

**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 COUNT ONE**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, 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 U.S. 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 dismissing Count One of the Fourth Superseding Indictment, ECF 260.

Dated: September 2, 2026

Respectfully submitted,

/s/ Barry J. Pollack

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