

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	CRIMINAL NO.
)	
v.)	1:21-cr-00397-TFH
)	
)	
CHRISTIAN KULAS)	VIOLATION
)	
Defendant.)	40 U.S.C. § 5104(e)(2)(G)
)	(Parading, Demonstrating, or
)	Picketing in a Capitol Building)

**DEFENDANT CHRISTIAN KULAS' UNOPPOSED MOTION FOR RETURN OF
PASSPORT**

Defendant Christian Kulas, through undersigned counsel, respectfully moves the Court for the return of his passport, and in support of his request states as follows.

1. On April 26, 2022, this Court sentenced Christian Kulas to 6 months' probation, with the first 60 days to be served in home detention, as well as \$500 in restitution, and a \$10 special assessment. ECF 4/26/22.
2. On April 27, 2022, Pre-Trial Services Officer Jordan Herrera, from the Northern District of Illinois, contacted Christian to inform him that Pre-Trial Services would no longer be supervising him, and that instead the Probation Department would assume jurisdiction over his supervision. Ms. Herrera also informed Christian that she would like to return his passport to him, but said that he needed to obtain a court order before she could do so. Ms. Herrera further informed Christian that if he did not obtain a court order for the return of his passport, it would be returned to the Department of State for disposal. *See* Exhibit A.
3. Undersigned counsel has spoken with AUSA Michael Friedman, who has no objection to returning Christian's passport to him.

4. Christian understands that he may not leave the Northern District of Illinois, where he lives and is being supervised by Probation, without first obtaining permission from the Court and Probation.
5. Accordingly, Christian Kulas respectfully requests that this Court enter an order permitting Christian's passport to be returned to him, so that it is not returned to the Department of State for disposal. A proposed Order is attached.

Respectfully submitted,

/s/ Rachel M. Cannon
Rachel M. Cannon
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/s/ Brian M. Heberlig
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Counsel for Christian Kulas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY the foregoing **DEFENDANT CHRISTIAN KULAS' UNOPPOSED MOTION FOR RETURN OF PASSPORT** was served upon counsel of record automatically via CM/ECF this 27th day of April 2022.

s/ Rachel M. Cannon

Rachel M. Cannon
Steptoe & Johnson LLP

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PROPOSED ORDER

Upon consideration of Defendant Christian Kulas' Unopposed Motion For Return of Passport, it is HEREBY ORDERED that Defendant's motion is GRANTED, and the Pre-Trial Services Office is directed to return Defendant's passport to him forthwith.

Thomas F. Hogan
UNITED STATES DISTRICT JUDGE

copies to:

Michael Friedman
Assistant United States Attorney
U.S. Attorney's Office for District of Columbia
555 4th St NW, Washington, D.C. 20530

Rachel M. Cannon
Steptoe & Johnson LLP
227 W. Monroe St., Suite 4700
Chicago, IL 60606

EXHIBIT A

Thompson, Linda

From: Christian Kulas <ck5991@gmail.com>
Sent: Wednesday, April 27, 2022 12:09 PM
To: Jordan Herrera
Cc: Cannon, Rachel
Subject: Re: Sentence

Hello Jordan,

Thank you so much. It was an absolute pleasure to have you as my pre-trial services officer and I am very grateful to have worked with you. I have reached out to my attorney and am awaiting a response in regards of what to do about the passport situation. I have also already reached out and spoken with the duty supervisor for the Illinois Probation Office, and they are just awaiting additional materials and documentation from the Office in DC. Once again it was a pleasure to work with you. I will respond to you about the passport as soon as I hear from my attorney.

Best regards,
Christian Kulas

Sent from my iPhone

On Apr 27, 2022, at 11:49 AM, Jordan Herrera <Jordan_Herrera@ilnpt.uscourts.gov> wrote:

Hi Christian,

I wanted to follow up since your sentencing hearing. Someone from Probation will reach out to you for further information. You no longer need to report to me. It was a pleasure working with you.

We are in possession of your passport. In order for it to be returned to you the Judge has to approve. Reach out to your attorney about filing a motion, otherwise, it gets sent to the department of state. Let me know what you plan to do.

Best,

Jordan Herrera, MSW
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219 South Dearborn Suite 15100
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