

# EXHIBIT A

**From:** [REDACTED]  
**To:** [Hoxie, Jamie \(USANJ\)](#); [Rodney Villazor](#)  
**Subject:** [EXTERNAL EMAIL] Goettsche Recommendation  
**Date:** Wednesday, February 12, 2020 4:29:29 PM

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Good afternoon,

[REDACTED]

**RECOMMENDATION:**

Pretrial Services recommends that the defendant be released on a \$7,000,000 bond secured by the available equity (approximately \$ 3,313,000) from the below-noted five (5) properties, waiving the local rule. Pursuant to local rule, defense counsel shall perfect a lien on each property, in that jurisdiction.

1. [REDACTED], Lafayette, CO 80026;
2. [REDACTED], Erie, CO 80516;
3. [REDACTED], Boulder, CO 80301;
4. [REDACTED], Erie, CO 80516; and,
5. [REDACTED], Boulder, CO 80301

The bond shall be co-signed by Jonathan Landerman, and Evan Paul Doty. The following conditions are also recommended:

1. Pretrial Services Supervision.
2. The defendant shall be released into the third-party custody of his spouse, Danielle Goettsche, and his mother, Victoria Landerman.
3. Home Incarceration, with GPS location monitoring: 24 hour lock-down except for medical necessities and court appearances, or other activities specifically approved by the court. For the purpose of Location Monitoring, the defendant shall install a land line telephone in his residence within 10 days of release, unless waived by Pretrial Services.
4. The defendant shall remain in the presence of a third-party custodian at all times, unless otherwise approved by Pretrial Services.
5. The defendant is prohibited from employment at any location.
6. The defendant is prohibited from internet access and the possession and/or use of

computers or connected devices at any location, unless in the presence of counsel.

7. The defendant may not possess any cellular telephone without the prior approval of Pretrial Services who may regulate its provider and capabilities.
8. Any cellphones possessed by a third-party custodian must be password protected and subject to search for compliance by Pretrial Services.
9. The defendant hereby consents to Pretrial Services' use of electronic detection devices to evaluate the defendant's access to wi-fi connections.
10. The immediate sale of the Bombardier Inc. Model CL-600-2B16 aircraft, serial number 5410, U.S. registration number N357TC (Bombardier N357TC).
11. Surrender all passports/ travel documents. Do not apply for new travel documents.
12. The defendant will surrender his spouse's and three minor children's passports/travel documents. Do not apply for any new travel documents.
13. Travel restricted to Weld County, Colorado and Boulder County, Colorado, unless otherwise approved by Pretrial Services.
14. Maintain current residence with a third-party custodian, or a residence approved by Pretrial Services.
15. The defendant shall avoid all contact, direct, or indirect, with any person who is or may become a victim or potential witness in the subject investigation or prosecution.
16. No contact with codefendants and/or co-conspirators unless in the presence of counsel.
17. Substance abuse testing and/or treatment as directed by Pretrial Services.
18. The defendant shall not possess any weapons or destructive devices. All firearms in any home in which the defendant resides shall be removed, in compliance with Colorado state law, within 24 hours and verification provided to Pretrial Services. The defendant shall also surrender all firearm purchaser's identification cards and permits to Pretrial Services.
19. The defendant will remain detained until verification has been provided to Pretrial Services of the surrendering of all passports/travel documents, and lien perfections against the proposed properties.

  
U.S. Pretrial Services Officer

District of New Jersey

