

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA, : CASE NO.: 3:09CR00130 (SRU)
Plaintiff :
 :
V. :
 :
ANTONIA DELUCIA, :
Defendant : October 24, 2010

**DEFENDANT TONY DELUCIA'S
MEMORANDUM IN AID OF SENTENCING**

On August 15, 2009 defendant TONY DELUCIA pleaded guilty to Conspiracy to Possess With Intent to Distribute Cocaine, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(c) and 846. The defendant has reviewed her Presentence Report (“PSR”) prepared by Senior United States Probation Officer Ray Lopez. The defendant accepts responsibility for her criminal conduct, and acknowledges that her sentencing guidelines range is between 18 to 24 months’ imprisonment.¹ The defendant understands that her guidelines range has been determined based on her attributed drug quantity and her criminal history.

Ms. Delucia faces the possibility of incarceration because she purchased cocaine on a number of occasions both for personal use and to distribute to friends and family

¹ The defendant is aware that she also faces a possible fine of \$3,000 to \$30,000.

members. Although the defendant did not engage in this activity for profit, and did not use drugs frequently or consistently, the defendant has had prior involvement with the criminal justice system. The defendant had previously been given an opportunity, via probation, to straighten out her life and make better choices, but as evidenced by this arrest, it appears that she has not taken advantage of that opportunity. Arguably, prior sentences of probation were not severe enough to deter Ms. Delucia from re-engaging in criminal conduct. While arguments for a short period of incarceration are valid, undersigned counsel respectfully submits that a sentence of probation with a period of home confinement is sufficient to meet the goals of sentencing for this particular individual.

THE 18 U.S.C. § 3553(a) FACTORS.

The Court is well aware of the sentencing factors that must be considered in determining an appropriate sentence. The defendant respectfully submits that the defendant's guidelines' range would not result in a sentence that complies with the parsimony clause in 18 U.S.C. § 3553(a). The relevant § 3553(a) sentencing factors² mitigate in favor of a sentence of probation.

² Restitution is not an issue in this case.

The nature and circumstances of the offense.

Ms. Delucia's role in this offense, while not minimal, was relatively minor. As indicated in the PSR, Ms. Delucia purchased cocaine from Tito Rodriguez, the lead co-defendant in this case, on several occasions between November, 2008 and May, 2009. The defendant initially had difficulty accepting responsibility for her role as a co-conspirator in a drug distribution venture for a number of reasons. The defendant purchased narcotics mostly for personal use, and distributed to and used with friends and family members. Approximately a year after her arrest, the government made the meaningful point to the defendant that "sharing" is how drugs get distributed among the community. Large-scale dealers dispense drug to people who in turn share or sell to others.

Part of Ms. Delucia's initial inability to fully appreciate the seriousness of her conduct comes from the fact that Ms. Delucia grew up in an environment where drug use was widespread and accepted. Despite this, the defendant had always fulfilled her duties as a wife, mother, and business owner. She was able to function while using drugs, so, like many addicts, thought that as long as her drug use did not interfere with her responsibilities, she did not have a problem. Because the defendant regarded herself as a

“recreational user” she did not accept that her drug use had a negative impact on every aspect of her life. As discussed below, the defendant has begun to realize that she must make difficult and meaningful changes in her lifestyle. Ms. Delucia accepts responsibility for her conduct, has made some significant life changes over the past year, and plans to continue to create a better life for herself if given the opportunity.

The history and characteristics of the defendant.

As stated above, Ms. Delucia grew up in an environment where drug use was common. Ms. Delucia married Sal Delucia in 1987. The defendant met Mr. Delucia when she was fifteen years old, and he was the defendant’s only serious boyfriend. They began dating, and shortly thereafter, moved in together next door to Ms. Delucia’s parents’ house. Although their marriage was not perfect, Mr. Delucia had a steady job in construction and he was able to provide for Ms. Delucia and their children.

In 1991, Mr. Delucia sustained a serious back injury while at work. Mr. Delucia underwent back surgery, and he began taking pain medication. Mr. Delucia had used illicit substances in the past, and his use of prescription medication quickly turned to addiction. For the following eleven years, Ms. Delucia attempted to help her husband overcome his addiction to pain medication, and urged him to seek treatment when he began to abuse heroin, cocaine and crack cocaine. The defendant was able to convince

Mr. Delucia to participate in inpatient treatment, and secured for him a bed at Silver Hill Hospital in New Canaan, CT. Although Mr. Delucia entered treatment, his commitment to sobriety was short-lived. Mr. Delucia lost his job, was unable to maintain steady employment, and began to steal from his family, fail to show up at family functions and cheat on the defendant. Throughout her ordeal, Ms. Delucia continued to work long hours, help her parents with household chores, raise her children, and rarely had any time for herself.

In 1997, Ms. Delucia told her husband to leave the house. Although Ms. Delucia would allow him to return home, whenever he returned he stole from the family, engaged in other criminal acts, and ultimately went to jail. Ms. Delucia's daughters did not understand why their father was unavailable and often blamed Ms. Delucia for his absence. Friends recount Ms. Delucia's efforts to play the role of both mother and father without any support from her husband's side of the family. Ultimately, despite Ms. Delucia's efforts to preserve the family unit, Mr. Delucia abandoned the family.

