

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No. 22-cr-186 (TJK)**
 :
RALPH JOSEPH CELENTANO III, :
 :
 Defendant. :

**SECOND SUPPLEMENT TO GOVERNMENT’S RESPONSE TO DEFENDANT’S
MOTION TO PRECLUDE**

The United States respectfully provides notice of its final exhibits for text messages between Celentano and other parties to assist the Court in consideration of pending motions regarding the Government’s case-in-chief. *See* Attachments 1-5.

The Government would note the removal of pre-January 6th messages from the Text Exchange with Franklyn. *See* Attachment 2 Text Exchange Between Celentano and Franklyn. The Government and Defense believe this renders the pending objection regarding “fighting generation” moot. *See* Def. Mot. ECF 51 at 5.

The Government does not intend on offering into evidence the text exchange with “CM.” The Government and Defense believe this renders the pending objection regarding “CM” moot. *See* Def. Mot. ECF 51 at 2.

With respect to the Defendant’s message, “Fuck them congress shit their pants” to Kenny on January 6, 2021, that was the subject of the Defense objection (*See* Def. Mot. ECF 51 at 3; Gov Attachment 4), the Government has reviewed its text message exhibits and this phrase does not appear in any other text exhibit. The Government has also reviewed its Parler social media exhibits and this phrase appears once in a Parler post dated January 7, 2021 at 12:10 AM. *See* Gov Attachment 6. It is the Government’s position that this is not cumulative and is highly relevant given there is a significant difference in context and purpose between a private text message and a public social media post.

FOR THE UNITED STATES

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

_____/s/
JACQUELINE SCHESNOL
Assistant United States Attorney
Arizona Bar No. 016742
Capitol Riot Detailee
jacqueline.schesnol@usdoj.gov
(602) 514-7500

_____/s/
SHALIN NOHRIA
Assistant United States Attorney
D.C. Bar No. 1644392
shalin.nohria@usdoj.gov
202-344-5763