

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America )  
 )  
 v. ) USDC No. 21-cr-543-03 (CRC)  
 Loruhamah Yazdani-Isfehiani, *defendant.* )

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

Defendant, through undersigned counsel Nathan I. Silver, II, Esq. (“counsel”), appointed by this Court under the Criminal Justice Act, respectfully replies briefly to the government’s Opposition to Defendant’s Motion to Modify Sentence (“Opposition”).

The Opposition says that “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 home.” (ECF Doc. 79, page 1)

The stated basis for what the government and probation uniformly requests in these cases has been their concern for the safety of pretrial service and probation officers making home visits. Now Probation has expanded that to places *outside* the home. That differs from the original purpose of the common restriction, which this Court, with no opposition from the United States, previously lifted.

The defendant is on probation for a non-violent offense. She has no propensity for violence. On the contrary, she is deeply religious, with a propensity for peaceableness. She lawfully obtained a concealed carry permit when Ohio, her state of residence, required one. She has a demonstrable need for a firearm in order to protect herself. The defendant submits that

probation officers who reside in metropolitan Columbus<sup>1</sup> have much greater reason to fear its general population than to fear from the defendant herself.<sup>2</sup>

For the reasons previously stated, the defendant respectfully urges the Court to his original Motion, the defendant urges the Court to grant her motion to modify the sentence so long as she remains in compliance with the laws of Ohio regarding firearms and the terms of her probation.

This pleading is,

Respectfully submitted,

/s/

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#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Brittany L. Reed, Esq., assistant U.S. Attorney for the District of Louisiana this 24th day of November, 2022.

/s/

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*Nathan I. Silver, II*

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<sup>1</sup> Columbus has the ninth highest homicide rate among major American cities, according to statistics compiled last year. (Josiah Bates, "These Major Cities Reported the Highest Homicide Rates in 2021," Time Magazine, time.com, October 19, 2022 (<https://time.com/6223217/homicide-rates-us-cities-2021>))

<sup>2</sup>USPO Brent Willoughby of the U.S. District Court for the Southern District of Ohio has been assigned to supervise the defendant. He has already made a home visit. The defendant reports that she secured her firearm before the visit and assured Off. Willoughby she will do so as needed in the future. She reports, too, that she advised Off. Willoughby of her pending motion for permission to carry her firearm outside the home. He said he understood her need and did not oppose it. Off. Willoughby may be reached at the Joseph P. Kinneary US Courthouse 85 Marconi Blvd., Columbus, Ohio, 43215. Tel: Office: (614) 719-3175 Cel:l (614) 580-7635. Email: [brent\\_willoughby@ohsp.uscourts.gov](mailto:brent_willoughby@ohsp.uscourts.gov).