

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

<p>UNITED STATES</p> <p style="text-align: center;">v.</p> <p>JONATHAN MELLIS Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Criminal No. 21-cr-206-1 (EGS)</p>
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**DEFENDANT’S SUPPLEMENT TO MOTION TO
RECONSIDER PRETRIAL DETENTION**

Defendant Jonathan Mellis, by and through undersigned counsel, respectfully supplements his motion to reconsider his release from detention.

Other Similarly Situated Defendants

In *United States v. Matthew Beddingfield*,¹ the defendant was released into the custody of a third-party custodian over the government’s objection. Mr. Beddingfield’s criminal history is far more serious than that of Mr. Mellis. As well, the conduct alleged to have been committed by Mr. Beddingfield on January 6, 2021 is more serious than that with which Mr. Mellis has been accused.

As of January 6, 2021, Mr. Beddingfield was released on bail in Johnston County, North Carolina. At the time he was charged with attempted murder for shooting a 17-year-old young man in December 2019. One of his conditions of release was a curfew from 6:00 PM – 6:00

¹ 1:22-cr-0066-CJN-1

AM.² Mr. Beddingfield subsequently pled guilty to felonious assault with a deadly weapon with intent to kill or inflicting serious injury and received a sentence of twenty-four months of probation.³ On January 28, 2022, less than two weeks before his arrest in his U.S. District Court matter, Mr. Beddingfield was arrested on allegations of reckless driving – driving approximately 110 m.p.h. on a highway where the posted speed limit was 65 m.p.h. *Id.*

On January 6, 2021, apparently in violation of his curfew, Mr. Beddingfield had traveled to Washington, DC from North Carolina. At 12:57 PM, he jumped a barricade on the West Plaza of the Capitol.⁴ At approximately 1:06 PM, he attacked USCP officers, jabbing at them with a metal flagpole he had brought with him. He then made a Nazi salute while facing the Capitol. At about 2:30 PM, Mr. Beddingfield entered the Capitol, attempted to storm the Senate Wing, and appeared to use his flagpole to assault or attempt to assault officers outside the Old Senate Chamber.⁵

Both Mr. Mellis' criminal history and alleged actions on January 6, 2021 are in stark contrast to that of Mr. Beddingfield.

WHEREFORE, Jonathan Mellis respectfully reiterates his request that the Court release him from detention.

² *Id.* at ECF 10 at p. 5, FN1. [Attached as Exhibit 1].

³ *Id.* at p. 5. N.C. Gen. Stat. Section 14-32.

⁴ 1:22-cr-0066-CJN-1 at ECF 1, p. 9. [Attached as Exhibit 2].

⁵ *Id.* at p. 26.

Respectfully submitted,

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2022, a copy of the foregoing Supplement was served on all parties via the CM/ECF system.

_____/s/_____
David Benowitz