



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

132 JERSEYVILLE AVENUE
FREEHOLD, NJ 07728-2374

(732) 431-7160

RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR

April 4, 2025

The Honorable Marc C. Lemieux, A.J.S.C.
Superior Court of New Jersey
71 Monument Park
Freehold, New Jersey 07728

Re: State of New Jersey v. Paul Caneiro
Motion for Change of Venue

Dear Your Honor:

This morning we received a supplemental letter from defense counsel regarding information received from Phil Freedman, Executor Editor for the Asbury Park Press. It should first be noted that we received the same information from Mr. Freedman and there is no dispute as to that which he provided. The State simply felt that it was best to briefly respond and remind this Court that those who view the site often view a variety of articles and information on a daily basis.

That being said, while the number of individuals who view the site may vary slightly from month to month, these same people have read about a variety of criminal matters that were handled and even tried in Monmouth County over the course, for instance, the last several years. Kathy Hopkins, the reporter who most consistently handles Monmouth and Ocean Criminal matters, has covered many cases that these app.com readers would have read about over the last several years. This would include, but not be limited to: State v. Liam McAtasney (murder of Sara Stern), State v. Scott Kologi (quadruple murder of defendant's family), State v. Ebenezer Byrd, et al. (murder of schoolteacher Jonelle Melton), State v. Arthur Morgan (defendant killed his young daughter by throwing her, strapped in a weighted-down car seat, into a shallow body of water then fled to California), all of which were tried in Monmouth County. This is just a sampling of cases which were tried in this County after widespread attention. The State would also note the recent Ocean County trial of State v. Christopher Gregor (homicide involving defendant's son/"treadmill murder").

Simply put, there are other high-profile cases that have been significantly covered by the Asbury Park Press in recent memory. Each time, a fair and impartial jury was selected by utilizing specifically tailored voir dire questions to find jurors that could abide by their oath to pay close attention to the facts elicited in the courtroom and to follow the Judge's instructions. Each of these cases were viewed by the same, overall set of Monmouth County eyes on the Asbury Park Press' website or, to a lesser extent, its print edition. The State is certain that this case will be no different.

Finally, the State would briefly note that a quick look onto the New Jersey sister sites of the Asbury Park Press, which the State previously provided via email, [Local Brands Map - Gannett](#), would show that a number of articles regarding this case were featured on the websites of the New Jersey Herald (Newton, New Jersey) and the Burlington County Times (Willingboro, New Jersey) and likely others. See attached examples. Some, however, have none available via search history.

The State continues to maintain that a change of venue is not necessary in this case.

Very truly yours,
RAYMOND S. SANTIAGO
MONMOUTH COUNTY PROSECUTOR



By: Christopher J. Decker
Deputy First Assistant Prosecutor

Cc: Monika Mastellone, Esquire
Victoria Howard, Esquire

42