

EXHIBIT 7



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Transcript of Kelly Dominguez

Date: September 6, 2018

Case: Jaramillo, et al. -v- Naranjo

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3
4 JESÚS CABRERA JARAMILLO, in)
5 his individual capacity, and)
6 in his capacity as the) Case No.:
7 personal representative of) 1:10-cv-21951-EG
8 the estate of ALMA ROSA)
9 JARAMILLO, Jane Doe, in her)
10 individual capacity, and John) VIDEOTAPED
11 Doe, in his individual) DEPOSITION OF
12 capacity, and in his capacity) KELLY DOMINGUEZ
13 as the personal representative)
14 of the estate of EDUARDO)
15 ESTRADA,) MEDELLIN, COLUMBIA
16 Plaintiffs,) THURSDAY
17 v.) SEPTEMBER 6, 2018
18 CARLOS MARIO JIMÉNEZ NARANJO,) 9:51 A.M.
19 also known as "Macaco,")
20 "El Agricultor," "Lorenzo)
21 González Quinchía," and)
22 "Javier Montañez,")
23 -----)

24 Job No.: 205564

25 Pages: 1 - 25 Reported by: Leslie A. Todd

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1 Deposition of KELLY YESENIA DOMINGUEZ ROMERO,
2 held in the conference center of the:

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6 HOTEL PARK 10
7 Cra. 36B #11, 12
8 El Poblado
9 Medellín, Colombia
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15 Pursuant to notice, before Leslie Anne Todd,
16 Court Reporter and Notary Public, who officiated
17 in administering the oath to the witness.
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A P P E A R A N C E S

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Transcript of Kelly Dominguez
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4

1 APPEARANCES (Continued)

2

3 ON BEHALF OF DEFENDANT:

4 JUAN CARLOS RAMOS-ROSADO, ESQUIRE

5 (telephonically)

6 MCCONNELL VALDÉS LLP

7 SunTrust International Center

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9 Miami, Florida 33131

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11

12 ALSO PRESENT:

13 LISA TAYLOR, Spanish Interpreter

14 JULIAN ALONSO MEJIA HIDALGO, Videographer

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C O N T E N T S

EXAMINATION OF KELLY YESENIA DOMINGUEZ ROMERO	PAGE
By Ms. Savage	7, 23
By Mr. Ramos-Rosado	22, 24

E X H I B I T S

(None marked)

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P R O C E E D I N G S

KELLY YESENIA DOMINGUEZ ROMERO,
and having been first duly sworn,
was examined and testified as follows
through the Spanish interpreter:

EXAMINATION BY COUNSEL FOR PLAINTIFFS

BY MS. SAVAGE:

Q Good morning, Kelly. My name is Dylan 09:51:42
Savage, and I represent the plaintiffs in this 09:51:44
matter. With me today are my colleagues, Daniel 09:51:47
McLaughlin from CJA and Carolina Solano from CCJ. 09:51:59

MR. RAMOS-ROSADO: I'm sorry. I hate to 09:52:06
interrupt, but I can't really hear. 09:52:07

MS. SAVAGE: Can we go off the record. 09:52:07

(A discussion was held off the record.) 09:52:07

BY MS. SAVAGE: 09:52:07

Q And, Kelly, counsel for the defendant, 09:53:17
Juan Carlos Ramos Rosado, is appearing by 09:53:21
telephone. We are civil attorneys, we're not 09:53:29
criminal attorneys, and we, on the plaintiffs' 09:53:34
side, are representing the family of Eduardo 09:53:37
Estrada Gutierrez, and we are not affiliated with 09:53:41
U.S. government or law enforcement. 09:53:53

Do you have a preference of whether I 09:54:03

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1	refer to you as Kelly or Ms. Dominguez?	09:54:05
2	A Kelly.	09:54:11
3	Q Kelly, have you ever given a deposition	09:54:14
4	before?	09:54:16
5	A No.	09:54:16
6	Q Have you ever given testimony under oath	09:54:21
7	before?	09:54:26
8	A No.	09:54:27
9	Q Okay. I'm just going to go over a few	09:54:28
10	ground rules for today's deposition.	09:54:31
11	So today I'll be asking you some	09:54:39
12	questions relating to Eduardo Estrada Gutierrez	09:54:41
13	whose relatives are the plaintiffs in this case.	09:54:44
14	Do you understand that you will be	09:54:56
15	answering these questions under oath?	09:54:57
16	A Yes.	09:54:59
17	Q Okay. Our conversation will be	09:55:03
18	transcribed by the court reporter and facilitated	09:55:07
19	by Lisa, the translator.	09:55:10
20	In order to establish a clear record,	09:55:18
21	please answer my questions verbally, so no	09:55:20
22	nodding, no mm-hmms or uh-huhs, that type of	09:55:23
23	response.	09:55:28
24	A Yes.	09:55:40
25	Q Okay?	09:55:41

