

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

UNITED STATES OF AMERICA

v.

21-cr-237 (RDM)

MATTHEW KLEIN

**SUPPLEMENT TO RESPONSE TO ORDER OF COURT
REGARDING THIRD-PARTY CUSTODIANSⁱ**

Defendant, by and through undersigned counsel, does hereby supplement his previously filed Response to Order of Court Concerning Third-Party Custodians. The following is a list of members of the Oregon community who are willing to allow defendant to reside in their home and act as third-party custodians

1 Keira Mitchell, d/o/b 12/31/96 is engaged to defendant's older brother. Ms. Mitchell resides in Heppner, Oregon in a single-family home owned by her grandparents. Mr. Mitchell is employed by the United States Department of Agriculture and has known defendant for two years and communicates with him on a regular basis. Ms. Mitchell has an extra bedroom in her home and her home is wired for a landline so that a dedicated line can be established for electronic monitoring.

Ms. Mitchell is aware of the responsibilities of a third-party custodian. There are no firearms in her home.

2. Donna Thibodeau. Ms. Thibodeau resides in Baker City, Oregon with her husband. She has known defendant his entire life. Ms. Thibodeau is now retired but previously worked for Baker City, Oregon in numerous capacities and directly for the County Planning Commissioner.

Ms. Baker is married to Albert Thibodeau who is a retired corrections officer. Mr. Thibodeau has known defendant for entire life.

The Thibodeaus reside in a single-family home in Baker City and have an extra bedroom where defendant can reside. They understand the responsibilities of a third-party custodian and are prepared to fulfill the responsibilities.

Neither of the Thibodeaus have a criminal conviction. Mr. Thibodeau lawfully owns a firearm but it is kept in a locked safe. Defendant will not have any access to the firearm.

3. Rebecca and Adam Bernosky of Corvallis, Oregon are related to defendant and have known him his entire life. Ms. Bernosky is a part-time caretaker and Adam Bernosky is an engineer employed with Hewlett-Packard. The Bernoskys have no criminal convictions and have a separate room in their single-family home where defendant can reside. They

understand the responsibilities of being a third-party custodian and are prepared to fulfill any responsibilities that may be imposed upon them.

Mr. Bernosky owns a firearm for which he has a duly authorized permit. The firearm is maintained in a locked box and defendant will not have any access to the firearm. Mr. Bernosky has been employed at Hewlett-Packard for the past 28 years and has informed counsel he will remove the firearm from the home if need be.

Each of the individuals identified herein will make themselves available to answer any additional inquiries from the Court, Counsel or Pretrial Services.

Respectfully submitted,

_____/s/_____
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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 26th day of April 2021.

_____/s/_____
Steven R. Kiersh

ⁱ Specific identifying information regarding addresses, and social security numbers can be provided to the Court, Counsel and Pretrial Services under seal upon request.