

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

UNITED STATES OF AMERICA

v.

MATTHEW RYAN MILLER,

Defendant.

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Case No. 21-cr-75 (RDM)

UNITED STATES' REQUEST FOR CERTAIN CONDITIONS OF RELEASE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this Request for Certain Conditions of Release for the defendant, Matthew Miller, pursuant to the Court's Order at the February 16, 2021 Status Hearing.

On February 16, 2021, the Court advised the parties that it was inclined to release the defendant to the High Intensity Supervision Program (HISP), pending the screening and approval by the Pretrial Services Agency (PSA). On February 16, 2021, PSA issued a status report (ECF No. 18) advising the Court that the defendant was screened and found eligible for the HISP program. The government respectfully requests that as a part of the defendant's release conditions, the Court order that the defendant abide by the following conditions, as recommended by PSA in its initial report and agreed upon by the defendant in the defendant's Amended Motion for Modification of Pretrial Detention Order (ECF No. 12, pg. 7):

- Do not apply for or possess a passport;
- Stay away from Washington, DC unless for Court, Pretrial or consultation with attorney;
- Advise Pretrial Services of any travel within the US outside of home jurisdiction;
- No travel outside of the continental US without Court approval;
- Participate in all future proceedings as directed;

- Do not possess any firearms; and
- No state/federal crimes.

It is the government's understanding that the HISP program includes a requirement for location monitoring and that the defendant abide by a curfew. In the event that that HISP program does not include these provisions, the government respectfully requests that the Court order location monitoring in order to ensure that the defendant abides by the stay away order, as well as complies with a curfew in order to ensure the safety of the community.

For the reasons provided at the hearing on February 16, 2020, the government's opposition and supplemental opposition to release, and in order to ensure the safety of the community, the government respectfully requests that the Court issue the above-requested conditions of release.

Respectfully submitted,

MICHAEL R. SHERWIN
ACTING UNITED STATES ATTORNEY
New York Bar No. 4444188

By: /s/ Kaitlin A. Vaillancourt
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of this Notice to be served upon counsel of record, this 18th day of February, 2021.

/s/
Kaitlin A. Vaillancourt
Assistant United States Attorney