

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:21-CR-00237-RDM-1
	:	
JONATHANPETER ALLEN KLEIN,	:	
	:	
Defendant.	:	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S  
MOTION FOR RELEASE TO HOME DETENTION**

The United States of America respectfully submits its response to defendant Jonathanpeter Allen Klein’s Motion for Release to Home Detention (Dkt. 31). For reasons that materially distinguish defendant’s circumstances from those of his co-defendant, Matthew Leland Klein, the government does not oppose defendant’s motion provided the Court imposes the conditions of release proposed in defendant’s motion, as well as the standard conditions of release set forth in AO 199A (Order Setting Conditions of Release).<sup>1</sup>

Respectfully submitted,

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<sup>1</sup> Such conditions include:  
(1) The defendant must not violate federal, state, or local law while on release.  
(2) The defendant must cooperate in the collection of a DNA sample if it is authorized by 34 U.S.C. § 40702.  
(3) The defendant must advise the court or the pretrial services office or supervising officer in writing before making any change of residence or telephone number.  
(4) The defendant must appear in court as required and, if convicted, must surrender as directed to serve a sentence that the court may impose.