

CONNECTICUT APPELLATE COURT

Walcott v. Commissioner of Correction

Walcott · No. AC 47765 · Decided April 14, 2026

SUMMARY

The Connecticut Appellate Court affirmed the denial of Shanoah Walcott’s amended petition for a writ of habeas corpus. The court rejected her ineffective-assistance claims concerning trial counsel’s investigation and advice regarding a guilty plea, concluding that the alleged deficiencies and prejudice were not established. The court also held, relying on *United States v. Ruiz*, that Brady did not require disclosure of an alleged cooperation agreement before the petitioner entered her guilty plea.

CASE DETAILS

COURT	Connecticut Appellate Court
WRITING FOR THE COURT	Seeley, J.; Alvord, J.; Clark, J.
JURISDICTION	Connecticut Appellate Court
DECIDED	April 14, 2026
DOCKET	AC 47765
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal, following certification, from the judgment of the Superior Court habeas court denying an amended petition for a writ of habeas corpus.
STANDARD OF REVIEW	Underlying factual findings in a habeas appeal are reviewed for clear error; whether the facts constitute a violation of the constitutional right to effective assistance of counsel is reviewed plenary. The existence of an undisclosed agreement for Brady purposes is a factual question reviewed for clear error. The court defers to the habeas court's credibility determinations and does not reweigh the evidence.
PRECEDENTIAL VALUE	Published and precedential Connecticut Appellate Court opinion
PARTIES	Shanoah Walcott v. Commissioner of Correction

TOPICS

- state post-conviction relief
- ineffective assistance
- plea bargaining
- due process
- appellate procedure

PRACTICE AREAS

state post-conviction relief

criminal procedure

constitutional law

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether trial counsel rendered ineffective assistance by failing to conduct an adequate investigation of Walcott's case.
2. Whether trial counsel rendered ineffective assistance by failing to meaningfully explain the State's plea offer and advise Walcott regarding her guilty plea.
3. Whether the State violated Brady and due process by failing to disclose an alleged agreement or understanding with Anthony Brown before Walcott entered her guilty plea.

HOLDINGS

1. Walcott failed to prove that counsel's investigation was deficient because counsel and his investigator investigated information supplied by Walcott, and Walcott presented no evidence from the potential witnesses or other demonstrable evidence showing what additional investigation would have uncovered.
2. Walcott failed to establish deficient plea advice because counsel explained the evidence, the strengths and weaknesses of the State's case, the potential sentencing exposure, and the rights relinquished by pleading guilty, and the habeas court credited counsel's testimony that he did not pressure Walcott or specifically direct her to accept the offer.
3. Brady did not require disclosure of alleged impeachment evidence before Walcott entered her guilty plea because no trial occurred; under *United States v. Ruiz*, the Constitution does not require disclosure of material impeachment evidence before a guilty plea agreement is entered.

KEY QUOTATIONS

"In the present case, we conclude that the petitioner has not demonstrated that Attorney Brown failed to conduct a reasonable investigation of her case." (Part I A)

"In the absence of a trial, Brady imposed no obligation on the state to disclose the alleged impeachment evidence of an agreement between the state and Anthony Brown." (Part II)

FACTUAL BACKGROUND

Walcott was charged in connection with the August 2007 robbery and shooting death of Jephther White. Two confidential witnesses identified her as the shooter, but police recovered no firearm or forensic evidence. After jury selection began in April 2015, the prosecutor disclosed a written statement from Walcott's cousin, Anthony Brown, asserting that Walcott had admitted killing someone. Walcott subsequently entered an Alford plea to first-degree manslaughter with a firearm and received a twenty-year sentence, followed by five years of special parole.

PROCEDURAL HISTORY

Walcott was charged with murder, felony murder, first-degree robbery, and carrying a pistol without a permit. After jury selection had begun but before trial commenced, the State disclosed a written statement by Walcott's cousin implicating her in the victim's death. Walcott then entered an Alford plea to first-degree manslaughter with a firearm and received an effective twenty-year sentence, followed by five years of special parole. She later filed an amended habeas petition alleging ineffective assistance of trial counsel and a Brady violation. The habeas court, Wagner, J., denied the petition and granted certification to appeal; the Connecticut Appellate Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Brady v. Maryland, 373 U.S. 83, 87 (1963)
- State v. Andres C., 349 Conn. 300, 329, 315 A.3d 1014 (2024), cert. denied, 145 S. Ct. 602 (2025)
- North Carolina v. Alford, 400 U.S. 25, 37 (1970)
- Strickland v. Washington, 466 U.S. 668, 687 (1984)
- Hill v. Lockhart, 474 U.S. 52, 58-60 (1985)
- United States v. Ruiz, 536 U.S. 622, 629-33 (2002)
- Gusan v. Commissioner of Correction, 231 Conn. App. 429, 446-48, 332 A.3d 959 (2025), cert. denied, 351 Conn. 931, 334 A.3d 483 (2025)
- Owen v. Commissioner of Correction, 234 Conn. App. 481, 496-99, 344 A.3d 158 (2025), cert. denied, 353 Conn. 923, 345 A.3d 812 (2025)
- Crawford v. Commissioner of Correction, 285 Conn. 585, 598-99, 940 A.2d 789 (2008)
- Carrasquillo v. Commissioner of Correction, 206 Conn. App. 195, 205-09, 259 A.3d 1182 (2021), cert. denied, 339 Conn. 907, 260 A.3d 1227 (2021)
- Diaz v. Commissioner of Correction, 174 Conn. App. 776, 795-99, 166 A.3d 815 (2017), cert. denied, 327 Conn. 957, 172 A.3d 204 (2017)
- State v. Floyd, 253 Conn. 700, 740, 756 A.2d 799 (2000)
- Marquez v. Commissioner of Correction, 330 Conn. 575, 603-08, 198 A.3d 562 (2019)
- Roman v. Commissioner of Correction, 223 Conn. App. 111, 126, 307 A.3d 934 (2023), cert. denied, 348 Conn. 952, 308 A.3d 1039 (2024)
- Nealy v. Commissioner of Correction, 235 Conn. App. 872, 885, 346 A.3d 551 (2025), cert. denied, 353 Conn. 939, 347 A.3d 879 (2025)
- Johnson v. Commissioner of Correction, 228 Conn. App. 701, 715, 324 A.3d 837 (2024), cert. denied, 350 Conn. 929, 326 A.3d 250 (2024)
- Thomas v. State, 130 Conn. App. 533, 539 n.8, 24 A.3d 12 (2011), cert. denied, 302 Conn. 945, 30 A.3d 2 (2011)
- State v. Roy, 182 Conn. 382, 385, 438 A.2d 128 (1980)
- Lapointe v. Commissioner of Correction, 316 Conn. 225, 308 n.62, 112 A.3d 1 (2015)

- *Cator v. Commissioner of Correction*, 229 Conn. App. 393, 429, 327 A.3d 1028 (2024), cert. denied, 351 Conn. 919, 333 A.3d 105 (2025)
- *United States v. Mathur*, 624 F.3d 498, 506-07 (1st Cir. 2010)

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