appear that Sergeant Bedard made this decision with input from Sergeant DeAngelo.

Investigator Webster:

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Let's just back up. If you look at your report, it says, "After Sergeant DeAngelo and Sergeant Bedard spoke with both parties, it was determined that Reyes and [REDACTED] would be placed in custody." Who determined that they would be placed in custody?

*Jake Romanski:
Sergeant DeAngelo.*

*Investigator Webster:
Sergeant DeAngelo, so, it was his decision?*

*Jake Romanski:
Yes.*

*Investigator Webster:
Okay. And did he tell you to place the cuffs on Reyes?*

*Jake Romanski:
Yes.*

*Investigator Webster:
Okay. He told you he's under arrest. Did he tell you what he was under arrest for?*

*Jake Romanski:
No.*

*Investigator Webster:
So, you had no idea why they were under arrest?*

*Jake Romanski:
That's a... Okay. I didn't know the specific charges at the time.*

*Investigator Webster:
Okay. Did you ask?*

*Jake Romanski:
I don't recall.
(Ex. H, page 25-26)*

During his interview, Reyes acknowledged that Romanski was instructed to place him under arrest by a Sergeant on scene,

*Eric Daigle:
Okay. And who was the arresting officer? Who do you understand the arresting officer to be?*

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Sean Paul Reyes:

I believe Romanski was the arresting officer. I believe he's the one that processed me. I can say that. [REDACTED] was also arrested for the same charges, but I believe one of the sergeants, I don't recall his name, was the one that told him to arrest me.

(Ex. F, page 28)

According to Reyes' complaint the Groton police officers failed to establish probable cause to arrest him, therefore making his arrest "unlawful." The decision to arrest Reyes and [REDACTED] was made by Sergeant Bedard, with input and advice from Sergeant DeAngelo. Because the decision rested with the two supervisors on the scene, it is determined that the other named officers should not be included. Therefore, the complaint against Officer Romanski, Officer McKechnie, Officer Brillon, and Officer Hempel are not sustained.

Sergeant Bedard and Sergeant DeAngelo both stated that they did have probable cause to arrest Reyes and [REDACTED] on July 11, 2025, for Voyeurism and Breach of Peace. Sergeant Bedard and Sergeant DeAngelo both stated that they discussed Criminal Trespass; however, they were not sure until Sergeant DeAngelo spoke to Chief Fusaro, who spoke with the State's Attorney's Office and directed them to charge both Reyes and [REDACTED] with the additional crime Criminal Trespass First Degree.

Probable cause as defined in the Groton Police Department's General Orders G.O. 1.02 Limits of Authority states

Probable cause is more than mere reasonable suspicion, but less than proof beyond a reasonable doubt. Probable cause exists if based on the facts and circumstances, an experienced Officer would reasonably believe that criminal activity has occurred, is occurring, or is about to occur.

The question becomes did Sergeant Bedard and Sergeant DeAngelo have enough facts to reasonably believe, given the facts and circumstances with which they were presented, that Reyes committed the crimes he was charged with. Sergeant Bedard and Sergeant DeAngelo both articulated their belief that based upon their understanding of the criminal statutes for Voyeurism, Breach of Peace, and Criminal Trespass there was probable cause for the arrests.

Under the totality of the circumstances test established in *Illinois v. Gates*, 462 U.S. 213 (1983), probable cause does not require certainty, nor that any single fact be independently incriminating. Rather, the inquiry is whether the known facts and circumstances taken together would warrant a person of reasonable caution to conclude there was a fair probability that criminal activity had occurred or was occurring. The Gates framework deliberately rejects a rigid, element-by-element checklist in favor of a practical, common-sense assessment of the totality of the circumstances available to the officer at that time.

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Applying that standard here, the totality of the circumstances known to the officers at the time was sufficient to establish probable cause. According to Sergeant Bedard and Sergeant DeAngelo the circumstances included,

- Reyes and Glover filming on Fahey's property without consent
- Fahey's reasonable expectation of privacy (location of residence in relation to the street)
- Malice (due to the past interactions between Reyes and Fahey)
- Belief that the billboard truck and its video, which was publicly displayed, was intended to incite alarm and provoke Fahey
- Reyes and Glover entered upon Fahey's property despite the presence of signs
- Reyes and Glover's failure to immediately leave when told to do so by Fahey

The courts' later alteration of the charges against Reyes is irrelevant to the officers' perception that criminal activity had occurred. Probable cause is evaluated at the time of arrest based solely on what the officers knew at the time of the arrest. It is a reasonable belief, based on articulable facts and circumstances, that a crime has been or is being committed by the person being arrested. A prosecutor's decision to dismiss, change or reduce charges has no bearing on whether officers had probable cause at the time of arrest for several reasons, including that different standards are used to establish probable cause versus a conviction of crimes – one being "reasonable believe" and the other requiring proof beyond a reasonable doubt. In addition, prosecutors exercise discretion to drop or reduce charges for reasons unrelated to probable cause. As such, the decision to reduce or dismiss charges does not affect whether officers had probable cause to arrest.

