

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

DAVID EBRAHIMZADEH,

Defendant.

No. 1:25-cr-10455

**MOTION REQUESTING ACCESS TO PASSPORT FOR TRAVEL
WITHIN THE UNITED STATES AND TO OBTAIN A SOCIAL SECURITY CARD**

Pursuant to his conditions of release, Defendant David Ebrahimzadeh seeks the Court's permission to obtain his passport from the United States District Court Pretrial Services Office for the Southern District of New York for a one-week period so that he may (i) travel to West Palm Beach, Florida from January 12, 2026 to January 13, 2026, and, (ii) so that he may use his passport to obtain an official copy of his Social Security card, which he will use to obtain a REAL ID. In support of this motion, undersigned counsel states as follows:

1. Mr. Ebrahimzadeh does not currently hold a REAL ID and thus must use his passport for domestic travel purposes until he obtains a REAL ID.
2. Mr. Ebrahimzadeh has known about this investigation for multiple years and traveled domestically and internationally during that time, always returning.
3. With the Court's permission, Mr. Ebrahimzadeh recently traveled to Anguilla with his family and returned without issue.
4. 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.

5. For his upcoming domestic travel, Mr. Ebrahimzadeh has already provided Pretrial Services with a copy of his travel itinerary and where he is staying, as required by his conditions of release. *See* ECF No. 12.
6. Further, to lessen the administrative burden on probation and the Court moving forward, Mr. Ebrahimzadeh is seeking a REAL ID.
7. To obtain a REAL ID, Mr. Ebrahimzadeh must first obtain a copy of his Social Security card. He has an appointment scheduled on January 16, 2026 for that purpose, and he will need his passport for that appointment.
8. Additionally, Mr. Ebrahimzadeh will need his passport to obtain his REAL ID after he receives a copy of his Social Security card.
9. To avoid the need to return to Court after Mr. Ebrahimzadeh receives his Social Security card, Mr. Ebrahimzadeh further requests that the Court permit him to, within 30 days, obtain his passport for a 48-hour period for his REAL ID appointment, which he will schedule once he receives his Social Security card.
10. In sum, Mr. Ebrahimzadeh requests that the Court permit him to obtain his passport (i) from January 9, 2026 to January 16, 2026, for a one-day domestic trip and to obtain his Social Security card; and (ii) for a future 48-hour period within 30 days so that he may obtain his REAL ID.
11. Neither the Government nor Pretrial Services objects to the return of Mr. Ebrahimzadeh's passport on these two occasions for these two purposes.

Given the proximity of his upcoming travel, Mr. Ebrahimzadeh respectfully requests the Court grant him permission to pick up his passport on January 9, 2026 and return it on or before January 16, 2026.

Dated: January 7, 2026

Respectfully submitted,

/s/ R. Scott Seitz

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on January 7, 2026 and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing (“NEF”).

/s/ Jacob E. Morse
Jacob E. Morse

CERTIFICATE OF CONSULTATION

I hereby certify that, consistent with Local Rule 7.1(a)(2), the parties have conferred and attempted in good faith to resolve or narrow the issues presented in this motion. The Government indicated that it does not object to this motion.

/s/ R. Scott Seitz
R. Scott Seitz