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April 4, 2025

Honorable Marc C. Lemieux, A.J.S.C.
Monmouth County Courthouse
71 Monument Park, 3rd Floor
Freehold, NJ 07728

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

Supplemental Letter re: Motion to Change Venue

Dear Judge Lemieux:

With respect to the oral argument that took place for this Motion on April 2, 2025, the Court had inquired about Asbury Park Press (APP) statistics related to their viewership in Monmouth County and Ocean County versus other counties such as Mercer or Burlington. Today, the defense received the attached response via email from Phil Freedman, Executive Editor of APP. In short, Mr. Freedman informs that with regard to digital viewership of APP's content, in March 2025, APP had 1.75 million "unique visitors" (measured by device, not necessary by individual person) to APP.com. He also notes that in the past year, this number has ranged from 1.4 million to 1.95 million each month.

Significantly, the "vast majority" (approximately 90% to 92% of the views) were pretty evenly split" between Ocean and Monmouth Counties (approx. 805,000 viewers per each county in March 2025). Thus, the remaining viewership – approx.. 8% to 10% - is split amongst readers from outside of those two counties. In theory, because there are 21 counties in NJ, this would amount to less than 1% per each outside county.

In light of this information, the defense relies on same to further support its request for a Change of Venue in this exceptional case. As the Court is aware, a significant amount of media reporting in this case was by the APP; and, as we now know, an overwhelming majority of the viewers/ readers of APP's content are from Ocean and Monmouth Counties – which (by way of some quick math ($1.75 \text{ million} \times .92\% / 2$)), amounts to approx. 805,000 views in March 2025 alone. As such, the defense submits that it is evident that an extraordinary amount of prejudice would occur to Mr. Caneiro's ability to obtain a fair and impartial jury in this matter were his jury pool to originate from Ocean or Monmouth County. Accordingly, defense submits that the Court should order a change of venue to another neighboring county such as Mercer, Middlesex, or Burlington.

Sincerely,

/s/ Monika Mastellone

Monika Mastellone, Esq. 122942014

CC: AP Chris Decker; AP Nicole Wallace

From: [Freedman, Philip](#)
To: [Newton, Michael \[OPD\]](#)
Cc: [Mastellone, Monika \[OPD\]](#)
Subject: [EXTERNAL] Re: following up regarding query from Public Defender's Office
Date: Friday, April 4, 2025 10:23:33 AM

These are the numbers I can provide at this time for public consumption. Some of what was requested is proprietary information that we do not want competitors to be able to access.

PRINT

I do not have permission from our legal team to share our print subscription numbers. They have dropped precipitously over the past 30 years and the vast majority of our readership is online.

DIGITAL

In March 2025, we had 1.75 million unique visitors to app.com. Our range over the past year has been from about 1.4 million to 1.95 million per month. A unique visitor is not necessarily one person, it is measured by device url. So, if someone accesses app.com on their phone, their work computer and their personal laptop, that would count as three unique visitors.

The vast majority of these clicks originate in Ocean and Monmouth counties. It is pretty evenly split. We do get a good bit (maybe 8 to 10 percent) of readers visiting from outside those two counties, depending on the subject matter, but there is no other county that shows any measurable readership. This includes Mercer, Burlington and other border counties.

I hope this helps.

Phil Freedman
Executive editor
Asbury Park Press / APP.com

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