

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

UNITED STATES v. JONATHAN MELLIS Defendant.)))))))))))	Criminal No. 21-cr-206-1 (EGS)
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**DEFENDANT’S THIRD 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.

Monitoring by a Third-Party Security Company

Counsel has made arrangements with Avigdor Protection Agency, LLC (“Avigdor”) to provide daily in-person monitoring of Mr. Mellis if the Court were to release Mr. Mellis and allow him to live at Kelly Wilde’s address in Nashville, TN. Avigdor was co-founded by Sam Barnes, a retired law enforcement officer who has twenty-six (26) years of experience as a Deputy Sheriff, police officer, and investigator in Tennessee. Avigdor has been contracted to conduct in-person visits of Mr. Mellis by its personnel, which consists of off-duty Tennessee State Troopers, police officers, and other security personnel. Avigdor personnel are required by contract and could of course be Court-ordered to immediately report any violations of release conditions by Mr. Mellis to Pretrial Services and/or the Court.

Mr. Barnes will be available to answer any questions the Court or government may have about this proposal, which counsel submits should assuage any safety concern the Court might have in releasing Mr. Mellis.

Additional Letters In Support of Jonathan Mellis

Counsel has submitted as Attachments G through K additional letters written in support of Mr. Mellis. In particular, retired Sheriff Robert Deeds, who knew Mr. Mellis when he lived in Williamsburg, VA, attests to the lack of danger Mr. Mellis would present if released by the Court. WHEREFORE, Jonathan Mellis respectfully reiterates his request that the Court release him from detention.

Respectfully submitted,

_____/s/
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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of July, 2022, a copy of the foregoing Second Supplement was served on all parties via the CM/ECF system.

_____/s/_____
David Benowitz