Accordingly, this investigation determined, by a preponderance of the evidence, that Sergeant Bedard and Sergeant DeAngelo had probable cause to arrest Reyes, and that the arrest did not violate Groton Police Department General Order 5.07. This allegation is Exonerated.

FINDING #2

Groton Police Department General Order #5.07 Arrest Processing Section N, Bond, 1

Abuse of Authority

EXONERATED

The investigation determined, by a preponderance of the evidence, that Sergeant DeAngelo increased SeanPaul Reyes' bond from \$10,000.00 to \$75,000 in accordance with Groton Police Department General Order 5.07, Arrest Processing Section N, Bond. The investigation determined that the increase followed consultation with the State's Attorney's Office and was not in retaliation against Reyes.

Groton Police Department General Order 5.07 states, in part,

1. *A prisoner is guaranteed reasonable bail under the Eighth Amendment of the United States Constitution, "Excessive bail may not be required, nor*

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excessive fines imposed, nor cruel and unusual punishments inflicted." The on-duty Sergeant or higher-ranking supervisor shall have the authority to set a reasonable bond for the arrestee or to release the prisoner on a Written Promise to Appear. The supervisor will comply with Connecticut General Statutes § 54-63c, Release by Law Enforcement Officer. In the event that the arrestee cannot make bail, the on-duty supervisor shall contact a bail commissioner promptly per Connecticut General Statutes § 54-63c(a). All prisoners will be presented at court at the next court date after their arrest in compliance with Connecticut General Statutes § 54-1g.

2. *When considering whether to release an individual on bond, the supervisor shall consider:*
 - a. *The arrested individual's length of residence in the community;*
 - b. *The person's connection with the community;*
 - c. *Record of arrests, convictions, and history of failure to appear in court; and*
 - d. *Safety to the victim(s) and arrested person.*

Mr. Reyes alleges that Groton Police Officers retaliated against him for going to Bryan Fahey's residence on July 11, 2025.

Complaint stated, *"I'm demanding all Groton police officers involved be investigated for unlawful arrest, failure to establish probable cause, First Amendment violation and retaliation by not only arresting me but raising my bond from 10,000 to 75,000"* **(Exhibit C)**

During his interview, Mr. Reyes explained his belief that he was retaliated against by the Groton officers by stating that one of the officers criticized the billboard truck which was depicting his past encounters with Fahey, *"So, when you have a law enforcement officer who is overtly criticizing me for the billboard truck being there, and he sees it as something other than what it is a First Amendment protected activity, to me that makes it seem like they're retaliating against my First Amendment, my First Amendment right to knock on that door and ask questions as a journalist"* **(Ex. F, page 24)**

Mr. Reyes further stated his belief that the retaliation was because Bryan Fahey was a Connecticut State Trooper and a member of the Law Enforcement Community, *"I believe they retaliated against me based on my speech. They did not like that I was being critical of a law enforcement officer. They did not like that I went to a law enforcement officer's residence and knocked on his door. They have a relationship with this law enforcement officer as a member of their community and not just their community as far as Groton, but the law enforcement officer community"* **(Ex. F, page 36)**

And finally, Mr. Reyes noted that the Groton Police Department's Chief of Police, Chief Fusaro, worked with and supervised Bryan Fahey during the Chief's employment with the CSP, *"I just felt*

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that from the very moment, and this is pretty typical from what I've seen across the country, he might not work... Bryan Fahey might not work for the town of Groton Police Department, but he's a resident there. He is a law enforcement officer, and the police chief there does have ties with Bryan Fahey. They worked together for the Connecticut State Police. I believe he was his direct supervisor. That's what I was told. So, I see that they were protective of him" (Ex. F, page 20)

During this investigation, Sergeant DeAngelo advised investigators that the decision to set prisoner bond fell upon him because he was the shift commander that evening.

When asked why the bond was increased, Sergeant DeAngelo explained that it was based on the additional Criminal Trespassing charge and that the Chief had advised that the State's Attorney's office that they uphold the \$75,000.00 bond. *"So, the considerations would be the new charge. In addition to that, this is Groton Police General Order 5.07. This would be Section N, which is bond subsection two. This is something that I have referenced when we're talking about bonds, as any shift commander would. When considering whether to release an individual on bond, this is verbatim, the supervisor shall consider the arrested individual's length of residency in the community. B, the person's connection with the community. C, the record of arrest, convictions, and history of failure to appear in court. And D, the safety to the victim and arrested person"* (Ex. L, page 23)

Chief Fusaro stated that Reyes' bond had nothing to do with Fahey's status as a law enforcement officer, and that it was based on Reyes' living in another state, and his criminal record, which included a felony charge.

