

CONNECTICUT APPELLATE COURT

Jose Medina v. Commissioner of Correction

Medina v. Commissioner of Correction, AC 47905 (Conn. App. Ct. June 16, 2026) · No. AC 47905 · Decided June 16, 2026

SUMMARY

The Connecticut Appellate Court dismissed Jose Medina’s appeal from the denial of his habeas petition and petition for certification to appeal. The court held that the habeas court did not abuse its discretion and that Medina had not shown an unequivocal demand to pursue an innocence defense instead of self-defense, as required for a freestanding autonomy claim under McCoy v. Louisiana. The court therefore upheld the habeas court’s analysis under the ineffective-assistance framework described in Strickland v. Washington.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Connecticut Appellate Court                                                                                                                                                                                                                                                                                                                                                                                                      |
| WRITING FOR THE COURT | Bishop, J.; Suarez, J.; Wilson, J.                                                                                                                                                                                                                                                                                                                                                                                               |
| JURISDICTION          | Connecticut Appellate Court                                                                                                                                                                                                                                                                                                                                                                                                      |
| DECIDED               | June 16, 2026                                                                                                                                                                                                                                                                                                                                                                                                                    |
| DOCKET                | AC 47905                                                                                                                                                                                                                                                                                                                                                                                                                         |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | Appeal from the denial of a petition for certification to appeal from the judgment of the Superior Court habeas court, which dismissed in part and denied in part the petition for a writ of habeas corpus.                                                                                                                                                                                                                      |
| STANDARD OF REVIEW    | The court reviewed the denial of certification to appeal for abuse of discretion. A petitioner must show that the issues are debatable among jurists of reason, that a court could resolve them differently, or that the questions deserve encouragement to proceed further. The court considered the merits of the underlying claims to determine whether the habeas court reasonably determined that the appeal was frivolous. |
| PRECEDENTIAL VALUE    | Published Connecticut Appellate Court opinion; precedential.                                                                                                                                                                                                                                                                                                                                                                     |
| PARTIES               | Jose Medina v. Commissioner of Correction                                                                                                                                                                                                                                                                                                                                                                                        |

TOPICS

state post-conviction relief

habeas corpus

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appellate procedure

## PRACTICE AREAS

post-conviction relief

criminal procedure

constitutional law

appellate procedure

## QUESTIONS PRESENTED

1. Whether the habeas court abused its discretion in denying Medina's petition for certification to appeal.
2. Whether the habeas court improperly analyzed Medina's alleged Sixth Amendment right-to-autonomy violation under Strickland v. Washington rather than treating it as a freestanding McCoy v. Louisiana claim.
3. Whether a freestanding McCoy claim would succeed where the habeas court found no direct, clear, unequivocal, or unambiguous objection to counsel's use of a self-defense theory.

## HOLDINGS

1. The habeas court did not abuse its discretion in denying certification to appeal because Medina failed to show that his claims were debatable among jurists of reason, could be resolved differently by a court, or deserved encouragement to proceed further.
2. The habeas court properly construed Medina's pleaded autonomy allegation as part of his ineffective-assistance-of-counsel claim and analyzed it under Strickland rather than as a freestanding McCoy claim.
3. A freestanding McCoy claim requires proof that counsel conceded the defendant's guilt over the defendant's direct, clear, and unambiguous objection; because the habeas court found that Medina made no such unequivocal demand, any freestanding McCoy claim would fail.

## KEY QUOTATIONS

*"We conclude, therefore, that the habeas court properly interpreted the petition in the present case and analyzed the petitioner's claim of a violation of the right to autonomy under Strickland rather than as a freestanding McCoy claim."*

*"Success for a McCoy claim requires a finding that an "intransigent and unambiguous objection" was made by a defendant."*

## FACTUAL BACKGROUND

Medina was convicted by a jury of capital felony, two counts of murder, and conspiracy to commit murder arising from a 2011 shooting and vehicle pursuit in which two victims died. His trial counsel pursued a self-defense theory, while Medina later claimed that he wanted an innocence defense and objected to self-defense. In the habeas proceeding, the court credited counsel's testimony and found no unequivocal demand by Medina that counsel pursue an innocence defense or abandon self-defense.

