

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	*	
	*	
V.	*	Case No. 1:21-CR-623-2 (CRC)
	*	
KIRSTYN NIEMELA	*	
	*	

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

NOW COMES the Defendant, Kirstyn Niemela, by and through counsel, Richard Monteith and Paul Garrity, and submits the following supplemental objections to the Government’s Exhibit List that was submitted to this Court on January 2, 2023.

In support thereof, Ms. Niemela states as follows:

1. The Defendant objects to Government Exhibit #914, an excerpt from a January 7, 2021 group chat regarding Trump in control, and submits that this exhibit is irrelevant, vague, and prejudicial and should be precluded from introduction into evidence pursuant to FRE 401 and 402.
2. The Defendant objects to Government Exhibit #915, which consists of a group chat certifying at 1:00 p.m. and treason, and submits that this exhibit is irrelevant, vague, and prejudicial and should be precluded from introduction into evidence pursuant to FRE 401 and 402.
3. The Defendant objects to Government Exhibit #916 and #917, an excerpt from January 7, 2021 group chat with Niemela sending Flynn gematria post, and submits that these exhibits

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA * * V.
 * Case No. 1:21-CR-623-2 (CRC) * KIRSTYN NIEMELA * * DEFENDANT'S SUPPLEMENTAL OBJECTIONS TO
 GOVERNMENT'S TRIAL EXHIBITS NOW COMES the Defendant, Kirstyn Niemela, by and through counsel,
 Richard Monteith and Paul Garrity, and submits the following supplemental objections to the Government's
 Exhibit List that was submitted to this Court on January 2, 2023. In support thereof, Ms. Niemela states as
 follows: 1. The Defendant objects to Government Exhibit #914, an excerpt from a January 7, 2021 group chat
 regarding Trump in control, and submits that this exhibit is irrelevant, vague, and prejudicial and should be
 precluded from introduction into evidence pursuant to FRE 401 and 402. 2. The Defendant objects to
 Government Exhibit #915, which consists of a group chat certifying at 1:00 p.m. and treason, and submits that
 this exhibit is irrelevant, vague, and prejudicial and should be precluded from introduction into evidence pursuant
 to FRE 401 and 402. 3. The Defendant objects to Government Exhibit #916 and #917, an excerpt from January
 7, 2021 group chat regarding Speaker Pelosi being detained and new government in place, and
 submits that this exhibit is irrelevant, vague, and prejudicial and should be precluded from
 introduction into evidence pursuant to FRE 401 and 402. 4. The Defendant objects to Government Exhibit #921, an excerpt from a January 7, 2021 group chat regarding
 Speaker Pelosi being detained and new government in place, and submits that this exhibit is irrelevant, vague,
 and prejudicial and should be precluded from introduction into evidence pursuant to FRE 401 and 402. 5. The
 Defendant objects to Government Exhibit #922 and #923, excerpts and posts sent by the Defendant regarding
 "Corporation of America", and submits that these exhibits are irrelevant, vague, and prejudicial and should be
 precluded from introduction into evidence pursuant to FRE 401 and 402. 6. The Defendant objects to
 Government Exhibit #924 and #925, excerpts from a January 13, 2021 group chat regarding "First Arrests Will
 Shock The World", and submits that these exhibits are irrelevant, vague, and prejudicial and should be precluded
 from introduction into evidence pursuant to FRE 401 and 402. 7. The Defendant objects to Government Exhibit
 #926 and #927, a post from January 13, 2021 sent by Niemela regarding "Three Options If Something Doesn't
 Happen", and submits that these exhibits are irrelevant, vague, and prejudicial and should be precluded from
 introduction into evidence pursuant to FRE 401 and 402. WHEREFORE, the Defendant, Kirstyn Niemela,
 respectfully requests that this Honorable Court: A) Uphold her objections and preclude the Government from
 introducing the above-referenced exhibits. B) Order such other relief as may be just and proper. Respectfully
 submitted, Kirstyn Niemela, By her Attorneys, Date: January 12, 2023 /s/ Paul J. Garrity Paul J. Garrity, Bar No.
 905 14 Londonderry Road Londonderry, NH 03053 603-434-4106 garritylaw@myfairpoint.net /s/ Richard F.
 Monteith Richard Monteith, Bar No. 9352 14 Londonderry Road Londonderry, NH 03053 603-437-2733
 monteithlaw@aol.com CERTIFICATE OF SERVICE I, Richard F. Monteith and Paul J. Garrity, herein certify that
 on this 12th day of January, 2023, a copy of the within was e-filed for all parties involved and mailed, postage
 pre-paid to Kirstyn Niemela, Date: January 12, 2023 /s/ Paul J. Garrity Paul J. Garrity /s/ Richard F. Monteith
 Richard Monteith

exhibits are irrelevant, vague, and prejudicial and should be precluded from introduction
 into evidence pursuant to FRE 401 and 402.

7. The Defendant objects to Government Exhibit #926 and #927, a post from January 13,
 2021 sent by Niemela regarding "Three Options If Something Doesn't Happen", and
 submits that these exhibits are irrelevant, vague, and prejudicial and should be precluded
 from introduction into evidence pursuant to FRE 401 and 402.

WHEREFORE, the Defendant, Kirstyn Niemela, respectfully requests that this Honorable Court:

- A) Uphold her objections and preclude the Government from introducing the above-
 referenced exhibits.
- B) Order such other relief as may be just and proper.

Respectfully submitted
Kirstyn Niemela,
By her Attorneys,

Date: January 12, 2023

/s/ Paul J. Garrity

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CERTIFICATE OF SERVICE

I, Richard F. Monteith and Paul J. Garrity, herein certify that on this 12th day of January, 2023, a copy of the within was e-filed for all parties involved and mailed, postage pre-paid, to Kirstyn Niemela.

Date: January 12, 2023

/s/ Paul J. Garrity

Paul J. Garrity

/s/ Richard F. Monteith

Richard Monteith