Chief Fusaro was asked about the bond figures, and he stated that he believed that Inspector Hurley may have been the one to suggest starting the bond at \$50,000.00, *"Right off the bat, without having any criminal history or anything, I think they introduced \$50,000"* (Ex. T, page 11)

Chief Fusaro stated that he believed the \$75,000.00 bond was based on Reyes residing in New York as well as his criminal record, *"I think that was done right when we found out that he had ... The baseline was 75, I think because one had charges, one had felony convictions, the other one did not. The one that did not have any stayed at that and the other one was elevated. Okay. We had cursory conversations over the phone with the state's attorney. He indicated that they would stay the bond, that they felt comfortable that person should be held"* (Ex. T, page 13)

Chief Fusaro was asked if the fact that Fahey was law enforcement had any relevance to the bond and he stated, *"The guidance and the charges an out of state individuals that came here, clearly traveled for a specific reason to confront Mr. Fahey that clearly were convicted felons based on the information. I haven't seen the rap sheets myself, but that was conveyed to me that there was a criminal history here. But none of it had to do with Fahey and his employment status, if that is your question"* (Ex. T, page 14)

During his interview, Mr. Reyes admitted to having multiple arrests in his past, including a felony charge. Mr. Reyes also confirmed that he resides in the State of New York.

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Eric Daigle:

At the time of your arrest, were you a resident of the State of Connecticut?

Sean Paul Reyes:

I was not.

Eric Daigle:

Okay. And as I know now that you're a resident of New York, correct?

Sean Paul Reyes:

That is correct.

Eric Daigle:

All right. Have you ever been convicted of a felony crime?

Sean Paul Reyes:

Correct.

Eric Daigle:

And the reason why I ask that is that there is a criteria form that is supposed to apply and these are questions that apply to it. So I wanted to confirm those applications as to the process. There's a department policy on how a bond is issued and there is state's attorney guidance on how bond is issued. Obviously, as you said, the bail commissioner is there as the checks and balances of making sure that that's accurate. And in this case, you are accurate. It's my understanding that you bailed out before the bail commissioner contacted the department. Is that also your understanding?

Sean Paul Reyes:

That's my understanding as well. And just for the record, I'd like to just state that I have been arrested two other additional times in the State of Connecticut and both of those times I had a felony conviction and both of those times I was not a resident of Connecticut. And each time one was a promise to appear and one was \$10,000 bond.

Eric Daigle:

And what were those charges for? Were they misdemeanors or felonies?

Sean Paul Reyes:

Misdemeanors. Misdemeanor charges. Yeah.

(Ex. F, page 34)

While Mr. Reyes may have been initially informed that his bond was going to be set at \$10,000.00, Sergeant DeAngelo was advised by Chief Fusaro that the SA's office was initially suggesting \$50,000.00 bond. The bond was increased after SA Narducci advised that the Charge of Criminal

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Trespassing First Degree, a felony, should be added.

According to section 2 of the Groton Police Department General Order 5.07 Arrest Processing Section N, Bond, consideration of the person's length of residence in the community, connection to the community, record of arrests and convictions, and safety to the victim. Reyes was living in New York State at the time of his arrest, and he had a felony conviction on his record.

Accordingly, this investigation determined, by a preponderance of the evidence, that Reyes' bond was set in accordance with Groton Police Department General Order #5.07 Arrest Processing Section N, Bond. The bond was increased after the charge of Criminal Trespass in the First Degree was added following consultation with the State's Attorney's Office. The \$75,000.00 amount reflects the factors required by Section N, including that Reyes resided in New York and had a prior felony conviction. The investigation found no evidence that Reyes' bond was based on his recording activity or on Fahey's employment as a law enforcement officer.

FINDING #3

Groton Police Department General Order 1.02 Limits of Authority

Abuse of Authority

EXONERATED

The investigation determined, by a preponderance of the evidence, that Groton Police Department officers investigated and arrested Mr. Reyes on July 11th, 2025, within the authority granted to them under Groton Police Department General Order 1.02 Comment Limits of authority. The arrest was based on probable cause developed during the officers investigation of the interview. Incident, which also resulted in the arrest of Bryan Fahey.

The Groton Police Department General Orders 1.02, Limits of Authority, IV Procedure, A- Legally Mandated Authority of Sworn Personnel defines where the GPD officers derive their authority from,

1. Sworn Groton Police Department officers shall support and uphold the Constitutions of the United States and the State of Connecticut; laws and statutes of the United States and the State of Connecticut; the Charter and ordinances of the Town of Groton; and the policies, procedures, rules and regulations of the Groton Police Department.

2. Sworn Groton Police Department officers derive their power and authority from state and local law, as provided for in the General Statutes of the State of Connecticut and the Groton Town Charter.

3. Title 54 of the Connecticut General Statutes (Chapters 959 through 960*) details the legal authority of Connecticut law enforcement officers. Sworn Groton Police Department officers of the Groton Police Department shall enforce all state*

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and federal laws, including the ordinances of the Town of Groton.