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1	A	Yes.	09:55:41
2	Q	For the same reason, please wait until	09:55:42
3		the translator finishes the question before you	09:55:44
4		answer it. We just want to make sure that	09:55:46
5		everything on the record is clearly written down,	09:55:48
6		and it could be hard to do so if any of us are	09:55:51
7		talking at the same time.	09:55:55
8	A	Okay.	09:56:09
9	Q	Okay. If you don't understand one of my	09:56:09
10		questions, please ask me for clarification or to	09:56:11
11		rephrase it.	09:56:14
12	A	Yes.	09:56:23
13	Q	If you feel like you need a break at any	09:56:23
14		time, please let me know and that should be fine.	09:56:26
15	A	Okay.	09:56:33
16	Q	And defendant's attorney may object to	09:56:34
17		questions that I'm asking you. You should still	09:56:37
18		proceed to answer despite an objection.	09:56:39
19	A	Okay.	09:56:52
20	Q	Could you please state your full name	09:56:54
21		for the record.	09:56:54
22	A	Kelly Yesenia Dominguez Romero.	09:57:00
23	Q	Is there any reason you cannot testify	09:57:22
24		fully and accurately today?	09:57:26
25	A	No reason.	09:57:28

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1	Q	Okay. Have you taken any medication in	09:57:29
2		the last day that could impact your ability to do	09:57:31
3		so?	09:57:35
4	A	No.	09:57:40
5	Q	Okay. I want to ask you just a few	09:57:40
6		background questions to start with.	09:57:42
7		In the July 2001 time period, what city	09:57:44
8		were you living in?	09:57:47
9	A	In San Pablo, Bolívar.	09:57:59
10	Q	And is Bolívar the department that San	09:58:00
11		Pablo is located in?	09:58:04
12	A	Yes.	09:58:08
13	Q	Okay. Can you describe San Pablo?	09:58:09
14	A	Can I describe it?	09:58:11
15	Q	Is it a large or a small town?	09:58:17
16	A	It's not that big; it's not that small.	09:58:19
17		It's really hot. And what else? It's a happy	09:58:27
18		town.	09:58:36
19	Q	Okay. Is it the type of town where	09:58:37
20		everyone generally knows each other?	09:58:39
21	A	Yes.	09:58:41
22	Q	In 2001, do you know whether there were	09:58:47
23		paramilitaries in San Pablo?	09:58:50
24	A	Yes.	09:58:52
25	Q	Do you know -- do you remember when they	09:58:57

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1	first came to town?	09:58:58
2	A Yes. It's unforgettable.	09:59:04
3	Q When was that?	09:59:07
4	A The exact date I'm not sure, but it was	09:59:21
5	in 1999 because there was a massacre.	09:59:23
6	Q Okay. So I believe you just said that	09:59:26
7	in 2001, there were paramilitaries in San Pablo.	09:59:32
8	How did you know these people were paramilitaries?	09:59:35
9	A They would go around in armed trucks.	09:59:53
10	It was difficult to see them. It's hard to not	09:59:56
11	know when you live in a town that's so small about	10:00:08
12	these people.	10:00:11
13	Q Understood. Are there any other ways	10:00:12
14	that you could identify a paramilitary?	10:00:13
15	A They would call them the Paracos, the	10:00:20
16	paramilitaries, or the Self-Defense Forces.	10:00:31
17	Q Was it common knowledge within San Pablo	10:00:33
18	who the paramilitaries were?	10:00:35
19	A Of course. Everyone knew.	10:00:37
20	Q Were you aware at the time in 2001 of	10:00:44
21	paramilitaries killing individuals they perceived	10:00:48
22	to be guerilla sympathizers in San Pablo?	10:00:52
23	A Yes.	10:00:57
24	Q Did that happen often, to her knowledge?	10:01:05
25	A So every day, there were about two or	10:01:08

