

EXHIBIT 8

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

**Jesús Cabrera Jaramillo, in his individual
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.)

**PLAINTIFFS’ THIRD SET OF REQUESTS FOR ADMISSION TO CARLOS MARIO
JIMÉNEZ NARANJO**

Pursuant to Federal Rules of Civil Procedure Rules 26, 33 and 36 and Local Rule 26.1(g) for the United States District Court for the Southern District of Florida, Plaintiffs Sara González Calderón and Alonso Estrada Gutierrez (collectively “Plaintiffs”) hereby request that Defendant Carlos Mario Jiménez Naranjo (“Defendant”) answer the following requests for admission, separately and fully, in writing, under oath, within thirty (30) days after the service of these requests for admission in accordance with the Federal Rules of Civil Procedure, and in compliance with the Definitions and Instructions set forth below.

DEFINITIONS

1. The terms “DEFENDANT,” “YOU,” or “YOUR” refer to Defendant Carlos Mario Jiménez Naranjo, and any of his agents, attorneys, employees, representatives, accountants, and any other persons acting, or purporting to act, on his behalf.

2. The terms “DOCUMENT” and “DOCUMENTS” shall mean any written, recorded, filmed, or graphic matter within the scope of FED. R. CIV. P. 34 whether produced or reproduced, on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, all items defined in FED. R. EVID. 1001, memoranda, notes, electronic mail, minutes, records, employment files, case files, pleadings, photographs, slides, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, blueprints, drawings, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, notes, records and recordings of oral conversations, and work papers, and all preliminary and final drafts of any such items. The terms “DOCUMENT” and “DOCUMENTS” shall further mean and include all copies of documents on which there appears any marking that does not appear on the originals or other copies thereof, and all drafts or notes made in the

preparation of each document. The terms “DOCUMENT” and “DOCUMENTS” shall further mean and include electronic data in whatever form it may exist, including but not limited to all e-mail.

3. The term “COMMUNICATION” means any form of interpersonal communication, including without limitation any transmission, conveyance, or exchange of word, statement, fact, thing, idea, document, instrument, data, or information, by any medium whether written, verbal, non-verbal, or any other means, including without limitation electronic communications and e-mails.

4. The term “DESCRIBE” means identify AND describe with particularity the facts AND circumstances that relate to the allegation OR answer in any manner whatsoever, including those facts AND circumstances that tend to prove OR disprove the allegation OR answer.

5. The terms “RELATE,” “RELATES,” “RELATED TO,” and “RELATING TO” means pertaining to, referring to, recording, evidencing, containing, setting forth, reflecting, showing, disclosing, describing, explaining, summarizing, supporting, contradicting, refuting, or concerning, whether directly or indirectly.

6. The term “ANY” should be understood to include and encompass “ALL,” and vice versa, as necessary to bring within the scope of a particular request any document which might otherwise be construed to be outside its scope.

7. The term “OR” should be understood to encompass “AND,” and vice versa, as necessary to bring within the scope of a particular request any document which might otherwise be construed to be outside its scope.

8. The term “BCB” refers to the Bloque Central Bolívar, affiliated with the Autodefensas Unidas de Colombia.

9. The term “COLOMBIA” or “COLOMBIAN” shall refer to the Republic of Colombia.

10. The term “COLOMBIAN GOVERNMENT” shall mean the Government of the Republic of Colombia, including, but not limited to, all ministries, armed forces, missions, services, departments, agencies, commissions, legislatures, parliaments, assemblies, cabinets, judicial or quasi-judicial forums, local or provincial governments, and any of their directors, members, officers, agents, current or former employees, representatives, agencies, departments, affiliates, divisions, bureaus and predecessors.

11. The term “GUERRILLA” or “GUERRILLAS” refers to members, or perceived members or sympathizers, of leftist irregular armed groups who took part in the internal armed conflict of Colombia, including, but not limited to the FARC (Fuerzas Armadas Revolucionarias de Colombia), the ELN (Ejército de Liberación Nacional), and any splinter groups from these organizations.

12. The term “MIDDLE MAGDALENA” refers to the Middle Magdalena River region of northwest COLOMBIA and includes all cities, towns, villages, boroughs, municipalities, settlements, neighborhoods, districts, provinces and communities.

13. The term “VERSIONES LIBRES” refers to voluntary depositions pursuant to Law 975 also known as the Ley de Justicia y Paz or Justice and Peace law.

14. “Julián Bolívar” refers to Rodrigo Pérez Alzate, a former member of the BCB.

INSTRUCTIONS

1. YOUR written response to the requests for admission must comply with Federal Rule of Civil Procedure 36, in that if YOU do not admit each matter, YOU must separately respond under oath to each request within thirty (30) days of the service of this request by:

a. Admitting so much of the matter involved in the request as is true, either as expressed in the request itself OR as reasonably AND clearly qualified by the responding party;

b. By denying so much of the matter involved in the request as is untrue; AND, specifying so much of the matter involved in the request as to the truth of which the responding party lacks sufficient information OR knowledge.

