

ORIGINAL UNREDACTED LODGED PURSUANT TO MOTION TO SEAL

DOCKET NO: HHD-CV-18-6088970-S : SUPERIOR COURT
GLORIA FARBER, as Executor of the : J.D. OF HARTFORD
Estate of HILLIARD FARBER
VS. : AT HARTFORD
FORE GROUP, INC., and FOTIS : October 22, 2019
DULOS

REDACTED AFFIDAVIT OF ANDREW B. BOWMAN

1. I am counsel for the deponent Michelle Troconis and serve as her attorney in the two pending criminal cases in the Stamford Judicial District [REDACTED]

2. In my capacity as counsel in both criminal cases, I am in possession of [REDACTED].

3. On the basis of my knowledge as Ms. Troconis's criminal defense attorney, [REDACTED].

4. I have done so consistent with my Sixth Amendment obligation to provide effective assistance of counsel and in accord with the Supreme Court's holding in *Hoffman v. United States*, 341 U.S. 488, 71 S. Ct. 814, 819 and the Connecticut Supreme Court's decision in *State v. Biller*, 190 Conn. 594, 600, 462 A.2d 987, 991 (1983). In *Biller*, the Connecticut Supreme Court held that the Fifth Amendment protects any disclosure that the witness *reasonably believes* [REDACTED].

5. It is my judgment based upon all of the knowledge available to me that it is reasonable to believe that [REDACTED].

6. [REDACTED].

7. [REDACTED].

/s/ Andrew B. Bowman
ANDREW B. BOWMAN

Subscribed and sworn to before me this 10th day of October, 2019

/s/ Alan Neigher
ALAN NEIGHER
Commissioner of the Superior Court