

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 SUPERVISION 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 several special conditions of release. One of those conditions requires that he have no contact with animals.
4. Mr. Ravelo respectfully seeks permission to spend the Thanksgiving holiday at his parents’ home. A dog and two cats reside in that home. Ravelo’s parents are fully aware of the charges pending against him and consent to him being in their home for Thanksgiving.
5. Another special condition of his release prohibits Mr. Ravelo from possessing any weapons. While his parents lawfully own firearms in their residence, all weapons will be

securely stored in an area that is completely inaccessible to Mr. Ravelo, and his parents will ensure continued compliance with this condition.

6. Mr. Ravelo is not seeking any broader relief and requests only a narrow modification that would allow him to be present in his parents' home on Thanksgiving despite the presence of household pets, while fully complying with all other conditions of bond.

7. Undersigned counsel contacted Assistant United States Attorney Emily Stone, who indicated that she does not oppose to this Motion.

WHEREFORE, the Defendant, FRANCISCO JAVIER RAVELO, respectfully requests that this Honorable Court enter an Order modifying his bond conditions to allow him to be present in his parents' home for Thanksgiving,

**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  
November, 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 visit his parents home on Thanksgiving with an exception to be in his parents home where a dog and 2 cats reside.

**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