

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.

Johnathanpeter Klein, through counsel, respectfully moves this Court for permission to travel from Pendleton, Oregon to Baker City, Oregon from May 6, 2022 to May 8, 2022. Mr. Klein will return to Pendleton, Oregon May 8, 2022. Mr. Klein makes this request in order to visit family. 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 this period. In addition, Mr. Klein also understands that, to the extent that he is in proximity to his brother, Matthew Klein, his co-defendant during this visit, that he will not engage in any discussions of any kind regarding the events of January 6, 2021 or these proceedings with him.

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 has no objection to this 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 within the District of Oregon, from May 6, 2022 to May 8, 2022, and suspend transfer third-party custody during that time to allow travel from Pendleton, Oregon to Baker City, Oregon to visit his parents for Mother's Day.

RESPECTFULLY SUBMITTED this 28th day of April 2022.

/s/ Michelle Sweet

Michelle Sweet

Attorney for Defendant