

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

**UNITED STATES OF AMERICA** :  
 : **Case No. 1:21-cr-131-PLF**  
 **v.** :  
 :  
 **CHRISTINA GERDING,** :  
 :  
 **Defendant** :

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION TO  
MODIFY CONDITIONS OF SUPERVISED RELEASE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits that it does not object to the first two of defendant’s proposed modifications to the conditions of her supervised release, except as set forth herein. Specifically, the United States does not object to the proposed modification to the restrictions on defendant’s travel that are described in paragraph 3 of her Motion. ECF No. 99 at 2. With regard to the proposed modification described in paragraph 5, the United States notes that the defendant’s Motion does not address whether firearms at her father’s residence could be removed or otherwise secured. ECF No. 99 at 2-3. That would seem to be reasonable. The United States does not otherwise object to a modification of the condition which would permit her to visit her father without that visit becoming a violation of her supervised release, provided the defendant does not have access to or possess firearms at her father’s residence. Again, it seems reasonable to expect that firearms can be secured or removed to restrict access. The United States submits that the restriction should otherwise remain.

The United States also submits that the drug-testing requirement should remain. *See* ECF No. 99 at 3 (¶ 6). Illinois state law does not change or provide a basis to remove the federal drug-testing requirement.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By: *s/ Christopher Brunwin*  
Assistant United States Attorney  
California Bar No. 158939  
United States Attorney's Office  
Central District of California  
312 N. Spring Street  
Los Angeles, California 90012  
(213)894-4242  
[christopher.brunwin@usdoj.gov](mailto:christopher.brunwin@usdoj.gov)

Nialah S. Ferrer  
Assistant United States Attorney  
New York Bar No. 5748462  
United States Attorney's Office  
601 D Street N.W.  
Washington D.C. 20001  
(202)557-1490  
[nialah.ferrer@usdoj.gov](mailto:nialah.ferrer@usdoj.gov)