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

10 UNITED STATE OF AMERICA,

11 Plaintiff,

12 vs.

13 RONALD MELE,

14 Defendant

Case No.: 1:21-cr-00392 -RCL-6

**DEFENDANT MELE’S MOTION FOR  
APPOINTMENT OF COUNSEL UNDER  
THE CRIMINAL JUSTICE ACT**

15  
16 **DEFENDANT MELE’S MOTION FOR APPOINTMENT OF CJA COUNSEL**

17 TO THE HONORABLE ROYCE LAMBERTH, U.S. DISTRICT JUDGE FOR THE  
18 DISTRICT OF COLUMBIA:

19 Mr. Ronald Mele, through his attorney, Steven C. Bailey, respectfully requests that this  
20 Honorable Court have his current attorney appointed by the Court to represent him pursuant to  
21 the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. In support of the motion, Mr. Mele shows  
22 as follows:  
23

24 1. Undersigned counsel was hired by Mr. Mele in mid-June 2021, to represent him  
25 in the above-mentioned matter. Since that time, Mr. Mele was fired from his well-paying job as  
26 a salesman. Mr. Mele has had multiple issues related to this since this case was brought against  
27 him and is happy to submit an affidavit under seal if the Court requests same. Mr. Mele also has  
28

1 legal fees related to this outside of his criminal case.

2           2.       Furthermore, Mr. Mele, along with multiple other defendants from this case and  
3 several other criminal cases filed in this District Court, was sued civilly in Federal District Court  
4 in the District of Columbia in *Smith, et. al. v. Donald Trump, et. al.*, 21 CV 2265(APM)(filed  
5 August 26, 2021). The *Smith* case was brought by the Lawyers' Committee for Civil Rights  
6 Under Law, a not-for profit partially funded by the Open Society Foundations which is founded  
7 by George Soros. The original complaint was 71 pages, however, an amended complaint was  
8 filed on December 3, 2021 and the complaint is now 79 pages. Mr. Mele has also had to hire me  
9 as his attorney of record in order to represent him in the civil case brought against him.  
10

11           3.       Although this case progressed at a normal rate in the beginning, as far as criminal  
12 discovery is concerned, however, during the months of September, October, November, and  
13 February, the United States ramped up discovery went into overdrive and has produced tens, if  
14 not hundreds of thousands of pages of discovery in this case. *See* ECF No. 81 and 124. With  
15 regard to only these defendants in this case, there have been nine discovery productions by the  
16 United States, most being produced in the months of September and October. Moreover, the  
17 United States has even documented the amount of evidence in this case is voluminous, with not  
18 only the hundreds of thousands of pages in discovery, but also the tens of thousands of  
19 electronic files that have also been produced by the United States, where this case has only been  
20 open for a year and eight months.  
21

22           4.       As the Court can imagine, Mr. Mele has exhausted the funds he has allocated and  
23 saved in order to pay for this case, where he can no longer pay undersigned counsel.  
24

25           5.       As Mr. Mele previously stated in his sealed declaration attached to his Motion  
26 for Permission to Relocate, he was effectively fired from his job within days of the indictment,  
27  
28

1 and although he was able to find new employment during the post-indictment time period,  
2 through a job that pays barely above minimum wage rendering Mr. Mele underemployed.  
3 Moreover, Mr. Mele's relocation has again placed him back on the job market. Therefore, the  
4 minimum wage job has not and will not provide Mr. Mele with the extra funds that he needs to  
5 pay for undersigned counsel. Mr. Mele is now without savings, and without a way to pay for  
6 undersigned counsel.  
7

8         6. Mr. Mele specifically requests the appointment of his current attorney, rather  
9 than appointment of new counsel. Undersigned counsel has represented Mr. Mele for nearly a  
10 year and eight months, essentially through the entirety of this case, plus undersigned counsel is  
11 thoroughly and intimately familiar with the case.  
12

13         7. Additionally, Mr. Bailey is assisted in this case by Amanda Perez who was  
14 recently admitted to the District Court bar and works for the firm of Bailey & Romero Law.  
15

16         8. Furthermore, with the actual trial on the horizon, and several motion hearings  
17 being set in this case for which undersigned counsel must appear for, it is imperative that  
18 undersigned counsel remain on the case.

19         9. Defending this case, organizing and going through the discovery, preparing for  
20 hearings, and filing motions etc. in this case has and will continue to be a monumental task.  
21 Undersigned counsel's associate attorney consulted with counsel (Kira West) for co-defendant  
22 (Mr. Warner) before filing this motion. A financial affidavit has been executed by Mr. Mele and  
23 emailed to Ms. Jenkins, the courtroom deputy.  
24

25         Therefore, Mr. Mele respectfully requests that undersigned counsel be appointed under  
26 the CJA Act to represent him in this case. The continuity of counsel would best serve Mr. Mele.  
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28

1 Undersigned counsel has spent an inordinate amount of time in the case and is at this time in the  
2 best position to continue representing Mr. Mele in this case.

3  
4 Respectfully submitted,

5  
6 Dated: February 9, 2023

7  
8 By: /s/ Steven C. Bailey

9 Steven C. Bailey

10 Attorney for the Defendant

11 RONALD MELE

12 **CERTIFICATE OF SERVICE**

13 I, Steven C. Bailey, hereby certify that on February 9, 2023, I caused a copy of this  
14 Motion for Appointment of Counsel Under the Criminal Justice Act to be delivered to the parties  
15 of record by filing it electronically.

16  
17  
18 /s/ Steven C. Bailey

19 Steven C. Bailey