

CRIMINAL COMPLAINT

Submitted to:

- Ekobrottsmyndigheten (Swedish Economic Crime Authority),
Hantverkargatan 15, 112 21 Stockholm.
- Krigsbrottsenheten (Swedish War Crimes Unit),
Kungsholmsgatan 43, 106 75 Stockholm.

17 December 2025

INTRODUCTION

Alfred Nobel's endowment for peace cannot be spent on the promotion of war. Nor can it be used as a tool in foreign military intervention. Venezuela, whatever the status of its political system, is no exception.

Nobel's will of 27 November 1895 is binding under Swedish law. It clearly states that each year the peace prize monies shall go to the person who during the proceeding year "... conferred the greatest benefit to humankind..." by doing "... the most or the best work for fraternity between nations, for the abolition or reduction of standing armies and for the holding and promotion of peace congresses."¹

Any disbursement contradicting this mandate constitutes misappropriation from the endowment. The pending transfer of 11 million SEK (\$1.18 million USD) and existing 10 December 2025 handover of the prize medal to María Corina Machado, in violation of this disbursement restriction, appear to be acts of serious criminality.

The political decision of the Norwegian selection committee does not suspend the fiduciary duty of Swedish funds administrators. Where a decision by the selection committee is in flagrant conflict with the explicit peace purpose of the will, or where there is evidence that the awardee will use or is using the prize to promote or facilitate the crime of aggression, crimes against humanity, or war crimes, administrators must resolve the conflict in favor of the will. They must safeguard the endowment by declining to disburse funds. The Norwegian committee's selection does not grant them criminal immunity.

Should the selection committee have chosen Benjamin Netanyahu, Ahmed Chalabi, or the committee chair's four-year-old grandchild, the explicit peace mandate in Nobel's will would similarly not have been fulfilled, and disbursement of funds would be misappropriation. Funds administrators have a fiduciary duty to make themselves aware of potential misappropriation.

The huge buildup of U.S. military forces off the coast of Venezuela, starting in August and now numbering over 15,000 personnel,³⁷ has already committed undeniable war crimes, including the lethal targeting of civilian boats and survivors at sea, which has killed at least 95 people.²⁹ The Office of the United Nations High Commissioner for Human Rights labeled these U.S. coastal strikes against civilian boats "extrajudicial executions."² It was the principal architect of this aggression, U.S. Secretary of State Marco Rubio, who nominated María Corina Machado for the peace prize.⁴²

There are ample public statements, accessible by the suspects, showing that the U.S. government and María Corina Machado have exploited the authority of the prize to provide them with a *casus moralis* for war with the object of installing her by force in order to plunder \$1.7 trillion in Venezuelan oil and other resources.

Using her elevated position as the recipient of the Nobel Peace Prize, Machado may well have tipped the balance in favour of war.

There is a real risk that funds derived from Nobel's endowment have been or will be intentionally or negligently diverted from their charitable purpose to facilitate aggression, crimes against humanity, and war crimes.

The failure of the suspected funds administrators to cease disbursements, in light of the quality and volume of evidence available to them, indicates ongoing criminal intent (see section V).

These disbursements aid a conspiracy to murder civilians, to violate national sovereignty using military force (and the CIA, authorized 22 August 2025),³ and to enact resource theft (Machado's \$1.7 trillion sell-off to U.S. firms).⁴ They flagrantly violate Nobel's will and clearly cross the threshold into criminality, including gross misappropriation, aiding international crimes (see section III), and conspiracy. The disbursement of the prize funds has already been used to whitewash war crimes and incite aggression that risks tens or hundreds of thousands of deaths and millions of refugees.⁵

This complaint seeks the immediate freezing of all remaining funds and a full criminal investigation lest the Nobel Peace Prize be permanently converted from an instrument of peace into an instrument of war.

This assessment is shared by 21 Norwegian peace organisations who boycotted the ceremony: "Machado is the opposite of a peace laureate."¹⁶

Nobel Peace Prize laureate Adolfo Pérez Esquivel stated: "Giving the prize to someone who calls for foreign invasion is a mockery of Alfred Nobel's will."⁶

I. COMPLAINANT

Julian Assange (3 July 1971).

