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September 28, 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 the Court's permission for Mr. Martinez to travel outside the bail limits imposed by this Court.

Mr. Martinez has been at liberty since he was arrested on February 28, 2022 and presented before Magistrate Judge Katherine H. Parker on March 1. Mr. Martinez's bond currently permits him to travel within the Southern and Eastern District of New York, the District of New Jersey, the District of Connecticut, and the District of Massachusetts.

In July 2022, Mr. Martinez received permission from the Court to travel to California in connection with his participation in the Stanford University executive program. Mr. Martinez again seeks permission from the Court to travel to California so that he may continue to participate in that program.

Mr. Martinez intends to travel to California tomorrow, September 29, 2022. He is scheduled to depart from Newark, New Jersey at 5:25 pm and to arrive in Los Angeles at 8:36 pm. He plans to stay at the Loews Santa Monica Beach Hotel. He will then drive from Los Angeles to San Francisco, and he intends to stay in lodging en route for one night. When Mr. Martinez arrives in San Francisco, he will stay at the Fairmont Hotel. He is scheduled to depart from San Francisco on October 8, 2022 at 10:40 pm and to arrive in Newark on October 9, 2022

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

Hon. Lewis J. Liman
P. 2

at 7:00 am.¹ Mr. Martinez's participation in the program was approved in November 2021, prior to his arrest in this case.

Mr. Martinez also intends to travel to California periodically to continue his participation in the Stanford University executive program. The next scheduled session is on March 14, 2023. Mr. Martinez would request permission to travel to California in connection with that session and any other sessions scheduled in 2023 that do not conflict with the proceedings in this case. If the Court permits this travel, we will provide detailed trip information to the AUSA and Pretrial Services Officer assigned to this matter.

Earlier today, we advised Mr. Martinez's Pretrial Services Officer and the assigned Assistant United States Attorney of this proposed travel. Pretrial Services indicated that they had no objection to this application, and the government indicated that it takes no position.

We thank the Court for its consideration of this matter.

Respectfully submitted,

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/s/ Telemachus P. Kasulis
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cc: AUSA Micah Fergenson
U.S. Pretrial Services Officer Viosanny Harrison

¹ Stanford University's executive program is also offering a secondary program that extends until October 10, 2022. Mr. Martinez is awaiting notice of whether availability in that program will open up. If it does, he would intend to participate in that program and return to New Jersey after that program ends on October 10, 2022.