

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

_____)	
UNITED STATES,)	
)	
v.)	Crim. No. 21cr268-CJN
)	
JEFFREY MCKELLOP,)	
Defendant.)	
_____)	

**DEFENDANT’S REPLY TO GOVERNMENT OPPOSITION TO
MOTION FOR PRETRIAL RELEASE**

Defendant Jeffrey McKellop, by counsel, hereby replies to the Government’s Opposition (Doc 132, “Opp”) to his Motion for Pretrial Release(Doc 125).

Without specifying the alleged misconduct or providing a single sheet of supporting documentation, the government blithely maintains that the denial of the discovery to which Defendant is constitutionally entitled, is justified as punishment by the jail for his own conduct (Opp 3). The jail has constitutional measures at its disposal should the need to impose discipline, in fact, arise.

According to the government, the jail’s unexplained seizure of counsel provided discovery is permissible because it was returned a year later (Opp at 3).

Defendant’s right to participate in his own defense cannot be honored by restricting his discovery review to counsel visits – particularly when discovery runs to 3.86M files (see Doc 131) and Defendant’s ability to appreciate the pertinence of particular components of this discovery is uniquely informed by his presence at the day’s events.

