UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
v.	)	CRIMINAL NO. 26-10030-RGS
	)	
GERMAN OLIVO,	)	
Defendant.	)	

MOTION TO MODIFY CONDITIONS OF RELEASE

NOW COMES counsel for the Defendant, German Olivo, and moves to modify the conditions of his release to permit him to travel to and be in Nashville, Tennessee, between the dates of April 24, 2026, to and including April 27, 2026, in order to participate in a 5K road race which is part of the Rock 'n' Roll running series.

Mr. Olivo is a personal trainer employed by Sweat440. He is released on conditions in the Southern District of Florida. His participation in this event, which was planned and paid for prior to arrest in this case, is in connection with his professional activities as a trainer. He is traveling and participating in the event as part of a group of personal trainer peers and clients.

Mr. Olivo's participation in this event is part of a planned program of race participation that Mr. Olivo expects will permit him to obtain professional certifications and advance his career as a personal trainer.

Undersigned counsel has consulted with Probation in both the District of Massachusetts and the Southern District of Florida. Probation assents to this request.

The government takes no position on this request.

WHEREFORE, Mr. Olivo requests the Court temporarily modify his conditions of release to permit him to be in and travel to and from Nashville, TN, between April 24, 2026, and April 27, 2026.[1]

Respectfully submitted,

GERMAN OLIVO,
By his attorney,

/s/Ian Gold

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April 16, 2026

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date, Apr. 16, 2026.

/s/ Ian Gold

[1] Itinerary information will be provided to Probation in advance. Defendant also requests Probation be granted to authority to extend this authorization as appropriate in the event of weather-related flight delays.