

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

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	Case No.: 22-CR-543-CRC
	:	
	:	
LORUHAMAH YAZDANI-ISFEHANI,	:	
	:	
Defendant.	:	

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

The United States of America by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this response to defendant’s Motion to Modify Conditions of Release. (ECF No. 36).

The government agrees that a modification of the pretrial firearms restriction is justified in this case. The defendant is not charged with any crimes of violence and has no violent criminal history. The defendant has asserted that she wishes to possess a firearm in her home while her partner works overnight, and the defendant is at home with their children. The defendant has an Ohio permit to possess a firearm in her home.

Based on the circumstances specific here, the government does not object to a modification. The government recommends that the Court order that the defendant should not possess any firearm other than her own personal firearm in her residence for personal protection, and that she be prohibited from possessing any other weapon or destructive device. Additionally, if at any time the defendant meets with Pretrial Services in person, she should not be allowed to possess her firearm during those visits.

The government has consulted with attorney for the defendant, and the defense does not object to this modification.

Respectfully submitted,

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