IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal Nos. 26-10030-RGS,
	)	26-10031-RGS
(1) SNIDERS JEAN-JACQUES	)	
	)	
Defendant	)	

EMERGENCY MOTION FOR STAY
AND REVOCATION OF RELEASE ORDER

The United States respectfully requests the Court revoke the February 13, 2026 Orders of Magistrate Judge Marty Fulgueria Elfenbein (the "magistrate judge"), presiding in the Southern District of Florida, releasing defendant Sniders Jean-Jacques on conditions, including electronic monitoring. Under 18 U.S.C. § 3145(a)(1), this Court has jurisdiction over any government motion to revoke an order of pretrial release issued by a magistrate judge in the district where the defendant was arrested, which in this case is the Southern District of Florida. Under the factors set forth in 18 U.S.C. § 3142(g), as described further below, Jean-Jacques presents a substantial risk of flight and danger to the safety of witnesses and the community, even with the conditions imposed by the magistrate judge, particularly given his use of other people's identities in the course of the charged offense, his history of threatening behavior, and his ongoing criminal conduct. Because there are no conditions or combination thereof that can eliminate those risks, the government requests that this Court stay the release order until a hearing on this motion can be held by this Court, revoke the magistrate judge's order of release, and order Jean-Jacques held pending trial.

PROCEDURAL BACKGROUND

On February 5, 2026, a grand jury sitting in Boston returned two separate indictments against Jean-Jacques. In the first indictment (No. 26-cr-10030), Jean-Jacques and four co-conspirators were charged with one count of bank and wire fraud conspiracy in violation of 18 U.S.C. § 1349. This indictment alleges that, between at least May 2018 through June 2025, the defendants conspired with each other and others to obtain money and property, including mortgage loans and apartment leases, through fraudulent misrepresentations, including fake paystubs, altered bank statements, fraudulent credit histories, and the unauthorized use of Social Security numbers belonging to others. The second indictment (No. 26-cr-10031) charges Jean-Jacques and three co-conspirators with one count of wire fraud conspiracy in violation of 18 U.S.C. § 1349. This indictment alleges that, between in or about March 2021 and December 2022, the defendants conspired with each other and others to obtain Paycheck Protection Program ("PPP") loans for dozens of borrowers by submitting fraudulent PPP loan applications to PPP lenders, including by falsely stating the borrowers' gross income and creating fake IRS Schedule C forms to substantiate the claimed income. Federal arrest warrants for Jean-Jacques were issued the same day as the indictments were returned.

On February 9, 2026, Jean-Jacques was arrested in Florida. The next day, Jean-Jacques appeared before the magistrate judge in the Southern District of Florida for an initial appearance and removal to this District, pursuant to Rule 5 of the Federal Rules of Criminal Procedure. The government moved for detention.[1] The magistrate judge held a hearing on the government's motion for detention of Jean-Jacques on February 13, 2026, at which the magistrate considered

[1] Jean-Jacques's six co-defendants were also arrested on February 9, 2026 and released on conditions following their initial appearances. The government did not move for detention on any of Jean-Jacques's co-defendants.

only risk of flight and refused to consider the danger Jean-Jacques presents to the safety of the community and witnesses. At the conclusion of that hearing, at which the parties proceeded mainly by proffer, although defense counsel also cross-examined a government witness, Jean-Jacques was ordered released on conditions, including electronic location monitoring.[2] The government notified the magistrate judge that it intended to seek review of the release order, and she stayed the release order until Wednesday, February 18, 2026.

THE GOVERNMENT'S CASE AGAINST JEAN-JACQUES

The Mortgage and Apartment Fraud Indictment

The first indictment alleges that, over at least seven years beginning by May 2018, in the District of Massachusetts, Southern District of Florida, and elsewhere, Jean-Jacques and his co-defendants conspired with each other and others to obtain money and property, including applying for more than \$6.7 million in mortgage loans and dozens of apartment leases. They engaged in the scheme by:

a. Recruiting individuals with poor credit histories who needed mortgage loans and apartment rentals ("Fraudulent Applicants");

b. Obtaining and providing victims' Social Security numbers to Fraudulent Applicants for use in mortgage loan and rental applications;

c. Paying for so-called "tradelines" in which co-conspirators temporarily added Fraudulent Applicants' names to the credit accounts of individuals with strong credit histories, in order to improve Fraudulent Applicants' credit scores;

d. Creating fake paystubs for Fraudulent Applicants;

e. Forging bank statements to show purported savings and income for Fraudulent Applicants;

