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May 24, 2022

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

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

Dear Judge Liman:

We represent Rafael Martinez in the above-captioned case and seek a modification of Mr. Martinez's bail conditions to permit travel to the District of Massachusetts. The government consents to this request.

Mr. Martinez was arrested on February 28, 2022 and was presented on a Complaint on March 1. Magistrate Judge Katharine H. Parker approved the following bail package: (1) a \$10 million personal recognizance bond; (2) cosigned by three financially responsible people; (3) secured by four designated properties; (4) with travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; (5) the surrender of any firearms; (6) supervision as directed by Pretrial Services; and (7) the surrender of any travel documents. Judge Parker subsequently modified Mr. Martinez's bail conditions to permit travel to the District of Connecticut.

Prior to his arrest, Mr. Martinez routinely traveled to Boston, including to take his elderly mother to visit her sister, who is not in good health. We have conferred with the assigned Assistant United States Attorney, who consents to this application.

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Accordingly, we respectfully request that the Court modify Mr. Martinez's bail conditions to permit travel to the District of Massachusetts. We thank the Court for its attention to this matter.

Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON &
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/s/ Telemachus P. Kasulis

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