

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
	:	
v.	:	S4 11-CR-205 (AKH)
	:	
CILIA ADELA FLORES de MADURO, <i>et al.</i>	:	
	:	
Defendants.	:	
-----X	:	

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Mark Donnelly and all exhibits annexed thereto, and upon all of the pleadings and proceedings contained herein, Ms. Cilia Adela Flores de Maduro, by and through undersigned counsel, respectfully moves this Court, before the Hon. Alvin K. Hellerstein at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, to allow her to join co-defendant Nicolás Maduro Moros's Motion to Dismiss the Fourth Superseding Indictment, and pursuant to Federal Rule of Criminal Procedure 12(b), issue an order dismissing the indictment against her. In the alternative, to the extent that this Court denies the Motion to Dismiss, counsel for Ms. Flores de Maduro seeks leave to withdraw pursuant to Local Rule 1.4.

Dated: March 3, 2026

Respectfully submitted,



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- I. Memorandum of Law in Support of Motion of Cilia Adela Flores de Maduro to Join Co-defendant Nicolás Maduro Moros's Motion to Dismiss the Indictment
- II. Exhibit A – Declaration of Henry Rodríguez Facchinetti
- III. Exhibit B – Declaration of Cilia Adela Flores de Maduro
- IV. Exhibit C – Declaration of Mark Donnelly
 - A. Exhibit 1 – OFAC License Issued on January 9, 2026
 - B. Exhibit 2 – OFAC License Issued on February 28, 2026
 - C. Exhibit 3 – Email from OFAC at 4:08 p.m. on Saturday, February 28, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March 2026, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

/s/ Mark E. Donnelly

Mark E. Donnelly