In August of 1997, the defendant and a long-time friend, Trudy DeMauro, bought a storefront at 1514 Quinnipiac Avenue in New Haven, CT, and completely renovated the property. They opened a deli that they named T & T Deli, and Ms. DeMauro, who was also in the process of a divorce, lived on the second floor of the building with her

youngest child. The defendant threw herself into her work. For the past twelve years, the defendant has cooked, cleaned, and worked at the deli almost every day. To date, the defendant is still responsible for almost every aspect of the business. In addition to cooking and cleaning and working at the cash register, she maintains the grounds and the building, and monitors the inventory.

The defendant has continued to care for her parents throughout the years. Ms. Delucia's parents are in their late seventies, and her father has recently been hospitalized. The defendant still lives next door to her parents, and she is their primary caregiver. Although Ms. Delucia has three brothers and a sister, Ms. Delucia assumes most of her parents' housekeeping responsibilities, and runs errands for them on a weekly basis.

The defendant's three daughters continue to rely upon her for financial support and child care. Ms. Delucia's 19 year old daughter, Nicole, lives with the defendant. Nicole Delucia is a single mother, and Ms. Delucia allows her daughter to live with her in the hopes that Nicole will complete her education and find stable employment. Ms. Delucia cares for her grandsons on a regular basis. She makes sure they are well fed and that they get to school on time every day. The defendant is extremely attached to her grandsons and always makes herself available whenever she is needed for childcare.

As evidenced by the attached letters from friends and family, Ms. Delucia is a loyal and generous friend. The defendant makes many charitable contributions to her local community. Ms. Delucia assists the elderly in her neighborhood by providing them with home-cooked meals free of charge, and she frequently donates trays of food to local fund-raising events. Friends and family members rely on her for emotional and financial support. Several of her friends have recounted the ways in which Ms. Delucia has sacrificed for others (see attached). It is apparent that some individuals take advantage of the fact that Ms. Delucia never says no. It is also apparent that Ms. Delucia's tendency to put everyone else first has taken its toll on the defendant.

Ms. Delucia's sense of responsibility for her friends and family has been a source of stress for the defendant. Rather than reach out for help or say no, Ms. Delucia hides her anxiety and internalizes her unhappiness. The defendant's way of relieving stress has always been to drink or use drugs; for her, it was a means of escape. From Ms. Delucia's perspective, as long as her drug use was "under control" and she was able to continue to work and provide for her family, she did not have a problem. Obviously, the defendant does have a problem, and at age 52, she is attempting to make amends for her criminal conduct and the negative effects it has had on her life and her family.

The need to promote respect for the law, provide just punishment for the offense and to provide the defendant with needed treatment.

The defendant's role in this offense and her personal characteristics mitigate in favor of probation. Any restriction on the defendant's liberty would be an increased sanction that would have a deterrent effect. A sentence of home confinement would enable the defendant to get mental health counseling and to continue substance abuse counseling in the community. The defendant has actively engaged in treatment at the Chemical Abuse Services Agency in New Haven, CT (see attached). Undersigned counsel spoke with the defendant's treatment provider, Robin Rigney, and she has stated that Ms. Delucia actually *wants* to attend treatment and has made a genuine effort to incorporate coping techniques into her daily life. Significant mental health and substance abuse counseling will assist the defendant in finding other outlets for everyday stresses and maintaining abstinence even while she is surrounded by those who still use drugs.

The defendant will abide by whatever conditions the Court imposes if she is given the opportunity to serve her sentence in the community. Ms. Delucia has demonstrated her ability to abide by the Court's orders. Upon her arrest, the defendant was placed on

electronic monitoring. The defendant complied with her curfew and other conditions of pretrial release³ and the bracelet was removed after approximately two months. The defendant was able to abide by the conditions of her release while working, supporting her family and engaging in treatment, and she will do so again if given the opportunity to remain in the community.

The need to protect the public and deter the defendant from committing further crimes.

Ms. Delucia's substance abuse is symptomatic of her inability to deal with the chaos in her life. The defendant has been arrested several times in the past, and was sentenced to probation or fined in almost every instance. Under almost all sentencing theories, a defendant's past criminal history is considered in order to ensure that incrementally increased sanctions are imposed for those who do not seem to learn their lesson; this principle is one of the purported goals of the Sentencing Guidelines. It appears as if probation has not been a sufficient sanction to prompt the defendant to change her lifestyle.

Undersigned counsel respectfully submits that Ms. Delucia's criminal history is overstated, and that she accumulated most of her criminal history points during an

³ Probation reflects all negative urinalysis, with the exception of a urine test that was altered. Undersigned counsel notes that this occurred early in the monitoring period, prior to Ms. Delucia's participation in drug treatment.

extremely turbulent period in her life. Most of the defendant's criminal history points are the result of disputes with her business partner and best friend, Trudy DeMauro. Ms. Delucia and Ms. DeMauro have a history together that includes opening and running a business, presence in each other's life for every milestone, and, unfortunately, drug abuse and even more troubling, Ms. DeMauro's indiscretions with Ms. Delucia's ex-husband. It was the discovery of these indiscretions that triggered a series of altercations between Ms. Delucia and Ms. DeMauro that led to Ms. Delucia's arrest on several occasions.

Undersigned counsel has met with Ms. DeMauro and Ms. DeMauro has confirmed that the majority of Ms. Delucia's prior criminal conduct resulted from personal arguments. Ms. DeMauro has indicated that she deeply regrets her actions and the ensuing disputes. Ms. DeMauro has recounted several instances where, despite Ms. DeMauro's betrayal, Ms. Delucia has supported her through surgery, loss and other hardships. It is unfathomable to undersigned counsel how Ms. Delucia and Ms. DeMauro have remained business partners and friends. Importantly, both parties appear to have matured, forgiven each other for their past conflicts, and their relationship seems to be incident-free.