[2] The magistrate judge's release orders were not yet available at the time of filing this motion.

f. Submitting the fake paystubs and forged bank statements on behalf of Fraudulent Applicants for mortgage loans and apartment leases;

g. Applying for apartment rentals for the use of Fraudulent Applicants but using identities of other individuals in the applications;

h. Charging Fraudulent Applicants a percentage of loan proceeds as a fee; and

i. Communicating with each other about Fraudulent Applicants, false and stolen Social Security numbers, tradelines, fake paystubs, forged bank statements, loan and apartment rental applications, and payments.

The government's evidence against Jean-Jacques, including his iMessage and WhatsApp chats, shows that Jean-Jacques recruited Fraudulent Applicants through his purported tax preparation and credit repair business; obtained victims' Social Security numbers and "tradelines" through co-defendant Jim Kelly Michel, which Jean-Jacques provided to Fraudulent Applicants; created fake paystubs for Fraudulent Applicants in the names of Jean-Jacques's other purported businesses, including Black Market Luxury and Nursing Loving Care; provided Fraudulent Applicants' original bank statements and the fake paystubs to co-defendant German Olivo to alter the bank statements to show high starting balances and purported payroll deposits corresponding to the fake paystubs, or asked Olivo to make fake bank statements out of whole cloth; and caused the fake paystubs, altered bank statements, fraudulently boosted credit scores, and victims' Social Security numbers to be submitted to mortgage lenders and landlords in connection with the Fraudulent Applicants' applications for mortgage loans or apartment rentals. Jean-Jacques also used other people's identities to rent apartments for use by the Fraudulent Applicants as well as himself. Jean-Jacques charged the Fraudulent Applicants for his "services," in addition to taking a cut of the loan proceeds.

In chats between Jean-Jacques and Fraudulent Applicants and his co-defendants, which were obtained pursuant to a Court-authorized search warrant, Jean-Jacques received images of driver's licenses and copies of Social Security numbers, purchased tradelines, and shared original and altered bank statements. For example, in October 2021, Jean-Jacques sent Olivo fake paystubs for the individual identified in the indictment as Borrower 2 along with Borrower 2's original bank statements, and asked Olivo to alter the statements to show a starting balance of at least $84,000 and payroll deposits corresponding to the fake paystubs. Olivo delivered the altered bank statements as requested, which Jean-Jacques sent to Borrower 2. Borrower 2 submitted the fake paystubs and forged bank statements with his mortgage loan application, which was approved for more than $400,000 in November 2021.

In addition to renting apartments under other people's identities for Fraudulent Applicants, Jean-Jacques also did so for himself. For example, on or about January 14, 2024, Jean-Jacques asked co-defendant Michel for a victim's Social Security number for his assistant and co-defendant Tanya Pierre, because Jean-Jacques was trying to move and planned to use Pierre's name, with a victim's Social Security number, to rent an apartment. Messages between Jean-Jacques and his real estate agent also show that, on or about June 12, 2021, Jean-Jacques sent a photo of a fake Social Security card with Jean-Jacques's name but a victim's Social Security number.

The PPP Indictment

The second indictment alleges that, beginning by at least March 2021, in the District of Massachusetts, Southern District of Florida, and elsewhere, Jean-Jacques and his co-defendants conspired with each other and others to obtain more than $7 million in PPP loans for dozens of borrowers by submitting fraudulent PPP loan applications to PPP lenders. They engaged in the scheme by:

a. Recruiting potential borrowers to apply for PPP loans regardless of whether the borrowers had qualifying businesses;

b. Traveling between Florida and Boston to meet with prospective fraudulent PPP loan applicants;

c. Applying for Employer Identification Numbers with the Internal Revenue Service and filing state business registrations to make the borrowers' purported businesses appear legitimate;

d. Making false representations on PPP applications regarding the borrowers' purported gross income for the purpose of securing PPP loans to which the borrowers were not entitled;

e. Establishing tax preparation software accounts in the names of co-conspirators so they could create fake Schedule C forms listing inflated or fabricated gross income for the borrowers' purported businesses;

f. Using the tax preparation software to create fake Schedule C forms;

g. Causing borrowers to sign and certify the fraudulent PPP applications electronically with PPP lenders;

h. Causing PPP lenders to fund the fraudulent PPP loans;

i. Charging borrowers as much as 30 percent of the PPP loan proceeds as a fee; and

j. Communicating with each other about the fraudulent PPP applications.

