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February 13, 2026

VIA ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSEMENT.

Permission granted. The Government shall respond by February 20, 2026 whether there is any reason that the travel restriction should not be lifted.

2/17/2026 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Re: United States v. Rafael Martinez, 22-CR-251 (LJL)

Dear Judge Liman:

Counsel for Rafael Martinez respectfully submits this letter to request permission for Mr. Martinez to travel to the Dominican Republic to visit his ailing mother, who is 93 years old, is on full-time oxygen, and has a pacemaker. The purpose of the trip is to allow Mr. Martinez to assist his mother—for whom he is power of attorney—with legal affairs pertaining to her estate. During the trip Mr. Martinez intends to reside with his mother in San Cristobal, Dominican Republic. Mr. Martinez would depart on February 23, 2026 and return to the United States on March 3, 2026. He also seeks permission to travel to the Dominican Republic for a follow up trip approximately 30-45 days after his March 3, 2026 return to the United States to complete the filings necessary to get his mother's legal affairs in order.

Mr. Martinez is currently serving a 3-year term of supervised release that began on December 30, 2025. One of the conditions of Mr. Martinez's release is that he "must not knowingly leave the federal judicial district where [he is] authorized to reside without first getting permission from the court or the probation officer." ECF No. 82 at 4. Mr. Martinez's probation officer, Larren Riley, approves of Mr. Martinez's travel plans but, given the international nature of the travel, requested that Mr. Martinez receive permission of the Court as well.

While he is away, Mr. Martinez will make arrangements to check in with his probation officer every day and will remain available to his probation officer for the duration of the trip. While he is in the Dominican Republic, Mr. Martinez would continue to be subject to all other conditions of his supervised release. He will also provide his probation officer with his specific travel itinerary if this request is granted.

Mr. Martinez has a full record of compliance during pretrial supervision in this case, his term of incarceration at FCI Lewisburg, his stay at a residential reentry management center, and home confinement. He will continue to be compliant while he visits his mother during this sensitive time. He therefore respectfully requests that the Court grant him this travel request.

Sincerely,

WILLKIE FARR & GALLAGHER LLP

/s/ Michael S. Schachter

Michael S. Schachter

cc: AUSA Micah Fergenson (via ECF)