

SUPREME COURT OF CONNECTICUT

State of Connecticut v. David D. Roberts

State of Connecticut v. David D. Roberts · No. SC 21061 · Decided April 28, 2026

SUMMARY

The Connecticut Supreme Court affirmed the defendant's convictions and the denial of his motion to withdraw guilty pleas. The court held that the plea canvass was constitutionally adequate under *Boykin v. Alabama* because, considering the totality of the circumstances, the record affirmatively demonstrated that the pleas were knowing and voluntary, although the canvass was close to constitutionally inadequate and contrary to best practices.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of Connecticut                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Dannehy, J.; Mullins, C. J.; McDonald, J.; D’Auria, J.; Ecker, J.; Alexander, J.; Bright, J.                                                                                                                                                   |
| JURISDICTION          | Connecticut Supreme Court                                                                                                                                                                                                                      |
| DECIDED               | April 28, 2026                                                                                                                                                                                                                                 |
| DOCKET                | SC 21061                                                                                                                                                                                                                                       |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | The defendant appealed, after certification was granted, from the Appellate Court’s affirmance of the trial court’s denial of his motion to withdraw guilty pleas and the resulting convictions.                                               |
| STANDARD OF REVIEW    | The court reviewed de novo whether the plea canvass affirmatively disclosed that the defendant entered his guilty pleas knowingly and voluntarily under <i>Boykin</i> , considering the totality of the circumstances surrounding the canvass. |
| PRECEDENTIAL VALUE    | Published Connecticut Supreme Court opinion; precedential.                                                                                                                                                                                     |
| PARTIES               | David D. Roberts v. State of Connecticut                                                                                                                                                                                                       |

TOPICS

- plea bargaining
- criminal procedure
- fifth amendment
- sixth amendment
- appellate procedure

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the trial court's plea canvass was constitutionally adequate under *Boykin v. Alabama* even though the court did not specifically enumerate and obtain separate waivers of the rights against self-incrimination, to a jury trial, and to confront one's accusers.
2. Whether the defendant was entitled to withdraw his guilty pleas because the record did not affirmatively disclose that the pleas were knowing and voluntary.

## HOLDINGS

1. *Boykin* does not require a trial court to expressly enumerate each of the three rights identified in *Boykin* or obtain a separate on-the-record waiver of each right. It requires an affirmative record showing that the defendant entered the guilty plea knowingly and voluntarily.
2. The plea canvass was constitutionally adequate under the totality of the circumstances, although it presented a very close question and fell at the outermost boundary of what *Boykin* permits.
3. As the best practice for ensuring a defendant's understanding of the consequences of a guilty plea, trial courts should personally inquire into all five rights enumerated in Practice Book § 39-19 (5), including the rights to a jury trial, confrontation, and against self-incrimination.

## KEY QUOTATIONS

*"Boykin requires only that the record affirmatively disclose that a defendant has entered his plea knowingly and voluntarily for the plea to be constitutionally valid, and there is no requirement that a plea canvass include enumeration of each of the three constitutional rights identified in Boykin."* (Opinion discussion applying *Boykin*)

*"Because Practice Book § 39-19 (5) was adopted in order to ensure a defendant's understanding of the consequences of his guilty plea, trial courts should expressly inquire as to all five rights enumerated in § 39-19 (5), which includes all three Boykin rights."* (357)

## FACTUAL BACKGROUND

In 2020, David D. Roberts went to a neighbor's house carrying a shotgun, cocked and aimed it at Airbnb renters, used racial slurs, and ordered them to leave. He later left threatening voicemails for the property owner concerning additional renters of color. Roberts pleaded guilty pursuant to an agreement under which the state agreed to a six-year sentence, execution suspended after one year, followed by three years of probation, while retaining the ability to seek a shorter term of incarceration.

