

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	CAUSE NO.: 2:16 CR 161
	)	
JOHN BUNCICH,	)	
Defendant.	)	

**DEFENDANT, JOHN BUNCICH'S, MOTION FOR  
MODIFICATION OF CONDITIONS OF BOND**

Comes now the Defendant, John Buncich, by and through his attorney, Bryan M. Truitt, and respectfully moves this Court to modify the conditions of his bond allowing for the return of his firearms and in support thereof states as follows:

1. That this Court previously released John Buncich on an unsecured bond. One of the conditions of said bond was that the Defendant surrender all firearms and to not possess firearms.
2. That the Defendant is the Sheriff of Lake County and thus a law enforcement officer.
3. That the Defendant is not charged with a crime of violence.
4. That the Defendant has never been charged with a crime previously.
5. That the Defendant needs his firearms to carry out his employment.
6. That the Defendant does not represent a danger to himself or others.
7. That the Defendant requests this Court to order the return of his firearms and allow him to possess the same at least until the conclusion of this case.

WHEREFORE Defendant, John Buncich, by counsel prays this Court to modify the conditions of his bond allowing for the return of his firearms for all of the above and foregoing reasons and for all other just and proper relief.

Respectfully submitted,

/s/ Bryan M. Truitt

Bryan M. Truitt, Atty. #20684-64

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**CERTIFICATE OF SERVICE**

The undersigned counsel for Defendant does hereby certify that a copy of the foregoing was served on counsel of record via the District Court's CM/ECF system on January 27, 2017.

/s/ Bryan M. Truitt

Bryan M. Truitt; 20684-64