

IN CONNECTICUT SUPERIOR COURT

PAUL BOYNE

HARTFORD JD

v

NED LAMONT, in
gubernatorial capacity

Return Date: 3 JUNE '25

COMPLAINT FOR DECLARATORY JUDGEMENT

Plaintiff pleads in statutory relief of declaratory judgment under CGS §52-29, by practice rules §§17-54 thru 59 for declaration that PA 21-56, amending state stalking laws §53a-181 c, d, & f is facially unconstitutional for reasons cited in *People v Relford*, Illinois Supreme Court (2017), cited by Judge Robert Clark in *State v Billings* (2022), as well reasons explained in *Mashaud v Boone*, DC Court of Appeals (2023), as applicable solely to the Plaintiff under relevant facts. The action has public interest that is direct, immediate, and adverse to the defendant, requiring the court to provide reasonable notice allowing concerned parties to join, per practice rule §17-56(b). Conditions for declaratory judgement required by rule §17-55 are met, as (1) plaintiff holds legal interest by reason of danger of loss of First & Fourteenth Amendment rights, while uncertainty abounds, other jural rights notwithstanding; (2) there is an actual bona fide and substantial question of constitutionality in dispute requiring settlement; (3) there is no other proceeding to provide immediate redress, no alternate procedures exist.

PARTIES

The plaintiff, Paul Boyne, is a citizen of the Commonwealth of Virginia, arrested by Connecticut warrant issued by Gold,J for crime of stalking in the first degree, based on political speech resting in cyberspace, then extradited by demand warrant of defendant, Governor Lamont.

The defendant, Governor Ned Lamont of Connecticut, signed PA 21-56 into law and issued non-fugitive demand warrant for extradition of plaintiff from Virginia.

JURISDICTION AND VENUE

The court holds statutory jurisdiction under CGS §52-29, Superior Court may declare rights and legal relations; the venue of Hartford JD is proper to join defendant, having office in the district.

STATEMENT OF FACTS

The exact wording of PA 21-56 found facially unconstitutional in 2017 by Illinois' high court in violation of First Amendment, said judgement of *Releford* cited in *Billings* in 2022, bestowed with full faith & credit protections by Constitution Article IV, predating Gold's arrest warrant of July '23 and defendant's demand warrant of August '23. Connecticut case law dating to 1993 prohibits interpretation of 'stalking' that sweeps speech to avoid vagueness and overbreadth fatal flaws, unfaithful to First Amendment, opined by Lavine,J in *State v Culmo*, then repeated in *State v Marsala* (1997) and *State v Jackson* (2000), all recited in *Billings* by Clark,J of the appellate court. Defendant made demand for extradition under color of stalking based solely on speech, for which USAO D.Connecticut previously reviewed and passed on probable cause of 18 USC §2261A and §875(c), interstate stalking and threats, during federal investigation from October '21 to May '22, (3:22mj113) a repeat of federal investigation by the same office conducted from 2015 to 2017, returning no indictments, terminated by action of USAO D. Eastern District Virginia (1:17sw14), relying on *U.S. v Cassidy*, D. Maryland (2011) on precise facts of the case.

AS AND FOR A FIRST CAUSE OF ACTION

Defendant violates Supremacy Clause, Article VI: 'This Constitution ... shall be the supreme Law of the Land' by willful betrayal of oath required of 'all executive ... Officers, ... of the several States, shall be bound by Oath or Affirmation, to support this Constitution'. Defendant's demand warrant deliberately exceeded constitutional limits for personal pleasure, acting under color of state law, in deprivation of First Amendment protections, enforced upon him by the Fourteenth, being criminal conduct under Enforcement Act of 1871 (Ku Klux Klan Act), codified in 18 USC §242.

AS AND FOR A SECOND CAUSE OF ACTION

Defendant violates Full Faith & Credit Clause, Article IV: 'Full Faith & Credit shall be given in each State to the ... judicial Proceedings of every other State.' The language of PA 21-56 having been found facially unconstitutional by Illinois in *Releford*, so admitted to Connecticut by judicial proceeding and opinion by the intermediate appellate court in *Billings* by Clark,J.

