

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,

DEFENDANT'S SUPPLEMENT TO
MOTION FOR RELEASE TO HOME
DETENTION

vs.

JONATHANPETER ALLEN KLEIN,

****UNDER SEAL****

Defendant.

On May 7, 2021, the Court requested that defense counsel confer with Pretrial Services and apprise the Court of any progress made regarding efforts to identify a potential third party custodian in this case.

1. Mrs. [REDACTED] has agreed to be a third party custodian. The [REDACTED] were identified to pretrial services as a potential residence for Mr. Klein on or about April 22, 2021. This option was discussed in the request in the Motion for Release to Home Detention filed on May 6, 2021. On May 10, 2021, Mrs. [REDACTED] the pretrial services officer, and defense counsel participated in a conference call regarding her ability to be a third party custodian. On that same

day, pretrial services informed defense counsel that “Mrs. [REDACTED] has been screened and found suitable as a 3rd party custodian.” The government has also been informed of this option.

2. In addition to Mrs. [REDACTED] Mr. [REDACTED] has also been identified as a potential third-party custodian. Mr. Klein resided and worked with Mr. [REDACTED] previously on his ranch. Mr. [REDACTED] continues to support Mr. Klein and would welcome him back on the ranch. This information was originally provided to pre-trial services in Oregon on March 23, 2021 and presented to the magistrate judge on March 26, 2021. This option was again discussed with pretrial services in Washington D.C. but concerns regarding the availability of a GPS monitor existed. Mr. [REDACTED] continues to support Mr. Klein and continues to want him to reside and work on the ranch with him. Mr. [REDACTED] is willing to work with pre-trial services to determine if a GPS signal would be viable as more information was collected regarding cell towers and service providers. He also agreed to be a third party custodian. On May 10, 2021, defense counsel alerted pre-trial services of this alternative option and Mr. [REDACTED] willingness to be a third-party custodian. Given the timing of the status hearing in this case, the availability of Mrs. [REDACTED] to be a third party custodian, and the uncertainty about the viability of the GPS monitoring, defense counsel agreed with pretrial services to pause this option for now. However, Mr. [REDACTED] will remain available and this option may become viable in the future if need be. The government has also been informed of Mr. [REDACTED] continued support and offer to be a third-party custodian.

RESPECTFULLY SUBMITTED this 11th day of May, 2021.

/s/ Michelle Sweet

Michelle Sweet
Attorney for Defendant