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March 4, 2026

VIA ECF

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

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

Dear Judge Liman:

Counsel for Rafael Martinez respectfully submits this letter to request that the Court modify the travel restriction that is a condition of his supervised release. 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 supervised 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.]

On February 13, 2026, Mr. Martinez asked the Court for permission to travel to the Dominican Republic to assist his ailing, 93-year-old mother with legal affairs pertaining to her estate. [ECF No. 109.] The Court granted Mr. Martinez's request and also instructed the Government to "respond by February 20, 2026 whether there is any reason that the travel restriction should not be lifted." [ECF No. 110.] The Government did not file a response. Meanwhile, Mr. Martinez visited his mother without incident while keeping Probation apprised of his itinerary.

Mr. Martinez now asks that the Court modify the travel restriction as a condition to his supervised release. The deteriorating state of his mother's health will require him to travel to the Dominican Republic frequently in the coming months. Additionally, Mr. Martinez is pursuing business opportunities that also require international travel.

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. His Probation Officer, Darren Reilly, also approves of modifying the travel restriction on the condition that Mr. Martinez provide advance notice to Probation of his travel arrangements. Given that the Government did not object when the Court asked if there was any reason to retain the travel restriction, Mr. Martinez's history of compliance, and his Probation Officer's support, Mr. Martinez respectfully requests that the Court modify the travel restriction

as a condition of his supervised release and permit him to travel both domestically and internationally, so long as he provides advance notice to Probation of his travel plans.

Sincerely,

WILLKIE FARR & GALLAGHER LLP

/s/ Michael S. Schachter

Michael S. Schachter

cc: AUSA Micah Fergenson (via ECF)