AS AND FOR A THIRD CAUSE OF ACTION

Defendant exceeded authority, by abuse of office, in deprivation of due process protections of Fourteenth Amendment, under color of State 'Uniform Criminal Extradition Act', CGS §54-157 to 185, by issuing non-fugitive demand warrant on claim of self-inflicted emotional distress of residents incurred by voluntary seeking, retrieving, and reading political prose resting outside Connecticut.

AS AND FOR A FOURTH CAUSE OF ACTION

Defendant committed fraud by issuance of demand warrant claiming plaintiff committed a crime in the Commonwealth of Virginia, no penal code cited, wherein Virginia 'stalking' laws are limited to proscribing physical conduct.

AS AND FOR FIFTH CAUSE OF ACTION

Defendant falsely exercised extraterritorial operation of a State penal code not enacted in the Commonwealth of Virginia, a prohibited construction of the Republic, explained in *Scott v Sanford* (SCOTUS, 1857).

AS AND FOR SIXTH CAUSE OF ACTION

Defendant violates statutory due process codified in State shield law, CGS §54-33j, by his executive agents failing to issue requisite subpoena on a journalist or news organization, search warrants proscribed, while a government cannot break laws to obtain a conviction, *Olmstead v U.S.* (SCOTUS, 1928) Brandeis, J dissenting.

AS AND FOR SEVENTH CAUSE OF ACTION

Defendant allows for state police to violate CGS §52-571b Religious Freedom Act, by swearing search warrant application claiming speech on religious beliefs is probable cause of criminal stalking, so proscribed by *Zorach v Clauson* (SCOTUS, 1952) requiring government neutrality in competition between religious sects, so enshrined in First Amendment, enforced upon defendant by the Fourteenth.

AS AND FOR EIGHTH CAUSE OF ACTION

Defendant allows state police violation of law of the Commonwealth of Virginia by conspiring and executing removal of property seized under jurisdiction of Virginia Circuit Court, wherein state actors John P. Doyle, Jr., Samantha McCord, and unknown other stripped the Virginia

court of jurisdiction by illegally removing seized property from the Commonwealth absent court order required by Virginia Code §19.2-58, a violation of the constitutional construction of the Republic, contempt of court, so proscribed by *Olmstead v U.S.* (1928) Brandeis dissenting; prohibiting government from breaking the law to obtain a conviction.

AS AND FOR NINTH CAUSE OF ACTION

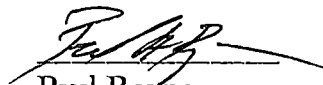
Defendant violates his guarantee prohibiting deprivation of rights using federal funds, wherein his conduct did suppress and chill freedom of speech, silence a free press, defeat free exercise, terrify Patriots, while violating Presidential Executive Order, Restoring Freedom of Speech, 20 January 2025, reciting that government censorship of speech is intolerable in a free society.

AS AND FOR TENTH CAUSE OF ACTION

Defendant violates constitutional construction of the Republic in allowing his agent Samantha McCord and others to harass and intimidate Dutch citizens in normal operation of businesses, compliant with Dutch law, by sending demands in name of State authority not conferred upon him by law or official discretion, being unlawful conduct funded with state and federal dollars, in deprivation of rights, so proscribed by Fourteenth Amendment, being criminal conspiracy under Enforcement Act of 1871 (Ku Klux Klan Act) codified in 18 USC §241.

PRAYER FOR RELIEF

Plaintiff prays for specific relief declaring Governor Lamont lacked authority to issue extradition demand warrant based on flawed penal code, that extraterritorial operation was barred by the Supremacy Clause of Article VI and the Full Faith & Credit Clause of Article IV, that Lamont violated his oath to support federal Constitution required under Article VI, that Lamont failed to assure the proper application of state shield law, state religious freedom law, and did conspire with others to pursue conviction on actions of his agents violating Virginia law, that his conduct was willful, where he knew or had executive responsibility to know, of the underlying deprivation of rights, for which he warrants against use of federal funds for such deprivations, that proper gubernatorial remedy lies in CGS §54-177, to recall the errant warrant.


Paul Boyne
Pro Se