The government's evidence against Jean-Jacques, including his iMessage and WhatsApp chats, shows that he recruited potential borrowers through his purported tax preparation and credit repair business; prepared PPP applications for borrowers that listed fraudulently inflated gross income; and created fake Schedule C forms using Jean-Jacques's tax preparation software to support the claimed gross income. Jean-Jacques also recruited additional co-conspirators to help him recruit additional borrowers and complete fraudulent PPP applications. Jean-Jacques took up to 30% of the PPP loan proceeds as a fee.

Ongoing Tax Fraud Scheme

The government has also gathered substantial evidence that Jean-Jacques aided or assisted in the preparation of false tax returns, in violation of 26 U.S.C. § 7206(2).[3] For tax years 2019 through 2023, 93% of the returns his tax preparation business filed claimed a refund, well above the national average of 68%. Additionally, 49% of the returns that his tax preparation business filed included a Schedule C Business, well above the national average of 21%. The government has interviewed witnesses who reported that Jean-Jacques prepared their federal income tax returns and included false business expenses on those returns, which appear designed to inflate the witness's tax refund. Additionally, Jean-Jacques does not have a Preparer Tax Identification Number ("PTIN"), which the IRS requires individuals who prepare or assist in preparing federal tax returns for compensation to have. Rather, according to witnesses, Jean-Jacques uses other people's PTINs to submit tax returns on behalf of his clients. Jean-Jacques advertised his tax preparation services on social media as recently as late January 2026, and around the same time Jean-Jacques told a witness he would be able to pay back money he owed after the "[f]irst drop from taxes," showing Jean-Jacques is continuing to prepare taxes during this current tax season.

ADDITIONAL BACKGROUND RELEVANT TO DETENTION

Jean-Jacques previously served a two-year sentence for theft of government funds in violation of 18 U.S.C. § 641. *See United States v. Jean-Jacques*, No. 14-cr-40024-TSH (D. Mass.). That case, like his current circumstances, concerned stolen Social Security numbers and fraudulent tax refunds, and Jean-Jacques was detained pretrial based on a risk of flight. In a post-arrest interview in that case, Jean-Jacques told investigators he obtained victims' personally identifying information through the internet and his contacts in Miami. Notably, Jean-Jacques was on

[3] Jean-Jacques has not yet been charged with this offense.

supervised release for that offense through December 2018, meaning he began the mortgage and apartment rental fraud while still on supervised release.

Jean-Jacques does not have a stable address in Florida, with at least four addresses identified in the past year alone. At the time of his arrest, a witness told investigators that Jean-Jacques had said he was staying at an address on NE 156th Terrace, which was also the address listed on Jean-Jacques's Florida driver's license. Upon arrival, an individual living at this address told investigators that Jean-Jacques had moved in December 2025. Investigators then found Jean-Jacques at an address on W. Dixie Highway. While investigators were present at this address on February 9, 2026, a local sheriff's deputy arrived with an eviction notice for Jean-Jacques. Additionally, this address did not appear lived in, with barely any furniture or clothing. Further, Jean-Jacques locked himself inside this apartment for approximately fifteen minutes, during which time he appears to have tried to destroy evidence by giving his electronic devices to his brother, who happened to be there when agents arrived to arrest Jean-Jacques. During a safety check, agents found five phones on the brother, including one with a photo of Jean-Jacques and his children as the background. The brother claimed the phones were his and attempted to leave with them. In May 2025, a third address, on Indian Creek Drive, was listed for Jean-Jacques on child support paperwork filed in the Florida court system. And in November 2025, a sheriff's deputy attempted to serve Jean-Jacques with a child support suit at a fourth address on Treasure Drive.

Jean-Jacques also uses multiple phone numbers, including Google Voice and other voice-over-internet-protocol (VoIP) numbers that he can exchange with only an email address. Investigators found a SIM card in his wallet, suggesting he removed it from a phone to avoid being tracked.[4] Jean-Jacques does not own any property. Based on a review of Florida corporate records, none of Jean-Jacques's businesses are active, and in any event, appear to be intertwined with his fraud.