At the age of 52, the defendant has started to reflect on her life decisions and to move in a positive direction. The defendant seems to have finally taken inventory of her

life. She realizes that her daughters have all been impacted by her life circumstances and poor choices, and she is attempting to help them to make better decisions. The defendant wants to set a positive example for her grandchildren. Ms. Delucia has learned through counseling that she needs to address issues underlying her substance abuse and abstain from use altogether. The defendant is making changes in her work and personal environment to ensure that she recreates for herself a healthier—and better—life.

Community-based treatment is appropriate given the defendant's personal circumstances.

Approximately one year ago, Ms. Delucia resolved to take affirmative steps to ensure that the rampant drug use in her area would not overflow into her life again. Ms. Delucia had been renting the apartment above her deli for several years. In November, 2009, upon confirming her suspicions that the tenants were selling drugs from the apartment,⁴ Ms. Delucia asked them to leave.

Since their departure, Ms. Delucia has completely remodeled the space and is in the process of turning the apartment into a sober house. With the help of friends, the defendant has cleaned out the premises and transformed it from a two bedroom apartment to an open-style suite that can house up to seven residents. Ms. Delucia has met with

⁴ Ms. Delucia had suspected this, but had looked the other way because they were family friends and always paid their rent on time.

several owners of halfway houses in the New Haven area, and has done a significant amount of research regarding how to run a sober house as a business.

While working on this project and awaiting sentencing, Ms. Delucia has continued to work full-time at the deli, and care for her children, grandchildren and parents. Allowing the defendant to remain in the community will enable her to continue to work and care for her loved ones, and receive mental health and substance abuse counseling. The defendant has begun to take responsibility for herself, and is more emotionally stable. Importantly, she is making tangible life changes that show her commitment to making better choices for herself, her family and her future. This personal progress benefits the community as well.

CONCLUSION

Undersigned counsel cannot point to one aspect of Ms. Delucia's character, history or personal circumstances and argue that it is so significant that that thing alone warrants another chance. A person is a sum of their parts; all of the individual characteristics of the defendant, considered together, are compelling and support a sentence of probation. A sentence of probation with a period of home confinement, and with conditions specifically tailored to this particular defendant, would serve as an adequate deterrent, assist in the defendant's rehabilitation, and be in the interests of justice. A sentence

below the guidelines range that takes into account all of the above-mentioned mitigating circumstances and recognizes the genuine efforts the defendant has made thus far to make amends, with an order that she participate in mental health counseling and in intensive outpatient drug treatment program, would be in the interests of justice.

RESPECTFULLY SUBMITTED,

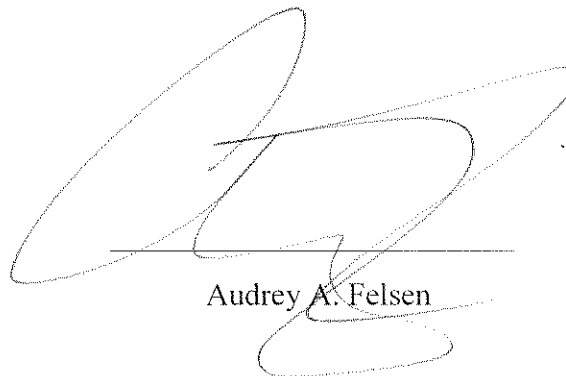
THE DEFENDANT
ANTONIA DELUCIA

BY 

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CERTIFICATION

THIS IS TO CERTIFY that on October 25, a copy of the foregoing was filed electronically [and served by mail on anyone unable to accept electronic filing]. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.



Audrey A. Felsen

CHEMICAL ABUSE SERVICES AGENCY, INC
MULTICULTURAL AMBULATORY ADDICTION SERVICES

426 East Street New Haven, CT 06511 ~ Phone: (203) 495-7710 ~ Fax: (203) 495-7713

To: Audrey Felson
Re: Antonia Delucia
Date: September 20, 2010

The following information concerns the above client's current treatment progress in the following areas (Note: This information is conveyed only in the presence of a signed release of information form):

Last treatment session attended: 9-13-10

Treatment session attendance overall: Excellent

Individual sessions: 18

Missed individual sessions: 4

Outpatient groups attended: 41

Missed groups: 4

Ms. Delucia called the clinic to inform her clinician every time she was not able to attend treatment.

Urine toxicology/Breathalyzer results (drug/alcohol screening):

Negative: 14

Positive: 1 for opiates, client has prescription on file

1 for amphetamine, client has prescription on file

Pending: None

Summary:

Ms. Delucia displays motivation and a commitment to work on her substance use issues. She has excellent attendance and has provided all negative UA with the exception of prescriptions that are on file. She has been compliant with treatment recommendations and actively participates in her treatment. The client has voluntarily continued attending treatment even after it was recommended for her to be successfully discharged from the program.

If you have any further questions, please feel free to contact me at 495-7710
Thank you.

Sincerely,



Robin Rigney LPC
Clinician II

cc: Case file

The confidentiality of this record is required under Title 42 of the code of Federal regulations. This material shall not be transmitted to anyone without written consent or other authorization as provided in the aforementioned statutes.

