



**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Case Number: 19-cr-20450-SCOLA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEX NAIN SAAB MORAN,

Defendant.

_____ /

**MOTION TO DISMISS COUNTS 2 THROUGH 8 OF INDICTMENT AGAINST
DEFENDANT ALEX NAIN SAAB MORAN**

NOW COMES the United States of America, by and through its undersigned counsel, and respectfully requests that pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the Court allow the United States to dismiss without prejudice Counts 2 through 8 of the Indictment against defendant ALEX NAIN SAAB MORAN, and only this defendant, based on assurances made by the Government of the United States to the Government of the Republic of Cabo Verde during the extradition process of defendant ALEX NAIN SAAB MORAN from the Republic of Cabo Verde.

On July 25, 2019, defendant ALEX NAIN SAAB MORAN was indicted by a federal grand jury in the Southern District Court of Florida, along with co-defendant Alvaro Pulido Vargas, with one count of conspiracy to commit money laundering and seven substantive counts of laundering monetary instruments. On June 12, 2020, Saab was detained in the Republic of Cabo Verde, an archipelago west of continental Africa, at the request of the United States. The United States thereafter submitted a formal extradition request, which Saab opposed. On September 7, 2020, during the extradition process, the United States sent an assurance through diplomatic channels to the Republic of Cabo Verde that the United States will not prosecute or punish defendant ALEX

NAIN SAAB MORAN for more than a single Count of the Indictment, in order to comply with Cabo Verdean law regarding the maximum term of imprisonment. Defendant ALEX NAIN SAAB MORAN was extradited to the United States on October 16, 2021.

As such, to abide by the assurances that the United States made to the Republic of Cabo Verde during the extradition of defendant ALEX NAIN SAAB MORAN, the United States respectfully requests that Counts 2 through 8 of the Indictment against defendant ALEX NAIN SAAB MORAN, and that defendant only, be dismissed.

Respectfully submitted,

JOSEPH S. BEEMSTERBOER
ACTING CHIEF, FRAUD SECTION

By: /s/ Alexander Kramer

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