2. If YOUR response to a particular request for admission is that YOU lack information OR knowledge as a reason for failure to admit all OR part of a request for admission, then YOU shall state in the answer that a reasonable inquiry concerning the matter in the particular request has been made, AND that the information known OR readily obtainable is insufficient to enable YOU to admit that matter.

3. If YOUR response is that only part of a request for admission is objectionable, the remainder of the request shall be answered.

4. If an objection is made to a request for admission OR to a part of a request for admission, the specific ground for the objection shall be set forth clearly in the response.

5. Whenever YOU are requested to "IDENTIFY" an entity, state its full name, the present or last known address of its principal office or place of business, and the type of entity (e.g., corporation, partnership, unincorporated association).

6. If YOU claim that the attorney-client privilege or any other privilege or protection is applicable to any written or electronic COMMUNICATION, YOU shall IDENTIFY the COMMUNICATION pursuant to Instruction 2(i), and IDENTIFY each and every person who prepared or participated in the preparation of the COMMUNICATION; state the present location of the COMMUNICATION and all copies thereof; IDENTIFY each and every person having

custody or control of the DOCUMENT and all copies thereof; state the privilege or protection claimed; and provide sufficient further information concerning the COMMUNICATION and the circumstances thereof to explain the claim of privilege or protection and to permit the adjudication of the propriety of the claim.

7. The singular form of a word shall be interpreted as plural and the masculine gender shall be deemed to include the feminine, and vice versa, as necessary to bring within the scope of a particular request for admission any information which might otherwise be construed to be outside its scope.

8. These requests for admission shall be continuing in nature. If YOU subsequently obtain information that renders YOUR answers to these requests for admission incomplete or inaccurate, YOU are to amend YOUR answers to make them complete and accurate.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 27:

Admit that the VERSIONES LIBRES produced by YOUR attorneys on May 7, 2018 are true, correct and unaltered copies of YOUR VERSIONES LIBRES.

REQUEST FOR ADMISSION NO. 28:

Admit that YOUR VERSIONES LIBRES accurately and truthfully reflect the facts YOU state therein.

REQUEST FOR ADMISSION NO. 29:

Admit that in YOUR VERSIONES LIBRES YOU state that YOU created the BCB and served as the BCB's Commandant General. (e.g., versiones libres of November 6, 2007, p. 115).

REQUEST FOR ADMISSION NO. 30:

Admit that in YOU created the BCB and served as the BCB's Commandant General.

REQUEST FOR ADMISSION NO. 31:

Admit that in YOUR VERSIONES LIBRES YOU accept responsibility as Commandant General for killings committed by the BCB.

REQUEST FOR ADMISSION NO. 32:

Admit that you are responsible as Commandant General for killings committed by the BCB.

REQUEST FOR ADMISSION NO. 33:

Admit that the BCB sometimes killed persons suspected of being GUERRILLAS or GUERRILLA sympathizers.

REQUEST FOR ADMISSION NO. 34:

Admit that as the Commandant General of the BCB YOU were aware that the BCB sometimes killed persons suspected of being GUERRILLAS or GUERRILLA sympathizers, even if YOU did not always know the identity of those killed.

REQUEST FOR ADMISSION NO. 35:

Admit that it was the BCB's practice to kill persons suspected of being GUERRILLAS or GUERRILLA or guerrilla sympathizers.

REQUEST FOR ADMISSION NO. 36:

Admit that the BCB killed persons who were mistakenly suspected of being GUERRILLAS or GUERRILLA sympathizers, but who it later learned were not actually GUERRILLAS or GUERRILLA sympathizers.

REQUEST FOR ADMISSION NO. 37:

Admit that in YOUR VERSIONES LIBRES YOU state that YOU were in charge of the BCB fronts in the South of Bolívar as of 2001 (versiones libres of June 12, 2007, p. 32).

REQUEST FOR ADMISSION NO. 38:

Admit that YOU were in charge of the BCB fronts in the South of Bolívar as of 2001.

REQUEST FOR ADMISSION NO. 39:

Admit that YOU had authority over lower-ranking BCB members present in San Pablo in or around July 2001.

REQUEST FOR ADMISSION NO. 40:

Admit that in YOUR VERSIONES LIBRES YOU describe YOUR responsibilities as Commandant General of the BCB, including those detailed in the April 2001 BCB Functions Manual. (versiones libres of June 13, 2007, pp. 51-52).

REQUEST FOR ADMISSION NO. 41:

Admit that as Commandant General of the BCB it was YOUR duty to supervise the collection of the BCB's revenues and to order investments required to cover operating expenses.

REQUEST FOR ADMISSION NO. 42:

Admit that as Commandant General of the BCB it was YOUR duty to appoint BCB operational military commanders.

REQUEST FOR ADMISSION NO. 43:

Admit that as Commandant General of the BCB it was YOUR duty to transfer or demote BCB zone heads and financial commanders, including for abuses committed against the civilian population.

REQUEST FOR ADMISSION NO. 44:

Admit that as Commandant General of the BCB it was YOUR duty to dispose of BCB war materiel and weapons.

