

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

UNITED STATES OF AMERICA,)
)
 v.)
)
 MATTHEW KLEIN,)
)
 _____ Defendant.)

No. 1:21cr237-RDM

MOTION TO PERMIT TRAVEL

Matthew Klein, through counsel, respectfully moves this Court to allow him to travel to North Plains, Oregon, from July 30 to August 1, 2021, while in the custody of his third-party custodian and subject to location monitoring. The purpose of the requested travel is for Mr. Klein to attend the wedding of his brother, William.¹ In support of this motion, Mr. Klein states as follows:

1. On May 13, 2021, this Court entered an order setting the conditions of pretrial release. ECF 38. The Court placed Mr. Klein on home confinement in the custody of his aunt, Donna Thibodeau, with location monitoring, limitations on travel, and other restrictions;

2. Since his release, Mr. Klein has been fully compliant with the conditions imposed by the Court;

3. Mr. Klein now seeks permission to travel to his brother's wedding in North Plains, Oregon, on July 30, 2021. Mr. Klein's brother, William, who has no involvement in this case, has asked Mr. Klein to be the best man at his wedding;

¹ William Klein has no involvement in this case.

4. Mr. Klein asks this Court to allow him to travel to the wedding with his third-party custodian, Ms. Thibodeau. Ms. Thibodeau is the photographer for her nephew's wedding, and must travel to North Plains on July 30. North Plains is more than a five hour drive from Baker City—longer in a mobile home—and is therefore too far away to travel to and return on the day of the wedding;

5. Ms. Thibodeau will travel to North Plains in her mobile home, where Mr. Klein would stay with her if permitted to travel. Mr. Klein would remain in the custody of Ms. Thibodeau for the duration of the trip;

6. Undersigned counsel has reached out to Mr. Nick Nischik, Mr. Klein's supervising pretrial officer in the District of Oregon, regarding this request. Mr. Nischik indicated that he was not able to agree to Mr. Klein's request given that the current conditions of release place Mr. Klein on home confinement with no exceptions for the type of travel requested. Mr. Nischik noted, however, that Mr. Klein has been fully compliant with the conditions of release;

7. Undersigned counsel also spoke with AUSA Veatch regarding this request. AUSA Veatch stated that the government does not oppose this travel request, provided that Mr. Klein remains on GPS monitoring and agrees to abide by all conditions imposed by Court and Pretrial Services with respect to the travel.

WHEREFORE, Mr. Klein respectfully asks this Court to permit him to travel to North Plains, Oregon, from July 31 to August 1, 2021, in the custody of his third party custodian and subject to location monitoring, to attend his brother's wedding.

Respectfully Submitted,

By: /s/ Eugene V. Gorokhov

Eugene Gorokhov, DC Bar No. 979785

Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document via ECF and a copy will be automatically sent to the AUSA of record.

By: /s/ Eugene V. Gorokhov
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ORDER

This matter comes before the Court on Matthew Klein's motion to travel to North Plains, Oregon, from July 30 to August 1 to attend his brother's wedding. Having considered the matter, the motion is GRANTED and it is hereby

ORDERED that Mr. Klein is permitted to travel to North Plains, Oregon from July 30 to August 1, 2021;

It is further ORDERED that Mr. Klein shall remain in the custody of his third party custodian, Donna Thibodeau, for the duration of the approved travel;

It is further ORDERED that Mr. Klein shall remain subject to location monitoring for the duration for the approved travel;

It is further ORDERED that all other conditions of pretrial release shall remain in effect.

So ORDERED on _____.

United States District Court Judge
Washington, DC