

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

DAVID WIERSMA,

Defendant.

Case No.: 1:21-cr-00592-001 ABJ

**UNOPPOSED MOTION TO MODIFY  
CONDITIONS OF RELEASE**

COMES NOW, David Wiersma, through undersigned counsel, Joseph R. Conte, to respectfully request this honorable court to modify his conditions of release to permit him to travel within 100 miles of his home without having to notify the Pretrial Services Agency (PSA). As grounds for this motion counsel would state.

1. Mr. Wiersma made his initial appearance in this matter on September 28, 2021, and was released on conditions.
2. A condition of his release requires that Mr. Wiersma notify the PSA of any travel outside the Northern District of Illinois. (Dkt. #14).
3. Mr. Wiersma drives for Uber and occasionally must drive outside the Northern District of Illinois.
4. Due to the nature of the travel notifying PSA under those circumstances is not feasible.
5. The United States does not oppose this motion.

<i>United States v. David Wiersma</i> Case No. 1:21-cr-00592-001 ABJ  Unopposed Motion to Modify Conditions of Release Page No. 1  BOND MODIFY 21/12/16 15:23:15		Joseph R. Conte Law Office of J.R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004 Phone: 202.638.4100 Email: dcgunlaw@gmail.com
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WHEREFORE counsel respectfully requests that the conditions of release be modified to permit the defendant to travel within 100 miles of his home without having to notify the PSA.

Dated: December 16, 2021

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<p><i>United States v. David Wiersma</i> Case No. 1:21-cr-00592-001 ABJ</p> <p>Unopposed Motion to Modify Conditions of Release Page No. 2</p> <p>BOND MODIFY 21/12/16 15:23:15</p>		<p>Joseph R. Conte Law Office of J.R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004 Phone: 202.638.4100 Email: <a href="mailto:dcgunlaw@gmail.com">dcgunlaw@gmail.com</a></p>
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