The Groton Police Department General Orders 1.02, Limits of Authority, IV Procedure, C-Compliance with Constitutional Requirements, 9 Arrests with and without a Warrant provides that the GPD officers may make misdemeanor and felony arrests under section c, subsections 1 and 2,

(1) Police officers in the State of Connecticut may only make a warrantless misdemeanor arrest for on-sight violations of the law and/or based on “speedy information”, committed within the limits of their political subdivision. Officers may detain a person for a misdemeanor offense committed outside of their jurisdiction until an officer who has jurisdiction over the matter can make the arrest. Officers shall document an incident in which they detain a person outside of their jurisdiction.

(2) Officers have authority to may make a felony arrest within the entire State of Connecticut. Sworn members of this agency will remain aware of elements of offenses which would constitute felony crimes and will bear in mind that an arrest for a felony must be based on probable cause and that the actual offense need not actually be witnessed in order for an arrest to be made. Officers shall complete an Arrest Report, and other required form(s), for each warrantless arrest made.

Mr. Reyes’s complaint states that he wanted the Groton Police officers who were present during the investigation and subsequent arrest, investigated for abuse of their authority. **(Exhibit C)**

During his interview, Mr. Reyes was asked to explain why he believed that the officers abused their authority, and he responded in part, “*I think everything I’ve said... Yeah. I think everything I’ve said during this whole interview is part of how they abused their authority, and that’s basically it. I mean, I don’t think I have anything else additional to add as far as an abuse of authority other than that*” **(Ex. F, page 37)**

Given the broad explanation that Mr. Reyes provided, DLG is left to interpret this part of the complaint. As we understand it, Mr. Reyes believes that the Groton Police Officers abused their authority by arresting him and [REDACTED] on July 11, 2025.

As outlined in the Groton Police Department General Orders, Groton Police Department officers derive their power and authority from state and local law, as provided for in the General Statutes of the State of Connecticut and the Groton Town Charter. With this authority comes the ability and responsibility to enforce the laws and statutes of the State of Connecticut, the outcome of which may be arrest based upon probable cause.

As previously stated under Finding #1, Groton Police Officers arrested Mr. Reyes after their investigation revealed that probable cause existed to indicate that Reyes violated Connecticut General Statutes. The GPD investigation further revealed that [REDACTED] also violated Connecticut General Statutes, which ultimately led to his arrest.

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Accordingly, this investigation determined, by a preponderance of the evidence, that Groton Police Officers acted within the authority granted to them under Groton Police Department General Order 1.02, Limits of Authority, during their investigation and arrest of Mr. Reyes. Based on the investigation, officers determined that probable cause existed to arrest Mr. Reyes for Voyeurism and Breach of Peace in the Second Degree. The charge of Criminal Trespass in the First Degree was added after consultation with the State's Attorney's Office. The investigation found no evidence that officers used their authority for any purpose other than enforcing Connecticut law.

FINDING #4

Groton Police Department General Order 2.06 Recording Police Activity and other legal standards applicable to First Amendment protected activity.

First Amendment protected Activity

UNFOUNDED

The investigation determined, by a preponderance of the evidence, that Groton Police Officers arrested SeanPaul Reyes on July 11, 2025, based on legitimate law enforcement considerations independent of his protected First Amendment activity, and that officers did not interfere with his recording of police activity in violation of Groton Police Department General Order 2.06, Recording Police Activity. Because Reyes' allegation is broad, the analysis addresses whether officers took investigative, enforcement, or arrest action against Reyes because he engaged in protected First Amendment activity, or whether their actions were based on legitimate law enforcement objectives independent of his speech or expressive conduct.

Mr. Reyes' First Amendment allegation is premised on his contention that members of the Groton Police Department arrested him, at least in substantial part, because of his journalistic recording and protest activities surrounding his July 11, 2025 visit to Bryan Fahey's residence. Reyes's written complaint specifically alleged an unlawful arrest, failure to establish probable cause, First Amendment violation, retaliation, and abuse of authority. During his interview, Reyes confirmed those allegations and expanded upon his theory that the Groton officers' response was influenced by their disapproval of his decision to go to Fahey's residence, record the encounter, and operate a billboard truck criticizing Fahey.

The investigation recognizes that several aspects of Reyes' conduct implicated First Amendment protections. Reyes criticized a government employee, gathered information for publication, used a billboard to communicate a message critical of Sergeant Fahey, and recorded portions of his activities and subsequent interaction with Groton Police Officers. Reyes specifically characterized his arrest as retaliation for this activity, stating that officers "*did not like*" that he was critical of a law enforcement officer, went to Fahey's residence, and knocked on his door. However, constitutionally protected activity does not immunize an individual from otherwise lawful police investigation or enforcement action arising from conduct occurring contemporaneously with that activity.

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The evidence developed during this investigation does not show that Groton Police Officers attempted to prevent Reyes from expressing his views, operating the billboard truck from the public roadway, documenting the incident, or recording officers while they performed their duties. Sergeant DeAngelo specifically denied directing Reyes to stop filming and denied directing another officer to interfere with the recording. Officer Romanski similarly stated that he did not direct Reyes to stop recording and was unaware of any officer doing so. The evidence therefore does not establish that officers interfered with Reyes' recording merely because he was recording police activity.

