

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                           |   |                        |
|---------------------------|---|------------------------|
| UNITED STATES OF AMERICA, | ) |                        |
|                           | ) |                        |
| v.                        | ) |                        |
|                           | ) | No. 21-cr-248-01 (RDM) |
| AARON MILEUR              | ) |                        |
|                           | ) |                        |
| Defendant.                | ) |                        |
| _____                     | ) |                        |

**MOTION TO MODIFY CONDITIONS OF PROBATION**

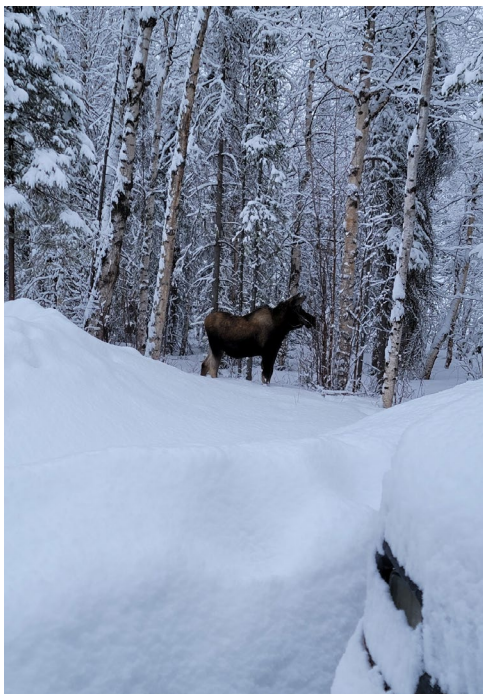
Aaron Mileur hereby respectfully moves this Honorable Court to permit him to possess, at home, a firearm, in order to protect himself and his property from the moose population in Wasilla, Alaska. The government intends to file an opposition to this request.

Mr. Mileur resides in Wasilla, AK and, until this case, possessed a rifle in order to fend off moose. The Court, at his Sentencing Hearing on March 20, 2023, inquired whether Mr. Mileur needed to maintain his firearm for self-defense and defense of property. Caught off guard by this question, Mr. Mileur hesitated and ultimately declined.

Upon reflection and after a visit by moose during the following week, Mr. Mileur now requests permission to possess a rifle. "Moose are usually not dangerous, although they can become aggressive if they are harassed by humans, domesticated pets, or traffic. They can also become temperamental when hungry or tired, especially during the winter when they must travel through deep snow." <https://a-z-animals.com/blog/are-moose-dangerous/>. Mother moose are also very

protective of their calves. <https://wildlifeinformer.com/are-moose-more-dangerous-than-bears/> (“In late spring or summer, females with young calves are very protective and will attack if they get too close. Make sure never to walk between a calf and mother.”). Thus, in “Alaska, more people are injured each year by moose attacks than bears.... Around 5 to 10 people in Alaska are wounded because of moose annually.” <https://wildlifeinformer.com/are-moose-more-dangerous-than-bears/>

Mr. Mileur owns the rifle because of the presence of wild and potentially dangerous animals in Alaska, not the least of which are, moose. After his Sentencing Hearing, Mr. Mileur observed a young moose in his backyard, pictured here. Given the moose’s age, Mr. Mileur surmised that a mother moose was also nearby.



### **Conclusion**

Mr. Mileur thus respectfully requests that the conditions of his probation be modified so that he may defend himself and his property against potential moose on his property.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

Eugene Ohm  
Assistant Federal Public Defender  
625 Indiana Ave. NW, Ste. 550  
Washington, D.C. 20004  
(202) 208-7500  
Eugene\_ohm@fd.org