... from the desk of Clifford D. Fritzell III, Esquire
April 5, 2010



Clifford D. Fritzell III, Esquire
Fritzell & Gallo, LLC
New Haven, Connecticut 06510

BRIEN McMAHON FEDERAL BUILDING
c/o the Honorable Stefan R. Underhill
United States District Judge
United States Courthouse
915 Lafayette Boulevard - Suite 411
Bridgeport, Connecticut 06604

Re: Antonin "Toni" Delucia

Dear Judge Underhill,

Today I compose this letter with a profound sadness in my heart. It is a sadness that stems from a friend who has helped many people, including family and friends, and now needs my help but I cannot give to her the help she needs. She needs your help, your mercy and your understanding. The only thing that I can do is write this letter so you may become aware and familiar of the many great attributes my friend possesses so that when you are reviewing her file and deciding her fate, you can recall the person that I know and love.

I will try my best to describe Toni. She has an amazing ability to connect with people. I recall meeting her for the first time as if it were yesterday. She has a refreshing candidness that reveals itself early on in her relationships. She comes across with no hidden or private thoughts or agendas. She shows you her soul and her heart almost instantaneously. Her warmth and kindness are always on display.

I met her when I stopped to buy a steak and cheese sandwich at her deli. There were many different types of people having lunch there at the time. She knew all of them on a first name basis. They all enjoyed the light-hearted banter that just seemed to bring the small roadside eatery to life.

As time went on, I began to ride my motorcycle with Toni. She has an encyclopedic knowledge of Harley Davidson motorcycles and I am trying to learn as much as I can. We ride on most days when the weather permits. While spending this time with her, I've had a ringside seat or at least a small window into her life.

Judge, I am telling you that she is simply amazing. She is all things to many people. Her house is next door to her parents' house. Her parents ask a lot of her and she never says

Judge Underhill
April 5, 2010
Page 2

no to them. During any given week, she may be asked to clean for them, run errands for them or help them financially. To my knowledge, she has never refused them. Its simply not in her vocabulary to say no.

She also has three daughters that she continues to care for and basically mother their respective needs. The youngest, Nicole, who is about eighteen now needs her mother on a daily basis. Nicole has some type of undiagnosed issue where without mom, she may slip into a very bad depression or worse. Every time I visit, Nicole needs mom to intervene with a problem that she cannot figure out for herself. The last time I can recall specifically, Nicole needed to remedy a car insurance misunderstanding. Toni spent several hours on the phone and fixed the problem. I know that without her mother there to fix things, Nicole would not be able to drive today.

There are two other children, Jennifer and Chrissy. Jennifer resides with mom. Chrissy is recently married but the two of them rely on mom very heavily. Last week, Jennifer needed mom to help her with filling out her income taxes. Toni helped her complete the forms and has always been there to show Jennifer right from wrong. Chrissy, even with her new husband, also seems to be asking mom for advice quite frequently and I cannot imagine how these girls would survive without mom to guide them.

As you know, she got into some trouble and maybe facing some consequences that would have a ripple effect that would bring a family to its knees. Toni is a mom to three girls that even in their older years, rely on mom to be there to help fix things in this world for each of them. Toni is also a daughter, a great daughter, to her parents that would also be lost without her.

Since the incident, I see Toni on a regular basis. She has done everything she possibly can do to make things right for herself and her family. Her remorse is plain to see. She has been on the strait and narrow and I intend on keeping it that way.

So I implore you, to find it in your heart to allow us to keep Toni from the grim possibilities that are facing her. She means a lot to many and she is a friend to all.

Thank you for your time.

Sincerely,



Clifford Fritzell, Esq.

To whom it may concern,

I am Toni Delucia's sister Carol Ferraro

I am writing to you to please find it in your heart to think about giving my sister a chance to prove to you the kind of person she really is. I know you must think she does not deserve another chance because of her past history but you know as well as I do stories sometimes do get fabricated .

My sister, where to begin there are so many things I can say who she is a mother, a grandmother a daughter, a sister a friend who I can call at anytime and she is always there for me and anyone else who needs her. Everyone makes mistakes no one is perfect. I can only hope that you can look beyond the wrong and see my sister for all the good she does for my family, friends, and people in need. I know my sister and she has a good heart she helps everyone she can when she is asked to help she is there she goes out of her way to give what ever she can. I watch her help people who have no food she gives from her deli to the old people in the neighborhood, brings them food when they can not leave their home, gives clothing to kids in the area when needed even toys to the kids. My parents depend on my sister for a lot because she lives next door she helps with everything without her they would be heartbroken as we all would. Her two grandsons are the center of her life they live in the same house, without her around they would be devastated they count on my sister for everything more than their mother and father. Her daughters are also very close to her, Nicole lives with her, Jennifer lives upstairs from her and her daughter Chrissy was just married and a baby on the way. I can only hope for the best with your decision when it comes to my sister I am asking from my heart to please give her a chance to prove herself. I will promise anything you need from me I will do. I can go on and on to you about my sister because she is my sister and my friend I love my sister.

