

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

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**UNITED STATES OF AMERICA,**

**v.**

**FEDERICO GUILLERMO KLEIN,**

**Defendant.**

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) **Criminal No. 1:21-CR-00040-TNM**  
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**UNOPPOSED MOTION TO TEMPORARILY MODIFY RELEASE CONDITIONS**

Defendant Federico Klein, by and through the undersigned counsel, respectfully moves this Court for an Order pursuant to section 3145(a)(2) of Title 18 of the United States Code, temporarily amending his pretrial release conditions to permit Mr. Klein to visit with his family on Christmas Eve, December 24, 2021, and on Christmas, December 25, 2021.

Earlier today, December 20, 2021, Mr. Klein requested a “timeout” from pretrial services to permit his visiting his family on Christmas Eve and Christmas Day. Pretrial services advised Mr. Klein that they “do not approve social timeouts for holidays or otherwise” and directed Mr. Klein to have his attorney file a motion with the Court in the event that he would “like to see [his] family for the holidays.”

The undersigned has conferred with counsel for the government, who advise that they do not oppose Mr. Klein’s request.

Specifically, Mr. Klein requests leave to visit his family at his brother’s house in Northern Virginia on December 24, 2021, Christmas Eve, between the hours of 11am and 11pm,<sup>1</sup> inclusive of travel time. Next, Mr. Klein requests leave to visit his family at his mother’s

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<sup>1</sup> Separately, pretrial has approved Mr. Klein’s attending a midnight mass between the hours of 11pm and 2am on December 24, 2021, into the morning of December 25, 2021.

house, also in Northern Virginia, on December 25, 2021, Christmas Day, between the hours of 11am and 11pm, inclusive of travel time.

The addresses of Mr. Klein's brother's house and mother's house have been provided both to pretrial services and to the government (and can be made available to the Court upon request). Mr. Klein will continue to be tracked by GPS location monitoring during his visits and is not otherwise requesting any modification of his current pretrial release conditions.

[SIGNATURE ON NEXT PAGE]

Dated: September 15, 2021

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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