

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

UNITED STATES OF AMERICA,

V.

FEDERICO GUILLERMO KLEIN,

Defendant.

Criminal No. 1:21-CR-00040-TNM

**DEFENDANT FEDERICO KLEIN’S MOTION TO
TEMPORARILY MODIFY PRETRIAL 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 modifying Mr. Klein's pretrial release conditions to permit him to temporarily stay at the home of a family friend to watch their dog while the friend is traveling, for which he will be compensated.

Since or about April 12, 2021, Mr. Klein has been subject to Conditions of Release with Global Positioning System Monitoring pursuant to court order. *See* Order Setting Conditions of Release, *United States v. Klein*, No. 21-cr-236 (D.D.C. April 12, 2021) (ECF No. 30). This Court entered the same Order on October 4, 2021, after Mr. Klein’s case was consolidated with the above-captioned action. Order Setting Conditions of Release (Oct. 4, 2021) (ECF No. 148). In relevant part, that Order provides that Mr. Klein shall be “restricted to [his] residence” and does not otherwise allow Pretrial Services to authorize Mr. Klein to stay anywhere other than his residence.

Mr. Klein requests this Court temporarily modify his conditions of release to permit Mr. Klein to temporarily stay at the home of a family friend from March 30, 2022, to April 2, 2022.

Mr. Klein has provided the name of the family friend and address of the residence where he'll be staying, in Annandale, Virginia, to Pretrial Services, which advised that it does not oppose the Court's authorizing Mr. Klein's temporary stay at the residence, but "will defer to the Court" and "should the Court approve the motion requests Mr. Klein provide [Pretrial Services] any information [they] request[]/require so that [they] will be able to continue to effectively supervise [Mr. Klein] while he is house-sitting." Defense counsel has also conferred with the government, which does not oppose Mr. Klein's request, "[s]o long as Mr. Klein is still subject to the same conditions of release, just at the Annandale location."

WHEREFORE, Frederico Klein respectfully requests this Court amend its Pretrial Order to authorize Mr. Klein to stay at the home of a family friend from March 30, 2022, to April 2, 2022.

[SIGNATURE ON NEXT PAGE]

Dated: March 25, 2022

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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CERTIFICATE OF SERVICE

On March 25, 2022, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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