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[redaction]

II. ACCUSED NATURAL AND LEGAL PERSONS

The suspects are those involved in the operational disbursement of funds derived from the endowment and those who hold a fiduciary duty to protect it from misappropriation. According to public records, this includes the Nobel Foundation (Nobelstiftelsen, reg. no. 802002-4462) and its Board of Directors (Styrelsen):

1. Astrid Söderbergh Widding, Chair of the Board of the Nobel Foundation
2. Hanna Stjärne, Executive Director of the Nobel Foundation
3. Emma Bergström, Chief Financial Officer, Nobel Foundation
4. Ulrika Bergman, Chief Investment Officer, Nobel Foundation
5. Tomas Nicolin, Member of the Nobel Foundation Investment Committee and senior executive, Skandinaviska Enskilda Banken AB (SEB)

As well as the Nobel trustees (Fullmäktige, as of 25 April 2024):

6. Birgitta Henriques Normark
7. Martin Jakobsson
8. Kerstin Sahlin
9. Helena Edlund
10. Olof Ramström
11. Eva Lindroth
12. Olle Kämpe

13. Nils-Göran Larsson
14. Gunilla Karlsson Hedestam
15. Ellen Mattson
16. Anne Swärd
17. Ingrid Carlberg
18. Kristin Clemet
19. Jørgen Watne Frydnes
20. Asle Toje

As well as their deputies:

21. Torleif Härd
22. Carl Folke
23. Magnus Berggren
24. Richard Brenner
25. Sten Linnarsson
26. Juleen Zierath
27. Anders Olsson
28. Eric M. Runesson
29. Anne Enger
30. Gry Larsen

III. LEGAL BASIS UNDER SWEDISH LAW

- *Brottsbalken* (BrB) Chapter 10 §§ 1, 2 and 3: *förskingring* and *grov förskingring* (breach of trust, misappropriation and gross misappropriation)⁷
- BrB Chapter 9 § 1: *stämpling till brott* (conspiracy to commit indictable offence)⁹
- *Lag (2014:406) § 16: brott mot mänskligheten och krigsförbrytelser* (facilitation of war crimes and crimes against humanity) including of:
 - § 2 crimes against humanity: killing;
 - § 3 killing protected persons: shipwrecked survivors, civilians;
 - § 4 war crimes;
 - § 11 gross (aggravated) war crimes including of § 11a the crime of aggression;
 - § 15 attempted war crimes; § 16 incitement, conspiracy, and preparation for these crimes.¹¹
- Sweden's obligations under Article 25(3)(c) Rome Statute (facilitation of crimes within ICC jurisdiction)¹²

These provisions apply as the Nobel Foundation is a Swedish entity managing testamentary assets, and disbursements occur under Swedish jurisdiction. Criminal intent (*uppsåt*) is established by continued payments despite public knowledge of violations, including Machado's support for war crimes, crimes against humanity, and involvement in U.S. efforts to effect regime change and resource theft in Venezuela by installing the awardee through force.

IV. THE 2025 PEACE PRIZE DISBURSEMENTS

On 10 October 2025, the Norwegian Nobel Committee announced María Corina Machado as the 2025 Nobel Peace Prize laureate.¹³ Since then, the Nobel Foundation and related entities have disbursed or caused to be disbursed (estimated based on 2023-2024 annual reports):

- SEK 135,000 for the gold bullion value of the medal at current prices (18 karat x 140g)
- SEK 500,000 for the Oslo announcement press conference (10 October 2025)¹⁴
- SEK 1,794,000 for private jets, security, accommodation, medal production, and related ceremonial costs (October-December 2025)¹⁴

A further 11 million SEK of restricted Nobel funds (the monetary award) faces imminent misappropriation and wire transfer via Swedish bank SEB to Machado and her agents.¹⁵

V. MACHADO'S INCITEMENTS TO WAR MAKE HER INELIGIBLE

Machado dedicated the Peace Prize to U.S. President Trump (11 October 2025). Machado's endorsement of military means, including violations of the Rome Statute, in relation to her own country and in others, is explicit. The following statements by Machado are listed in reverse chronological order:

