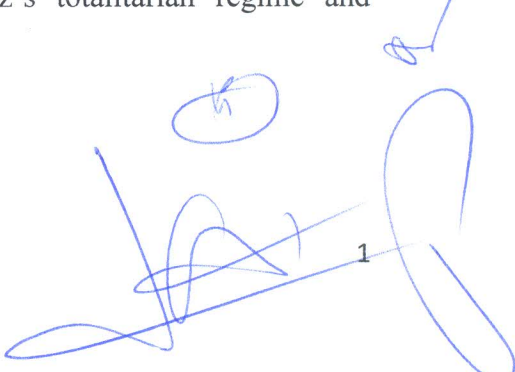


HONORABLE CHIEF PROSECUTOR OF INTERNATIONAL CRIMINAL COURT, MRS. BENSUDA.

HÉLIO PEREIRA BICUDO, Brazilian Lawyer, bearer of Brazilian Identity Card. n. 5.888.644; **JANAINA CONCEIÇÃO PASCHOAL**, Brazilian Lawyer, Criminal Law Professor, bearer of Brazilian Identity Card n. 24.130.055-1, with address at Pamplona Street, 1.119, apartment 41, Jardim Paulista, São Paulo/SP; **MARISTELA BASSO**, Brazilian Lawyer, International Law Professor, bearer of Brazilian Identity Card no. 5010373446, with address at Rua Dr. Gabriel dos Santos, 564, apartment no. 11, Higienópolis, São Paulo/SP; **JORGE COUTINHO PASCHOAL**, Brazilian Lawyer, bearer of Brazilian Identity Card n. 42.271.338-7, with address at Pamplona Street, 1.119, apartment 41, Jardim Paulista, São Paulo/SP; respectfully report before Your Honor **CRIMES AGAINST HUMANITY** committed by **NICOLÁS MADURO**, who transformed Venezuela into a totalitarian Dictatorship, violating and systematically abusing fundamental human rights, for the factual and legal grounds set forth below.

1. GENERAL FRAMEWORK OF ATROCITIES COMMITTED BY MADURO AND THE NECESSITY OF THE INTERNATIONAL CRIMINAL COURT'S INTERVENTION

Venezuela has suffered throughout its history several crises. It is possible to point political, economic and social crises, accompanied by disrespect and violation of human rights. But none of these crises can be compared to that currently underway in the country. The first violations started during Hugo Chávez's totalitarian regime and worsened in President Maduro's government.



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In the past, Venezuela has managed to build a rule of law, consolidating itself as a democracy in the mid-twentieth century. For a while, Venezuela has been one of the most important and prosperous countries in Latin America.

Despite all development and prosperity, Venezuela began to collapse¹, with the rise of Hugo Chávez and of the Partido Socialista Unido de Venezuela (United Socialist Party) to the power. Chávez created a regime that is conventionally called the 'Bolivarian Republic'. He legalized his own powers with the approval of a new Constitution, in 1999.

The Bolivarian Republic has been endorsed for successive reelections, and ever since, there has been no alternation in the political arena. There are, in this context, numerous suspicions of fraud in the electoral process. Even the Company entrusted with the elections, SMARTIMATIC, denounced the inadmissible frauds. In other words, the Company alleged manipulation of the results².

Despite the already authoritarian character of Chávez's tenure, it was only recently, with Maduro's government, that the tyrannical system became more entrenched, especially in the last few years. There are no doubts that Venezuela has become a bloodthirsty Dictatorship.

There is no longer a system of checks and balances between the Executive, Legislative and Judiciary powers, since all of them are currently under the rule and influence of President Maduro, especially with the New Constituent Assembly (NCA), composed only of governors, indeed, imposed to people. The NCA composed only of Maduro's supporters, holds absolute authority over all instances in the Venezuelan state.

In turn, Maduro's dictatorial government has pursued all types of opposition to his regime, concentrating in his hands, practically, all the powers of State, with broad

¹ How Venezuela went from a rich democracy to a dictatorship on the brink of collapse. Available at: <https://www.vox.com/world/2017/9/19/16189742/venezuela-maduro-dictator-chavez-collapse>. Access on 30 November 2017; Venezuela rights suffer under Chavez. Available at: <https://www.hrw.org/news/2008/09/18/venezuela-rights-suffer-under-chavez>;

https://www.transparency.org/news/feature/corruption_and_human_rights_violations_in_venezuela
² Venezuela Reported False Election Turnout, Voting Company Says. Available at: <https://www.nytimes.com/2017/08/02/world/americas/venezuela-election-turnout.html>. Access on 30 November 2017.

