J.L. Russo, P.C.

JOHN L. RUSSO
ATTORNEY AT LAW

COUNSEL
Milton Florez, Esq.
Michael Horn, Esq.

31 · 19 Newtown Avenue, Suite 500
Astoria, New York 11102
Tel: 718 · 777 · 1277
Fax: 718 · 204 · 2310
Email: *JLRussoPC@Gmail.com*

PARALEGAL
Maria Nunez, B.S.

Granted.
So ordered.
12/15/2025

J. PAUL OETKEN
United States District Judge

December 15, 2025

Via ECF
Honorable. J. Paul Oetken
United States District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States of America v. Juan Nolasco -Martinez, et al.
22-CR-00012 (JPO) & 22-CR-00008 (JPO)

Your Honor:

This office represents Defendant Juan Nolasco-Martinez, a U.S. citizen, who is currently serving a term of federal probation following the completion of his sentence in the above-mentioned matter. I respectfully write to request the Court's permission for Mr. Nolasco Martinez to travel to the Dominican Republic from December 22nd to January 5th to visit his mother.

Mr. Nolasco Martinez has been fully compliant with all conditions of probation to date. He has consistently reported as required, completed all obligations, and demonstrated ongoing commitment to abiding by the terms of his supervision.

The Government does not oppose this request. Specifically, AUSA Patrick Maroney has no objection, AUSA Mitzy Steiner defers to Probation, and Probation Officer Fernandez has advised that there are no objections to the requested travel.

Given these circumstances, and considering Mr. Nolasco-Martinez's record of compliance, we respectfully request that the Court grant him leave to travel as outlined above. Thank you.

Respectfully submitted,
/s/ John L. Russo
John L. Russo (JR6200)