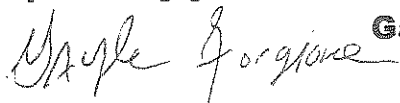
Thank-you
for taking your time to read this letter



To the Honorable Judge Underhill,

If I could please your Honor with the real persona of Antonia Delucia, I would start by saying she is an asset to the community. Toni owns a deli she is there to make a living to provide for her family, but the attributes she demonstrates daily show her true character an exceptional character at that. Many people in the community of TNT Deli are less fortunate than most. Toni found out that a man down the street eats out of garbage cans she immediately provided free lunch for him and at the end of the day gave him all the leftovers this has been going on for many months now, he is most thankful. Toni is the nucleus of the family, having picnics, birthdays, anniversary christmas parties and Holloween she decorates the whole house for all the neighborhood to go thru the haunted grave it is a happy time for all. At Christmas a toys 4 tots was put in her store she felt the box was to empty so she went out and spent her money to fill it. Toni has so much empathy and compassion for those less fortunate. Her husband left her with three children because drugs were more important than his family he never helped with child support. At the young age of 15 years old she lost nephew and best buddy to a tragic accident as hard as it was for the family she held everyone together and grieved in private. She also helped start a scholarship fund for East Haven High School in her nephews name, she also donated all the food for the golf tournament in Joey Wojies name that money also was raised for scholaroships in his memory. She has overcome many obstacles in her life she raised 3 wonderful girls and has 2 grandsons that adore her. Toni has shown great remorse for the mistake that she made, she has built a remarkable sober house to help those people get their life back. I hope this will give you a clearer picture of who Antonia Delucia really is and resolve any grievences so she can persue and remain her dream of helping people and her community. Thank you for your time, God Bless You.

Respectfully yours



Gayle Forgione

Lifeline Nursing LLC

Dear Judge Underhill,

This is the hardest letter I ever wrote. My mother is in need of your help. Well, if fact, my entire family needs your mercy and compassion. My mom, Toni Delucia, has gotten herself into some trouble. I've tried to understand what she did and what she might get as a sentence and to be honest, I can't seem to wrap my brain around it.

Without getting into what she did and didn't do, i write you this letter to you to tell you about an unbelievable person who has been amazing to her family for many years

My mom means the world to my sisters and me. She works very hard to make sure we have the ability to deal with the trials and difficulties of life. My younger sisters have needs beyond those of your typical 18 and 25 year olds. My sister Nicole, now 18, has been especially needy. She resides with my mom and she relies on her for nearly everything. When Nicole needs advice on boys, mom is there. When she needs advice on school, mom is there. When she needs advice or direction on anything from employment to car insurance, again, mom is there. I do not know how Nicole would survive without mom to show her the way.

Nicole is not the only one that is extremely dependent on mom. My other sister, Jennifer, now 25, also resides upstairs in mom's house. Mom gives Jennifer daily guidance as well. Jennifer is a little older than Nicole but is still very reliant on mom. Mom makes herself available to Jennifer for anything that may arise. Jennifer would also be lost without mom not only because mom pays all of the bills for the house, but daughters, at that age, well at any age, need their mom.

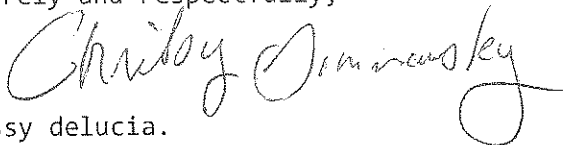
As for me, my mother is my best friend. I confide in her on almost everything. She makes me feel better when I feel beaten down by a sometimes cruel world. I am recently married. My husband Steve also loves mom. Mom has been a great friend to him as well. It's funny to see them interact. Both of them can work with their hands and frequently do tackle home projects when the house needs work.

All four of us, Nicole, Jennifer, Steve and me would be devastated without moms loving advice.

Please exercise your discretion to its absolute limits to allow us to keep our mom home. We will promise to keep her on the straight and narrow from now on.

Thank you so much for reading this letter,

Sincerely and respectfully,

A handwritten signature in cursive script that reads "Chrissy Delucia". The signature is written in black ink and is positioned above the printed name.

Chrissy delucia.

Thomas J. Vuolo
17 Briarwood Drive
Meriden CT 06450-4430
203-235-4788

December 8 2009

To Whom It May Concern

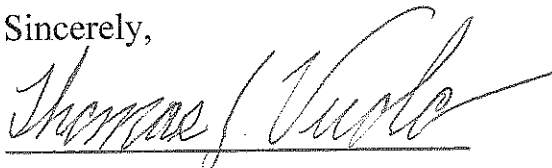
Although I've not had the opportunity to meet Antonia DeLucia, I would like to tell you how I know of her. Our home health aide, Trudy DiMauro is Antonia's friend who owns a deli in New Haven.

On several occasions Antonia has been kind enough to send out home cooked meals for my Mom (96 years old) and me. Since we rely on meals on the meals on wheels program to deliver our daily meals, it is a pleasure for us when she does this.

We anxiously await this holiday season as we look forward to her authentic Polish meals she'll be sending. I hope to soon have the opportunity to meet her and thank her in person for her kindness.

It's rare in this day and age that a complete stranger would be so compassionate and thoughtful.

Sincerely,

A handwritten signature in cursive script, reading "Thomas J. Vuolo", written over a horizontal line.

Thomas J. Vuolo

TJV;tt

To Whom It May Concern;

I am writing this letter to inform you of the type of person Antonia (Toni) Delucia is . Not only is she my sister – in- law of 25 years but also my dear friend for over 45 years. Although through the years we have had our many disagreements as do many family members ,but I wouldn't trade those times for anything.

.Let me start by stating , my family ,Joe (Toni's brother), Little Joey, Adam and myself have always been extremely close to Toni. We suffered a tremendous loss when my oldest son Joey was killed in and accident. To this day I still don't know how we made it this far. As for Toni, if it weren't for her selfless and caring ways we probably wouldn't have made it through. She never left our sides during our grieving. She has made it possible for us to go on, and there is no words to describe how grateful we are for that.