Jean-Jacques also has extensive foreign ties. Born in Haiti, Jean-Jacques appears to maintain ties there and brags to his contacts about raising money for Haitian causes. In the past five years, Jean-Jacques has traveled internationally at least 13 times, including twice to Haiti directly and twice to the Dominican Republic, which shares a land border with Haiti. Jean-Jacques also appears to have crossed the border to Mexico by land, as there is a record of him flying back from Mexico but not traveling there.

Jean-Jacques has a documented history of threatening behavior. At least three witnesses have reported seeing him with a handgun, despite that he is prohibited from owning one as a convicted felon. One of these witnesses reported that in or about March 2025, she saw Jean-Jacques draw the gun from the rear pocket of the passenger seat of Jean-Jacques's car and threaten another driver who had cut off Jean-Jacques. A few weeks later, a hotel in Braintree, Massachusetts called 911 after Jean-Jacques reportedly displayed a firearm to the occupants of the hotel room above his for making too much noise. Although police did not find a firearm, they did find a 16-inch machete, which Jean-Jacques said he kept for protection. There is a pending state arrest warrant for Jean-Jacques arising from his threats to kill the closing attorney for a property he owned with the mother of his child (procured through a fraudulent mortgage) over a $3,900 disbursement check in April 2025. In March 2025, Jean-Jacques threatened to kill an attorney for

[4] Indeed, investigators obtained a "ping" warrant to locate Jean-Jacques using data from his cellphone provider, but it appeared Jean-Jacques had turned off his phone so it was not traceable.

State Farm Insurance over a delay in processing an insurance claim, and in April 2025, Jean-Jacques threatened to shoot and kill the State Farm agents themselves, and their staff, over the same claim. The mother of one of his children reported that, in April 2024, Jean-Jacques threatened to kill her and their daughter. And one of the borrowers for whom Jean-Jacques submitted a fraudulent PPP application was so scared after Jean-Jacques threatened him for not paying Jean-Jacques $12,000 from the loan proceeds that he moved and sold his car because he was afraid Jean-Jacques knew the make and model and would find him and follow through on his threats.

LEGAL STANDARD

"If a person is ordered released by a magistrate judge . . . the attorney for the Government may file, with the court having original jurisdiction over the offense, a motion for revocation of the order or amendment of the conditions of release. . . . The motion shall be determined promptly." 18 U.S.C. § 3145(a). As Jean-Jacques is charged in the District of Massachusetts, this Court has original jurisdiction over the offense and is the proper forum to hear the government's Emergency Motion for Stay and Revocation of a Release Order.

The district court reviews a release order *de novo*. *See United States v. Tortora*, 922 F.2d 880, 884 n.4 (1st Cir. 1990) (with respect to pretrial detention or release orders, the proper approach is for the district court to engage in *de novo* review of the contested order). *Tortora* mandates that the district court must make an independent determination of the detention decision, unconstrained by the limits of the magistrate's conclusions or the record established in the original detention hearing. *See also United States v. Leon*, 766 F.2d 77, 80 (2nd Cir. 1985) ("In our view a district court should fully reconsider a magistrate's denial of bail and in ruling on a motion for revocation or amendment of a detention order should not simply defer to the judgment of the magistrate, but reach its own independent conclusion."). Accordingly, in its discretion, this Court may proceed to rehear the evidence to support detention by recalling the witnesses, reviewing transcripts, or by proceeding through proffer and argument. It may take additional evidence from new witnesses or consider arguments not raised previously. In short, the Court may proceed as best enables it to resolve the question posed: whether any condition or combination of conditions will reasonably assure the appearance of the person as required.

Pursuant to 18 U.S.C. § 3142(g) the Court shall consider: (1) the nature and circumstances of the offense charged, (2) the weight of the evidence, (3) the history and characteristics of the person, and (4) the nature and seriousness of the danger to any person or the community that would be posed by the person's release. The preponderance standard governs the flight risk determination, *United States v. Patriarca*, 948 F.2d 789, 793 (1st Cir. 1991), while a determination that a defendant presents a risk of safety of any other person and the community must be supported by clear and convincing evidence. 18 U.S.C. § 3142(f); *see also United States v. Fortna*, 769 F.2d 243 (5th Cir. 1985) (distinguishing the standard governing the flight risk determination with the higher clear and convincing burden of proof that governs detention based on danger to the community).

