

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

UNITED STATES OF AMERICA

v.

21-cr-237 (RDM)

MATTHEW KLEIN

RESPONSE TO ORDER OF COURT

Defendant, by and through undersigned counsel, does hereby respond to the Order of this Court as follows:

1. Undersigned counsel has spoken with DaShanta Valentine-Lewis of the District of Columbia Pretrial Services Agency. Ms. Valentine-Lewis informed counsel that she will speak directly with the appropriate Oregon Pretrial Services Agency concerning release conditions for Mr. Klein.

2. Defendant proposes the following release conditions:

- a. No attendance at any political rallies;
- b. No possession of any firearms;
- c. Drug testing as deemed necessary by Pretrial Services Agency;
- d. Electronic monitoring;

- e. No travel outside the United States;
- f. No travel outside Oregon without preapproval of Pretrial Services Agency;
- g. No travel to the District of Columbia;
- h. Reside with parents in Baker City, Oregon

3. Defendant's parents are prepared to act as third-party custodians throughout the duration of the proceedings. Their information is as follows:¹

Nanci Klein
Baker City, Oregon
d/o/b 11/12/1967
Social Security Number xxx-xx-xxxx

Jeffrey Klein
Baker City, Oregon
d/o/b 4/30/1963
Social Security Number xxx-xx-xxxx

- 4. There are no firearms in the house.
- 5. Nanci and Jeffrey Klein will pay for any costs associated with electronic monitoring.

¹ All of this information has been provided to Ms. Valentine-Lewis including complete social security numbers.

6. Nanci and Jeffrey Klein will answer any further inquiry concerning conditions of release that the Court, the Government or Pretrial Services has related their roles as third-party custodians individually or collectively.

Respectfully submitted,

_____/s/_____
Steven R. Kiersh#323329
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Suite 440
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing was served, via the Court's electronic filing system upon all counsel of record on this the 21st day of April 2021.

_____/s/_____
Steven R. Kiersh