

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA,

Plaintiff

vs.

No. 3:21-cr-00087 (VAB)

DENNIS A. BRADLEY, JR.

Defendant

**DEFENDANT DENNIS BRADLEY’S MOTION FOR CURATIVE RELIEF
REGARDING PREJUDICIAL MEDIA PUBLICATION AND TO ADMIT COMPLETE
TEXT-MESSAGE EXHIBIT PURSUANT TO FEDERAL RULE OF EVIDENCE 106**

Defendant Dennis A. Bradley, Jr., through undersigned counsel, respectfully moves this Court for immediate curative relief in response to the highly prejudicial publication of an article titled “Subpoena: Why I Testified In The Bradley Election-Fraud Trial” on the Only In Bridgeport website (onlyinbridgeport.com) on March 24, 2026—the very day government witness Leonard “Lennie” Grimaldi testified under subpoena in this trial. The article discusses Mr. Grimaldi’s testimony in detail, quotes government-introduced evidence, and selectively characterizes the January 2021 text-message exchange between Mr. Grimaldi and Mr. Bradley as a “testy” exchange that defense counsel “falsely conflated” as a threat—providing only a partial, misleading characterization. This one-sided portrayal creates a substantial risk that jurors in the New Haven venire will be exposed to extrinsic, prejudicial material.

As a narrowly tailored curative measure, the defense requests that the Court (1) admit the complete, unredacted January 2021 text-message thread (attached hereto as Exhibit B and to be marked as Defense Exhibit 838 as a full defense exhibit under Federal Rule of Evidence 106

(Rule of Completeness), and (2) issue a strong curative instruction directing the jury to disregard all media coverage of the trial, including this article.

I. Factual Background

1. On March 24, 2026, the government called Mr. Grimaldi—who authors the widely read local political blog Only In Bridgeport—to testify under subpoena. During cross-examination, defense counsel referenced and elicited testimony concerning a specific January 2021 text-message exchange between Mr. Grimaldi and Mr. Bradley (post-dating the 2018 campaign events charged in the Superseding Indictment by approximately three years).
2. Later the same day, Mr. Grimaldi published the article at issue. It:
 - a. recounts his subpoenaed testimony in detail;
 - b. quotes the February 28, 2018 Only In Bridgeport blog post (“Book It: Dennis Bradley’s Ides of March State Senate Moment”) that the government previously sought to introduce (see Gov’t Opp. to Martinez Mot. in Limine to Exclude Blog Post, ECF No. 83 (May 20, 2022); Martinez Mot. in Limine, ECF No. 68 (May 16, 2022)); and
 - c. describes the January 2021 texts as “testy” while asserting that defense counsel “falsely conflated” them as a threat—providing only a partial, misleading characterization.
3. Only In Bridgeport has become highly influential to this jury because of the government’s focus on this article and its repeated attempts in front of the jury to introduce this article and discuss its content. Mr. Grimaldi has a prior federal conviction (2001 racketeering conspiracy and false tax return), a fact the defense highlighted in

pretrial motions in limine. The article's same-day publication heightens the risk of juror exposure.

4. The full text-message thread (Exhibit B) reveals the following most problematic statements by Mr. Grimaldi that directly undercut his article's one-sided narrative:
 - a. "Ok. Have it your way. Watch now what this old guy can do." (Page 1 of Grimaldi Texts.pdf);
 - b. "I don't need you you for a fucking thing. Nothing ever" (Page 1 of Grimaldi Texts.pdf);
 - c. "Especially the position you're in with the federal government" (Page 1of Grimaldi Texts.pdf);
 - d. "Dennis. Don't get into a public fight with me. You'll lose" (Page 2 of Grimaldi Texts.pdf);
 - e. "Ok. It's your ass" (Page 2 of Grimaldi Texts.pdf).

These statements, when read in full context alongside the remainder of the exchange (including Mr. Grimaldi's later apology: "Sorry for my petulant rant. Need to take my meds more regularly!" on Page 1), demonstrate that the exchange was and far more nuanced than the article suggests. Admission of the complete thread is essential to prevent the jury from being misled by Mr. Grimaldi's selective public characterization of evidence that was elicited during his live testimony.

II. Legal Authority

Trial courts have broad authority—and an affirmative duty—to protect a defendant's Sixth Amendment right to a fair trial when prejudicial extra-judicial material reaches the jury pool. *Sheppard v. Maxwell*, 384 U.S. 333, 362-63 (1966) (courts must take steps to insulate jurors from prejudicial publicity); *see also* Fed. R. Evid. 403 (balancing probative value against unfair prejudice, confusion, or misleading the jury); Fed. R. Crim. P. 24 and the Court's inherent supervisory authority.

The article's timing, content, and selective narrative constitute classic prejudicial extrinsic influence that cannot be ignored.

III. Proposed Curative Relief: Admission of the Complete Text Messages Under FRE 106

The least disruptive and most effective remedy is to admit the full, unredacted January 2021 text-message thread so the jury can evaluate the exchange in its complete context rather than the partial, misleading version implied by the article and any limited cross-examination excerpts.

Federal Rule of Evidence 106 expressly authorizes this:

“When a writing or recorded statement or part thereof is introduced by a party, an adverse party may require the introduction, at that time, of any other part or any other writing or recorded statement which ought in fairness to be considered contemporaneously with it.”

Admission of the complete exhibit will:

- cure the prejudice created by the article's selective narrative;
- prevent juror speculation about “missing” context; and
- avoid more drastic remedies (e.g., mistrial or extensive individual voir dire).

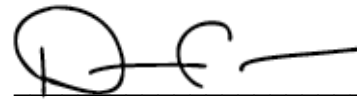
IV. Requested Relief

Defendant respectfully requests that the Court:

- A. GRANT this motion and admit the complete January 2021 text-message exchange between Lennie Grimaldi and Dennis Bradley as a full defense exhibit under FRE 106;
- B. ISSUE the following curative instruction (or one substantially similar) to the jury: “You must decide this case solely on the evidence presented in this courtroom. You are prohibited from reading, watching, listening to, or discussing any media coverage of this

trial, including any articles on Only In Bridgeport or any other website, blog, or social media. Any such material is not evidence and must be disregarded entirely.”

Respectfully submitted by:

A handwritten signature in black ink, appearing to read "D. Crosland", written over a horizontal line.

Darnell D. Crosland, Esq.

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Dated: March 24, 2026

DEFENDANT's COUNSEL

CERTIFICATION

I HEREBY CERTIFY that on March 24, 2026, a copy of the foregoing motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Respectfully submitted by:

A handwritten signature in black ink, appearing to read "D. Crosland", written over a horizontal line.

Darnell D. Crosland, Esq.

CROSLANDLAWGROUP LLC