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1	three people who would be taken away by truck, and	10:01:28
2	so you knew that their last years would be along	10:01:31
3	the river where they would take them.	10:01:34
4	Q And were these experiences common	10:01:35
5	knowledge?	10:01:38
6	A Pretty much everyone knew about it, but	10:01:39
7	because of the fear no one really talked about it.	10:01:50
8	Q Okay.	10:01:54
9	A Women, children disappeared.	10:01:59
10	Q Kelly, I'm going to move on to ask a few	10:02:05
11	questions about Eduardo Estrada Gutierrez.	10:02:08
12	Are you aware that this lawsuit is about	10:02:15
13	the death of Mr. Gutierrez?	10:02:16
14	A Yes.	10:02:20
15	Q Do you have any connection to	10:02:24
16	Mr. Gutierrez's family?	10:02:27
17	A Yes. Because his sister is the school	10:02:34
18	teacher of Sebastian.	10:02:49
19	Q Is Sebastian -- who is Sebastian?	10:02:51
20	A My son.	10:02:54
21	Q I would like to direct your attention to	10:02:55
22	the date July 16th, 2001.	10:02:58
23	What were you doing on the night of	10:03:02
24	July 16th?	10:03:04
25	A That was the day that they killed	10:03:22

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1	Eduardo, right? I don't know exactly the date	10:03:24
2	when they killed Eduardo. I just know that I was	10:03:36
3	there.	10:03:38
4	Q Yes, I would like to talk about the day	10:03:39
5	that Eduardo was killed.	10:03:41
6	What were you doing that night?	10:03:45
7	A I was going with some friends to go to a	10:03:53
8	party.	10:03:56
9	Q Okay. Do you recall about what time?	10:03:58
10	A It was about 11 at night. Maybe 10:30.	10:04:10
11	Q Okay. While you were out, did you see	10:04:14
12	Eduardo?	10:04:16
13	A We were waiting on the corner, waiting	10:04:25
14	for them to pick us up.	10:04:27
15	Q I'm sorry. One second.	10:04:29
16	Who was "them"?	10:04:31
17	A So I was a minor, and they didn't let me	10:04:38
18	go out, so I ran out of the house.	10:04:41
19	Q Okay.	10:04:43
20	A And we were waiting for my boyfriend,	10:04:47
21	the person who was my boyfriend.	10:04:49
22	Q Okay.	10:04:52
23	A And at that time while we were waiting,	10:04:59
24	Eduardo passed by with his wife.	10:05:01
25	Q What's his wife's name?	10:05:03

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1	A	Sara.	10:05:05
2	Q	What did they seem to be doing?	10:05:07
3	A	They were coming from downtown toward	10:05:17
4		their house.	10:05:20
5		He was saying something into her ear,	10:05:25
6		and she was laughing.	10:05:27
7	Q	Okay. Did you see something happen to	10:05:29
8		Eduardo?	10:05:32
9	A	About a hundred meters after the bridge	10:05:49
10		where they were walking, a man came close to him,	10:05:52
11		and he shot him.	10:05:55
12	Q	Okay. So about how far away were you	10:05:56
13		standing?	10:06:00
14	A	I was on the corner, and he was diagonal	10:06:12
15		from there. I don't know the exact distance, but	10:06:15
16		it was close.	10:06:17
17	Q	Okay. And did you have a clear view of	10:06:17
18		the shooting?	10:06:19
19	A	Yes, very clear.	10:06:20
20	Q	Okay. And what did the man look like	10:06:24
21		who shot Eduardo?	10:06:28
22	A	He wasn't very tall; he was stout.	10:06:41
23	Q	Okay.	10:06:45
24	A	He had a big nose. And, anyway, I had	10:06:51
25		seen him beforehand.	10:06:54

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1	Q	Where had you seen him before?	10:06:56
2	A	In a restaurant.	10:06:58
3	Q	In San Pablo?	10:07:02
4	A	In San Pablo.	10:07:03
5	Q	And did you have reason to believe he	10:07:05
6		was a paramilitary?	10:07:07
7	A	And so we used to go to a restaurant	10:07:25
8		where the mom of one of my friends used to work.	10:07:27
9		And I was with her, my friend, on the day of the	10:07:30
10		shooting. And they would always come to eat	10:07:33
11		there, all of them.	10:07:37
12	Q	By "they," do you mean paramilitaries?	10:07:39
13	A	Yes.	10:07:43
14	Q	Okay. Can you estimate how old the man	10:07:44
15		was?	10:07:47
16	A	Maybe 38 years. I don't know. He	10:08:01
17		wasn't that old.	10:08:04
18	Q	Okay. Besides seeing him at the	10:08:05
19		restaurant before, had you seen him anywhere else?	10:08:08
20	A	On the street -- on the streets, on the	10:08:20
21		motorcycle. They were always traveling throughout	10:08:29
22		the town. And I had seen him before because I had	10:08:31
23		talked to him in the restaurant.	10:08:34
24	Q	And, again, when you say "they," do you	10:08:35
25		mean paramilitaries?	10:08:37

