

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

CILIA ADELA FLORES de MADURO, et al.,

Defendants.

S4 11-CR-205 (AKH)

NOTICE OF MOTION AND MOTION TO SEAL

Pursuant to Rule 4.B of Your Honor's Individual Rules, Cilia Adela Flores de Maduro respectfully requests permission to file under seal Exhibit 2 to her Reply Memorandum of Law in Further Support of Her Application for Pretrial Release, which identifies the address of the proposed residence for her release on conditions.

The address is submitted in response to the Government's observation that no residence had been proposed. ECF 333 at 17. Public disclosure of the address would compromise the security and privacy of the residence. The address is provided to the Court for review in connection with Ms. Flores de Maduro's application for pretrial release.

In accordance with the Court's procedures:

A slip sheet identifying Exhibit 2 as filed under seal is being filed on ECF with the Reply. An unredacted version of Exhibit 2 is being submitted to Chambers via hand delivery, as per Rule 4.B, and is being provided to the Government.

Dated: September 30, 2026

Respectfully submitted,

/s/ Mark E. Donnelly

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