The Bail Reform Act does not limit "danger to the safety of any other person or the community" to violent crimes. *United States v. Cook*, 880 F.2d 1158, 1161 (10th Cir. 1989) ("The concern about safety is to be given a broader construction than the mere danger of physical violence."). To the contrary, the legislative history makes clear that Congress intended "safety of the community" be given "broad construction," encompassing "the danger that the defendant might engage in criminal activity to the detriment of the community." S. Rep. No. 225, 98th Cong., 1st Sess. 12 (1983).[5] Courts have consistently construed protection of the community to include protection from economic harm. *United States v. Schenberger*, 498 F. Supp. 2d 738, 742 (D.N.J. 2007) (holding that "[a] danger to the community does not only include physical harm or violent behavior" and citing the Senate Committee Report language); *United States v. Persaud*, No. 05-cr-00368, 2007 WL 1074906, at *1 (N.D.N.Y. Apr. 5, 2007) (concurring with a magistrate's finding that "economic harm qualifies as a danger within the contemplation of the Bail Reform Act"); *United States v. Gentry*, 455 F. Supp. 2d 1018, 1032 (D. Ariz. 2006) (in a fraud and money laundering case, holding that danger to the community "may be assessed in terms other than the use of force or violence . . . [including] economic danger to the community"); *United States v. Giordano*, 370 F. Supp. 2d 1256, 1270 (S.D. Fla. 2005) ("There can be no question that an economic danger, like that posed by a serious defrauder, falls under the broad umbrella of 'dangerousness' as that term is used throughout the Bail Reform Act.").

ARGUMENT

Jean-Jacques poses both a risk of flight and danger to the community and witnesses that cannot be mitigated by conditions of release.

Jean-Jacques Poses a Substantial Risk of Flight

Jean-Jacques has an incentive to flee and the means and ability to do so. The weight of the evidence—in particular, his own chat messages, corroborated by financial records—is

[5] This topic is discussed in the legislative history of the Bail Reform Act of 1984. S. Rep. No. 225, 98th Cong., 1st Sess. 12 (1983) ("The reference to safety of any other person is intended to cover the situation in which the safety of a particular identifiable individual, perhaps a victim or witness, is of concern, while the language referring to the safety of the community refers to the danger that the defendant might engage in criminal activity to the detriment of the community. The Committee intends that the concern about safety be given a broader construction than merely danger of harm involving physical violence.")

overwhelming. If convicted, Jean-Jacques faces a significant sentence. He organized sophisticated financial frauds with combined losses between his two indictments exceeding $13 million, and he used other people's Social Security numbers to do it. With a Criminal History Category II, Jean-Jacques's Guidelines sentencing range is at least 188 to 235 months, if not higher. Having already served two years in federal prison, Jean-Jacques presumably does not want to return, particularly where he will have to give up his designer clothes, luxury vehicles, and expensive jewelry featured in his social media.

Jean-Jacques's access to and prior use of other people's identities to commit his crimes—including where he was personally living in apartments rented under other people's names—shows he has the ability to flee. While his foreign ties certainly make him a risk to travel overseas, even if he is ordered to surrender his passport, he could easily go underground within the United States and live under a stolen identity because he has previously done so. His demonstrated inability to follow court orders—including that he not commit any crimes while on supervised release (yet he did) or own a gun as a convicted felon (but he apparently has one)—shows that he is unlikely to comply with a court order not to flee or, for instance, cut off or damage a GPS bracelet. Likewise, Jean-Jacques's ability to obtain financing using other people's identities and forged bank statements allows him to fund his flight indefinitely. Further, he appears to have recently received an influx of cash based on tax returns he had already prepared, given that he was promising to pay back money he owed after the "[f]irst drop from taxes." The IRS began accepting federal income tax returns for tax year 2025 on January 26, 2026.

