



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 11, 2026

Via ECF

Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Stansell et al. v. FARC et al.*, 16 Misc. 405 (LGS) (SN)
Pescatore et al. v. Palmera Pineda et al., 18 Misc. 545 (LGS) (SN)
In re Claims Against the Valero-Petrocedeno Account, 20 Misc. 249 (LGS) (SN)
Osio et al. v. Maduro Moros et al., 25 Misc. 390 (LGS) (SN)

Dear Judge Netburn:

I write on behalf of the United States of America in connection with the Court's order issued on January 12, 2026, which, "[i]n light of recent events in Venezuela," invited the Government to "file a statement of interest pursuant to 28 U.S.C. § 517 on (1) the authority-to-represent issue and (2) any other issues raised by the litigation that the United States deems of interest." Dkt. No. 612, *Stansell v. FARC*, No. 16 Misc. 405 (LGS) (SN).¹

The United States, pursuant to 28 U.S.C. § 517,² respectfully provides this Statement of Interest in response to the Court's order. As to the first point, the government advises the Court that "[o]n March 5, 2026, the United States issued a statement announcing the normalization of relations with Venezuela under interim President Delcy Rodriguez." Letter from Ambassador Michael G. Kozak, Senior Bureau Official, Bureau of Western Hemisphere Affairs, U.S. Department of State, to Jay Clayton, United States Attorney for the Southern District of New York, attached hereto as Exhibit A, at 2. Additionally, on March 7, President Trump—referring to the March 5 statement issued by the State Department—stated, "this week we have formally recognized the Venezuelan government. We've actually legally recognized them."³

¹ The Court granted the government's requests to extend its time to respond until March 11, 2026. Dkt. Nos. 618, 620, *Stansell v. FARC*, No. 16 Misc. 405 (LGS) (SN).

² Congress has authorized the Attorney General to send "any officer of the Department of Justice . . . to any State or district in the United States to attend to the interests of the United States in a suit pending in a court of the United States." 28 U.S.C. § 517; see *Georges v. United Nations*, 834 F.3d 88, 91 & n.10 (2d Cir. 2016).

³ Video at 31:14-20, President Trump Delivers Remarks at the Shield of the Americas Summit (Mar. 7, 2026), <https://www.whitehouse.gov/videos/president-trump-delivers-remarks-to-the-shield-of-americas-summit>.

As the State Department advises, the United States’ “engagement is focused on helping the Venezuelan people move forward through a phased process that creates the conditions for a peaceful transition to a democratically elected government.” Ex. A at 2. “In order to facilitate this transition, the United States is recognizing Delcy Rodriguez as the sole Head of State, able to take action on behalf of Venezuela.” *See id.*

The United States otherwise respectfully declines to opine on the pending dispute regarding “which counsel is authorized to represent certain Venezuelan state-owned entities,” *see Stansell*, Dkt. No. 612 at 1, particularly as the facts underlying the representation question have changed substantially since the dispute pending before the Court emerged.

As to the second point, the United States appreciates the Court’s invitation to provide its views on other issues raised by the litigation, but respectfully declines to do so at this time. However, the United States leaves open the possibility of a future submission, if appropriate, at a later stage in the litigation.

I thank the Court for its consideration of this matter.

Respectfully submitted,

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cc: Counsel of record (by ECF)