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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Case No. 1:21-cr-00237-RDM-1

Plaintiff,

vs.

UNOPPOSED MOTION TO MODIFY
CONDITIONS OF RELEASE

JONATHANPETER ALLEN KLEIN,

Defendant.

Johnathanpeter Klein, through counsel, respectfully moves this Court for an order modifying the conditions of release. When his conditions were last modified (August 31, 2022), to allow him to move to different county (Baker County), the original travel restrictions remained in effect. Unfortunately, the travel restriction condition originally imposed in May 2021, actually limited Mr. Klein's travel to the county of his prior residence (Umatilla County) as opposed to just requiring approval from pretrial prior to travel.

Through this motion, we request to expand Mr. Klein's travel limitation to the District of Oregon. Undersigned counsel conferred with the government, and through Assistant United States

Attorney Christopher Veatch, it does not oppose this request. Pretrial services is aware of the requests and remains neutral and defers to the Court.

Mr. Klein currently lives in Baker City, Oregon. Mr. Klein has been on pretrial release since May 19, 2021 and he has remained in compliance.

In conclusion, Mr. Klein requests that the Court order that Mr. Klein's travel be restricted to the District of Oregon.

RESPECTFULLY SUBMITTED this 26th day of October 2022.

/s/ Michelle Sweet

Michelle Sweet

Attorney for Defendant