

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

UNITED STATES,)	
)	
v.)	Crim. No. 21cr268
)	Hon. Carl J. Nichols
JEFFREY McKELLOP,)	
Defendant.)	

**DEFENDANT’S REPLY TO GOVERNMENT’S OPPOSITION TO HIS
SECOND EMERGENCY MOTION FOR RELIEF**

Comes now Defendant Jeffrey McKellop, by counsel, and replies to the Government’s Opposition (Doc 120) as follows.

The Government fails to persuade with its lengthy recourse to the administrative regulations and procedures providing the pretext for the D.C. Jail’s chronic mistreatment of Defendant. Occasional verbal outbursts born of his understandable frustration with the immutable conduct of his jailors, do not justify solitary confinement – whatever name it is given. Nor do a group of staff demanding his signature without explanation connote justification for reporting his “refusal” of dental treatment.

Undersigned has generated no “documented report” of a “huge toll on McKellop psychologically.” Government Opposition at 4-5.

Defendant continues to suffer a festering tooth (or rather, part of a festering tooth – the molar in question has fractured – undersigned has the portion that fell out of Defendant’s mouth) after the Court ordered emergency treatment of the abscess.

Competing hearsay narratives will not illuminate Defendant’s circumstances or the reasons therefore. The Warden and any staff who participated in Defendant’s removal to The

Hole need to account for their actions in open court. Further ,Inmate Timothy hale-Cusanelli needs to be on hand to report precisely the events for which Defendant is being punished.

Respectfully submitted,

JEFFREY McKELLOP
By Counsel

/s/
John C. Kiyonaga

600 Cameron Street
Alexandria, Virginia 22314
Telephone: (703) 739-0009
Facsimile: (703) 340-1642
E-mail: john@johnckiyonagaa.com

Counsel for the Defendant

Certificate of Electronic Service

I hereby certify that on October 20, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties.

/s/
John C. Kiyonaga