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 Naples, Florida, between the dates of June 29, 2026, to and including July 3, 2026, in order to vacation with his wife, three children, and other family.

Mr. Olivo is released on conditions which restrict this travel to the Southern District of Florida. He lives in the greater Miami area. Naples, Florida, two hours west, is in the Middle District of Florida.

Undersigned counsel has consulted with Probation in the District of Massachusetts, which has conferred with its counterpart in the Southern District of Florida. Probation assents to this request. The government also assents.

WHEREFORE, Mr. Olivo requests the Court temporarily modify his conditions of release to permit him to be in and travel to and from Naples, Florida, between June 26, 2026, and July 3, 2026.[1]

Respectfully submitted,

GERMAN OLIVO,
By his attorney,

/s/Ian Gold

Ian Gold (BBO #665948)
185 Devonshire Street, Suite 302
Boston, MA 02110
(617) 297-7686 (office & mobile)
ian.gold@iangoldlaw.com

June 26, 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, Jun. 26, 2026.

/s/ Ian Gold

[1] Itinerary information will be provided to Probation in advance.