Case 1:25-cr-00041-DLC Document 58 Filed 09/16/25 Page 1 of 1

U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

September 16, 2025

BY ECF
The Honorable Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: U.S. v. Jaen Martinez et al., S2 25 Cr. 41 (DLC)

Dear Judge Cote:

The Government respectfully requests that the Superseding (S2) Indictment in this matter be unsealed and that the Court schedule an arraignment and pretrial conference.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

by: /s/
Jun Xiang / Kathryn Wheelock / Andrew Chan / Timothy Ly
Assistant United States Attorneys
(212) 637-2289 / -2415 / -1062 / -1072

CC (ECF)
All Counsel of Record

The application to unseal S2 25 Cr 41 is granted.
9/16/25