

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

UNITED STATES OF AMERICA	:	Case No. 21-CR-206 (EGS)
	:	
	:	
v.	:	
	:	
JONATHAN GENNARO MELLIS,	:	
	:	
Defendant.	:	

NOTICE OF FILING

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully gives notice that undersigned counsel for the government has provided counsel for the defendant discovery in the above-mentioned case as outlined in the government’s attached discovery letter dated April 28, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar No. 415793

By: /s/ Emory V. Cole
EMORY V. COLE
Assistant United States Attorney
PA. Bar Number 49136
555 Fourth Street, N.W.
Washington, D.C. 20530
(202) 252-7692
Emory.Cole@usdoj.gov

CERTIFICATE OF SERVICE

On April 28, 2021, a copy of the foregoing notice and attached discovery letter were served on defendant's counsel through the Court's Electronic Filing System with the listed attachments provided to counsel through the means described in the discovery letter.

/s/ Emory V. Cole
Emory V. Cole
Assistant United States Attorney



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

April 28, 2021

By Email

Thomas Abbenante
888 17th Street
Suite 1200
Washington, DC 20006
tabbenante@aol.com
Counsel for Defendant

Re: *United States v. Jonathan Gennaro Mellis*
Criminal No.: 21-CR-206 (EGS)

Dear Counsel:

This discovery letter concerns the above-referenced case. Among other things, this letter memorializes ongoing discovery that has been provided to you in the above-referenced matter via email.

I. Discovery

A. Documents and Digital Files:

<i>Platform</i>	<i>Quantity</i>	<i>Description</i>	<i>Production Date</i>
Email	2 videos	<ul style="list-style-type: none"> • Jon_Gennaro_Capitol_Video_5.mp4 • Mellis Assault on USCP Officer.mp4 	2021-04-28
Email	7 pdfs	<ul style="list-style-type: none"> • SIGNED21-mj-224FINALMELLISComplaintREDACTED.pdf • U_Arrest_and_Interview_of_Jonathan_Gennaro_Mellis.pdf • U_Custodial_Debrief_of_Jonathan_MELLIS_on_3_16_2021.pdf • U_Evidence_Entry_-_Arrest_of_MELLIS.pdf • U_Jonathan_Gennaro_Mellis_Complaint_and_Arr 	2021-04-28

		<p>est_Warrant.pdf</p> <ul style="list-style-type: none">• U_Search_executed_at_234_Robertson_St._Williamsburg_VA_23185.pdf• U_Video_Evidence_of_Jonathan_Gennaro_MELLIS_at_U.S._Capitol_assaults.pdf	
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Please be advised that we anticipate providing additional discovery in this case.

B. Government's Discovery Requests

The government hereby makes a reverse discovery request pursuant to Fed. R. Crim. P. 16(b), including, but not limited to the following:

- (1) notice of documents and tangible objects the defendant expects to introduce;
- (2) a Jencks request for all prior statements of any defense witness (excluding the defendant);
- (3) a Lewis request (for which we request the name, date of birth, sex, and social security number of each defense witness prior to trial); and
- (4) a request for information pertaining to any expert or scientific testimony or evidence.

Pursuant to Fed. R. Crim. P. 16, we note our continuing request to receive any material pursuant to Rule 16(b) as the case proceeds.

II. Contact Information

If you have any questions about the information provided above, you may contact me by telephone, fax, or mail; as provided below.

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Respectfully,

CHANNING D. PHILLIPS
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By: /s/ Emory V. Cole
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Assistant United States Attorney