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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHANPETER ALLEN KLEIN,

Defendant.

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

UNOPPOSED MOTION TO MODIFY
CONDITIONS OF RELEASE

CONSENT MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Johnathanpeter Klein, through counsel, respectfully moves this Court to modify his conditions of pretrial release to remove the requirement of location monitoring and drug testing.

In support of his motion, Mr. Klein states as follows:

1. Mr. Klein is currently on pretrial release awaiting trial for charges related to the events of January 6, 2021.

2. After an initial period of detention, Mr. Klein was granted pretrial release subject to certain conditions. ECF 40.

3. Mr. Klein was originally confined to home detention and his travel was restricted to Umatilla County, Oregon, was required to reside with a third-party custodian, was subject to a curfew, and was subject to other restrictions. Mr. Klein's conditions were modified such that he is no longer limited to Umatilla County, does not have to reside with a third-party custodian, and is no longer subject to curfew.

4. Mr. Klein is currently compliant with his pretrial conditions.

5. Mr. Klein has opened a contracting business with this brother. Mr. Klein frequently travels to remote areas for building projects, which has caused technical complications with his location monitoring device.

6. As a result of this issue, undersigned counsel conferred with Mr. Klein's supervising pretrial services officer to determine whether there was any objection to the removal of location monitoring as a condition of pretrial release. Mr. Klein's pretrial officer did not object to the removal of location monitoring.

7. Additionally, we are asking that the substance abuse testing condition be removed, given that Mr. Klein has no history of substance abuse and has continuously tested negative while on pretrial release. Pretrial services does not have any objection to this condition being removed.

8. The undersigned has conferred with the government, represented by Assistant U.S. Attorney Katherine Boyles. The government does not object to the requested modifications set forth herein.

WHEREFORE, for all the forgoing reasons, Mr. Klein respectfully requests that this Court remove the condition of location monitoring and remove the condition of substance abuse testing.

Respectfully submitted this 25th day of July, 2023.

/s/ Michelle Sweet

Michelle Sweet

Attorney for Defendant