

# **EXHIBIT 6**



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# Transcript of Oscar Leonardo Montealegre Beltran

**Date:** October 23, 2019

**Case:** Jaramillo, et al. -v- Naranjo

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case Number 1:10-cv-21951-EG

JESUS CABRERA JARAMILLO, in his individual  
capacity, and in his capacity as the personal  
representative of the estate of Alma Rosa  
Jaramillo,

JANE DOE, in her individual capacity, and  
JOHN DOE, in his individual capacity, and in  
his capacity as the personal representative of  
the estate of Eduardo Estrada,

Plaintiffs,

v.

CARLOS MARIO JIMINEZ NARANJO, also known as  
Macaco, El Agricultor, Lorenzo González  
Quinchía, and Javier Montañez,  
Defendant.

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VIDEO DEPOSITION OF OSCAR LEONARDO MONTEALEGRE BELTRAN  
October 23, 2019

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Pursuant to Notice and the Federal Rules of  
Civil Procedure, the video deposition of OSCAR LEONARDO  
MONTEALEGRE BELTRAN, taken by Plaintiffs, was held at  
HOTEL PARK 10, Cra. 36B #11, 12, El Poblado, Medellin,  
Colombia, on Wednesday, October 23, 2019, at 8:03 a.m.,  
before Jason T. Meadors, RPR, CRR, CRC, and Notary  
Public.

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Conducted on October 23, 2019

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14 Also Present:  
15 Julian Mejia, videographer  
Lisa Taylor, interpreter  
16 Delilah Crim

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1 THE REPORTER: Before I administer the oath,  
2 could the parties stipulate that they understand that  
3 the court reporter is not a notary public in this venue  
4 and nevertheless stipulate that he can administer the  
5 oath, and further agree that they will not object to  
6 the admissibility of the transcript based on the oath.

7 MS. SAVAGE: Yes, on behalf of plaintiffs.

8 MR. MICHEO: Yes, on behalf of defendant.

9 (Interpreter sworn.)

10 OSCAR LEONARDO MONTEALEGRE BELTRAN,  
11 having been first duly sworn, testified as follows:

12 EXAMINATION

13 QUESTIONS BY MS. SAVAGE:

14 ANSWERS THROUGH THE INTERPRETER:

15 Q Good morning, Mr. Montealegre. Thank you  
16 very much for your time today. We really appreciate  
17 you being here.

18 A Good morning.

19 Q My name is Dylan. I'm an attorney on behalf  
20 of the plaintiffs. And with me here are Daniel and  
21 Claret, who are with CJA, also on behalf of plaintiffs.

22 We also have with us today Javier, who is an  
23 attorney on behalf of the defendant. He will be  
24 appearing by phone on behalf of the defendant in this  
25 case, Carlos Mario Jimenez Naranjo.

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1 I'm just going to explain a few -- a few  
2 things about the purpose of us being here today.

3 MR. MICHEO: Sorry for the interruption. Can  
4 the translator and the witness speak up just a little  
5 bit? I can hear you fine, Dylan, but I can't hear  
6 them --

7 MS. SAVAGE: Okay.

8 MR. MICHEO: -- too well.

9 MS. SAVAGE: Okay. Did you get the -- I'm  
10 just going to get a couple of things -- okay, great.

11 MR. MICHEO: Yes, I gotcha.

12 Q (By Ms. Savage) Okay. So we are civil  
13 attorneys, not criminal, and we represent the family of  
14 Eduardo Estrada Gutierrez in this case.

15 This is a civil suit in civil court. We are  
16 not affiliated with the US government or law  
17 enforcement, and we're not seeking to cause some money  
18 issues.

19 And today, we'll largely be discussing  
20 information that has already been discussed publicly.  
21 And while some of the questions might be uncomfortable,  
22 we're not here to pass any judgment on the past.

23 A Don't worry. I've been in this legal process  
24 for about 12 years now, so it's a custom now.

25 Q Okay. Thank you. And I'm just going to also

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1 go over a few of the typical procedures that we use in  
2 depositions.

3 So today, I'll be asking you some questions  
4 under oath and may also show you some documents and ask  
5 you questions about those documents.

6 A Yes.

7 Q Our questions -- or apologies. Our  
8 conversation will be transcribed by the court reporter  
9 and facilitated by a translator.

