UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA v. LORENZO NOURAFCHAN	)	No. 26-cr-10115-LTS

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE TO PERMIT LIMITED BUSINESS TRAVEL WITHIN CALIFORNIA, EXCLUDING THE SOUTHERN DISTRICT OF CALIFORNIA, AND TO PERMIT USE OF WHATSAPP

Defendant Lorenzo Nourafchan, by and through his undersigned counsel, respectfully moves this Honorable Court, with the assent of the Government, to modify his conditions of release in two limited respects: first, to permit business-related travel within the Eastern and Northern Districts of California, in addition to the Central District of California already permitted by his conditions of release, upon advance notice to Pretrial Services and compliance with any directives from Pretrial Services, but excluding travel to the Southern District of California; and second, to permit the use of WhatsApp for lawful communications permitted under his conditions of release.

In support of this assented-to motion, Mr. Nourafchan states as follows:

1. Mr. Nourafchan is currently on pretrial release in this matter and resides in California.

2. His current travel condition restricts his travel to the Central District of California and the District of Massachusetts "unless prior permission is granted by the Supervising Agency to travel to a specific other location. Court permission is required for international travel as well as for any domestic travel if the defendant is in a Location Monitoring Program or as otherwise provided for below."

3. In addition, Mr. Nourafchan previously sought and received permission from this Honorable Court for limited travel to Las Vegas, Nevada for legal purposes. The present motion is separate from that prior legal-travel request.

4. Mr. Nourafchan now seeks a modification permitting him to travel within the Eastern and Northern Districts of California, in addition to the Central District of California already permitted by his conditions of release, for legitimate business purposes. This requested modification does not include travel to the Southern District of California. Any domestic travel outside of the above-referenced districts requires notice to the Government and prior approval of the Court. International travel shall remain prohibited absent further order of the Court.

5. The Government assents to the proposed modification permitting business travel within the Eastern and Northern Districts of California, in addition to the Central District of California already permitted by his conditions of release, for the business purposes described herein. Mr. Nourafchan understands that any travel to the Southern District of California will require a separate motion and order

of the Court.

6. The requested California travel modification would allow Mr. Nourafchan to fulfill his employment/business responsibilities related to BBos.ai. BBos.ai is an Enterprise Resource Planning (ERP) business software platform that combines Customer Relationship Management (CRM), accounting, HR, voice AI, project management, and more than 65 modules in one platform, with the modules sharing the same data.

7. First, the travel would allow Mr. Nourafchan to attend prospect and client meetings. In-person meetings may be necessary to meet decision-makers, understand their business needs, and evaluate whether the software and related services are an appropriate fit for a prospective or existing client.

8. Second, the travel would allow Mr. Nourafchan to conduct business and operations assessments. Site visits may include reviewing a prospective or existing client's workflow, staffing, billing, reporting, client intake, and current systems. This information helps tailor the software demonstration, sales discussion, implementation plan, and onboarding support.

9. Third, the travel would allow Mr. Nourafchan to conduct software demonstrations and sales presentations. Some prospects prefer or require in-person demonstrations, especially when multiple decision-makers are involved. These meetings help address operational needs, answer questions, and build trust.

10. Fourth, the travel would allow Mr. Nourafchan to provide implementation and onboarding support. For new clients, travel may be needed to support early implementation, coordinate the transition to the software platform, and address workflow questions with leadership or operations teams.

11. Fifth, the travel would allow Mr. Nourafchan to attend industry events and develop business relationships. Travel may be needed for industry events, conferences, trade association meetings, networking functions, and other relationship-development events involving prospective clients.

12. For any such business travel within the Eastern or Northern Districts of California, Mr. Nourafchan will provide advance notice to Pretrial Services. He will also provide relevant travel information, including the purpose of the travel, dates, locations, lodging information if applicable, contact information, and itinerary, and will comply with any directives from Pretrial Services.

13. Mr. Nourafchan also requests permission to use WhatsApp for lawful communications permitted under his conditions of release. Many of his business colleagues use WhatsApp as an ordinary means of communication.

14. Mr. Nourafchan will disclose the WhatsApp account, phone number, username, and device to Pretrial Services before use. He will use WhatsApp only for lawful communications and other communications permitted by his conditions of release. He will not use WhatsApp to contact any person prohibited by his

conditions. He will also comply with any reasonable compliance-review requirements imposed by Pretrial Services, subject to attorney-client privilege and any other applicable protections.

15. The requested modifications are narrow, business-related, and do not otherwise alter Mr. Nourafchan's conditions of release. All other conditions of release would remain in full force and effect.

16. Counsel has conferred with Assistant United States Attorneys Kaitlin O'Donnell and Ian Stearns. The Government assents to the WhatsApp modification and assents to the travel modification as set forth herein.

WHEREFORE, Mr. Nourafchan respectfully requests that this Court enter an order modifying his conditions of release to: (1) permit business travel within the Eastern and Northern Districts of California, in addition to the Central District of California already permitted by his conditions of release, but excluding the Southern District of California, upon advance notice to Pretrial Services and compliance with any directives from Pretrial Services; and (2) permit use of WhatsApp for lawful communications permitted under his conditions of release, subject to disclosure to Pretrial Services and compliance with his conditions.

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A proposed Order is attached hereto.

Dated: June 22nd, 2026

Respectfully submitted,

LORENZO NOURAFCHAN,

By his attorneys,

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CERTIFICATE OF SERVICE

I certify that a copy of the above was served on all parties via ECF system on June 22nd, 2026.

/s/ Camie Linnell
Camie Linnell
An employee of Chesnoff & Schonfeld