

DR. LEROY A. GARRETT

PRO SE REPRESENTATIVE FOR ~23,000 PETROLEUM HOLOCAUST VICTIMS

[HTTPS://VZLAHOLOCAUSTO.ORG/EN/](https://vzlaholocausto.org/en/)

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

March 11, 2026

Katy, Texas

Clerk of Court

U.S. Court of Appeals for the Third Circuit

601 Market Street

Philadelphia, PA 19106

Re: Crystallex International Corp. v. Bolivarian Republic of Venezuela, No. 25-3347 et al.

(Supplemental Authorities Letter Pursuant to FRAP 28(j) re: Proposed Amicus Motion to Reconsider, Docket No. 232)

Dear Clerk,

Pursuant to Federal Rule of Appellate Procedure 28(j), proposed amicus Doctor Leroy A. Garrett supplements his March 5, 2026, motion to reconsider (Docket No. 232) with the following supplemental authority:

U.S. Department of State Press Releases and Statements Recognizing Delcy Rodríguez as Interim President of Venezuela (dated March 5-7, 2026), available at [State Department publication attached to this letter].

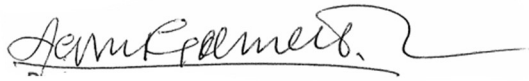
The Executive Branch's formal recognition of the Rodríguez government revokes the prior Guaidó-era basis for the Ad Hoc Board's authority (Executive Order 13857, as superseded by recent policy shifts). Because courts must accept the Executive's foreign-recognition determinations, the Ad Hoc Board's (Representing Venezuela's interest in this proceedings) continued participation lacks legal foundation. See Belmont, 301 U.S. at 330; Zivotofsky, 576 U.S. at 28-32.

For additional context on the impact to human rights claims and docket access, see the attached open letter to Honorable Judge Leonard P. Stark (dated March 11, 2026), publicly published on my platforms (X: @LeroGarrett; website: <https://vzlaholocausto.org/En/>).

This development supports disqualification of the Ad Hoc Board and prioritization of PDVSA purge victims' alter ego claims, as it confirms PDVSA's continuity as a state instrumentality absent obsolete opposition control.

Word count: 278 (excluding headings and certificates).

Sincerely,

A handwritten signature in black ink, appearing to read "Leroy A. Garrett", followed by a long, horizontal, slightly wavy line extending to the right.

Dr. Leroy A. Garrett

Pro Se Representative for ~23,000 Petroleum Holocaust Victims

Attachments: Judge Stark's Open Letter, @LeroGarrett X Publication. Department of State Statement of Recognition of Delcy Rodrigues's Government.