Reyes places considerable significance on Officer Romanski's comments concerning the billboard truck and his belief that officers were critical of his decision to go to Fahey's residence. Reyes interpreted those comments as demonstrating an animus toward his First Amendment activity. The investigation does not reduce the relevance of those statements. An officer's statements concerning protected activity may constitute circumstantial evidence of retaliatory motivation when considered together with the remaining circumstances surrounding an enforcement decision. However, criticism, skepticism, or disagreement with an individual's expressive conduct is not equivalent to taking enforcement action because of that expression. The question is therefore not whether an officer approved of Reyes' methods or believed his actions contributed to the confrontation. Rather, the question is whether that disapproval caused the supervisors' decision to arrest him.

The totality of the evidence does not show that it did. Sergeant Bedard made the decision to arrest Reyes and [REDACTED] at the supervisory level, with input from Sergeant DeAngelo. Officer Romanski physically placed Reyes under arrest pursuant to supervisory direction and was not responsible for determining the criminal charges. The investigation determined that Officer McKechnie and the other responding officers were not responsible for the arrest decision. Accordingly, without additional evidence, statements made by an individual responding officer about the billboard cannot be attributed to the supervisors who made the enforcement decision or establish the motivation behind that decision.

More importantly, the supervisors articulated specific facts that they relied upon in determining that probable cause existed. Those circumstances included:

1. Reyes and Glover entering Fahey's residential property while filming;
2. The location and secluded nature of the residence;
3. The officers' understanding regarding Fahey's expectation of privacy;
4. The prior history between Reyes and Fahey;
5. The presence and content of the billboard truck;
6. The existence of signs on the property; and
7. The officers' perception that Reyes and Glover did not immediately leave the property after being directed to do so.

Whether every one of those facts ultimately supported each criminal charge beyond a reasonable doubt is not the standard applicable to the officers' arrest decision. As addressed in Finding #1,

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probable cause is evaluated based upon the facts and circumstances reasonably available to officers when the arrest was made.

The billboard requires additional consideration because it served two distinct evidentiary purposes. Mr. Reyes viewed the billboard as constitutionally protected protest activity. In that respect, the investigation agrees that expressing a message critical of a government official cannot, standing alone, justify arrest merely because an officer or the subject of the criticism finds the message offensive, provocative, or objectionable. At the same time, the billboard's existence and content were part of the circumstances confronting the responding officers and were relevant to understanding the preexisting relationship between Reyes and Fahey, the purpose of Reyes' presence at the residence, and the officers' assessment of the events preceding the confrontation. The fact that protected expression may constitute relevant contextual evidence does not necessarily mean that officers punished Reyes for engaging in that expression.

This distinction is important. The investigation does not conclude that the billboard, Reyes' criticism of Fahey, or his status as a journalist or First Amendment auditor, considered alone, provided probable cause for enforcement action. They did not. Rather, those circumstances existed alongside other conduct the supervisors believed implicated Connecticut criminal statutes. The evidence supports the conclusion that the supervisors were evaluating the physical circumstances of Reyes' entry onto residential property, the filming on that property, his interaction with Fahey, the parties' prior history, and what occurred after Fahey directed Reyes and Glover to leave. The First Amendment did not prohibit officers from considering those facts simply because protected expressive activity was occurring at the same time.

The consultation with the State's Attorney's Office further undermines Reyes' assertion that the arrest decision was manufactured solely to retaliate against him. Sergeant DeAngelo explained that because the incident involved another law enforcement officer, Chief Fusaro was notified and consulted with the State's Attorney's Office. The State's Attorney's Office subsequently advised that Criminal Trespass in the First Degree was an appropriate additional charge. Chief Fusaro similarly reported that the supervisors had already identified Voyeurism and Breach of Peace and were uncertain about the appropriate trespass charge. According to Fusaro, the State's Attorney subsequently advised that Criminal Trespass in the First Degree was warranted. Although consultation with a prosecutor does not independently establish the constitutionality of an arrest, it is relevant when evaluating Reyes' allegation that officers were searching for baseless charges to punish his protected expression.

The investigation also considered Mr. Reyes' assertion that favoritism toward Fahey demonstrated retaliatory motive. Reyes believed officers protected Fahey because he was a law enforcement officer and because Chief Fusaro, a former state trooper, had previously supervised Fahey. That concern warranted investigation, particularly because Reyes was arrested on July 11, while [REDACTED] was not arrested until August 29, 2025. However, the evidence explains the different timing of the enforcement actions. Sergeant DeAngelo stated that he and Sergeant Bedard did not disregard Reyes' allegation against [REDACTED]; rather, they believed additional investigation was required because the available recording was incomplete for their purposes, other evidence remained to be

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reviewed, and they could not definitively determine from the video available at the scene that Fahey had spit on Reyes. Additional evidence was subsequently reviewed, and after consultation with the State's Attorney's Office, Sergeant Bedard prepared an arrest warrant charging [REDACTED] with Disorderly Conduct.

