

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
UNITED STATES OF AMERICA,	:	
	:	
v.	:	S4 11-CR-205 (AKH)
	:	
NICOLÁS MADURO MOROS, et al.,	:	
	:	
Defendants.	:	
-----X		

**NOTICE OF MOTION FOR RELEASE UNDER CONDITIONS OF CILIA ADELA
FLORES DE MADURO**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the exhibits attached thereto, Ms. Cilia Adela Flores de Maduro, by and through undersigned counsel, will respectfully move this Court, the Hon. Alvin K. Hellerstein, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, at a date and time designated by the Court, for an Order releasing Ms. Flores de Maduro on the proposed conditions, or any other conditions the Court deems appropriate.

Dated: September 9, 2026.

Respectfully submitted,

/s/ Mark E. Donnelly
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Counsel for Cilia Adela Flores de Maduro

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- I. Memorandum of Law in Support of Motion of Cilia Adela Flores de Maduro for Release Under Conditions.
- II. Exhibit A – Declaration of Louis J. Milione, dated September 8,2026.
- III. Exhibit B – ECF 53, *United States v. Ng Lap Seng*, 1:15-cr-706 (VSB).
- IV. Exhibit C – **Under Seal** - Medical Records for Cilia Adela Flores de Maduro with Declaration from Mark E. Donnelly, dated September 9,2026.