



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

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RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR

May 7, 2025

The Honorable Marc C. LeMieux, A.J.S.C.
Monmouth County Courthouse
71 Monument Park
Freehold, New Jersey 07728

Re: State of New Jersey v. Paul Caneiro
Indictment No. 19-02-0283; Case No. 18004915
Motion to Admit Text Messages
Returnable: June 2, 2025

Dear Judge LeMieux:

On March 13, 2020, the State filed an in limine motion with the Court in the above-captioned case, which specifically sought admission of text messages authored by one of the defendant's victims, Keith Caneiro. In support of that motion, the State submitted a 20-page brief outlining the facts and law that allow this Court to grant the State's motion. To date, this motion has not been responded to by the defense or scheduled by the Court.

By way of this letter, the State respectfully requests its motion be heard and granted by this Court for the reasons and authorities set forth in its 2020 motion. For the convenience of the Court and defendant, the State has

appended its prior filings hereto and updated its proposed form of order. Should defendant now object to the State's motion, the State reserves the right to reply accordingly, see R. 1:6-5, if needed.

Respectfully submitted,

RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR

/s/ Monica do Outeiro

By: Christopher J. Decker, 038272003
Deputy First Assistant Prosecutor and

Nicole D. Wallace, 037582008
Trial Team Leader
Assistant Prosecutor
Of Counsel and

Monica do Outeiro, 041202006
Assistant Prosecutor
Director, Appellate Section
On the Letter

c Monika Mastellone, A.D.P.D.