

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

UNITED STATES OF AMERICA

v.

21-cr-237 (RDM)

MATTHEW KLEIN

**RENEWED MOTION FOR INSTITUTION
OF CONDITIONS OF PRETRIAL RELEASE**

Defendant, by and through undersigned counsel, respectfully renews his previously filed Motion for Institution of Conditions of Pretrial Release. In support thereof, defendant sets forth as follows:

1. Defendant hereby incorporates by reference his entire previously filed Motion for Institution of Conditions of Release Pending Trial and makes it a part hereof.

2. On May 5, 2021, this Court denied defendant's Motion for Institution of Conditions of Release Pending Trial without prejudice seeking additional information related to third-party custodians. The Court did not deem defendant's mother to be an appropriate third-party custodian.

3. D.C. Pretrial Services Agency, Ms. DaShanta Valentine-Lewis, was provided with the name of Donna Thibodeau as an alternative third-party

custodian. Ms. Thibodeau was interviewed by Ms. Valentine-Lewis who informed counsel, "I spoke to Ms. Donna Thibodeau and she has been screened and found eligible to be the defendant's third-party custodian. Ms. Thiodeau(sic) did indicate that she has firearms in her residence, and could move them if the defendant is released."

4. Ms. Thibodeau is retired from the Baker County, Oregon government. She resides with her husband at 3505 Auburn Avenue, Baker City, Oregon, 97814. Her husband Albert Thibodeau is employed as a guard at the Powder River Corrections Facility. They reside in a single-family home and have a bedroom available for use by defendant. They have no prior criminal convictions.

5., Defendant has previously provided a list of proposed conditions for him to abide by as part of release pending trial.

WHEREFORE, the foregoing considered, defendant prays this Honorable Court allow him to be released pending trial into the third-party custody of Donna Thibodeau

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 10th day of May, 2021.

_____/s/_____
Steven R. Kiersh