

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 21-206(EMS)
 :
 JONATHAN MELLIS :
 :
 Defendant :

MOTION FOR TEMPORARY RELEASE

Comes Now, Defendant, Jonathan Mellis, by and thru counsel, Thomas Abbenante, who respectfully requests that this Honorable Court release the defendant from custody for one week to allow the defendant to attend the funeral services for his father, who passed away suddenly on May 17, 2021. As grounds, defendant submits the following information.

1. Defendant is before this Court charged with alleged crimes arising out of the storming of the Capitol on January 6, 2021. The officer that was the alleged victim of the assault was not seriously injured. The defendant has remained incarcerated since his arrest and has been a model prisoner at the Central Treatment Center. The defendant is awaiting a plea offer from the government to determine if this matter can be resolved prior to trial.

2. On May 17, 2021 the defendant’s father, Gennaro “Jerry” Mellis passed away suddenly. Attached with this motion is a letter from the local funeral home detailing the schedule for the services. Defendant requests that he be released

on Saturday or Sunday, May 22nd or 23rd, to attend the services for his father and return to custody, May 29th, 2021. He will reside with his mother , Donna Mellis, at 234 Robertson Street, Williamsburg, Virginia 23185. He will abide by a 9:00 p.m. curfew and his sister, Jennifer Mellis has agreed that she will notify the Court immediately if Mr. Mellis violates any of these conditions. He will be transported to and from the Jail by a responsible local real estate agent Kelly Wilde who resides in McLean, Virginia.

WHEREFORE, the foregoing premises considered, defendant prays that this motion be granted.

Respectfully submitted,

_____/s/_____
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May 19, 2021

To whom it may concern:

Gennaro "Jerry" Mellis passed away on May 17, 2021. The Mellis family has entrusted Nelsen Funeral Home & Crematory with handling his funeral arrangements.

Arrangements have been scheduled as follows:

The visitation will be held at Nelsen Funeral Home, 3785 Strawberry Plains Rd., Williamsburg, VA 23188 from 2:00 – 4:00 PM and 7:00 – 9:00 PM on Tuesday, May 25, 2021.

The funeral service will be held at St. Bede Catholic Church, 3686 Ironbound Rd., Williamsburg, VA 23188 on Wednesday, May 26, 2021 at 12:00 PM.

An interment date is still pending, and will be scheduled by St. Bede Catholic Church.

If you need any further information, please do not hesitate to reach out to us at 757-565-1141 or via email at williamsburg@nelsencares.com.

Regards,

A handwritten signature in black ink that reads "Elaine Gibavic". The signature is written in a cursive, flowing style.

Elaine Gibavic
Office Manager
Nelsen Funeral Home & Crematory
3785 Strawberry Plains Road
Williamsburg, VA 23188
(757) – 565 – 1141
williamsburg@nelsencares.com

Ashland

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Williamsburg

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