

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

UNITED STATES OF AMERICA,

v.

NICOLÁS MADURO MOROS, *et al.*,

Defendants.

S4 11-CR-205 (AKH)

**NOTICE OF MOTION OF NICOLÁS MADURO MOROS
TO DISMISS THE FOURTH SUPERSEDING INDICTMENT
BASED ON SOVEREIGN IMMUNITY**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Barry J. Pollack and exhibits annexed thereto, and upon all of the pleadings and proceedings herein, Mr. Nicolás Maduro Moros, by and through undersigned counsel, will respectfully move this Court, before the Hon. Alvin K. Hellerstein at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, on November 17, 2026 at 10:30 am (or at such other date and time designated by the Court) for an order pursuant to Federal Rule of Criminal Procedure 12(b) dismissing the Fourth Superseding Indictment.

Dated: September 2, 2026

Respectfully submitted,

/s/ Barry J. Pollack

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 - B. Exhibit 2 – English translation - *What are Colectivos? An Essential Clarification*, PSUV (Oct. 28, 2014), <http://www.psuv.org.ve/opiniones/%C2%BFque-son-colectivos-una-aclaratoria-imprescindible/>
 - C. Exhibit 3 – original Italian language decision and English translation - Cass. pen. [Court of Cassation], sez. III, Sept. 17, 2004, n. 49666, 129 Foro it. 253 (2006) (It.)
 - D. Exhibit 4 – original Italian language decision and English translation - Cass. pen. [Court of Cassation], sez. I, June 28, 1985, n. 1981, 109 Foro it. 277 (1986) (It.)