

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES

v.

Ronald Balhorn

**CASE NO: 1:23-cr-00114-ACR-2**

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW Defendant Ronald Balhorn, and request this Honorable Court to modify conditions of release to allow Defendant to take possession and return his firearms for hunting purposes.

**BRIEF BACKGROUND**

1. On October 18, 2023, this Court found the Defendant guilty of misdemeanor offenses relating to January 6, 2021.
2. The matter is scheduled for sentencing on February 21, 2024.
3. The Defendant lives in the State of Michigan.
4. The Defendant has been on pretrial release since January 27, 2023.
5. The Defendant was required to remove all firearms from his possession since the inception of the case.
6. Pursuant to the Court's Order, he immediately removed all of his firearms upon presentment in this matter.
7. The Defendant lives in the State of Michigan and has been an avid hunter and a gun owner all of his life.

8. The Defendant has complied with all conditions of his release since the inception of this case.
9. While the Defendant has been found guilty of the charges – his convictions were for misdemeanors.

Respectfully submitted,  
ROLLINS AND CHAN

/s/

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**Date Filed:** December 7, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2023, this motion was electronically filed pursuant to the rules of the Court.

/s/

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Mark Rollins