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1	A	Yes.	10:08:41
2	Q	Okay. Do you remember -- sorry. Do you	10:08:42
3		remember what type of clothing he was wearing?	10:08:45
4	A	No.	10:08:50
5	Q	And do you know what this man was	10:08:53
6		called?	10:08:56
7	A	Chuckie.	10:08:56
8	Q	Are you aware of any other aliases he	10:09:02
9		had?	10:09:04
10	A	No.	10:09:09
11	Q	Is it possible that other people called	10:09:10
12		him by different names?	10:09:12
13	A	I don't know.	10:09:14
14	Q	Okay. Do you know Chuckie's real name?	10:09:18
15	A	No.	10:09:24
16	Q	Okay. After Eduardo was shot, what	10:09:26
17		happened next?	10:09:30
18	A	The woman started shouting and shouting,	10:09:32
19		and what we did was to hide. Jurani and I hid	10:09:50
20		behind some bricks.	10:09:54
21	Q	When you said "the woman," do you mean	10:09:55
22		Sara?	10:09:57
23	A	Sara.	10:09:59
24	Q	And what -- did you see what happened	10:10:03
25		with Eduardo's body?	10:10:07

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1	A	Well, she was screaming for help. We	10:10:16
2		were hidden, and I did see that a motorcycle	10:10:26
3		passed maybe to help, but I don't know.	10:10:29
4	Q	Okay. What did you and your friend do	10:10:32
5		after you -- what did you and your friend do after	10:10:34
6		you were hiding?	10:10:37
7	A	We went home.	10:10:43
8	Q	Okay. And was anyone there when you got	10:10:44
9		home?	10:10:47
10	A	When we got home -- when we got home,	10:11:00
11		the man who had killed Eduardo was in the house of	10:11:03
12		my friend.	10:11:07
13	Q	Okay. Did you speak to him that	10:11:08
14		evening?	10:11:10
15	A	No.	10:11:11
16	Q	Did you stay overnight at that house?	10:11:13
17	A	Yes. They didn't let me leave.	10:11:18
18	Q	Okay. And the next morning, what	10:11:21
19		happened the next morning?	10:11:23
20	A	I went home. But when we woke up in the	10:11:33
21		morning, he wasn't there any longer.	10:11:36
22	Q	Okay. Did you ever see Chuckie again?	10:11:38
23	A	Yes.	10:11:45
24	Q	When was that?	10:11:46
25	A	We used to live in a neighborhood called	10:11:57

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1 La Victoria, and they lived two blocks away from 10:11:59
2 where I lived. And they used to pass by the 10:12:03
3 house. And because I had so many nerves after 10:12:19
4 what had happened, my mom sent me to live 10:12:22
5 somewhere else. 10:12:25

6 Q Did he ever speak to you when you saw 10:12:25
7 him? 10:12:27

8 A The day I left, he did this to me 10:12:28
9 (demonstrating). 10:12:28

10 MS. SAVAGE: For the record, the witness 10:12:36
11 is patting the shoulder of the translator. 10:12:37

12 A When I was -- when I was traveling, when 10:13:00
13 I was about to leave, he came and he touched me on 10:13:07
14 the shoulder. He said, Where are you going? And 10:13:10
15 I said, Going to my father's house. 10:13:12

16 MS. SAVAGE: Okay. Could we take a 10:13:14
17 quick break. 10:13:18

18 (Recess.) 10:13:21

19 BY MS. SAVAGE: 10:28:46

20 Q All right. Kelly, I just want to ask 10:28:57
21 you a few follow-up questions about some of the 10:28:59
22 things we just talked about. 10:29:02

23 We've been talking about San Pablo. To 10:29:08
24 your knowledge, is San Pablo in the Middle 10:29:10
25 Magdalena region? 10:29:14