Toni is such a caring and giving person, I have an uncle that is mentally retarded, and he loves birds. I clearly remember over 25 years ago when Toni had come to his home with me she had seen the state in which my uncle was in. She then immediately left the house and went to buy him a parakeet . To this day this man still remembers and asks about Toni on a daily basis. Now if that isn't an act of her nurturing and caring ways then I don't know what else is. What a lift that gave him and he still smiles when he speaks of Toni.

Also I can remember Toni closing her place of business in the middle of her lunch crowd (the most lucrative time of day).

Because she remembered she had told elderly patients at Montowese Health Center that she would bring them meatloaf ,and Toni is a person of her word. Just something simple like that should show the type of caring person Toni is.

Its just her caring ways and acts of kindness that make Toni a unique individual. Toni is a wonderful friend , a great mother , a very nurturing grandmother as well as a great daughter and family member.I am proud not only to have her as my sister-in-law ,but to say she is my dear and close friend. Having Toni away from all the people who depend on her and need her would be such a injustice

Sincerely;

A handwritten signature in cursive script that reads "Cynthia Wojciechowski". The signature is written in black ink and is positioned above the printed name.

Cynthia Wojciechowski
(Joey's Wife)

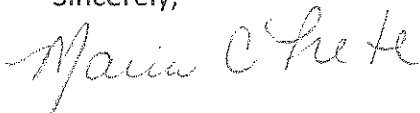
You're Honor,

Thank you for taking the time to read this letter of character for Antonia Delucia. I know that you have a very difficult job in determining the character of the defendants that come in front of you on a daily basis.

I would like to tell you that despite what you may see on the exterior of this case, I can honestly say that Antonia Delucia is a great mom and an even better grandmother. She has a very kind heart and in all the 20 plus years I have known her, has always been one to lend a hand to anyone who has asks for help. This is a woman who will go out of her way to help even strangers. She operates a small deli in New Haven where she works long and hard weeks. She also has the overwhelming burden of taking care of her elderly parents, who are not well. She also has to care for her children and grandchildren. To which I add she does a fantastic job, instilling morals that have long been absent in today's society. The impact on the family if Antonia were not there would be enormous. All the parties involved would suffer, especially the children and even more so the grandchildren, whom she spends a tremendous amount of time with.

In all, your Honor, Antonia is a very caring and loving person who cares a tremendous amount about the community and her family. As I stated she operates a small business and often caters to the local Municipalities. I can vouch for her in saying that she is one of the most intrinsically good people I know. You're Honor, I ask you to find truth in your heart and mind, for if any person deserves the benefit of the doubt, it would be Antonia Delucia.

Sincerely,

A handwritten signature in cursive script that reads "Maria C. Prete". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Maria C. Prete

184 Weybosset Street
New Haven, CT 06513

.....
Lynda McMillen

September 14, 2009

Dear Sir or Madam:

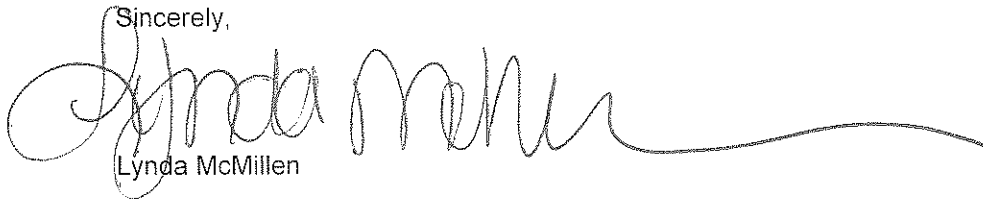
This letter is being written on behalf on Antonia DeLucia.

Antonia has been my neighbor and friend for well over 30 years. She is an amazing person who contributes much to our society. She is a single mother and raised her three beautiful daughters on her own.

As a member of the democratic town committee, Antonia was very active in my campaign and is a strong supporter of the Democratic Party in New Haven. She has been a member of the neighbor hood block watch and a neighbor who helps when needed.

I am privileged to have a neighbor and friend who supports her community and is always willing to lend a hand when needed.

Sincerely,


Lynda McMillen

.....

370 Sackett Point Rd.
North Haven, CT 06473

.....
John McMillen Jr.

August 6, 2009

To whom it may concern:

This letter is to serve as a character reference for Ms. Antonia Delucia.

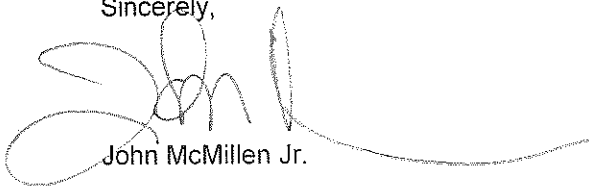
I confirm that I have known Antonia Delucia for well over fifteen years. Ms. DeLucia has been a friend and a mentor to me in the course of the fifteen years.

In the fifteen years of our friendship I have found Ms. DeLucia to be a loving and nurturing mother, grandmother, daughter and sister. Her family is her life and passion and it shows through her heart that she gives unconditionally.

She is a business owner who is hardworking, dependable, conscientious, and honest and peace loving. She's strived to grow and make her TNT deli a success in the past five years.

I am proud to call her a friend!

