

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

NOAH S. BACON,

Defendant.

Case No.: 1:21-cr-00488 CRC

**DEFENDANT’S OBJECTIONS TO
GOVERNMENT’S EXHIBITS**

COMES NOW, Noah Bacon, through counsel, Joseph R. Conte, to make the following objections to the proposed government exhibit list.

- 1. Exhibit 19 -- “Area Closed Sign” -- This exhibit could come from anywhere. There is no evidence Mr. Bacon saw the sign or was otherwise aware of its existence.
- 2. Exhibit 25 -- “Area Closed Sign” -- Although the location of this sign is obvious there is no evidence Mr. Bacon saw the sign.
- 3. Exhibit 400 -- SMS message. These messages are dated November 27, 2022, and are not relevant to the charges in the indictment.
- 4. Exhibit 406 -- SMS message. These messages are from December 12, 2020, and are not relevant to the charges in the indictment.

Respectfully submitted,

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