

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

DECLARATION OF BARRY J. POLLACK

I, Barry J. Pollack, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. On January 5, 2026, I filed a notice of entry of appearance as retained counsel on behalf of Nicolas Maduro Moros. *See* Dkt. 269.
2. Mr. Maduro had his initial appearance in Court and his arraignment later that day. I represented Mr. Maduro during that proceeding. *See* Dkt. 274.
3. On January 6, 2026, Bruce Fein filed a motion to appear *pro hac vice* and a notice of entry of appearance purporting to appear on behalf of Mr. Maduro as retained counsel. *See* Dkt. 271 and Dkt. 272.
4. I did not authorize Mr. Fein to communicate with Mr. Maduro, a represented party; nor did I authorize him to file a notice of appearance on behalf of Mr. Maduro.
5. I have not directed that anyone acting on my behalf provide such authorization to Mr. Fein.
6. After Mr. Fein filed his motion to appear *pro hac vice* and a notice of entry of appearance, at my request, efforts were made to contact Mr. Fein both by telephone

and by email to ask the basis on which he was seeking to enter his appearance and what authorization he had to do so. I was copied on the email request, to which Mr. Fein did not respond.

7. On January 7, 2026, I personally emailed Mr. Fein and asked him the basis on which he entered an appearance on behalf of Mr. Maduro. He has not responded.
8. Mr. Fein's *pro hac vice* motion was granted on January 8, 2026 and a docket text updating attorney appearances was entered adding Mr. Fein as counsel for Mr. Maduro. *See* Dkt. 277.
9. On January 8, 2026, I was able to have a legal call with Mr. Maduro. I confirmed with Mr. Maduro that he does not know Mr. Fein and has not communicated with Mr. Fein, much less retained him, authorized him to enter an appearance, or otherwise hold himself out as representing Mr. Maduro. Mr. Maduro authorized me to file a motion to strike Mr. Fein's appearance.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 8, 2026.

/s/ Barry J. Pollack
Barry J. Pollack