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June 14, 2021

Via ECF

The Honorable Christopher R. Cooper
United States District Court, District of Columbia
333 Constitution Avenue N.W.
Washington, D.C. 20001

Re: *United States v. Richard Barnett*, 1:21-cr-00038-CRC

Your Honor:

This office represents Richard Barnett in the above-referenced matter. Mr. Barnett is currently on home detention with location monitoring supervised by Pretrial Services. We write to respectfully request changes to Mr. Barnett's release conditions.

As your Honor is aware, Mr. Barnett was detained for several months in between January 8, 2021 and April 27, 2021. During that time Mr. Barnett was terminated from his career position as a window salesman, which was his primary source of his income. Mr. Barnett's second job of buying and selling classic cars is now his primary source of income. Consequently, his ability to travel for work is crucial to his ability to pay his bills, provide for his family, and fund his legal defense.

Under the current conditions, Mr. Barnett is currently prohibited from traveling more than 50 (fifty) miles absent the Court's permission. While this is practical from someone who lives in an urban or suburban area, it is not practical for Mr. Barnett because he lives in rural Arkansas and work frequently requires him to travel more than 50 miles from his home to buy inventory that he must inspect, appraise, negotiate, and purchase in person. Because of this, we are respectfully asking that Mr. Barnett's travel restriction be modified so that pretrial services can grant or deny work related travel requests, and shield the details of said requests from the prying eyes of the public.

Rachel Roisen, Mr. Barnett's pretrial services officer, is aware of Mr. Barnett's need to travel more than fifty miles for work on a regular basis, as such, Officer Roisen supports this modification request. I can also represent to this Court that Officer Rosien has informed me that Mr. Barnett is in good standing with the conditions of his release and continues to comply with said conditions.

We contacted AUSA Dohrmann regarding these requests several days ago and have not received a response, as such, we are unable to inform the court as to AUSA Dohrmann's position regarding the aforementioned matters.

Lastly, on June 18, 2021, Mr. Barnett needs to travel for a work-related matter that is approximately 215 miles from his home. Because of this, we are asking the Court to allow Mr. Barnett to travel to said destination, spend the night of Friday, June 18, 2021 in a nearby location, and head back to his home on the evening of Saturday, June 19, 2021. This allows Mr. Barnett to get two full days of work at a travel show that is crucial to his ability to provide for both his family and legal defense. Again, Pretrial Officer Roisen supports this specific request.

For the reasons stated above, especially because Mr. Barnett's need to travel over 50 miles is going to be regular and necessary, we respectfully submit that pretrial services is best equipped to address Mr. Barnett's work-related travel needs going forward. As such, it is our sincerest hope that your Honor will grant this request.

I thank you for your attention and your kind courtesies regarding these requests.

Respectfully submitted,

Joseph D. McBride, Esq. /s/

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