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1	A	Yes.	10:29:20
2	Q	And we spoke earlier about a massacre	10:29:20
3		that happened in San Pablo in 1999.	10:29:23
4		Were you there?	10:29:25
5	A	Yes.	10:29:33
6	Q	Do you remember how many people were	10:29:34
7		killed?	10:29:35
8	A	Fourteen.	10:29:40
9	Q	And who -- do you know who the victims	10:29:41
10		were?	10:29:44
11	A	A man that worked in a bank; a man whose	10:30:01
12		last name was Juaquero. They were -- there were	10:30:05
13		14 people. I don't remember everyone, but -- but	10:30:13
14		they were 14. And they held a vigil in the park	10:30:21
15		for everyone.	10:30:29
16	Q	Were these 14 people civilians?	10:30:29
17	A	Yes.	10:30:32
18	Q	Okay. And were the people who committed	10:30:36
19		the massacre paramilitaries?	10:30:38
20	A	Yes.	10:30:43
21	Q	Okay. And you mentioned earlier that	10:30:44
22		the massacre was unforgettable. Why is that?	10:30:46
23	A	Because when an armed groups arrives to	10:31:11
24		your town and they kill 14 people in one time, of	10:31:13
25		course you are going to end up traumatized.	10:31:17

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1	Q	We discussed earlier during the	10:31:20
2		deposition how it was common knowledge within the	10:31:22
3		community who the paramilitaries were.	10:31:24
4		Do you believe it was also common	10:31:26
5		knowledge to the police who the paramilitaries	10:31:29
6		were?	10:31:31
7	A	Of course, yes.	10:31:46
8	Q	Okay. Why do you believe that?	10:31:48
9	A	Because it's a really small town, and	10:31:56
10		everyone knows who is who.	10:31:58
11		And beforehand the police couldn't walk	10:32:10
12		calmly through the town because the guerilla	10:32:13
13		fighters would kill them. And when the United	10:32:16
14		Self-Defense Forces came, the police would walk	10:32:21
15		around relaxed. And so that's why you never filed	10:32:24
16		a complaint, because you say, If I file a	10:32:34
17		complaint, well, I know the police is the same as	10:32:36
18		them.	10:32:39
19	Q	And United Self-Defense Forces, that's a	10:32:39
20		paramilitary group, right?	10:32:43
21	A	Yes.	10:32:48
22	Q	Do you believe it was also common	10:32:48
23		knowledge to the army that paramilitaries -- who	10:32:50
24		the paramilitaries were in San Pablo?	10:32:53
25	A	I don't know, but I imagine.	10:33:03

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1	Q	Okay. I would like to talk a little bit	10:33:06
2		more about Eduardo.	10:33:08
3		What type of person was Eduardo?	10:33:09
4	A	I didn't know him very well, especially	10:33:36
5		because he was an older man and I was a minor at	10:33:38
6		the time, but I did know who he was. And he also	10:33:41
7		had a restaurant. The restaurant was called	10:33:43
8		El Binomio. He was someone popular, and so that's	10:33:50
9		how you know who he was.	10:33:53
10	Q	Would you say he was a leader within San	10:33:55
11		Pablo?	10:33:57
12	A	I don't know.	10:34:02
13	Q	Okay. On the night Eduardo was killed,	10:34:03
14		I believe you testified that Chuckie was at your	10:34:06
15		friend's mom's house when you arrived. Do you	10:34:09
16		have any understanding of why he was there?	10:34:12
17	A	So he was a friend of Deisy, you know,	10:34:39
18		and beforehand supposedly he had asked for	10:34:41
19		permission to stay there for the night because he	10:34:44
20		had fought with his wife.	10:34:47
21	Q	All right. Was he armed when you saw	10:34:49
22		him there?	10:34:57
23	A	So obviously, after seeing something	10:34:57
24		like that, you don't expect to go home and find	10:34:59
25		that person there.	10:35:02

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1	Q	Right.	10:35:03
2	A	And so we arrived at the house, and we	10:35:20
3		were screaming and shouting, and they kept saying,	10:35:23
4		Be quiet, be quiet. We said, Why? They said,	10:35:25
5		Look over there in the room where the hammock is,	10:35:28
6		and we saw him there.	10:35:30
7	Q	Who was the "they" who was telling you	10:35:31
8		to be quiet?	10:35:34
9	A	Deisy.	10:35:36
10	Q	And when you saw the paramilitary in the	10:35:38
11		hammock, was he armed?	10:35:40
12	A	No.	10:35:49
13	Q	And did he speak to you that evening?	10:35:49
14	A	No.	10:35:53
15	Q	Do you know what paramilitary group he	10:35:57
16		belonged to?	10:35:58
17	A	To the Self-Defense Forces, of course.	10:36:04
18	Q	And --	10:36:07
19		MR. RAMOS-ROSADO: I'm sorry. I didn't	10:36:09
20		catch that part.	10:36:10
21		MS. SAVAGE: Can you say that answer	10:36:12
22		again louder?	10:36:13
23		THE WITNESS: To the Self-Defense	10:36:14
24		Forces. We all knew that he was part of the	10:36:24
25		Self-Defense Forces.	10:36:27

