

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20477-CR-RUIZ/LOUIS

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

FRANK JAVIER RAVELO,  
Defendant.

\_\_\_\_\_ /

**DEFENDANT’S UNOPPOSED MOTION TO MODIFY BOND CONDITIONS**

The Defendant, FRANCISCO JAVIER RAVELO, through undersigned counsel, respectfully moves this Honorable Court to modify the conditions of his bond and in support thereof states:

1. On October 23, 2025, Mr. Ravelo appeared before United States Magistrate Judge Ellen D’Angelo for an initial appearance and bond hearing in the above-styled matter.
2. Mr. Ravelo is charged by Information with Distribution of an Animal Crush Video, in violation of Title 18, United States Code, Section 48(a)(3).
3. The Court released Mr. Ravelo on a \$100,000 personal surety bond with special conditions of release. One of those conditions prohibited him from volunteering or being employed in any capacity involving animals.
4. Upon his release, Pretrial Services advised Mr. Ravelo that he was to have no contact whatsoever with animals. Undersigned counsel did not recall any such pronouncement by the Court. Had this been expressly stated, counsel would have objected, as Mr. Ravelo resides with his parents, who have a family dog living in their home.

6. Undersigned counsel has conferred with Assistant United States Attorney Emily R. Stone, who has no objection to modifying the bond to allow Mr. Ravelo contact with the family dog residing in his parents' home.

7. Mr. Ravelo is not seeking contact with any other animals, nor employment or volunteer work involving animals. He merely requests that the bond condition be clarified and modified to permit contact with the family dog so that he may continue residing in his family home.

**WHEREFORE**, the Defendant, FRANCISCO JAVIER RAVELO, respectfully requests that this Honorable Court enter an Order modifying his bond conditions to allow contact with his parents' family dog, and grant such other relief as this Court deems just and proper.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the above and foregoing was  
Furnished to: **Emily Stone, AUSA, The Office of the United States Attorney**, on this 24<sup>th</sup> day of  
October, 2025.

Respectfully submitted,

By: s/ Michael Mirer  
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**ORDER ON DEFENDANT'S  
UNOPPOSED MOTION TO MODIFY BOND CONDITIONS**

**THIS CAUSE**, having come on for consideration before the Court, upon the Defendant's Unopposed Motion to Modify Bond Conditions and after having reviewed said Motion and being otherwise fully advised on its premises, it is hereby

**ORDERED AND ADJUDGED** that the Defendant's Unopposed Motion to Modify Bond Conditions is hereby GRANTED.

The Defendant's bond conditions are hereby modified so that he may to allow contact with his parents' family dog and reside in his family home.

**DONE AND ORDERED** in Miami-Dade, this \_\_\_\_\_ day of \_\_\_\_\_  
2025.

\_\_\_\_\_  
THE HONORABLE RODOLFO A. RUIZ  
U.S DISTRICT COURT JUDGE

cc: Michael Mirer, Esq.  
Emily Stone, AUSA