UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Docket No.: 26-cr-10133-LTS
	)	
GAVRYEL SILVERSTEIN	)	

MOTION REQUESTING PERMISSION FOR DOMESTIC TRAVEL, ASSENTED TO BY UNITED STATES PROBATION, OBJECTED TO BY THE GOVERNMENT

Counsel for the above-named defendant, Mr. Gavryel Silverstein, moves this Court to modify conditions of pretrial release in this matter to permit his summer travel with his wife and children. Mr. Silverstein was released on bond on May 6, 2026 with standard and special conditions of release set by the Southern District of Florida. *See*, Rule 5(c)(3) Documents at Dkt. 18. These conditions were adopted and continued by this Court in the District of Massachusetts on June 1, 2026. Since his May 6th release Mr. Silverstein has been compliant with all court ordered conditions of release and now seeks permission to travel with his family for their annual summer vacation between the dates of July 1 to July 16, 2026. Federal probation in both the districts of Florida and Massachusetts assent to the relief sought.

1. Modification to Allow Travel – Modification of Standard Condition Two:

Mr. Silverstein's present release conditions require Court approval for travel outside of the Southern District of Florida. Exhibit A, Dkt. 18, Condition 2. Specifically, the language states:

> "May not travel outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel. The Southern District of Florida consists of the following counties: Broward, Highlands, Indian River. Martin, Miami-Dade, Monroe. Okeechobee. Palm Beach and St. Lucie."

Pursuant to this order, Mr. Silverstein seeks permission to travel with his family this summer, within Nevada and Utah, between the dates of July 1st through July 16th, 2026. If

granted, the confirmed bookings for the itinerary will be provided to his supervising Pretrial Services Office in the Southern District of Florida, Mckenzie Hilaire.

Mr. Silverstein's family, including his wife and their two children, have summer travel plans for an approximate two-week family vacation in early July to Nevada and Utah - so that he and his family may go on their annual summer vacation, including time spent at the National parks (hiking and exploring parks and then staying in a hotel outside the park grounds), visiting his sister in Utah, and stays in Las Vegas on both ends of the trip (staying in affordable accommodation so his children can enjoy the hotel pools and time with family after a busy and stressful school year). Counsel for Mr. Silverstein further confirms that the planned anticipated itinerary for Mr. Silverstein's family's vacation has already been shared with his supervising probation officer in the Southern District of Florida, who assents to this request.

Counsel for Mr. Silverstein represents that she communicated about this request with United States Probation in the districts of Florida and Massachusetts, as well as the government. Mr. Silverstein's supervising federal probation officer in the Southern District of Florida, Mackenzie Hilaire, as well as the District of Massachusetts federal probation office, by way of U.S. Probation officer Maria D'Addieco, assent to this request. Counsel conferred with the government, through Assistant United States Attorney Kaitlin O'Donnell, who indicated that the government opposes the request. Because the travel requested begins on July 1st, 2026, counsel for Mr. Silverstein respectfully requests the court schedule a remote hearing in this matter on Monday June 29, 2026.

Wherefore, counsel for Mr. Silverstein respectfully requests approval of the above-requested modification and requests that all other conditions of pre-trial supervision remain in place.

Respectfully Submitted,

Mr. Gavryel Silverstein,
By his attorney,

/s/ Cara McNamara
Cara McNamara

BBO # 712096
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Cara McNamara, 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) on June 26, 2026.

/s/ Cara McNamara
Cara McNamara