Sincerely,


John McMillen Jr.

.....

August 27, 2009

To Whom It May Concern:


RE: ANTONIA M. DELUCIA

This letter is intended as a character reference for Antonia M. DeLucia (Toni). Over the past 25 years I have seen Toni excel not only in business, however more importantly as a single parent raising three children. Toni has made parenting her most important role and has raised three wonderful children. She has worked hard to give her children guidance and a healthy and active environment. It is not unusual to see them together at family gatherings and social functions. Toni is always happy to participate with her children and her grandchildren's activities, sports and friendships. They have acquired a wonderful bond and it is very impressive to see a single mother and grandmother work so hard.

Aside from her important parenting role, Toni is a very dedicated, extremely hard-working individual. She is very dedicated to her job and has established a very successful business, working six days a week. She has created a work environment, which enables her to employ both her family and friends. Toni has been extremely committed to this task over the years.

Toni is a well-liked, considerate, generous individual who is always helping someone. Toni has made time out of her busy schedule on numerous occasions to visit my mother at a nearby convalescent home and truly has shown her love and concern for a completely disabled woman. She has taken her out to dinner, to picnics or just for a ride in the car. She has always put a smile on mom's face when she brings her grandchildren up to visit.

All in all I would like to stress that Toni is a well-balanced individual with an abundance of positive qualities maintaining her responsibilities as a parent and as proprietor of her business. I, as well as others, am proud to have her as a friend.


Debra Diana

To Whom it may concern:

Antonia (Toni) Delucia and I have been friends nearly 35 years. Toni is one of the most giving and kindness people I know. Throughout the years I have been through many ups and downs, and Toni has always been my rock. Toni taught me the meaning of the word kindness especially to the elderly. Toni shows the utmost respect to everyone she meets. She has been through many milestones with me , i.e. Sickness , marriage ,birth of my children. Toni is a rare individual who believes in giving not to receive anything in return. Toni would honestly give you the shirt off her back even if it was the only shirt she had. Myself and many others would be lost with out Toni in our lives. I an very proud and honored to have such a wonderful person as my friend. I consider myself blessed.

Sincerely;


Linda Miller

Danielle Anderson
9 Van Horn Drive
East Haven, CT 06512

February 2, 2010

To Whom It May Concern,

This letter is being written as a character reference for Anthonia DeLucia Antonia has been a close friend of my family for fifteen years. She has attended all of my family functions, including the birth of my daughter, offering help and support along the way. I have always considered her part of my family. She has always been there to help us out if we happen to get "in a jam". She would give us or anyone for that matter the shirt off her back if needed.

Antonia has always provided and cared for her family as best as she can. She has not had an easy life being raised in an inner city environment. She is a survivor not only for herself but for her three daughters. She has raised her girls on her own as their father has served time in prison on numerous occasions.

Antonia runs her own business, TMI Deli, which has become a staple in the area. She has established many loyal customers through the years. Where else can you go to get a great steak and cheese sandwich and good conversation?

Antonia may seem a little rough around the edges but those of us who are close to her see a different side. She is brutally honest, kind, caring, and respected.

Antonia has formed many bonds with people through the years but her greatest bond has always been with her grandchildren, especially Jonathan. To have to see him lose his grandmother would be devastating and I fear it would have a long term effect on him.

Incarcerating Antonia would be a huge disservice to the community and would have a detrimental effect on her family.

Sincerely,

Danielle Anderson

Danielle Anderson

To whom it may concern,

This is not only a letter of character, but also a letter of friendship. Antonia Wojciechowski DeLucia is a true friend to me. We met in the late 80's through family and friends and ever since we have been very close friends, I do consider myself a part of the "Woji" family.

My name is Patricia DeStefano, I am currently the lending manager a local credit union. For 15 years had my own business in North Haven, Connecticut in banking and finance. For many years I have served on board of directors for local and state Non-Profit organizations. My experience over the years of friendship with Toni and her family is she is honorable, hardworking and trustworthy. Her family values and dedication is what holds up the strength of our friendship.

I have found Toni to be dependable, and an asset to the entire community. There is never a time when anyone needs something she is there to volunteer, donate, or simply give her support. I have volunteered for many fundraisers over the past several years from Habitat for Humanity, Golf Tournaments for cancer research or fundraising for those in need, she is always there to donate and give a lending hand.


The holidays with Toni are truly a joy, to see the smiles and fun on all the kids faces are something to cherish. We both have very large families and many friends that look forward to all the holidays shared with Toni and her entire family. In the dead of winter there is always a fire burning and the decorations start to appear. By the time Christmas comes along her home turns into a winter wonderland. Her grandchildren and all the local children help decorate as she welcomes in the holidays. From Easter to Halloween and all the holidays in between, you can always count on Toni for her amazing talent and creativity. We are truly blessed to share in all the celebrations throughout the year.

There are friends in life who come and go however; I know that one friend I can count on to bring the smiles to everyone that is Toni. The love she has for her family especially her grandchildren is truly a gift. No matter what life has to offer her you can count on her love and support to pull us all together.

Toni is truly an award-winning cook, there is always something cooking at the Deli, as well as Sunday dinners at her home. My family is always welcomed. Her family has become my family. My young children always look forward to go to Miss Toni's for fun and laughter.

We are all truly blessed by her kindness, generosity, and love. The holidays would never be the same in her absence, and the children's laughter and smiles should not be replaced with tears.

