

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

UNITED STATES OF AMERICA,

v.

DAVID EBRAHIMZADEH,

Defendant.

No. 1:25-cr-10455

**DEFENDANT’S MOTION REQUESTING ACCESS TO PASSPORT
FOR UPCOMING INTERNATIONAL 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 for an upcoming international trip to Paris, France between May 4 and 7, 2026:

1. Mr. Ebrahimzadeh is seeking to travel to Paris, France with his wife to celebrate their upcoming anniversary.
2. Mr. Ebrahimzadeh has known about this investigation for multiple years and traveled domestically and internationally during that time, always returning.
3. Likewise, Mr. Ebrahimzadeh has traveled since being indicted in this case—including internationally, with this Court’s permission (ECF No. 20)—and has always returned.
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. Mr. Ebrahimzadeh requested the Government’s and Pretrial Services’ respective positions on this Motion. The Government indicated that it opposes all international

travel during the pendency of this case, and Pretrial Services indicated that it takes no position on international travel requests.

Accordingly, Mr. Ebrahimzadeh respectfully requests the Court grant him permission to obtain his passport for a trip to Paris, France between May 4–7, 2026.

Dated: April 22, 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 April 22, 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.

/s/ R. Scott Seitz
R. Scott Seitz