10 Because we're working with a court reporter,  
11 the translator, and counsel on the phone, as you're  
12 already doing quite well, please wait until the  
13 translator finishes the question before you answer it.

14 A Yes. There's no problem.

15 Q Okay. And if you don't understand one of my  
16 questions, please feel free to ask me for  
17 clarification.

18 The defendant's attorney may object to  
19 questions that I ask, essentially, on the grounds of  
20 the form of the question. You should go ahead and  
21 answer the question, even if there is such an  
22 objection, unless there's an instruction not to answer.

23 And again, just thank you very much for your  
24 time, and we're going to try and keep this short. But  
25 if you feel like you need a break at any time, please



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1 just let us know.

2 A Yes. That's good.

3 Q Okay. So Mr. Montealegre, could you please  
4 just state your full name for the record.

5 A Good morning. My name is Oscar Leonardo  
6 Montealegre Beltran.

7 Q Thank you. And I'd like to start just by  
8 talking a little bit about BCB's practices around the  
9 2001 time period. So I'm going to ask you a few  
10 questions which might seem very basic to you, and I  
11 appreciate your patience while I do so.

12 A Yes. That's fine.

13 Q So you were a former member of the Bloque  
14 Central Bolivar, correct?

15 A Yeah. I entered. If you want, maybe I could  
16 tell you the story of how I entered into the BCB until  
17 the year 2001.

18 Q Sure.

19 A I entered in Southern Bolivar in 1999,  
20 specifically into the rural community of San Blas,  
21 which is part of the township of Monterrey, in the  
22 municipality of Simiti.

23 Q Okay. And just go ahead.

24 A I entered as a patrolman, and then I did some  
25 retraining for four months. And then I became the

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1 bodyguard of Julian Bolivar, who is now Rodrigo Perez.  
2 I did this job until the beginning of 2000, and then I  
3 began managing the finances in Southern Bolivar until  
4 2001. And in January 2001, I was transferred to San  
5 Rafael de Lebrija, which is a municipality in  
6 Santander.

7 Q Okay. I just want to go back through a  
8 couple of things that we had talked about.

9 So just, for instance, is it okay if I refer  
10 to the Bloque Central Bolivar as the BCB today?

11 A Yeah. That's good. No problem.

12 Q And you mentioned Mr. Perez. Was he also a  
13 member of the BCB, a former member of the BCB?

14 A Yes. Of course.

15 Q Okay. And he mentioned -- sorry, you  
16 mentioned that you were a patrolman, and then you  
17 became a bodyguard, and then you began managing the  
18 finances. Are there any other positions that you held  
19 within the BCB?

20 A Yes. The actors involved in one. In  
21 Santander, I commanded various fronts, and that was --  
22 but I was a second man below Julian Bolivar.

23 Q Okay. And did you report to Julian Bolivar?

24 A When it was possible, yes, but because of the  
25 continuous movements in the operations of the Colombian

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1 army, it wasn't always possible.

2 Q Sorry. I think I need to rephrase my  
3 question.

4 Was Julian Bolivar your superior?

5 A Yes.

6 Q And did you have any other superiors?

7 A No, it was always Julian Bolivar until the  
8 day of demobilization on December 12, 2005.

9 Q Okay. Thank you very much.

10 Mr. Montealegre, both you and Julian Bolivar  
11 have participated in the justice and peace process; is  
12 that right?

13 A Yes. We have. Yes, from September 15, 2007,  
14 until today.

15 Q Okay. And in connection -- as part of your  
16 participation in that process, have you provided  
17 information about killings that were committed by the  
18 BCB?

19 A Yes. Yes, I had the opportunity to  
20 reconstruct the historical memory of the BCB when I was  
21 in jail.

22 Q Okay. Thank you. And the information that  
23 you provided in the justice and peace process, was that  
24 truthful, to the best of your knowledge?

25 A Yes. It was what I knew plus the information

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1 that men who are in the structure in different areas,  
2 that information that they gave me.

3 Q Okay. And would you expect the information  
4 that others gave in the justice and peace process to  
5 also be truthful and accurate?

6 MR. MICHEO: I'm going to object to that  
7 question, as it calls for speculation.

8 THE INTERPRETER: He said, "I would say so."

9 Q (By Ms. Savage) All right. Thank you.

10 A Should I answer it? Or --

11 Q (By Ms. Savage) Yes. Unless there's an  
12 instruction not to answer, you can go ahead and answer  
13 the question.

