

**Michelle Sweet, OSB No. 060015**  
**Assistant Federal Public Defender**  
**101 S.W. Main, Suite 1700**  
**Portland, OR 97204**  
**Tel: (503) 326-2123**  
**Fax: (503) 326-5524**  
**Email: michelle\_sweet@fd.org**

**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,**

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

**vs.**

**JONATHANPETER ALLEN KLEIN,**

**Defendant.**

---

Johnathanpeter Klein, through counsel, respectfully moves this this Court for an order modifying the conditions of release to reduce Mr. Klein's location monitoring schedule from home detention to curfew. Undersigned counsel conferred with both pretrial services and the government.

Pretrial services reports that Mr. Klein has been compliant on pretrial release and does not object to a reduction in his location monitoring schedule to curfew. The government attorney, AUSA Christopher Veatch, does not object to the modification to a curfew schedule as long as an additional condition is imposed that Mr. Klein have no contact with any known member of the Proud Boys. Mr. Klein does not object to that condition.

In conclusion, Mr. Klein requests that the Court order that his location monitor schedule be reduced to curfew, and Mr. Klein agrees to the government's request that a condition of release be added that he not have contact with any known members of the Proud Boys.

RESPECTFULLY SUBMITTED this 16th day of August 2021.

*/s/ Michelle Sweet*

\_\_\_\_\_  
Michelle Sweet

Attorney for Defendant