

**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

Alexander Kramer  
Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice  
Court ID No. A5502240  
1400 New York Ave. NW  
Washington, DC 20005  
TEL (202) 768-1919  
alexander.kramer@usdoj.gov

JUAN ANTONIO GONZLEZ  
UNITED STATES ATTORNEY

By: 

Kurt K. Lunkenheimer  
Assistant U.S. Attorney  
Court ID No. A5501535  
99 N.E. 4th Street  
Miami, Florida 33132-2111  
TEL (305) 961-9008  
Kurt.Lunkenheimer@usdoj.gov

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UNITED STATES OF AMERICA,

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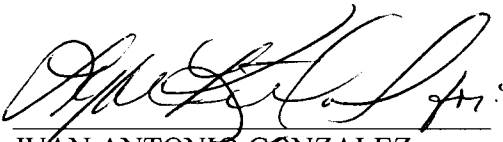
ALEX NAIN SAAB MORAN,

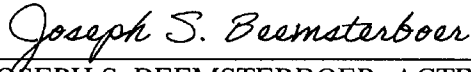
Defendant.

ORDER OF DISMISSAL

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure and by leave of Court endorsed hereon, the United States hereby dismisses without prejudice, Counts 2 through 8 contained in the Indictment against defendant **ALEX NAIN SAAB MORAN**, and only this defendant, based on assurances made to the Republic of Cabo Verde during the extradition process of defendant **ALEX NAIN SAAB MORAN** from the Republic of Cabo Verde.

Respectfully submitted,

  
\_\_\_\_\_  
JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF FLORIDA

  
\_\_\_\_\_  
JOSEPH S. BEEMSTERBOER, ACTING CHIEF  
CRIMINAL DIVISION, FRAUD SECTION  
U.S. DEPARTMENT OF JUSTICE

cc: Counsel of Record

Leave of Court is **GRANTED** for the filing of the foregoing Dismissal of Counts 2 through 8 against defendant **ALEX NAIN SAAB MORAN** in the above-captioned criminal case.

DATE: \_\_\_\_\_

\_\_\_\_\_  
ROBERT N. SCOLA, Jr.  
UNITED STATES DISTRICT JUDGE