14 (Exhibit 1 marked.)

15 A So what happened is that I was recompiling  
16 information, and independent of what others said,  
17 whether that was the truth to them or not, this is a  
18 process of the justice and peace process. It means  
19 it's voluntary and the objective is oriented toward the  
20 victims and telling them the truth.

21 Q (By Ms. Savage) Okay. Thank you.

22 A But sometimes it's difficult to find an exact  
23 truth. But unfortunately, it's difficult to know, have  
24 full knowledge, about these events, because some of the  
25 people that were in the structure decided not to join

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1 the justice and peace process, or they didn't  
2 demobilize, or they're dead, or they became part of  
3 these new armed groups within the country.

4 Q Okay. Thank you.

5 So Mr. Montealegre, I'm handing you what's  
6 been marked as Exhibit 1. It's a news article from  
7 2009 from a website called verdadabierta.com.

8 MS. SAVAGE: And Javier, this is an exhibit  
9 we used yesterday. I don't have the exhibit number  
10 from yesterday, but it's the Verdadabierta article,  
11 Bates number ending -- Bates number EEG845.

12 A Yes. I'm looking at it.

13 Q (By Ms. Savage) And Mr. Montealegre, if you  
14 could please look at the title of the article on this  
15 first page, beginning with, Nos convertimos.

16 A We became a killing machine. Julian Bolivar.

17 Q And that does refer to the BCB as a killing  
18 machine; is that right?

19 A Yes, but to understand that title, I think  
20 you have to understand the context of where the BCB  
21 began and the objective.

22 Q Okay. What does he mean by "the objective"?

23 A First, it was an anti-subversive fight  
24 against the enemy. And in that area of the country,  
25 that was the guerrilla forces of the ELN and the FARC.

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1           And so we started to combat the guerrilla  
2 forces in that region, and when we're talking about a  
3 killing machine, it refers to, every day, there was  
4 contact with the guerrilla confrontations, and it  
5 wouldn't be exaggerating to say that there were 10 to  
6 15 deaths daily.

7           And there were also land mines and bombs,  
8 which aren't talked about in some of legal websites,  
9 but something that we've telling about in the legal  
10 procedures and the justice and peace process.

11           Are when we're talking about a machine, we  
12 would say when we entered into Southern Bolivar, there  
13 were 98 men in 1998. And then the date of  
14 demobilization on January 31, 2006, approximately 1800  
15 men demobilized.

16           The force grew effectively due to the  
17 military force against these guerrilla forces. At the  
18 beginning, there were rural confrontations, and then it  
19 became an urban war.

20           This information about where the guerrillas  
21 were was originally given by locals or small-scale  
22 farmers in the region. And then this information began  
23 to be given by men who belonged to the ELN or the FARC  
24 who had changed sides.

25           I think that this was facilitated in regions

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1 like San Pablo, Barrancabermeja. We were able to  
2 facilitate the location of guerrilla fighters dressed  
3 as civilians, because their former colleagues began to  
4 indicate them, point them out. That's it.

5 Q Thank you. I want to go back again to some  
6 of what he just discussed.

7 So first, I believe you just mentioned  
8 San Pablo. Was the BCB present in San Pablo in 2001?

9 A Yes, they had a fixed presence from 1999,  
10 January of 1999. And this was shown by the first  
11 massacre in January 9, 1999.

12 Q Okay. And then I believe at the very  
13 beginning, you mentioned that this was a fight against  
14 the guerrillas and FARC. Did the fight -- was the BCB  
15 also fighting against people who it suspected of being  
16 guerrilla sympathizers?

17 A That's very subjective, because as I  
18 mentioned before, this information was originally given  
19 by small-scale farmers and locals in the region, but  
20 then former members of the very same guerrilla  
21 structures gave the information. When they gave the  
22 information, we would investigate it, and based on the  
23 results of that investigation, we would give the order  
24 for execution.

25 Q Okay. And I believe you mentioned that

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1 eventually, the fight progressed into an urban war.

2 Could you describe what you meant by "urban war"?

3 A How can I explain this. When you enter a  
4 region where there is presence of the guerrilla in  
5 urban areas, within the population, there are guerrilla  
6 fighters. But they're obviously passing as civilians.

