

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

DAVID EBRAHIMZADEH,

Defendant.

Case No. 1:25-cr-10455

**DEFENDANT’S MOTION REQUESTING ACCESS TO PASSPORT
FOR UPCOMING DOMESTIC TRAVEL**

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 to travel to Miami, Florida between April 3–11, 2026. In support of this motion, undersigned counsel states as follows:

1. Mr. Ebrahimzadeh does not currently hold a REAL ID but has taken all the steps required to get one and is now simply waiting to receive it in the mail.
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 has traveled both domestically and internationally pursuant to his conditions of release.
4. 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.
5. Neither the Government nor Pretrial Services objects to the return of Mr. Ebrahimzadeh’s passport for his planned domestic travel as described herein.

Accordingly, Mr. Ebrahimzadeh respectfully requests the Court grant him permission to obtain his passport for his domestic travel on April 3–11, 2026.

Dated: March 30, 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 March 30, 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