REQUEST FOR ADMISSION NO. 45:

Admit that as Commandant General of the BCB it was YOUR duty, jointly with the Inspector General, to ensure compliance of YOUR BCB subordinates with international humanitarian law and human rights law.

REQUEST FOR ADMISSION NO. 46:

Admit that as Commandant General of the BCB YOU received reports from YOUR subordinates regarding activities of the BCB.

REQUEST FOR ADMISSION NO. 47:

Admit that as Commandant General of the BCB YOU issued orders to YOUR subordinates regarding activities of the BCB.

REQUEST FOR ADMISSION NO. 48:

Admit that John Francis Arrieta alias Gustavo Alarcón was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 49:

Admit that Jairo Orozco alias Taraza was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 50:

Admit that Hernan Dario Meza Marulanda alias Felipe Candado was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 51:

Admit that alias Juan Esteban also known as alias Triglial (or Trigizal) was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 52:

Admit that alias Montador was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 53:

Admit that Vinicio Virguez alias JJ or 22 was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 54:

Admit that Oscar Montealegre was a member of the BCB in or around July 2001.

REQUEST FOR ADMISSION NO. 55:

Admit that in YOUR VERSIONES LIBRES YOU describe instances where military officials provided information about suspected GUERRILLA sympathizers to the BCB. (e.g., versiones libres of March 7, 2008, p. 246).

REQUEST FOR ADMISSION NO. 56:

Admit that the COLOMBIAN police AND military sometimes provided information to the BCB.

REQUEST FOR ADMISSION NO. 57:

Admit that the information provided by COLOMBIAN police AND military sometimes led to the killing of suspected GUERRILLAS by the BCB.

REQUEST FOR ADMISSION NO. 58:

Admit that the “Version Rodrigo Pérez Alzate” dated November 13 produced by YOUR attorneys on April 17, 2018 is a true, correct and unaltered copy of the VERSIONES LIBRES of Rodrigo Pérez Alzate alias Julián Bolivar.

REQUEST FOR ADMISSION NO. 59:

Admit that to YOUR knowledge there are not ANY different, amended or alternative versions of the “Version Rodrigo Pérez Alzate” dated November 13 produced by YOUR attorneys on April 17, 2018 that exist.

REQUEST FOR ADMISSION NO. 60:

Admit that to YOUR knowledge the description of events within the “Version Rodrigo Pérez Alzate” dated November 13 produced by YOUR attorneys on April 17, 2018 provides a true, correct, and accurate depiction of those events.

REQUEST FOR ADMISSION NO. 61:

Admit that the “Version Rodrigo Pérez Alzate” dated November 13 produced by YOUR attorneys on April 17, 2018 states that the persons responsible for the murder of Eduardo Estrada on July 17, 2001 were directly under YOUR command in San Pablo.

REQUEST FOR ADMISSION NO. 62:

Admit that the persons responsible for the murder of Eduardo Estrada on July 17, 2001 were directly under YOUR command in San Pablo.

REQUEST FOR ADMISSION NO. 63:

Admit that to YOUR knowledge there are not ANY subsequent VERSIONES LIBRES provided by Rodrigo Pérez Alzate that contradict the contents of the “Version Rodrigo Pérez Alzate” dated November 13 and produced by YOUR attorneys on April 17, 2018.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU have no reason to doubt the deposition testimony of Rodrigo Pérez Alzate on October 22, 2019 that the military clothing worn during the January 1999 massacre in San Pablo was “bought from different state security forces that sold the clothing to us.” (Alzate Dep. 24:25 – 25:14.)

REQUEST FOR ADMISSION NO. 65:

Admit that the COLOMBIAN military sold weapons to the BCB as testified by Rodrigo Pérez Alzate on October 22, 2019. (Alzate Dep. 31:17-23.)

REQUEST FOR ADMISSION NO. 66:

Admit that the COLOMBIAN police AND military were sometimes bribed by the BCB as testified by Rodrigo Pérez Alzate on October 22, 2019. (Alzate Dep. 33:11-18.)

REQUEST FOR ADMISSION NO. 67:

Admit that there were instances where the COLOMBIAN authorities did not investigate killings committed by the BCB because of bribery payments from the BCB.

REQUEST FOR ADMISSION NO. 68:

Admit that the video clip produced by YOUR attorneys on February 20, 2018 is a true, correct and unaltered extract of a VERSIONES LIBRES given by Ivan Roberto Duque Gaviria alias Ernesto Baez.

REQUEST FOR ADMISSION NO. 69:

Admit that the BCB believed Eduardo Estrada was a GUERRILLA sympathizer.

REQUEST FOR ADMISSION NO. 70:

Admit that the BCB killed Eduardo Estrada.

REQUEST FOR ADMISSION NO. 71:

Admit that YOU were excluded from the Colombian Justice and Peace process for continuing to engage in criminal activity following YOUR demobilization from the BCB.

Dated: January 16, 2020

/s/ Luke A. Liss

Luke A. Liss

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing PLAINTIFFS' THIRD SET OF REQUESTS FOR ADMISSION TO CARLOS MARIO JIMÉNEZ NARANJO was served by electronic mail.

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