

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 1:21-CR-00237-RDM-2
 :
 MATTHEW LELAND KLEIN, :
 :
 Defendant. :

**GOVERNMENT’S RESPONSE TO DEFENDANT’S
MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

The United States of America respectfully submits its Response to Defendant Matthew Klein’s Motion to Modify Conditions of Pretrial Release, (Dkt. 89), and states as follows:

1. Defendant’s motion seeks to modify the conditions of his pretrial release by:
 - a. Substituting defendant’s home detention with a condition requiring a curfew;
 - b. Eliminating the requirement that defendant’s third-party custodian file a weekly report with the Court; and
 - c. Modifying the restrictions on defendant’s internet usage.
2. On or about September 8, 2021, the Pretrial Services Agency issued a Status Report, (Dkt. 92), in which it advised that it had no objection to defendant’s first two requests, described in paragraphs 1(a) and (b), respectively, but recommended that defendant’s internet restrictions remain in place. *See* Dkt. 92 at 2.
3. The government concurs with the Pretrial Services Agency as to defendant’s requests in paragraph 1(a) and (b) and has no objection to defendant’s proposed modifications as to those conditions.
4. The government defers to the Pretrial Services Agency’s position that defendant’s

internet restrictions remain in place.

5. The government would likely support modifications to defendant's internet restrictions to the extent the Pretrial Services Agency is comfortable with such modifications.

Respectfully submitted,

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