7 For example, these people are in charge of  
8 receiving those who have been injured in combat, of  
9 supplying them with medicine, with clothing, and to  
10 compile information about the movement of state  
11 security forces. For example, the ELN would call these  
12 people masa, or the masses.

13 Q Okay. Is it -- as part of the urban war,  
14 were people who were believed to be guerrilla  
15 sympathizers sometimes shot?

16 A Yes.

17 Q Okay. And then --

18 A But when you're saying a sympathizer, what do  
19 you mean?

20 Q Someone who the BCB believed to be assisting  
21 the guerrillas or whose interests were aligned with the  
22 guerillas.

23 A Okay. Makes sense.

24 Q Okay. And I believe you also mentioned that  
25 information was given to the BCB by locals and farmers



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1 and then by persons in the ELN and FARC who had changed  
2 sides.

3 Did police -- did the police ever provide  
4 information?

5 A Yes. Yes, we've already referred to this in  
6 the justice and peace process. We also gave a list to  
7 the national government of collaborators who were  
8 giving us information, policemen, people from the army,  
9 from different state entities.

10 Q Okay. So just to confirm, people from the  
11 army also provided the BCB with information.

12 A Yes. Yes.

13 Q And you mentioned a list. Who provided that  
14 list?

15 A As I explained at the beginning, I was one of  
16 the people in charge of compiling historical memory of  
17 the Bloque Central Bolivar.

18 And as part of this, the national government  
19 also created within jail something called special  
20 patios, the special patios for justice and peace. And  
21 in these patios, we would meet up with men from  
22 determined regions and divide them by sector and by  
23 year.

24 They began to give information about  
25 politics, the military, finances. And within these

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1 military issues, they gave, for example, names of  
2 people who were not only material authors but also  
3 intellectual authors, who from the police or the  
4 military would give information, who, in the justice  
5 and peace process, I referred to as third parties.

6 And so as we compiled that information, we  
7 made a list of those third parties, which include  
8 police officers, military officers, even mayors and  
9 governors of the regions where we were.

10 Q Okay. Thank you. And can you remind me, who  
11 did you provide those books to?

12 A To the Attorney General's office for justice  
13 and peace, to Office Number 41, 42, 51, 28. This is a  
14 public document.

15 Q Okay. Do you know if anything was ever done  
16 with it?

17 A Yes, many of the people on this list were  
18 prosecuted, and some of them are in jail today.

19 Q Okay.

20 A Among that, it was a very famous issue in  
21 Colombia, the issue of parapolitics. Politicians who  
22 supported the United Self Defense Forces of Colombia.

23 Q Thank you. All right. I'd like to talk now  
24 a little bit about Eduardo Estrada Gutierrez, and  
25 again, I'll be starting with some pretty basic

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1 questions, so I appreciate your patience.

2 A Yeah. That's fine. No problem.

3 Q And I take it, based on what we've discussed  
4 previously, that you're familiar with San Pablo; is  
5 that right?

6 A Yes.

7 Q Okay. And you're -- are you familiar with  
8 Eduardo Estrada Gutierrez?

9 A No, ma'am. I never had the opportunity to  
10 meet him. When I first learned about him, it was when  
11 you began to become closer, when you were trying to  
12 locate Taraza.

13 But as I said, I was part of the process to  
14 reconstruct historical memory in the Southern Bolivar  
15 region, and so with men in the Southern Bolivar region,  
16 including Taraza, who was a politician in San Pablo.

17 Q Okay.

18 A When I say "politician," I mean a politician  
19 of our organization, of the central Bloque Central  
20 Bolivar.

21 Q Okay. So Taraza, does he go by any other  
22 names?

23 A Yes. His real name is Jairo Ignacio Orozco  
24 Gonzalez.

25 Q Okay. And he was also a member of the BCB?

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1 A Yes. Yes.

2 Q Okay. And I'm assuming that -- I don't -- I  
3 think you've never met Mr. Estrada. Are you aware that  
4 he was killed?

