

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

**MOTION TO MODIFY CONDITIONS
OF RELEASE**

COMES NOW, David Wiersma, through undersigned counsel, Joseph R. Conte, to respectfully request this honorable court to temporarily modify his conditions of release to permit him access to his firearms for the sole purpose of selling them to an already identified buyer. 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 prohibits him from possessing firearms.
3. Mr. Wiersma transferred his firearms to the office of the mayor of Posen, Illinois.
4. Mr. Wiersma desires to sell his firearms for financial reasons and has found a buyer.
5. Mr. Wiersma requires temporary access to the firearms for the sole purpose of transferring them to the buyer.
6. The transfer/sale of the firearms will occur on the same day that Mr. Wiersma gains access to the firearms.

<p><i>United States v. David Wiersma</i> Case No. 1:21-cr-00592-001 ABJ</p> <p>Motion to Modify Conditions of Release Page No. 1</p> <p>BOND MODIFY 20220312 22/03/12 09:51:16</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: dcgunlaw@gmail.com</p>
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7. Undersigned counsel has been unable to ascertain the position of the United States with respect to this motion.

WHEREFORE counsel respectfully requests that this motion be granted, and Mr. Wiersma be granted temporary access to his firearms.

Dated: March 12, 2022

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<p><i>United States v. David Wiersma</i> Case No. 1:21-cr-00592-001 ABJ</p> <p>Motion to Modify Conditions of Release Page No. 2</p> <p>BOND MODIFY 20220312 22/03/12 09:51:16</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: dcgunlaw@gmail.com</p>
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