

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§	
	§	
	§	
	§	
v.	§	CRIMINAL NO. C-06-563
	§	
	§	
CITGO PETROLEUM CORPORATION,	§	
CITGO REFINING AND CHEMICALS	§	
COMPANY, L.P.,	§	
	§	
Defendants	§	

**MOTION OF THE UNITED STATES TO UNSEAL
CITGO’S MOTION TO APPROVE LETTER TO ALLEGED VICTIMS**

COMES NOW, the United States of America and files this Motion to Unseal CITGO’s Motion to Approve Letter to Alleged Victims and in support thereof avers the following:

The defendants CITGO Petroleum Corporation and CITGO Refining and Chemicals Company, L.P., (hereinafter collectively CITGO) filed a motion seeking to have the district court approve a letter, drafted by CITGO, to be sent to the alleged victims of CITGO’s criminal conduct. (Docket # 587). CITGO’s motion is based on a March 28, 2008 Order entered by the Court. (Docket # 583). The District Court’s Order is a public document.

None of the information in CITGO’s motion requires the protection of a sealed court filing. In fact, CITGO’s motion contains only information already in or slated to become part of the public domain. CITGO’s motion provides no authority to support the filing under seal of “CITGO’s Motion to Approve Letter to Alleged Victims”. The United States is unaware of any reason CITGO’s motion should be filed under seal or any authority to support the filing of the motion under seal. As a general rule, court filings should be available to the public.

WHEREFORE, and for the reasons stated above, the United States requests that the District Court enter an Order unsealing CITGO's Motion to Approve Letter to Alleged Victims.

Respectfully submitted,

/s/ Howard P. Stewart

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CERTIFICATE OF CONFERENCE

I have conferred with Matt Hennessey and he is opposed to this motion.

/s/ Howard P. Stewart

Howard P. Stewart

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion of the United States to Unseal CITGO's Motion to Approve Letter to Alleged Victims was served on counsel for the defendants as identified below via the ECF System and email.

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DATED: April 8, 2008

/s/ Howard P. Stewart

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