5 A Yes.

6 Q Okay. And do you know approximately when?

7 A Because of the information that Taraza gave  
8 in Southern Bolivar, I don't remember if it was 2001 or  
9 2002.

10 Q Okay. And what, if anything, do you know  
11 about Mr. Estrada's murder?

12 A So what I'm going to refer to is what I've  
13 heard from others.

14 Q Okay.

15 A In the work bat or the favor that I've been  
16 asked to, to help find Rodrigo Perez and Taraza. And  
17 so when I looked for him, Taraza, to come here today  
18 for this procedure, he said he wasn't able to travel,  
19 but he did tell me about the incident about Estrada.

20 Q And what did he tell you?

21 A This man had a restaurant in San Pablo. And  
22 that the AUC had information that he was a collaborator  
23 of the ELN. When he received this information, he  
24 immediately informed his superior, who was Felipe  
25 Candado. His name was Hernan Dario Meza Marulanda.

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1           The information arrived to Taraza that he was  
2 collaborator with the ELN, and so he summoned him to  
3 call a meeting with Marulanda.

4           And so when Taraza brings him to the meeting  
5 or to Candado's house, Candado gets angry and he said,  
6 Why have you brought a guerrilla sympathizer to my  
7 house? Taraza says, Listen to him. And at the end,  
8 Felipe Candado listened to him, and then he lets him  
9 go.

10           However, the commentaries from that same  
11 community continued to point out this man as a supposed  
12 guerrilla fighter. These commentaries arrived to a  
13 commander in Southern Bolivar who is alias Gustavo  
14 Alarcon. His real name, John Francis Arrieta.

15           And in the months that went by, a guerrilla  
16 from the ELN was captured, and he carried a document  
17 which was a motorcycle permission. And so the  
18 ownership document of a motorcycle, when you sell it,  
19 it's left open. There's no name on it. And so the  
20 paperwork said that the original owner of that  
21 motorcycle was Eduardo Estrada.

22           Gustavo Alarcon becomes furious and he said,  
23 Take Eduardo Estrada to where he's living in San Pablo.  
24 But Felipe Candado doesn't take him there, and he goes  
25 with Taraza to San Pablo.

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1           At that moment, Felipe Candado and Taraza  
2           said they had a moment to talk to him, and that  
3           Mr. Eduardo had said that he had collaborated with the  
4           guerrilla because he was afraid, for fear, just like  
5           all of the residents of the municipality did. And that  
6           blank paperwork, anyone could have that. Gustavo  
7           Alarcon ordered to stop the assassination.

8           And then later on, Taraza and Felipe Candado  
9           go back to San Pablo. And then Felipe Candado and  
10          Taraza are transferred from San Pablo to Santander.  
11          And the person left, that's commanding San Pablo. And  
12          the person that's left in charge is alias Juan Esteban  
13          or Trigizal.

14          And in the month of July 16 -- or I don't  
15          remember if it was June or July, Taraza gets a radio  
16          call from Juan Esteban, where he said that Gustavo  
17          Alarcon was calling him to assassinate Mr. Eduardo.  
18          This call was in the morning.

19          A little bit later, Felipe Candado called  
20          Taraza personally, and he says he's not going to allow  
21          Gustavo Alarcon to keep punishing him over radio. And  
22          Taraza says, Why are you being reprimanded. And  
23          Gustavo Alarcon says that -- and he says that. . .

24                   (Exchange between interpreter and witness in  
25                   Spanish.)

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1           A       And so Gustavo had told Felipe Candado that  
2 he should not have to fight him and not fulfill the  
3 order to kill the guerrilla.

4                   And that day, he had to kill Mr. Eduardo,  
5 because they didn't just have the information that he  
6 had helped them when he had a restaurant and with the  
7 motorcycle paperwork, but also that he had begun a  
8 radio station to help the guerillas. And because of  
9 that, Mr. Eduardo had to die that day.

10                   He hangs up the radio or the phone call.  
11 Felipe calls Juan Esteban, who was the commander of  
12 San Pablo. He gives him the same instructions or the  
13 order that, today, Mr. Eduardo has to die.

14                   Juan Esteban says that the day was a holiday  
15 of the Virgin Mary, and so he couldn't assassinate him  
16 in the afternoon but had to wait until late at night.

17                   That was how it ended up happening. The  
18 event happened around 11:00 p.m. at night. Juan  
19 Esteban gave the order to Pikachu and Burro, who were  
20 the material authors of the crime. That's what Taraza  
21 told me.

