

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH RADER,

Defendant.

No. 1:22-cr-00057-RCL

**DEFENDANT'S RESPONSE TO
ORDER TO SHOW CAUSE**

COMES NOW, Defendant Kenneth Rader, to provide the following response to the Court's Order to Show Cause (Doc. 23).

Mr. Rader admits that he has violated the Order Setting Conditions of Release (Doc. 13), as alleged in the Status Report filed by the U.S. Probation Office (Doc. 22). He notes, however, that he did not "abscond[]" from in-patient treatment because he self-admitted to the facility (without being ordered to do so by the U.S. Probation Office) and left to pursue outpatient treatment instead. Mr. Rader's issues on supervision have largely stemmed from his addiction, lack of transportation, and occasional lack of access to a cellular telephone.

Mr. Rader submits that the Court should not revoke his supervision because he is not likely to flee or pose a danger to the community or any person, and he is likely to comply with the conditions going forward. *See* 18 U.S.C. § 3148(b). He has approximately one month until his sentencing hearing.

If the Court does revoke his release, Mr. Rader respectfully requests that the Court order that he be detained near Sioux City, Iowa (his residence), rather than

being transported closer to the District of Columbia, so that his attorney may have better access to him during preparation for sentencing.

Respectfully submitted,

/s/ Brad Hansen

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2022, I electronically filed this document with the Clerk of Court using the ECF system, which will provide notice to all assigned attorneys.

/s/ Theresa McClure