The investigation identifies legitimate concerns about how Mr. Reyes' allegation against Fahey was initially handled. Officer Romanski acknowledged hearing Reyes allege that Fahey spit in his face and that Reyes requested Fahey's arrest, yet Romanski ultimately acknowledged that he personally took no investigative steps regarding that allegation. The report also notes that a written statement was not obtained from Reyes at the scene, and Sergeant DeAngelo acknowledged that one probably should have been taken. These circumstances are appropriately considered when evaluating the overall quality and completeness of the investigation. They do not, however, establish that the omissions resulted from hostility toward Reyes' First Amendment activity. The subsequent investigation of [REDACTED] and the procurement of [REDACTED] are inconsistent with a conclusion that the Department intended to shield [REDACTED] from all criminal accountability.

The investigation also considered whether Mr. Reyes' status as a known First Amendment auditor influenced the enforcement decision. Sergeant DeAngelo specifically denied that Reyes was treated differently because of his status as an auditor, denied favoritism toward Fahey, and denied that the arrest was retaliatory. No evidence reviewed during this investigation establishes an agreement among responding officers, supervisors, or Chief Fusaro to arrest Reyes because of his history of criticizing law enforcement. Reyes' belief that such a conspiracy existed was largely inferential. Indeed, when asked why an officer with whom he had virtually no interaction remained included in his complaint, Reyes stated that her involvement would depend on whether the investigation uncovered evidence that she participated in a conspiracy. His interview therefore acknowledged that he did not possess individualized evidence demonstrating retaliatory conduct by every officer named in his complaint.

The subsequent disposition of Reyes' criminal charges does not alter this analysis. Reyes repeatedly relied on the dismissal or reduction of the original charges as evidence that the officers lacked probable cause and therefore must have acted for an improper purpose. Reyes acknowledged, however, that he did not know why the prosecutor dismissed the charges and that his conclusion about the prosecutor's reasoning was his own interpretation. As discussed elsewhere in this report, the validity of an arrest is evaluated based on the information reasonably available to officers at the time of the arrest. A later prosecutorial decision to dismiss, substitute, or reduce a charge does not retroactively establish that the original arrest was retaliatory.

After reviewing Reyes' complaint and interview, the available video evidence, BWC recordings, police reports, officer and supervisor interviews, the circumstances surrounding the arrest decision, and the subsequent investigation of Bryan Fahey, the evidence does not establish that Groton Police Officers arrested Reyes because he was engaged in constitutionally protected speech, journalism, protest, or recording activity. Reyes was unquestionably engaged in expressive activity that implicated the First Amendment. Nevertheless, the investigation established legitimate law-

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enforcement considerations, independent of the content of Reyes' speech, that formed the basis of the supervisors' enforcement decision.

The evidence further fails to establish that Groton Police Officers prevented Reyes from recording police activity, ordered him to stop recording, seized his recording equipment to suppress his speech, prohibited the operation of the billboard truck because of its message, or otherwise directly restricted his ability to criticize Fahey or law enforcement. While certain comments about the billboard and Reyes' decision to confront Fahey at his residence could reasonably have contributed to Reyes' perception that officers disapproved of his methods, the evidence does not establish that such disapproval led to his arrest.

Accordingly, this investigation determined, by a preponderance of the evidence, that Groton Police Officers arrested Mr. Reyes based on probable cause and legitimate law enforcement considerations independent of his protected First Amendment activity. The investigation found no evidence that officers prevented Reyes from recording police activity in violation of Groton Police Department General Order 2.06, Recording Police Activity, or restricted his First Amendment rights. This allegation is unfounded.

FINDING #5

Law Enforcement Function, General Order 1.01, C- Standards of Conduct

Misconduct

UNFOUNDED

The investigation did not disclose sufficient evidence to determine that the Groton Police Officers engaged in unethical behavior or violated department conduct policies during their investigation and subsequent arrest of SeanPaul Reyes, in violation of the Groton Police Department General Order 1.01, Standards of Conduct, Section C.

The Groton Police Department General Order 1.01, Section C, Standards of Conduct, provides:

1. All Groton Police Department employees will abide by the Standards of Conduct, a copy of which appears as Appendix C. The Standard of Conduct ensures that Groton Police Department employees uphold the highest standards of expected conduct, both in their professional and private lives. The Groton Police Department Standards of Conduct is available to all personnel via the PowerDMS system.

