UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
v.	)	No. 26-cr-10133-LTS
NICOLO NOURAFCHAN	)	

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE AND APPROVE DOMESTIC TRAVEL

Defendant Nicolo Nourafchan, by and through undersigned counsel, and with the assent of the Government, respectfully moves this Honorable Court to modify Paragraph 3 of his conditions of release and to approve limited domestic travel to Lake Tahoe, Nevada, between July 26, 2026, and August 3, 2026.

Mr. Nourafchan was arrested on May 6, 2026, and released on conditions imposed in the Central District of California. Paragraph 3 of his current conditions provides:

> Travel is restricted to CDCA & D/MA unless prior permission is granted by 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.

To align Mr. Nourafchan's travel condition with the travel conditions imposed on most or all of his co-defendants, *see e.g.,* Dkt. 111-1 at 2, Mr. Nourafchan respectfully requests that Paragraph 3 be modified to provide that travel is restricted to the Central District of California and the District of Massachusetts, unless otherwise expanded in the future, and that any domestic travel outside those districts requires notice to the Government and prior approval of the Court. International travel shall remain prohibited absent further order of the Court.

Mr. Nourafchan also respectfully requests approval for planned domestic travel with his

family to Lake Tahoe between July 26, 2026 and August 3, 2026. Once flight plans are finalized, Mr. Nourafchan will provide an itinerary for his trip to the Government and Pretrial Services. The specific destination for this family vacation has been provided to the Government and will be provided, if this Honorable Court allows the travel, to Pretrial Services.

The Government assents to the requested modification and to the proposed Lake Tahoe travel.

WHEREFORE, Defendant Nicolo Nourafchan respectfully requests that this Honorable Court allow this assented-to motion, modify Paragraph 3 of his conditions of release as set forth above, and approve his domestic travel to Lake Tahoe between July 26, 2026 and August 3, 2026.

Respectfully submitted,

Nicolo Nourafchan,
By his attorney,

/s/ Martin G. Weinberg
Martin G. Weinberg
Mass. Bar No. 519480
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
owlmgw@att.net

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date, June 19, 2026, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

/s/ Martin G. Weinberg
Martin G. Weinberg