

**Michelle Sweet, OSB No. 060015**  
**Assistant Federal Public Defender**  
**101 S.W. Main, Suite 1700**  
**Portland, OR 97204**  
**Tel: (503) 326-2123**  
**Fax: (503) 326-5524**  
**Email: michelle\_sweet@fd.org**

**Attorney for Defendant**

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

**UNITED STATES OF AMERICA,**

**Case No. 1:21-cr-00237-RDM-1**

**Plaintiff,**

**UNOPPOSED MOTION TO PERMIT**  
**TRAVEL**

**vs.**

**JONATHANPETER ALLEN KLEIN,**

**Defendant.**

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Johnathanpeter Klein, through counsel, respectfully moves this Court for permission to travel overnight from Pendleton, Oregon to the Hillsboro/Portland, Oregon area from February 27, 2022 to February 28, 2022. Mr. Klein will return to Pendleton, Oregon February 28, 2022. Mr. Klein makes this request in order to meet in person with undersigned counsel. Mr. Klein would remain subject to location monitoring and all previously ordered release conditions (CR 41), except we do request that the third-party custodian requirement be suspended during the travel. Additional details have been provided to Pretrial Services in Portland, Oregon and in Washington

D.C., and to the Government. Pretrial services in Portland, Oregon and in Washington D.C. have no objections to this overnight travel request, and the Government does not oppose this motion.

Since his release to the custody of his third-party custodian on May 19, 2021, Mr. Klein has remained in general compliance with the conditions of his pretrial release. He is employed full-time. He also contributes to his third-party custodian's household by taking on home improvement projects. Additionally, he is actively involved in his local faith community.

### **CONCLUSION**

For the reasons stated above, Mr. Klein requests permission to temporarily travel overnight within the District of Oregon, from February 27, 2022 to February 28, 2022, and suspend transfer third-party custody during that time to allow travel from Pendleton, Oregon to Hillsboro/ Portland, Oregon to meet in person with undersigned counsel.

RESPECTFULLY SUBMITTED this 23rd day of February 2022.

*/s/ Michelle Sweet*

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Michelle Sweet

Attorney for Defendant