- 15 December 2025, Machado on CBS Face the Nation: "I say this from Oslo right now, I have dedicated this award to [President Trump] because I think that he finally has put Venezuela in where it should be, in terms of a priority for the United States national security."³⁰
- 30 October 2025, Bloomberg interview: "Military escalation may be the only way... the United States may need to intervene directly."¹⁷
- 17 October 2025, call to Benjamin Netanyahu on Israel's conduct in Gaza: "The Nobel Peace Prize laureate told the Prime Minister that she greatly appreciates his decisions and resolute actions in the course of the war."¹⁸
- October 2025, Fox News interview on U.S. military strikes on civilian vessels: "justified."¹⁹
- 5 October 2025, interview in The Sunday Times on the U.S. military buildup and extra-judicial assassination strikes against civilian boats: Trump's strikes are "visionary". "I totally support his strategy."²⁰
- February 2025, interview with Donald Trump Jr.: "We're going to kick the government out of the oil sector... American companies are going to make a lot of money... forget Saudi Arabia, we have more oil."²¹
- 9 February 2019, interview with EL PAÍS: Maduro will only leave "in the face of a real threat from a more powerful state."²²
- 25 February 2014, testimony before U.S. Congress: "The only path left is the use of force."²³

VI. THE MILITARY BUILDUP FURTHERED BY MACHADO'S STATEMENTS

The Nobel Peace Prize decision and ceremony have occurred amidst a shift in the U.S. administration to "maximum lethality, not tepid legality" and "going on the offence", in the words of Trump's Secretary for War, Peter Hegseth.³¹

In fact, the announcement of Machado's selection, and the Nobel Prize award ceremony, have occurred during the largest U.S. pre-invasion buildup since the Iraq war:

In early September 2025, Reuters reported that seven US war ships and one nuclear powered fast-attack submarine, including more than 4,500 sailors and marines, had been deployed in the Southern Caribbean.³²

By 15 October troops had swelled to 10,000. Simultaneously, it was reported that President Trump had authorised covert CIA action in Venezuela.³³

Around the same time, the Head of U.S. Southern Command (SOUTHCOM) in charge of Latin America, Navy Adm. Alvin Holsey, was pressured into resigning by Secretary of War Hegseth after raising “concerns about the mission and the attacks on the alleged drug boats.”³⁴

By 21 November 2025 the Trump administration had classified elements of the Venezuelan military as a Foreign Terrorist Organisation (FTO). U.S. Secretary of War Hegseth told OAN that the FTO classification “brings a whole bunch of new options to the United States.”³⁵

By the time of the Nobel ceremony, U.S. military presence around Venezuela had grown into “the largest U.S. military deployment in the Caribbean since the Cuban Missile Crisis in 1962”, “a show of force that has included a series of heavy bomber aircraft flying along Venezuela’s coast”, and three amphibious ships which have “essentially zero capability” against drug trafficking but are “ideal for landing troops ashore”. The same article reports that U.S. troops have been “carrying out mock landing operations” on nearby Puerto Rico’s beaches.³⁶

Two days after the Nobel ceremony, President Trump announced that the United States air strikes would be “starting by land... that’s going to start happening.”³⁸ On the 15th of December, President Trump signed an Executive Order classifying illicit Fentanyl and its core precursor chemicals as Weapons of Mass Destruction (WMD).

U.S. military personnel recently deployed near Venezuela are now estimated to number more than 15,000, including in Puerto Rico, Guyana, El Salvador, Panama, the Dominican Republic, and Trinidad and Tobago.³⁷ The deployment includes the “largest and most advanced” aircraft carrier, the Gerald R. Ford, which measures more than 330 meters long.