22           Q       Okay. Thank you. I'm, again, going to go  
23 back through some of that and ask questions, follow-up  
24 questions.

25                   Okay. So you mentioned this was what Taraza

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1 told you. So all of the information that you just  
2 provided us, did that come from Taraza?

3 A Yes.

4 Q Okay.

5 A Moreover, he sent us a document by email. If  
6 you want, we can send it to you by email or Whatsapp.  
7 It's a document in which he tells all of the events.

8 Q Yes, we would -- we would like to see that  
9 document, please. And --

10 MR. MICHEO: So we know who all -- we would  
11 request a copy of that document, please.

12 MS. SAVAGE: We can get it to you, Javier.

13 MR. MICHEO: Thank you.

14 Q (By Ms. Savage) Okay. And is it fair to say  
15 that based on the information that the BCB had at the  
16 time that it viewed Mr. Estrada as a guerrilla  
17 sympathizer?

18 A Yes, that's what Gustavo Alarcon determined,  
19 based on commentaries from 10 to 4, from the  
20 restaurant, from the incident with the motorcycle. And  
21 the last drop that made the cup spill over was the  
22 information about the radio station.

23 Q Okay. And do you know how Mr. Estrada was  
24 killed, with what weapon?

25 A No, I don't know.



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1 Q Do you know if he was shot?

2 A I don't know.

3 Q And then I just want to go through a couple  
4 of the people that you mentioned as well.

5 Gustavo Alarcon. He was a member of the BCB;  
6 is that right?

7 A Yes, he was a military commander of the BCB  
8 and second in line behind Rodrigo Perez or Julian  
9 Bolivar.

10 Q Okay. And Felipe --

11 A His name is John Francis Arrieta.

12 Q Okay. And Felipe Candado. Was he also a  
13 member of the BCB?

14 A Yes, he was a financial commander in 1999.  
15 And then in 2000, was the military commander in  
16 San Pablo. Around November, December, of 2000, he was  
17 transferred to the lower Rio Negro region in  
18 San Andres, as a commander. He was there until 2003,  
19 May 2003, where he leaves for another region to take on  
20 another type of job.

21 Q Okay. And Juan Esteban -- I missed his last  
22 name, but was he also a member of the BCB?

23 A Yes, but that wasn't his name. He had two  
24 names. He was either Juan Esteban or Trigizal.

25 Q But he was a member of the BCB.

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1           A     Yes. He was the person who replaced Felipe  
2 Candado as the commander in San Pablo, in this  
3 municipality.

4           Q     Thank you. And I think you mentioned that  
5 Gustavo Alarcon at one point told Felipe Candado that  
6 he defied him. Do you know how he found out that  
7 Felipe had, quote-unquote, defied him? Disobey.

8           A     Because he'd already given the order several  
9 times to assassinate him, to assassinate Mr. Eduardo.  
10 And because, as Taraza tells me, he had impeded this  
11 from happening. That's why he took Eduardo to Felipe  
12 Candado's house, the incident with the motorcycle, and  
13 the phone call.

14          Q     In general, would members of the BCB report  
15 to their superiors that killings had been carried out?

16          A     Not always. Why? Because each commander in  
17 every municipality was autonomous in terms of finances  
18 and military commands. And also because of  
19 communications. We didn't always say what happened,  
20 but more or less every 24 hours. And they did this to  
21 avoid the police or the army or even guerrilla fighters  
22 from overhearing the conversations.

23          Q     Sorry. Could -- what did you mean with the,  
24 around every 24 hours? What was -- what was done about  
25 every 24 hours?

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1           A     It was a report that the commanders of the  
2     municipality or region would give, and in this case,  
3     Felipe Candado or Gustavo Alarcon.

4           Q     And what type of information would those  
5     reports typically include?

6           A     No. Sometimes it was simple. Sometimes it  
7     was just, We're good. We haven't had any casualties.  
8     Or in the case of a combat, to ask for help or support  
9     to know exactly where the combat was happening.

10           And then after a certain amount of days,  
11     there was a more personal report in which they would  
12     give information of a period of time between every  
13     seven to fifteen days or even just once a month.

14           Q     I just want to make sure that that report was  
15     in person, face to face?

16           A     Yes.

17           Q     Okay. And would these reports, would they  
18     include information about the number of guerillas  
19     killed if you were in combat?

