

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

UNITED STATES OF AMERICA,	X	
	:	
v.	:	
	:	S4 11-CR-205 (AKH)
	:	
NICOLÁS MADURO MOROS, et al.,	:	
	:	
Defendants.	:	

**NOTICE OF MOTION OF CILIA ADELA FLORES DE MADURO
TO DISMISS THE FOURTH SUPERSEDING INDICTMENT
BASED ON SOVEREIGN IMMUNITY**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the exhibits attached thereto, upon the Memorandum of Law submitted by defendant Nicolás Maduro Moros in support of his motion to dismiss (ECF 320-1), which Ms. Flores de Maduro joins and adopts in full, and upon all of the pleadings and proceedings herein, Ms. Cilia Adela Flores de Maduro, 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 Counts Two, Three, and Four of the Fourth Superseding Indictment as against her.

Dated: September 2, 2026

Respectfully submitted,

/s/ M. Andrés Sánchez-Ross

M. Andrés Sánchez-Ross

Mark E. Donnelly

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- I. Memorandum of Law in Support of Motion of Cilia Adela Flores de Maduro to Dismiss the Fourth Superseding Indictment Based on Sovereign Immunity
- II. Exhibit A – Suggestion of Immunity of the United States and Affirmation of Abraham D. Sofaer, Legal Adviser of the Department of State, *Mumtaz v. Ershad*, Index No. 74258/89 (Sup. Ct. N.Y. Cnty. May 30, 1990)
- III. Exhibit B – Identical Letters dated 3 January 2026 from the Permanent Representative of the Bolivarian Republic of Venezuela to the United Nations addressed to the Secretary-General and the President of the Security Council, U.N. Docs. A/80/586–S/2026/5
- IV. Exhibit C – Letter of Acting Legal Adviser James H. Thessin to Acting Assistant Attorney General Stuart E. Schiffer (Mar. 19, 2001), *Leutwyler v. Office of Her Majesty Queen Rania Al-Abdullah*, No. 00 Civ. 5485 (GEL) (S.D.N.Y.)