Throughout this massive military buildup, and as all-out war hangs in the balance, Machado has continued to incite the Trump Administration to pursue its escalatory path.³⁹

By contrast, in October UN Secretary General Antonio Guterres and UN human rights chief Volker Turk (who would, unlike Machado, have met Nobel’s prize criteria) called on the U.S. to “halt such attacks and take all measures necessary to prevent the extrajudicial killing of people aboard these boats, whatever the criminal conduct alleged against them”, finding that the attacks occurred “in circumstances that find no justification in international law.”⁴⁰

Then in December, Guterres called on “all actors to refrain from actions that could further escalate bilateral tensions and destabilize Venezuela and the region.”⁴¹

Yet it is into this dangerous situation that Machado has incited and defended the Trump administration’s use of lethal military force and preparation for war. Using her elevated position as the recipient of the Nobel Peace Prize, Machado may well have tipped the balance in favour of war—facilitated by the names suspects.

Beyond this grotesque reality, there are the concrete legal obligations of the individuals tasked with ensuring the fulfilment of the intended purpose of Alfred Nobel’s will, that is, to end wars and prevent violations of the Rome Statute, and not to enable them.

VII. THE FOUNDATION’S LEGAL POWER AND DUTY TO INTERVENE

The Foundation holds supervisory authority over the prizes and their disbursements. In 2018, amid the Swedish Academy’s scandal over Jean-Claude Arnault, Executive Director Lars Heikensten withheld

the Literature Prize.^{24 25} Failure to intervene here, despite U.S. war crimes off the Venezuelan coast and Machado's key role in furthering aggression, breaches trust (BrB 10).

VIII. EXPERT AND INSTITUTIONAL CONDEMNATION

- Joint statement of 21 Norwegian peace organisations, 9 December 2025: "Machado is the opposite of a peace laureate."¹⁶
- Adolfo Pérez Esquivel (1980 Laureate), 11 October 2025: "Giving the prize to someone who calls for foreign invasion is a mockery of Alfred Nobel's will."⁶
- CAIR, 11 October 2025: "Her open alliance with Likud and support for the Gaza war make this award unconscionable."²⁶
- PRIO, 7 November 2025: Machado "has called for military intervention in Venezuela."²⁷
- David Smilde (Tulane), November 2025: Strikes as "performance as strategy" for regime change, not drugs.²⁸

IX. REQUESTED MEASURES

1. Immediate freezing of the pending SEK 11,000,000 monetary prize transfer and any remaining related budget and secure return of the medal.
2. Investigation of the named persons and Foundation officers and associated entities for breach of trust, facilitation of war crimes and crimes against humanity, and conspiracy.
3. Seizure of board minutes, emails, group chats, financial records.
4. Interrogation of Widding, Stjärne and other suspects.
5. ICC referral (Rome Statute Art. 25(3)(c)).

Signed

[redacted]

Julian Assange.

CITATIONS

1. Alfred Nobel's Will (27 November 1895).
<https://www.nobelprize.org/alfred-nobel/alfred-nobels-will/>
2. OHCHR (21 November 2025).
<https://www.ohchr.org/en/statements/2025/11/venezuela-concern-over-extrajudicial-executi>
3. Reuters (22 August 2025).
<https://www.reuters.com/world/americas/us-launch-new-phase-venezuela-operations-sources->
4. Geopolitical Economy Report (16 October 2025).
<https://geopoliticeconomy.com/2025/10/16/venezuela-maria-corina-machado-privatize-oil->
5. CNN (7 December 2025).
<https://www.cnn.com/2025/12/07/politics/venezuela-war-migrants-trump>
6. PRIO (7 November 2025).
<https://www.prio.org/comments/1830>
7. Brottsbalken (1962:700), Chapter 10 §§ 1 and 3.
<https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/brottsbal>
8. Ibid., Chapter 10 § 5.
9. Ibid., Chapter 9 § 1.
10. Ibid., Chapter 22 §§ 1–6.
11. Lag (2014:406) om straff för folkmord, brott mot mänskligheten och krigsförbrytelser.
<https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-20144>
12. Rome Statute, Art. 25(3)(c).
<https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf>
13. NobelPrize.org, Nobel Peace Prize 2025.
<https://www.nobelprize.org/prizes/peace/2025/summary/>
14. Nobel Foundation Annual Report 2023, pp. 7–12.
<https://www.nobelprize.org/wp-content/uploads/2024/04/nobel-foundation-annual-report-202>
15. NobelPrize.org, Prize Amount 2025.
<https://www.nobelprize.org/prizes/about/the-nobel-prize-money/>
16. El Ciudadano (9 December 2025).
<https://www.elciudadano.com/>
17. Bloomberg (30 October 2025).
<https://www.bloomberg.com/features/2025-maria-corina-machado-weekend-interview/>
18. Reuters (17 October 2025).
<https://www.reuters.com/world/americas/israel-says-venezuelas-machado-voices-support-cal>
19. Fox News (October 2025).
<https://www.foxnews.com/world/machado-justifies-us-strikes-venezuela-2025-10>
20. The Sunday Times (5 October 2025).
<https://www.thetimes.co.uk/article/venezuela-machado-trump-strikes-visionary-2025-10-05>
21. Geopolitical Economy Report (16 October 2025).
<https://geopoliticeconomy.com/2025/10/16/venezuela-maria-corina-machado-privatize-oil->