Respectfully, her friend



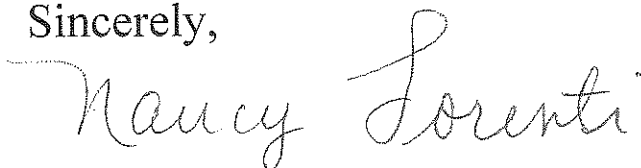
Patricia A. DeStefano
27 Jeffrey Road
East Haven, CT 06513

November 20, 2009

To Whom It May Concern:

This letter is being written in regards to a friend of mine, Toni Delucia. We met through a mutual friend and family member a few years ago. I would like to say that Toni is a wonderful person, hard worker and very family orientated. She has been very kind to me and my family. She has shown the utmost respect to my ailing father and is always offering her services whenever needed. Hopefully you will consider all these special qualities that Toni possesses.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Lorenti". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Nancy Lorenti

4/5/10

To Whom it may concern:

I am writing this letter on behalf of my sister-in-law Toni Delucia. Four months ago I was diagnosed with a severe case of neuropathy and can no longer type on the computer and it's difficult for me to write so Toni did not ask me to write a letter on her behalf but I took it upon myself to write one anyway.

I met Toni 28 years ago when I started dating her brother, John. We were friendly but did not become close friends until two years later when Toni, our other sister-in-law, Cindy, and myself were pregnant at the same time. Our kids were all born months apart. Starting as far back as then I could always depend on Toni. She gave my rides to the OB GYN and helped me get everything ready for the baby. I have no siblings so Toni treated me as if we were sisters.

When all the kids were little (nieces, nephews and friends kids) they always wanted to go to Auntie Toni's house. I could remember her always playing games, doing activities and turning her living room into a tent city with sheets and blankets and the kids would bring their sleeping bags but she didn't just let them play by themselves she got right in there and played with them if it be a make believe ~~picnic~~ picnic or a make believe day at the zoo with all the stuffed animals. She just loved kids, always went out of her way to make sure none of the kids were left out and still to this day she goes out of her way to help kids, especially her grandsons. Still to this day my daughter remembers and the kids, now adults, talk about the old days at Toni's house. Throughout the years she has just been a special person. At Halloween time when we were afraid to let the kids

go trick or treating, Toni would have a Halloween party that night (this was a yearly event).

On many occasions throughout the years a group of us would plan on day events for the kids like zoo's, amusement parks, fairs, chucky cheese but at the last minute I would have to back out because I did not have enough money but Toni would not stand for that, she could never let her niece down she would scrape up extra money or ask her mother for it and treat me and ~~my~~ ^{my} daughter, even if that meant her own kids could not buy ~~a~~ buy something, where ever we went. That is the type of person Toni was and still is. I think she is the one that coined the phrase "NO CHILD LEFT ~~BEHIND~~ ^{BEHIND}", (in her own way).

For 28 years Toni became more than a sister-in-law or friend

she is like the sister I never had. She is such a good, selfless person, she is the type that would go the extra mile for you. Throughout all these years I cannot ever remember a time that I ever asked Toni for something and she refused. Everyone says Toni would give you the shirt off her back if you needed it.

I've been bed ridden and now house ridden for over 6 months and Toni continually calls me at lunch time to see if I want a sandwich from the Deli or anything to eat. I cannot drive so when I want or need something she makes sure someone drops me off lunch. She always calls me if she is at the grocery store to see if I need something and even though I say no she drops off a bag of goodies anyway.

I know I emphasized on Toni and how good she is with kids and how she cares so much about them because that is the most significant memory that sticks out in my head. She was just so good to me and my daughter and still is. Now my daughter is 25 years old and has a 7 month old baby and the cycle has ^{not} broken. Whenever she is at a store she picks up a little something for the baby. When she sees Sarah and the baby she slips her a ten dollar bill (of course not all the time) and says get something for the baby.

All these kids I spoke of earlier (now adults) still visit Toni and no matter if its family or friends kids they all call her Auntie Toni.

Granted, I know that noone is perfect not Toni, me or anyone else. I only ask that when

You are making your decision
you take into account what a
good person Toni is and how loved
she is.

Thank you for your time.

Sincerely,

Cindy Wojciechowski

To whom it may concern;

I have known Toni DeLuca for about six years. She is a good friend and neighbor. I can count on her when I need her, and when my kids got home early from school I could always count on her watching them till I got home. She has always welcomed my family with open hands. If you have any questions you are more than welcome to call me.

Margaret Caudona
203-676-2222

To Whom it may concern:

My name is Gina Williams. I've known Antonia Delucia for 25 years. Our children went to school together and we spent a lot of time doing things with our children. She was always a great mother to her children. Even my children called her "Auntie". They loved her and still do till this day.

Now I see her with her grandchildren and she is great with them. I've see her doing homework with them, feed them, and she is always involved in school activities. You would think she was their mother. She has such patience with them.

I work across the street from the Deli at Bishop Woods school. I eat lunch at the Deli often. After school I bring my granddaughter and my niece to the Deli and to Antonia's home. They love her. I've never seen anyone who had a way with children. We celebrate all the holidays with her and her family. She makes

them so special. She goes all out and decorates. She always makes them special treats. She is so generous.

I couldn't imagine her grandchildren without her. It would be a terrible injustice. She has the biggest heart of anyone I know. Should you require further information, please feel free to contact me

Gina Williams

Gina Williams
70 Stevens St.
East Haven, CT. 06512

203-415-9592