UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No.26-cr-10115-LTS
	)	
STJEPAN VINSKI	)	

SECOND ASSENTED TO MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, Stjepan Vinski, and hereby moves, pursuant to 18 U.S.C. §3142, to modify the conditions of release imposed by the Magistrate Judge in the United States District Court for the Central District of California at his initial appearance.

In support thereof Mr. Vinski states as follows:

1. On June 3, 2026, Mr. Vinski filed an Assented to Motion to Modify Conditions of Release (Dkt. Entry 50).
2. That motion has attached, as Exhibit 1, a copy of the Conditions of Release ordered by the United States District Court for the Central District of California which were imposed at his initial appearance on May 6, 2026.
3. Relevant to this motion, Mr. Vinski seeks to modify the Conditions of Release as follows:
    a. Allow Mr. Vinski to have contact with co-defendants Nowel Milik, Nicholas Rudela, and David

Makary on June 13, 2026 on the condition that they not discuss this case. As reasons therefore, on June 13, 2026 a party is scheduled to celebrate Mr. Rudela's engagement, and Mr. Milik, Mr. Rudela, Mr. Makary, and Mr. Vinski are all scheduled to attend. This party was scheduled prior to the indictments; and

b. Allow Mr. Vinski to travel from California to Topeka, Kansas and back to California, and all points in between, from June 24, 2026 through July 1, 2026. As reasons therefore, Mr. Vinski is scheduled to fly to Kansas City on June 24, 2026, drive to Topeka, Kansas to help his wife move from Kansas, and drive back to California. Again, this move was planned prior to the indictments.

c. Travel is restricted to Central District of California and District of Massachusetts (and any points between for travel purposes). Court permission is required for any other domestic of international travel.

4. Mr. Vinski has spoken to his pre-trial services officer regarding the travel to Kansas and has been directed to provide flight details and specifics of the itinerary approximately one (1) week prior to the trip.

5. Pursuant to Local Rule 7.1, and in anticipation of Mr. Vinski filing a motion to modify conditions of releases, the parties have conferred and the Government assents to these modifications.

6. A proposed order reflecting these modifications, as well as the modifications in have the Assented to Motion to Modify Conditions of Release filed June 3, 2026 (Dkt. Entry 50) is attached.

STJEPAN VINSKI
By his attorney:

Date: June 11, 2026

/s/ Michael J Callanan
Michael J. Callanan
105 Eastern Ave Suite 215
Dedham MA 02026
617-884-2130
BBO#654724
mjc@callanandefense.com

Certificate of Service

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

Date: June 11, 2026

/s/ Michael J Callanan
Michael J. Callanan