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1	BY MS. SAVAGE:	10:36:27
2	Q And is it your testimony that Eduardo	10:36:28
3	was killed by the paramilitaries living in San	10:36:31
4	Pablo at the time?	10:36:34
5	A Yes.	10:36:43
6	MS. SAVAGE: Can we go off for just one	10:36:46
7	second.	10:36:48
8	(A discussion was held off the	10:36:48
9	record.)	10:38:27
10	MS. SAVAGE: Juan, we have nothing	10:38:27
11	further.	10:38:28
12	MR. RAMOS-ROSADO: Can I have two or	10:38:31
13	three minutes to organize here?	10:38:32
14	MS. SAVAGE: No problem.	10:38:34
15	MR. RAMOS-ROSADO: All right. Thanks.	10:38:35
16	(Recess.)	10:40:19
17	EXAMINATION BY COUNSEL FOR	10:40:19
18	DEFENDANT	10:40:19
19	MR. RAMOS-ROSADO:	10:40:21
20	Q Hi, Kelly, I just have two or three	10:40:21
21	questions.	10:40:28
22	You stated that everybody knew in town	10:40:31
23	that this guy Chuckie was part of the Self-	10:40:35
24	Defense. How do you explain that everybody knew	10:40:42
25	that?	10:40:45

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1	MS. SAVAGE: Objection.	10:40:46
2	THE WITNESS: They always have an arm	10:41:10
3	band that identified them. And in small towns,	10:41:11
4	everyone knows who is who always. So I talked to	10:41:22
5	him before, and I knew who he was.	10:41:31
6	BY MR. RAMOS-ROSADO:	10:41:31
7	Q Okay. Do you know to which organization	10:41:36
8	of the Self-Defense that Chuckie belonged to?	10:41:42
9	A I know he was part of the United Self-	10:41:54
10	Defenses. I know that because of his name and	10:42:02
11	because of the arm band. The specific group, I	10:42:04
12	don't know.	10:42:08
13	MR. RAMOS-ROSADO: Okay. I have no	10:42:10
14	further questions?	10:42:11
15	MS. SAVAGE: I just have one further.	10:42:11
16	FURTHER EXAMINATION BY COUNSEL FOR	10:42:11
17	PLAINTIFFS	10:42:11
18	BY MS. SAVAGE:	10:42:13
19	Q Kelly, you just mentioned the	10:42:13
20	Autodefensas. Do you know if that was -- that	10:42:17
21	group was also called the AUC?	10:42:18
22	A Yes.	10:42:26
23	Q Okay.	10:42:27
24	A It's the same group, AUC.	10:42:29
25	MS. SAVAGE: Okay. Great. Thank you.	10:42:31

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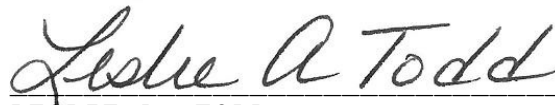
1	MR. RAMOS-ROSADO: So just one question.	10:42:34
2	FURTHER EXAMINATION BY COUNSEL FOR	10:42:34
3	DEFENDANT	10:42:34
4	BY MR. RAMOS-ROSADO:	10:42:34
5	Q So you are saying now that Chuckie was	10:42:36
6	part of the AUC?	10:42:38
7	A Yes.	10:42:45
8	Q Did the band that they used on their arm	10:42:51
9	said that he was AUC?	10:42:54
10	A Yes, the band always said AUC.	10:43:04
11	MR. RAMOS-ROSADO: Okay. I have no	10:43:09
12	further questions.	10:43:11
13	MS. SAVAGE: Nothing further from us.	10:43:11
14	(Whereupon, at 10:43 a.m.,	
15	the deposition of KELLY YESENIA	
16	DOMINGUEZ ROMERO was concluded.)	
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19	* * * * *	
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CERTIFICATE OF NOTARY PUBLIC

I, LESLIE A. TODD, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotypy and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that reading and signing was not waived; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Dated this 10th day of September 2018.



LESLIE A. TODD
Notary Public and
Certified Shorthand Reporter