

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.	)	
_____	)	

**ADDENDUM TO SECOND MOTION FOR  
RECONSIDERATION OF PRE TRIAL RELEASE**

Comes now Defendant Jeffrey McKellop, by counsel, and augments his Second Motion for Reconsideration of Pretrial Release (Doc 125).

The government in its Opposition (Doc 132) noted that Defendant’s cell was searched last summer pursuant to an investigation of Defendant for possible Contempt. Defendant has not been charged with any crime consequent to the investigation. During the search, federal agents seized some 70 documents largely comprising notes generated by Defendant consequent to his review of discovery. These notes, seized over six months ago and produced for the specific purpose of assisting in his own defense, have yet to be returned.

The repeated measures by which the jail staff has prevented Defendant’s access to his own discovery have precluded his replicating the seized notes. These measures have not only rendered impossible any reasonable semblance of assisting in the preparation of his trial defense, they have materially diminished Defendant’s ability meaningfully to treat with the government regarding any resolution of this case by agreement. Deprived of the benefit of his counsel’s review of his notes, Defendant was unable today to meet a deadline imposed by the government in the parties’ discussions.

Respectfully submitted,

JEFFREY McKELLOP

By Counsel

/s/

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Certificate of Electronic Service

I hereby certify that on December 22, 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