

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

**AMENDED AND UNOPPOSED
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's firearms are held by the Chief of Police in Posen, Illinois.
4. Mr. Wiersma desires to sell his firearms for financial reasons and has found a buyer.
5. Mr. Wiersma seeks to meet the buyer at the Posen Police Department, in Posen Illinois, where he will consent to the Chief of Police releasing his firearms to the third party buyer. Thus, Mr. Wiersma will not possess the firearms, but will be present during the transfer.

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6. The District of Columbia Pretrial Services Agency does not oppose this course of action, although pretrial services does require Mr. Wiersma to provide Pretrial Services Officer Nicole Gibson with proof of sale.

7. The United States does not oppose the transfer of these firearms by the means represented in this motion.

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

Dated: March 18, 2022

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<p><i>United States v. David Wiersma</i> Case No. 1:21-cr-00592-001 ABJ</p> <p>Amended and Unopposed Motion to Modify Conditions of Release Page No. 2</p> <p>BOND MODIFY 20220318 22/03/18 08:24:06</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: dccgunlaw@gmail.com</p>
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