

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

DAVID EBRAHIMZADEH,

Defendant.

No. 1:25-cr-10455

**MOTION REQUESTING PERMISSION TO TRAVEL
OUTSIDE THE UNITED STATES**

Pursuant to his conditions of release, Defendant David Ebrahimzadeh seeks the Court's permission to attend a family vacation in Aguilla from December 28, 2025 to January 3, 2026. In support of this motion, undersigned counsel states as follows:

1. Mr. Ebrahimzadeh has had a vacation to Aguilla booked since at least October 2025, when he made a hotel reservation. He is traveling with his wife and three children and has booked roundtrip airfare.
2. Mr. Ebrahimzadeh has known about this investigation for multiple years and traveled internationally during that time, always returning.
3. Mr. Ebrahimzadeh was born in the United States, has citizenship in no other country, and has substantial business interests here. His entire immediate family resides in the United States.
4. Mr. Ebrahimzadeh's counsel provided his itinerary to the government and probation, as instructed by the Court.

5. The government stated: “In your motion, please note the government’s objection to the travel outside the United States for the reasons that AUSA Basil stated on the record last week.”
6. Probation stated: “I can confirm I have received Mr. Ebrahimzadeh’s itinerary for his trip to Aguilla. You may confirm in your motion that I have received it. Please forward to me the court order with the approval of travel when it is available.”

Additionally, the United States District Court Pretrial Services Office for the Southern District of New York has indicated that they are closed December 25 and 26. Further, January 4—the day after Mr. Ebrahimzadeh returns—is a Sunday. Therefore, Mr. Ebrahimzadeh respectfully requests the Court grant him permission to pick up his passport on or after December 23, 2025 and return it on or before January 5, 2026.

Dated: December 19, 2025

Respectfully submitted,

/s/ R. Scott Seitz

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on December 19, 2025 and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing (“NEF”).

/s/ R. Scott Seitz
R. Scott Seitz