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**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,**

**vs.**

**UNOPPOSED MOTION TO MODIFY**  
**CONDITIONS OF RELEASE**

**JONATHANPETER ALLEN KLEIN,**

**Defendant.**

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Johnathanpeter Klein, through counsel, respectfully moves this Court for an order modifying the conditions of release. Mr. Klein requests the removal of the third-party custodian requirement, the removal of the curfew requirement, and the removal of the no contact order with Mr. Matthew Klein. In addition, Mr. Klein requests to move from Pendleton, Oregon to Baker City, Oregon. Undersigned counsel conferred with the government, and through Assistant United States Attorney Christopher Veatch, it does not oppose these requests. Pretrial services is aware of the requests and remains neutral and defers to the Court.

Mr. Klein currently lives in Pendleton, Oregon with family friends. He requests to move to a family home in Baker City, Oregon where he has a better employment opportunity. Mr. Klein

has been on pretrial release since May 19, 2021 and he has remained in compliance. He has been employed and he has contributed to his third-party custodian's household.

The government attorney, AUSA Christopher Veatch does not oppose lifting the no contact order between Jonathanpeter Klein and Matthew Klein and does not object to modification to the removal of third-party custodian. This will allow Mr. Jonathanpeter Klein to move from Pendleton, Oregon to Baker City, Oregon to reside in his family's vacant home and have a better employment opportunity. In addition, the government does not object to removing the curfew schedule from Mr. Klein's location monitor condition. With the removal of the curfew schedule, Mr. Klein will remain on GPS location monitoring, but it will be considered "stand alone monitoring." He would remain subject to any location or travel restrictions as imposed by the Court.

In conclusion, Mr. Klein requests that the Court order that Mr. Klein: be permitted to move from Pendleton, Oregon to Baker City, Oregon; is no longer subject to the third-party custodian requirement; is no longer subject to the curfew requirement; and can have contact with Mr. Matthew Klein.

RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of August 2022.

*/s/ Michelle Sweet*

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Michelle Sweet  
Attorney for Defendant