20           A     Yes. The number of guerrilla fighters that  
21     were killed in combat, or our own combatants.

22           Q     Okay.

23           A     Or captured -- those who were captured by the  
24     military, our men. A report on buying weapons or  
25     losing weapons.

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1 Q Did you also include in those reports whether  
2 order -- whether your superiors' orders had been  
3 fulfilled or carried out?

4 A And so when it was a direct order, almost  
5 always the next day over radio, they would say, the  
6 order was fulfilled, without exactly explaining over  
7 radio what kind of order it was.

8 Q Okay. And if -- if a member of the BCB  
9 defied an order from a superior, would there be  
10 consequences for that?

11 A Yes, they were assassinated.

12 Q Okay.

13 A Juan Esteban even said to Taraza the morning  
14 of the murder of Eduardo Estrada that he could go -- he  
15 could call Alarcon and tell him that he didn't want to  
16 assassinate him. But Taraza said, No, if I call  
17 Mr. Gustavo and I tell him that, they'll kill  
18 Mr. Estrada and they'll kill me.

19 Q Okay. And I just want to revisit something  
20 that we talked about earlier when we discussed  
21 information that the police and military would give to  
22 the BCB.

23 Did that information sometimes lead the BCB  
24 to target people for killing?

25 A Yes, on many occasions, the army or the

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1 police could capture people but they weren't able to  
2 prosecute them or detain them. And so when that person  
3 left, they would come find us and say, Look, we  
4 captured this guy yesterday, but the legal process was  
5 done wrong, but he is a member of the guerrilla.

6 Q Did you ever -- I'm sorry. Go ahead.

7 THE WITNESS: No, no.

8 Q (By Ms. Savage) Did you ever personally see  
9 this happen?

10 A Yes, of course, on many occasions and in  
11 various regions.

12 Q Okay. Thank you.

13 MS. SAVAGE: I think we're close to the end.  
14 If we could just have a very brief break. Thank you  
15 very much.

16 (Recess from 9:09 a.m. to 9:13 a.m.)

17 MS. SAVAGE: Okay. Mr. Montealegre, thank  
18 you, again, very, very much for your time today.

19 We have no further questions for you.  
20 Javier, who's on the phone may have some.

21 So Javier, we pass the witness.

22 MR. MICHEO: I do not have any questions for  
23 this witness. Thank you for your time.

24 MS. SAVAGE: Okay.

25 THE WITNESS (interpreted): You're welcome.

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1 MS. SAVAGE: Okay, Javier. We're going to go  
2 and hang up, if that's okay.

3 MR. MICHEO: Sure. Take care, guys. Safe  
4 travels back.

5 (Deposition adjourned at 9:15 a.m.)

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REPORTER CERTIFICATE

I, JASON T. MEADORS, Registered Professional Reporter, Certified Realtime Reporter, Certified Realtime Captioner, and Notary Public, appointed to take the video deposition of

OSCAR LEONARDO MONTEALEGRE BELTRAN,

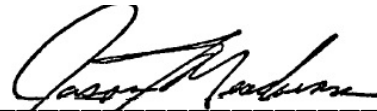
certify that prior to the deposition the witness was sworn by me to tell the truth; that the deposition was taken by me at HOTEL PARK 10, Cra. 36B #11, 12, El Poblado, Medellin, Colombia, on October 23, 2019.

I certify that the proceedings were reduced to typewritten form by computer-aided transcription consisting of 29 pages herein; that the foregoing is an accurate transcript of the proceedings.

I certify that I am not related to, employed by, of counsel to any party or attorney herein, nor interested in the outcome of this litigation.

I further certify review of the transcript was not requested.

Attested to by me this October 25, 2019.



Jason T. Meadors, RPR, CRR, CRC  
for Planet Depos International

My commission expires  
January 26, 2021

Re: Jaramillo, et al., vs. Naranjo  
Reporter: JM  
Proofer: SLM

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I, OSCAR LEONARDO MONTEALEGRE BELTRAN, do  
hereby certify that I have read the foregoing  
transcript and that the same and accompanying amendment  
sheets, if any, constitute a true and complete record  
of my testimony.

\_\_\_\_\_

Signature of Deponent

( ) No amendments

( ) Amendments attached