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

capacity, and in his capacity as the personal representative of the estate of Alma Rosa Jaramillo,	CASE NO: 1:10-cv-21951-CIV- TORRES
Sara González Calderón, in her individual capacity, and)))
Alonso Estrada Gutierrez, in his individual capacity, and in his capacity as the personal representative of the estate of Eduardo Estrada,	
Plaintiffs,))
v.	
Carlos Mario Jiménez Naranjo, also known as "Macaco," "El Agricultor," "Lorenzo González Quinchía," and "Javier Montañez,"	
Defendant.	

<u>DECLARATION OF DANIEL MCLAUGHLIN IN SUPPORT OF PLAINTIFFS'</u> <u>MOTION FOR SUMMARY JUDGMENT</u>

I, Daniel McLaughlin, declare as follows:

- 1. I am an attorney licensed to practice law before the State of California, and am admitted *pro hac vice* in the above-captioned matter. I am a senior staff attorney at the Center for Justice and Accountability, co-counsel for Sara González Calderón and Alonso Estrada Gutierrez (collectively, "Plaintiffs").
- 2. Attached hereto as Exhibit 1 is a true and correct copy of the Updated Expert Report of Gimena Sanchez-Garzoli, dated May 22, 2020.
- 3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of Luis Van Isschot, dated January 22, 2020.
- 4. Attached hereto as Exhibit 3 is a true and correct copy of a transcript of the Deposition of Father Francisco de Roux, taken on September 5, 2018.

- 5. Attached hereto as Exhibit 4 is a true and correct copy of a transcript of the Deposition of Rodrigo Pérez Alzate, taken on October 22, 2019.
- 6. Attached hereto as Exhibit 5 is a true and correct copy of Transcript of Change of Plea Hearing, *United States v. Jiménez Naranjo*, 07-20794-CR (S.D. Fla. Jan. 12, 2011), ECF No. 407.
- 7. Attached hereto as Exhibit 6 is a true and correct copy of a transcript of the Deposition of Oscar Leonardo Montealegre Beltran, taken on October 23, 2019.
- 8. Attached hereto as Exhibit 7 is a true and correct copy of a transcript of the Deposition of Kelly Dominguez, taken on September 6, 2018.
- 9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs' Third Set of Requests for Admission to Carlos Mario Jiménez Naranjo, dated January 16, 2020.
- 10. Attached hereto as Exhibit 9 is a true and correct copy of Sentencing Hearing Transcript, *United States v. Jiménez Naranjo*, 07-20794-CR (S.D. Fla. Jan. 12, 2011), ECF No. 431.
- 11. Attached hereto as Exhibit 10 is a true and correct copy of Defendant's Responses and Objections to Plaintiffs' First Set of Interrogatories, dated July 2016.
- 12. Attached hereto as Exhibit 11 is a true and correct copy of Defendant's Responses and Objections to Plaintiffs' Second Request for Admissions, dated April 18, 2018.
- 13. Attached hereto as Exhibit 12 is a true and correct copy of the *Versiones Libres* of Rodrigo Pérez Alzate, Exhibit 9 to the deposition of Rodrigo Pérez Alzate, taken on October 22, 2019 (with translation from Spanish to English).
- 14. Attached hereto as Exhibit 13 is a true and correct copy of a transcript of a video clip of Iván Roberto Duque Gaviria's confession, dated December 12, 2016 (only a video was produced by Defendant; the video can be provided at the Court's request).
- 15. Attached hereto as Exhibit 14 is a true and correct copy of an email from Javier F. Micheo Marcial, Defendant's Counsel dated February 20, 2018 (accompanying production of Video Confession of Iván Roberto Duque Gaviria).
- 16. Attached hereto as Exhibit 15 is a true and correct copy of the Confession of Jairo Orozco, dated October 20, 2019 (with translation from Spanish to English).

-2-

- 17. Attached hereto as Exhibit 16 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated June 12, 2007, produced by Defendant (with translation from Spanish to English).
- 18. Attached hereto as Exhibit 17 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated June 13, 2007, produced by Defendant (with translation from Spanish to English).
- 19. Attached hereto as Exhibit 18 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated October 29, 2007, produced by Defendant (with translation from Spanish to English).
- 20. Attached hereto as Exhibit 19 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated November 6, 2007, produced by Defendant (with translation from Spanish to English).
- 21. Attached hereto as Exhibit 20 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated November 7, 2007, produced by Defendant (with translation from Spanish to English).
- 22. Attached hereto as Exhibit 21 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated November 21, 2007, produced by Defendant (with translation from Spanish to English).
- 23. Attached hereto as Exhibit 22 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated November 22, 2007, produced by Defendant (with translation from Spanish to English).
- 24. Attached hereto as Exhibit 23 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated December 10, 2007, produced by Defendant (with translation from Spanish to English).
- 25. Attached hereto as Exhibit 24 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated March 7, 2008, produced by Defendant (with translation from Spanish to English).
- 26. Attached hereto as Exhibit 25 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated May 29, 2012, produced by Defendant (with translation from Spanish to English).

-3-

- 27. Attached hereto as Exhibit 26 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated May 30, 2012, produced by Defendant (with translation from Spanish to English).
- 28. Attached hereto as Exhibit 27 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated May 31, 2012, produced by Defendant (with translation from Spanish to English).
- 29. Attached hereto as Exhibit 28 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated June 4, 2012, produced by Defendant (with translation from Spanish to English).
- 30. Attached hereto as Exhibit 29 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated June 6, 2012, produced by Defendant (with translation from Spanish to English).
- 31. Attached hereto as Exhibit 30 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated June 8, 2012, produced by Defendant (with translation from Spanish to English).
- 32. Attached hereto as Exhibit 31 is a true and correct copy of *Versiones Libres del Señor Carlos Mario Jiménez Naranjo*, dated June 2012, produced by Defendant (with translation from Spanish to English).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 11th day of December, 2020 in San Francisco, California.

By: /s/ Daniel McLaughlin
Daniel McLaughlin

-4-