Mr. Reyes' civilian complaint indicated that he would also like all the Groton Officers present investigated for any other misconduct. When asked to explain what he meant with this statement, Reyes responded, *"Well, I guess I just threw that in there because... And I don't know what the investigation will unfold. I didn't know that they were going to be hiring a law firm to investigate the case. I thought it was going to be the Groton Police Department, but regardless, there's emails I don't have access to, phone calls, call logs, text messages. There's a myriad of different other*

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evidence that an investigator would have access to that I don't. So, there could be other violations there that I don't know. So, I was just saying there could be other violations and hopefully the investigator does that" (Ex. F, page 37)

Mr. Reyes was asked if the Groton Police Officers were rude or impolite during their contact with him, and he responded that some were compassionate, while others were skeptical and believed that he was the problem. Reyes stated that it was his belief that Officer Romanski and Sergeant Bedard took exception to his being at Fahey's residence, *"The issue wasn't the alleged felony voyeurism, but the issue was the billboard truck and knocking on a law enforcement officer's door. They did not like that I knocked on a law enforcement officer's door, and they did not like that I had a billboard truck outside of his house. That's what I got from it. That's the overarching. And Romanski and the other sergeant seemed to have some sort of built-in animus towards me regarding my actions, which I believe are First Amendment protected. But other than that, I've dealt with worse"* (Ex. F, page 37-38)

Although Reyes perceived that some officers disapproved of his decision to go to Fahey's residence, an officer's skepticism about a complainant's conduct does not, by itself, violate the Standards of Conduct. Reyes did not identify any discourteous, profane, or unprofessional statement made to him, and he acknowledged that other officers were compassionate toward him.

Mr. Reyes stated that the Groton Police Officers did not use excessive force during his arrest.

Mr. Reyes' request to investigate the Groton Police Officers for *"any other misconduct"* does not identify any specific conduct. When asked to explain this part of his complaint, Mr. Reyes could not identify any specific act of misconduct and simply stated that he did not have access to emails, phone calls and text messages as well as a *"myriad of different other evidence."*

Given the lack of a specific allegation, DLG reviewed the officers' conduct for general compliance with the Standards of Conduct, including professionalism, courtesy, and the use of force.

DLG has reviewed body worn camera footage of all the officers present on July 11, 2025, and determined that the officers acted professionally in their interactions with Mr. Reyes and in accordance with the Standards of Conduct.

Accordingly, this investigation determined, by a preponderance of the evidence, that there are no facts to support an allegation that Groton Police Officers engaged in misconduct in violation of Groton Police Department General Order 1.01, Section C, Standards of Conduct. Reyes did not identify any specific conduct in support of this allegation, and review of the body-worn camera footage did not disclose any. This allegation is Unfounded.

Additional Findings

Statement taken from complainant

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While department General Orders do not specifically state that officers should take written statements from people reporting a crime, it is an important part of any investigation. While it is understood that Mr. Reyes was recorded making his complaint on BWC, his belief was that Groton Officers had not intended to take any action against Bryan Fahey, *“Again, they didn't even take a statement from me as a victim of an alleged crime. I'm alleging that he committed a crime. He spat my face. They saw evidence of that. Again, whether it's assault or not, I would argue if he had some sort of disease, it could've been an assault. There's a lot of things that could've been a breach of the peace. Maybe not, it's not public, but there's definitely a charge there. Obviously, he was [REDACTED] with something. So, I just think that there was never an investigation done to my side of it”* (Ex. F, page 42)

Officer McKechnie obtained a written statement from Bryan Fahey even though his statements to officers were recorded on BWC. The statement taking and interview process allowed Officer McKechnie to obtain relevant details from Fahey regarding the incident. This fact was evident during DLG's interview with Sergeant DeAngelo, who stated that Fahey was able to provide Officer McKechnie additional details about the history of threats against Fahey, *“That was in there at some point, and then we later learned when Officer McKechnie was taking a statement from him, he provided some more details during that interaction”* (Ex. L, page 6)

Sergeant Bedard conceded that it would have been obtained from both Reyes and Glover,

Tim Webster:

Okay. But would you agree that a statement probably should have been taken?

Devon Bedard:

Sure.

Tim Webster:

Well, not sure. I mean, I'm asking if you agree. I mean, if you don't agree, you can say no.

Devon Bedard:

I would agree, a statement should have been taken.

Tim Webster:

Okay. As part of proper investigation?

Devon Bedard:

For both sides, sure.

(Ex. N, page 26)

Sergeant DeAngelo acknowledged that a statement probably should have been taken from Reyes, *“I'm not making an excuse per se, but Sergeant Bedard had things he was dealing with. I was talking to the chain of command and were trying to meet everything together and it's something*

that should have been done and wasn't." (Ex. L, page 26)

Industry's best practices generally provide that officers take statements from all witnesses, suspects, and complainants on scene, or later time and location. Here, Reyes was a complainant - alleging that Fahey had assaulted him through the action of spitting in his face and mouth. As such, the responding officers should have taken his statement from him, as they did with Fahey, who was alleging that Reyes and Glover had committed a crime.

DLG believes that, while not a policy requirement, it is best practice to obtain *written* statements from complainants, witnesses, and the accused when possible.

