

DR. LEROY A. GARRETT

<https://vzlaholocausto.org>

832-652-7912 | lry_garrett@yahoo.com | 6725 S Fry Rd. Ste 700 – 338 Katy Texas 77494

March 6, 2026

Office of Foreign Assets Control

Office of the Director

U.S. Department of the Treasury

1500 Pennsylvania Avenue, NW

Washington, DC 20220

Docket No.: OFAC-2025-CITGO-SALE

ATTENTION: Mr. Bradley T. Smith. Director. Office of Foreign Assets Control

Case ID VENEZUELA-EO13850-2025-1395693-1

Re: Urgent Denunciation of PDV Holding Lawyers' Opposition to Human Reparations in Violation of GL 7C Intent, FOIA-Documented Perjury, and Executive Order 14373 – Beseeching Immediate OFAC Support for QSF Implementation in Citgo/PDVH Proceedings (Third Circuit No. 25-3347 et al.).

Via OFAC Licensing Portal (Supplemental Documentation Submission)

Dear Mr. Bradley et al.,

I, Dr. Leroy A. Garrett, pro se representative of the Qualified Settlement Fund (QSF) for approximately 23,000 victims of the Venezuelan “Petroleum Holocaust” (systematic purges, blacklisting via the Tascón List, and denial of wages/pensions from 2002–2003), submit this fifth supplemental to my pending petition (Query OFAC-2026-009303, previously supplemented January 11, February 11, February 20, February 22, and March 4, 2026) for revocation of general licenses protecting the PDVSA ad hoc board (e.g., General License 7C) and a humanitarian carve-out from blocked Venezuelan assets, including, but not limited to, Citgo sale proceeds or new oil revenues.

This urgent submission strongly denounces the egregious antics of PDV Holding, Inc.’s (PDVH) lawyers, as evidenced in their March 4, 2026 opposition (D.I. 68) to my motion for reconsideration in U.S. District Court for the District of Delaware Case No. 1:24-cv-00380-JLH. Their filing not only dismisses the victims’ human-rights claims as “irrelevant political commentary” and “speculative assertions” but actively opposes any recognition of alter-ego liability for reparations—directly contravening the humanitarian intent of General License 7C, which was granted to the PDVSA ad hoc board to safeguard assets for the Venezuelan people’s benefit, not to shield them from accountability for sovereign transgressions. This opposition flagrantly rebels against President Trump’s Executive Order 14373, “Safeguarding Venezuelan Oil Revenue for the Good of the American and Venezuelan People,” which mandates protections for equitable distributions prioritizing human welfare over corporate impunity.

Moreover, FOIA disclosures (No. 2026-OF-00052) register instances of perjury by entities associated with the ad hoc board and union leaders aligned against the victims—evidencing a concerted effort to obscure the Petroleum Holocaust's facts and deny reparations. These declassified materials reveal misrepresentations in affidavits and proceedings that undermine the very licenses OFAC administers, turning GL 7C into a tool for perpetuating injustice rather than its intended purpose of fostering democratic transition and human-rights restoration. PDVH's lawyers' tactics—labeling victims' evidence as "meritless" while ignoring the identical alter-ego facts underpinning the Citgo execution—constitute a blatant wall against fair reparations, harming U.S. citizens, exiles, and purge survivors who have endured decades of denial. This conduct risks rendering any OFAC authorization for the Citgo sale or oil investments inconsistent with U.S. anti-impunity policy, as it prioritizes commercial creditors over the "good of the Venezuelan people" enshrined in EO 14373.

I beseech OFAC to act swiftly and decisively: Revoke or condition GL 7C to mandate QSF implementation as the priority mechanism for humanitarian carve-outs, ensuring initial disbursements address victims' denied pensions, confiscated funds, and damages before any broader allocations. The QSF framework—detailed in my prior supplementals (e.g., independent trusteeship, anonymized verification via affidavits/FOIA/IACHR data, pro rata distributions, and audited compliance)—offers a precise, equitable vehicle aligned with IRC § 468B and NGO-style licensing. Recent OFAC GL amendments (February 10 and 18, 2026) expanding contingent oil/gas investments only heighten this urgency, as they enable premature asset flows without victim safeguards.

The Third Circuit's February 20, 2026 denial (Order #208, undocketed) of my amicus curiae further underscores this systemic exclusion, as does PDVH's opposition, which ignores U.S. policy shifts favoring reparations. I urge OFAC to consult me immediately as the victims' representative, condition any Citgo approvals on QSF priority, and investigate the ad hoc board's compliance with GL 7C intent. Please confirm receipt, advise on expedited next steps, and consider this a formal request for a hearing or consultation.

I remain available for inquiries.

Thank you for your immediate attention to this grave matter.

I remain available for inquiries.

Thank you for your attention to this serious matter.

Respectfully.,



Dr. Leroy A. Garrett

QSF Representative

<https://vzlaholocausto.org>

cc: Secretary Marco Rubio, U.S. Department of State

U.S. Embassy in Caracas (or designated Venezuela Affairs Unit)

Attachments: PDVH Opposition to Reconsideration (D.I. 68, March 4, 2026), Executive Order 14373 (Full Text), General License 7C , Victims Affidavits (D.I. 2532-3), Copy of Third Circuit Amicus Curiae

Brief (February 18, 2026), Dr. Garrett's Affidavit – QSF – Citgo Sale Proceedings (D.I. 2582), Dr. Garrett's Letter to Hon. Kenneth Stark – Requesting Humanitarian Carve-Outs (D.I. 2581).