## PROCEDURAL HISTORY

Medina filed a second amended state habeas petition alleging prosecutorial impropriety and ineffective assistance of trial counsel, including an alleged violation of his Sixth Amendment right to autonomy. The Superior Court in the judicial district of Tolland, Bhatt, J., dismissed the prosecutorial-impropriety claim in part and denied the remaining claims. The habeas court denied certification to appeal, and Medina appealed to the Connecticut Appellate Court, which dismissed the appeal.

## DISPOSITION

dismissed

## CASES CITED

- Strickland v. Washington, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984)
- McCoy v. Louisiana, 584 U.S. 414, 426–27, 138 S. Ct. 1500, 200 L. Ed. 2d 821 (2018)
- State v. Medina, 170 Conn. App. 609, 610–12, 614, 155 A.3d 285, cert. denied, 325 Conn. 914, 159 A.3d 231 (2017)
- Crespo v. Commissioner of Correction, 292 Conn. 804, 811, 975 A.2d 42 (2009)
- Simms v. Warden, 230 Conn. 608, 615–16, 646 A.2d 126 (1994)
- Lozada v. Deeds, 498 U.S. 430, 431–32, 111 S. Ct. 860, 112 L. Ed. 2d 956 (1991)
- Anwar S. v. Commissioner of Correction, 237 Conn. App. 144, 157–58, 351 A.3d 819 (2026)
- Bobe v. Commissioner of Correction, 237 Conn. App. 172, 177–78, 351 A.3d 414, cert. denied, 354 Conn. 922, 353 A.3d 842 (2026)
- Canady v. Commissioner of Correction, 231 Conn. App. 603, 610–11, 333 A.3d 797, cert. denied, 352 Conn. 901, 334 A.3d 1006 (2025)
- White v. Commissioner of Correction, 236 Conn. App. 67, 82–87, 347 A.3d 214, cert. granted, 354 Conn. 901, 348 A.3d 813 (2026)
- Grant v. Commissioner of Correction, 345 Conn. 683, 692, 696, 698–99, 287 A.3d 124 (2022)
- Coleman v. Commissioner of Correction, 238 Conn. App. 610, 618–19, 2026
- Gibbs v. Commissioner of Correction, 239 Conn. App. 512, 518 n.4, 518 n.5, 523, 2026
- Saunders v. Commissioner of Correction, 343 Conn. 1, 25–26, 272 A.3d 169 (2022)
- Anderson v. Commissioner of Correction, 114 Conn. App. 778, 786, 971 A.2d 766, cert. denied, 293 Conn. 915, 979 A.2d 488 (2009)
- Nelson v. Commissioner of Correction, 326 Conn. 772, 780–81, 167 A.3d 952 (2017)
- Leon v. Commissioner of Correction, 189 Conn. App. 512, 527, 208 A.3d 296, cert. denied, 332 Conn. 909, 209 A.3d 1232 (2019)
- Skakel v. Commissioner of Correction, 329 Conn. 1, 29–31, 188 A.3d 1, cert. denied, 586 U.S. 1068, 139 S. Ct. 788, 202 L. Ed. 2d 569 (2019)
- Antonio A. v. Commissioner of Correction, 205 Conn. App. 46, 86, 256 A.3d 684, cert. denied, 339 Conn. 909, 261 A.3d 744 (2021)
- Coleman v. Commissioner of Correction, 137 Conn. App. 51, 57, 46 A.3d 1050 (2012)

- State v. Baez, 354 Conn. 564, 569, 354 A.3d 698 (2026)
- Walcott v. Commissioner of Correction, 238 Conn. App. 545, 559–60, 2026
- Gusan v. Commissioner of Correction, 231 Conn. App. 429, 457, 332 A.3d 959, cert. denied, 351 Conn. 931, 334 A.3d 483 (2025)
- Jan G. v. Commissioner of Correction, 237 Conn. App. 115, 125, 128, 350 A.3d 1156, cert. granted, 354 Conn. 930, 353 A.3d 848 (2026)
- Owen v. Commissioner of Correction, 234 Conn. App. 481, 488–89, 344 A.3d 158, cert. denied, 353 Conn. 923, 345 A.3d 812 (2025)
- State v. Johnson, 354 Conn. 96, 110, 349 A.3d 260 (2026)
- Miranda v. Arizona, 384 U.S. 436, 478–79, 86 S. Ct. 1602, 16 L. Ed. 2d 694 (1966)

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