Delay in the arrest of [REDACTED]

While Mr. Reyes did not specifically cite this in his civilian complaint, DLG believes that, for true transparency, the question needed to be answered as to why [REDACTED] was not arrested until weeks after the incident on July 11, 2025.

Sergeant DeAngelo was asked, as the shift commander, why Reyes' complaint was not acted upon, and he replied, in part, *"I should say Sergeant Bedard and I didn't disagree that something had occurred, but we felt as though that there needed to be a further investigation based on the fact that I only had a portion of the video from a cell phone and I understood that there was a statement taken from Mr. Fahey as well as some doorbell footage that I had not observed at that point, to my knowledge. And there was more to unpack whether or not Mr. Fahey would be arrested. It was something that we needed to further investigate."* (Ex. L, page 25)

Sergeant DeAngelo was asked whether he believed there was enough probable cause to arrest Fahey at the time of the incident and he stated that he did not believe there was. *"So, I felt as though there needed to be a further investigation and basically Sergeant Bedard arrested Mr. Reyes and [REDACTED], and I felt as though we needed further investigation of what Mr. Reyes was alleging. And we didn't have much evidence of such on the scene at that very time, and then obviously more evidence was introduced into the situation at which point we did make that decision"* (Ex. L, page 26)

Sergeant DeAngelo further explained why he believed Fahey was not charged on scene by explaining that he would have wanted to see Reyes' unedited video that he had agreed to provide to investigators. While Sergeant DeAngelo did acknowledge that he observed Reyes' recording while on scene, he stated that he could not definitively see Fahey spitting on the recording. It was only after he observed the video after it was zoomed in, did he recognize that Fahey did in fact spit. *"I think it was the fact that the additional evidence that was provided essentially by Mr. Reyes on his social media account that had a zoomed in perspective, and it also showed an entirety of what appeared to be a start to finish video. I can't say that for sure because I still haven't seen an unedited version, but it appeared to be zoomed in and that Mr. Fahey did in fact spit in Mr. Reyes's face."* (Ex. L, page 31)

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Sergeant Bedard was asked if Reyes ever requested to press charges against Fahey and he acknowledged that he did. When asked how he responded to Reyes, Sergeant Bedard stated, *"At first, I just shrugged. I didn't want to say too much because, as I said, myself and Sergeant DeAngelo already kind of had a plan established as far as action that we were going to take. And then that was when Reyes asked me if spitting was assault, which I stated it wasn't because I'm very black and white when it comes to reading the law. And I explained that. And of course, that was what he hung on. But we never said that we weren't going to address that. It was just at a later time that we came back [REDACTED]."* (Ex. N, page 23)

Sergeant Bedard advised that while he was speaking with Reyes, he advised him that the charge of assault did not fit. Sergeant Bedard stated that he advised Reyes that [REDACTED] actions would be considered Breach of Peace or Disorderly Conduct. Sergeant Bedard went on to state that he photographed Reyes' face but did not observe any evidence of spit. (Ex. N, page 24)

The delay in arresting [REDACTED] was discussed with Chief Fusaro, who explained that there was never any intention of not pursuing Reyes' complaint, however, certain factors slowed the process, *"I know there's some questions about the delay. I think it's important to point out that from the outset of this, these decisions were not made in a vacuum. Consultation was made with the state's attorney's office and that this ultimately this department had meetings immediately after this with representatives from the state's attorney's office to explore potential charges for [REDACTED]"* (Ex. T, page 17)

Chief Fusaro also attributed the delay in the change of venue on the court's side, *"So, whatever arrest was made did take some time because it ended up going from the state's attorney's office here, was transferred to Windham, but an arrest warrant affidavit was produced by this agency and actually reviewed ... It was done relatively quickly, but there was a relative delay in fleshing that out because of the change of venue, if you will."* (Ex. T, page 17)

When asked if the delay in arresting [REDACTED] had to do with the Groton Police not wanting to arrest [REDACTED] Chief Fusaro stated that during the meetings with the State's Attorney, he made it known that there appeared to be truth to Reyes spitting allegation. Chief Fusaro indicated that there was some opposition to his point of view, however, he made it clear [REDACTED] *"I think that there came a point in time... I think it was appropriate. Obviously, his reaction was one of surprise when someone showed up at his front door. I can understand that. And certainly, those of us in this business that have had interactions with people that would cause us concern in our private life, that is certainly something where I totally understand that. Spitting was probably not the best way to address that. To be alarmed and annoyed and scared, I can understand that. But yes, we did, at our direction, at my direction, we've continued to investigate it. The case was never closed"* (Ex. T, page 19)

Based on the information obtained during DLG interviews, it does not appear that the Groton Police Officers attempted to ignore Reyes' complaint, and that they were in fact actively attempting to establish the proper charges with the State's Attorney's office, and once that was completed, they did draft an arrest warrant for [REDACTED] and he was arrested.

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Prepared By:

A handwritten signature in blue ink, reading "E.P. Daigle". The signature is written in a cursive, flowing style.

Eric P. Daigle, Esq.
Daigle Law Group