22. EL PAÍS (9 February 2019).
https://elpais.com/internacional/2019/02/09/actualidad/1549734123_384912.html
23. C-SPAN, Machado Testimony (25 February 2014).
<https://www.c-span.org/video/?318045-1/venezuelan-opposition-leader-testimony>
24. The Guardian (17 July 2018).
<https://www.theguardian.com/news/2018/jul/17/the-ugly-scandal-that-cancelled-the-nobel-prize>
25. New York Times (26 May 2018).
<https://www.nytimes.com/2018/05/26/world/europe/swedish-academy-nobel-prize-literature.html>
26. Anadolu Agency (11 October 2025).
<https://www.aa.com.tr/en/world/controversy-erupts-over-nobel-peace-prize-for-venezuela-s>
27. PRIO (7 November 2025).
<https://www.prio.org/comments/1830>
28. FPIF (25 November 2025).
<https://fpif.org/venezuela-isnt-the-global-threat-trump-and-rubio-are/>
29. CBS, "US hits three more alleged drug boats in the Pacific killing 8, military says" (15 Dec 2025).
30. CBS Face the Nation, Interview with María Corina Machado (15 December 2025).
31. The Guardian, 'Trump signs Executive Order rebranding Pentagon as Department of War' (5 September 2025).
<https://archive.is/GhNZr>
32. Reuters, 'US Military kills 11 people in strike on alleged drug boat from Venezuela, Trump says' (3 September 2025).
<https://archive.is/3nMz2>
33. NY Times, 'Trump Administration Authorizes Covert C.I.A. Action in Venezuela' (15 October 2025).
<https://archive.is/YaQ2z>
34. NY Times, 'Head of the U.S. Military's Southern Command Is Stepping Down, Officials Say' (16 October 2025).
<https://archive.is/UH3Ve>
35. One America News, Interview with Secretary of War Hegseth (21 November 2025).
<https://archive.is/QF7ix>
36. NY Times, 'Satellite Data Reveals How the U.S. Navy Is Deployed Near Venezuela' (21 November 2025).
<https://archive.is/cXTwZ>
37. CNN, 'What we know of the countries backing US military moves in the Caribbean' (19 November 2025).
<https://archive.is/wP9TW>
38. Bloomberg, 'Trump says 'Starting' Land Strikes Over Drugs in Latest Warning' (13 December 2025).
<https://archive.is/4Xt1l>
39. NY Times, 'Venezuela's Nobel Winner Pushes False Claims About Maduro, Critics Say' (26 November 2025).
<https://archive.is/xh3ik>

40. UN News, 'US strikes in Caribbean and Pacific breach international law, says UN chief' (31 October 2025).
<https://archive.is/RTSzC>
41. France24, 'Seized Oil Tanker off Venezuela to be brought to US as tensions mount' (12 December 2025).
<https://archive.is/QDF5H>
42. NY Times, 'For Rubio the Cuba Hawk, the Road to Havana Runs Through Venezuela' (12 December 2025).
<https://www.nytimes.com/2025/12/12/us/politics/rubio-cuba-venezuela.html>, <https://archive.is/RTSzC>