



**BALAREZO LAW**

CRIMINAL DEFENSE

January 8, 2019

**FILED ON THE PUBLIC DOCKET**

The Honorable Brian M. Cogan  
United States District Judge  
for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Joaquín Archivaldo Guzmán Loera*  
Case No. 09-CR-0466(S-4)(BMC)

Dear Judge Cogan:

I respectfully write to object to the government's request to seal its Supplemental Giglio Disclosure for Cooperating Witnesses (Doc. 537). For the following reasons, the government's request to seal should be denied.

The government argues that the letter should be sealed because it discusses issues related to the witness' family members' safety as well as the witness' medical issues. The government's letter does not contain any information beyond mentioning the words "family" and "safety" that would implicate family safety. Similarly, the government's letter does not contain any information beyond mentioning the words "medical" and "issues" that implicate the witness' medical issues, which have already been disclosed in other filings. Finally, there is nothing in the government's letter that remotely implicates any protected material subject to the Court's Protective Order of April 3, 2017.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

A. Eduardo Balarezo

*Counsel for Joaquín Guzmán Loera*

cc: the Parties via ECF