While Jean-Jacques has resided in the United States since he was 11 and became a U.S. citizen within the past ten years, he has not maintained a stable address and is apparently being evicted from his current address. He uses multiple phone numbers, including VoIP numbers, and appears to have removed his SIM card to avoid being found. He has no legitimate employment, and his now-defunct businesses were intertwined with his schemes. His only apparent work is tax preparation, for which he lacks a PTIN to do for compensation, and, having previously been convicted of a charge involving stolen identities and tax fraud, he is likely prohibited from obtaining a PTIN in the future. While he has children, he is not married and in fact threatened to kill one of his children and her mother and is being sued for unpaid child support. And while he has family in Miami, his mother may be involved in the scheme as it appears Jean-Jacques was sending forged bank statements in her name to co-conspirators, used the purported nursing home she allegedly ran to create fake paystubs, and when investigators went looking for Jean-Jacques at this alleged nursing home (which was unlicensed), found that it was not in fact a nursing home but appeared to have homeless people living there. Similarly, Jean-Jacques's brother appears to have tried to help him destroy evidence—namely, Jean-Jacques's cell phones, which the brother claimed were his and tried to leave with.

In sum, Jean-Jacques's incentive and ability to flee, particularly his access to and use of other people's identities, and inability to comply with court orders, present a risk of flight that cannot be mitigated by even GPS monitoring and surrender of passport.

Jean-Jacques Presents a Danger to the Safety of Witnesses and the Community

Jean-Jacques presents a danger to the safety of the community because his crimes, including stealing others' identities and obtaining financing through fraudulent means, can be done from any computer and cannot be mitigated by conditions of release. As Jean-Jacques acknowledged after his arrest in 2014, he has contacts and access to websites that will give him victims' personal identifying information. Even if restrictions were put on his computer use, there is no family member or friend to serve as a guardian to enforce those restrictions given that Jean-Jacques seems to have involved them in his offenses, and Jean-Jacques cannot be trusted given his demonstrated inability to comply with court orders. Similarly, Jean-Jacques appears to be continuing his tax preparation fraud scheme, where he advertised his services on social media only three weeks ago and has apparently already prepared returns for which he is expecting payment, despite not having a PTIN of his own.

The ongoing nature of Jean-Jacques's fraud schemes, beginning with his use of stolen identities and tax fraud in relation to his 2014 charge and conviction and continuing through the instant charges and his ongoing tax fraud, is clear and convincing evidence of the danger he poses to the safety of the community. *See, e.g.*, *United States v. Carpenter*, 2014 WL 2178020, at *4 (D. Mass. May 23, 2014) (O'Toole, J.). (defendant indicted for wire and mail fraud posed a danger to the safety of the community because he was recently accused of similar offenses in another state); *United States v. Garcia-Oquendo*, No. 25-cr-00041, 2025 WL 756456, at *5 (D.P.R. Mar. 10, 2025) ("In light of his ongoing penchant for fraud and misappropriation of other person's identities, I also find that the Government has met its burden to show by clear and convincing evidence that there are no conditions that would reasonably assure the safety of the community if Garcia-Oquendo were to be released."). Where a prior two-year prison term and period of supervised release was not sufficient to deter Jean-Jacques from continuing his schemes, there appears to be no set of conditions that can protect the community from his fraud.

Further, Jean-Jacques presents a danger to witnesses in these cases. He has engaged in multiple instances of threatening behavior over what could be deemed trivial matters: being cut off in traffic, a loud hotel neighbor, a delay in a $3,900 check. Given his reaction to these inconveniences, his reaction to witnesses speaking to the government will likely be exponentially worse. That he has already attempted to obstruct the investigation by giving his brother his phones for disposal shows that he will not be inhibited from going further with witnesses. And while he apparently has not yet fired the handgun at least three witnesses reported he has, he does not need to use it to intimidate witnesses into changing their statements—his threats are enough.

Accordingly, given Jean-Jacques's access to and use of victims' personal identifying information, his more than a decade of perpetrating fraud schemes, his prior threatening behavior, and his access to weapons, the government submits there are no conditions or combination of conditions that can reasonably assure the safety of witnesses and the community.

CONCLUSION

For the reasons set forth above, this Court should revoke the order of release and detain Jean-Jacques pending his transportation to the District of Massachusetts.

Respectfully Submitted,

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By: */s/ Kristen A. Kearney*
KRISTEN A. KEARNEY
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Dated: February 17, 2026

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified in the Notice of Electronic Filing. I further certify that I have caused a copy of this motion to be sent to counsel for defendant in the Southern District of Florida by transmitting a copy of it by e-mail to Marcus Beaton, Esq., counsel for Sniders Jean-Jacques, on February 17, 2026.

/s/ Kristen A. Kearney
KRISTEN A. KEARNEY
Assistant U.S. Attorney