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JENNIFER N. SELLITTI
Public Defender

May 26, 2025

The Honorable Marc C. Lemieux, A.J.S.C.
Monmouth County Superior Courthouse
71 Monument Park
Freehold, NJ 07728

Re: State v. Paul Caneiro
Case No. 18-004915 / Indictment No. 19-02-283-I

Motion to Preclude Ballistics Evidence

Dear Judge Lemieux:

With respect to the Exhibits previously filed in support of this Motion on 5/6/25, the defense inadvertently included the wrong letter for Exhibit K. Specifically, the defense inadvertently included a letter from the Court (dated 4/10/25) rather than the intended exhibit of a letter from the State, dated March 31, 2025. Accordingly, enclosed with this letter, please find the corrected Exhibit K that is referenced in the defense's moving papers in support of this Motion (Db, 9).

Apologies for any inconvenience and thank you for the Court's continued consideration and attention to this matter.

Respectfully,

/s/ Monika Mastellone
Monika Mastellone, Esq.
Asst. Deputy Public Defender
Attorney ID No. 122942014

cc: AP Christopher Decker; AP Nicole Wallace

EXHIBIT K



RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR

**OFFICE OF THE COUNTY PROSECUTOR
COUNTY OF MONMOUTH**

132 JERSEYVILLE AVENUE
FREEHOLD, NJ 07728-2374
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March 31, 2025

Monika Mastellone & Victoria Howard
Assistant Deputy Public Defenders
Office of the Public Defender
7 Broad Street
Freehold, New Jersey 07728

Re: State of New Jersey v. Paul Caneiro
Indictment No. 19-02-0283; Case No. 18-4915
Response to NJSP Ballistics discovery request

Dear Ms. Mastellone & Ms. Howard:

On or about February 26, 2025, we received your request for additional discovery relating to Ballistics work done by the New Jersey State Police. Upon receiving your request, same was forwarded to the Sergeant First Class Christopher Clayton of the New Jersey State Police Ballistics Unit. As you know, all discovery provided to this Office by the NJSP Ballistics Unit was provided previously, mostly in 2018 and 2019. That being said, Sgt. Clayton recently responded to this Office, providing available documents responsive to your requests. As you know, these were made available to you on Friday, March 28, 2025, with one exception – Sgt. Clayton's list of testimony, which accompanies this letter. The below information addresses your request in order:

Case Files: Sgt. Clayton confirms that the majority of the requested items have been provided previously. He indicated that he is still attempting to obtain the NIBIN images discussed in section e; however, he possesses none at this time. As for sections h, i, and j, Sgt. Clayton has no documented records. The response to section k is being provided.

As for any data files, he is attempting to ascertain whether there is any available

information that he can access; however, his understanding is that there were no NIBIN hits identified to any of the test standards entered into NIBIN. He has further indicated that the requested statistical information is not applicable in this case. As for laboratory procedures, Sgt. Clayton performed microscopic comparisons/firearm operability examinations; both sections from their unit's Standard Operating Procedures are attached. Sgt. Clayton has also provided a copy of the AFTE training manual that he and other examiners in the unit follow. His attached Curriculum Vitae lists all of the trainings that he has attended. Sgt. Clayton has also provided a list of cases where he has testified as an expert in the field. He has also provided their A2LA accreditation certifications and the validation documents that he has.

It is my understanding that this information satisfies the requested information that they possess. If there are any questions, kindly let us know.

Respectfully submitted,

RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR



By: Christopher J. Decker
Deputy First Assistant Prosecutor

c: AP Nicole Wallace