

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
	:	
<b>v.</b>	:	<b>Case No.: 21-CR-543-CRC</b>
	:	
	:	
<b>LORUHAMAH YAZDANI-ISFEHANI,</b>	:	
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S  
MOTION TO MODIFY SENTENCE**

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 Sentence. (ECF No. 74).

Under 18 U.S.C. § 3563(b)(8), the court may provide that the defendant “refrain from possessing a firearm, destructive device, or other dangerous weapon.” Removal of firearms and other dangerous weapons from a person under supervision serves the statutory sentencing purpose of public protection, 18 U.S.C § 3553(a)(2)(C), by allowing the probation officer to supervise the defendant without risk to safety caused by the possession of weapons.

Loruhamah Yazdani-Isfehani (hereinafter “Loru”) should be prohibited from possessing a firearm outside of the presence of her home. This Court has allowed Loru to possess a firearm inside of her residence for her safety. The safety of the community and the risk of danger to the community should also be considered. U.S. Probation will be supervising Loru at her home while she is on probation. U.S. Probation has informed the government that it is concerned about the safety of its supervising officers if Loru is allowed to possess a firearm inside and outside of her

