

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

DAVID EBRAHIMZADEH,

Defendant.

No. 1:25-cr-10455

**DEFENDANT’S ASSENTED TO MOTION REQUESTING ACCESS TO PASSPORT
FOR DOMESTIC TRAVEL AND TO OBTAIN REAL ID**

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 so that he may (i) travel to Los Angeles, California with his family on March 5–9, 2026; (ii) travel to Austin, Texas on March 15–16, 2026; and (iii) for a future 48-hour period so that he may obtain his 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. As discussed in prior orders, Mr. Ebrahimzadeh is seeking a REAL ID, which first required him to obtain a social security card and birth certificate. He has now completed those appointments and has those documents.
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. This Court also recently permitted Mr. Ebrahimzadeh access to his passport for domestic travel. *See* ECF No. 25.
5. 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.
6. For his upcoming domestic travel, Mr. Ebrahimzadeh has already provided Pretrial Services with copies of his travel itineraries and where he is staying, as required by his conditions of release. *See* ECF No. 12.
7. Further, to lessen the administrative burden on probation and the Court moving forward, Mr. Ebrahimzadeh is seeking a REAL ID, and therefore requests advance permission to access his passport for a future 48-hour period in order to finish the process of obtaining a REAL ID.
8. Neither the Government nor Pretrial Services objects to the return of Mr. Ebrahimzadeh's passport for his planned domestic travel or for purposes of obtaining his REAL ID.

Accordingly, Mr. Ebrahimzadeh respectfully requests the Court grant him permission to obtain his passport for his domestic travel on March 5–9 and 15–16, 2026, and a future 48-hour period so that he may finish obtaining his REAL ID.

Dated: February 26, 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 February 26, 2026 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

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