## PROCEDURAL HISTORY

The defendant pleaded guilty under the Alford doctrine to reckless endangerment in the second degree and threatening in the first degree and entered a straight guilty plea to intimidation based on bigotry or bias in the third degree. The Superior Court denied his motion to withdraw the pleas and rendered judgment in accordance

with them. The Appellate Court affirmed, and the Connecticut Supreme Court granted certification and affirmed the Appellate Court.

## DISPOSITION

affirmed

## CASES CITED

- Boykin v. Alabama, 395 U.S. 238, 89 S. Ct. 1709, 23 L. Ed. 2d 274 (1969)
- North Carolina v. Alford, 400 U.S. 25, 91 S. Ct. 160, 27 L. Ed. 2d 162 (1970)
- State v. Roberts, 227 Conn. App. 159, 175-76, 188, 320 A.3d 989 (2024)
- State v. Simpson, 329 Conn. 820, 836, 189 A.3d 1215 (2018)
- State v. Godek, 182 Conn. 353, 356, 360-62, 438 A.2d 114 (1980), cert. denied, 450 U.S. 1031 (1981)
- State v. Suggs, 194 Conn. 223, 226-28, 478 A.2d 1008 (1984)
- Brady v. United States, 397 U.S. 742, 747-48 n.4, 90 S. Ct. 1463, 25 L. Ed. 2d 747 (1970)
- State v. Domian, 235 Conn. 679, 686-87, 668 A.2d 1333 (1996)
- Layne v. Moore, 90 Fed. Appx. 418, 422-23 (3d Cir. 2004)
- Fontaine v. United States, 526 F.2d 514, 516 (6th Cir. 1975), cert. denied, 424 U.S. 973 (1976)
- United States v. Sherman, 474 F.2d 303, 305 (9th Cir. 1973)
- Stinson v. Turner, 473 F.2d 913, 915-16 (10th Cir. 1973)
- Wade v. Coiner, 468 F.2d 1059, 1060-61 (4th Cir. 1972)
- United States v. Frontera, 452 F.2d 406, 415 (5th Cir. 1971)
- Van Poyck v. Wainwright, 595 F.2d 1083, 1085-86 (5th Cir. 1979)
- United States v. Stewart, 977 F.2d 81, 85 (3d Cir. 1992), cert. denied, 507 U.S. 979 (1993)
- State v. Carter, 243 Conn. 392, 397-401, 703 A.2d 763 (1997)
- State v. Badgett, 200 Conn. 412, 418-20, 512 A.2d 160 (1986), cert. denied, 479 U.S. 940 (1986)
- State v. Bugbee, 161 Conn. 531, 535-36, 290 A.2d 332 (1971)
- Blue v. Robinson, 173 Conn. 360, 361-62, 364-65 n.2, 371, 373, 376 n.6, 377 A.2d 1108 (1977)
- State v. Nelson, 221 Conn. 635, 640-41, 605 A.2d 1381 (1992)
- State v. Shockley, 188 Conn. 697, 698, 707, 453 A.2d 441 (1982)
- State v. Ocasio, 253 Conn. 375, 380, 751 A.2d 825 (2000)
- Office of Chief Disciplinary Counsel v. Vaccaro, 353 Conn. 793, 812, 347 A.3d 856 (2025)
- Maia v. Commissioner of Correction, 347 Conn. 449, 463, 298 A.3d 588 (2023)
- Gomez v. Commissioner of Correction, 336 Conn. 168, 186-87, 243 A.3d 1163 (2020)
- Oppel v. Lopes, 200 Conn. 553, 561, 512 A.2d 888 (1986)
- Dumont v. Borders, Docket No. 2:17-cv-1423 KJN P, 2018 WL 5999629, \*4 (E.D. Cal. Nov. 15, 2018)
- Wilkins v. Erickson, 505 F.2d 761, 763 (9th Cir. 1974)
- United States v. McWilliams, 730 F.2d 1218, 1223 (9th Cir. 1984)

- **People v. Tyrell**, 22 N.Y.3d 359, 365, 4 N.E.3d 346, 981 N.Y.S.2d 336 (2013)

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