

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

CASE NO: 1:10-cv-21951 Ungaro/Torres

Jesús 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 in her
capacity as the personal representative of the
estate of Eduardo Estrada, and

John Doe, in his individual capacity,

Plaintiffs,

v.

CARLOS MARIO JIMÉNEZ-NARANJO, also
known as "Macaco," "El Agricultor," "Lorenzo
González Quinchía," and "Javier Montañez,"

Defendant.

DECLARATION OF JESÚS CABRERA JARAMILLO IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION FOR
RECONSIDERATION OF COURT'S ORDER ON PLAINTIFFS' MOTION TO
PROCEED ANONYMOUSLY

I, Jesús Cabrera Jaramillo, declare as follows:

1. I am a citizen and resident of Colombia. I currently reside in the town of Cartagena, Colombia.
2. I am a named plaintiff in the above-captioned case against defendant Carlos Mario Jiménez Naranjo ("Defendant").
3. On November 18, 2011, I gave an interview with the Miami Herald and El Nuevo Herald discussing this case.
4. On November 21, I was actively followed by a white van, Toyota Prado with polarized windows and without plates. In Colombia is currently illegal to drive cars with such windows and of course, without properly identifying your vehicle. The windows were so dark I

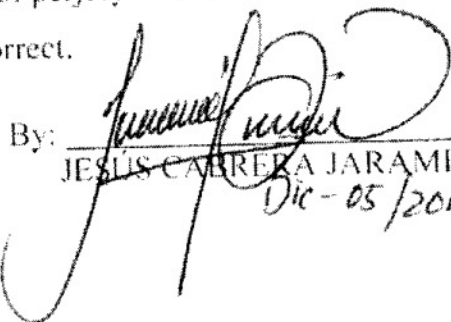
was not able to identify the Toyota occupants. The van followed me from my house and into the center of town. As a consequence, I was forced to change my bus route three times before I was able to reach, safely, my home.

5. On November 30, I was again in the center of town in Cartagena running an errand. I attempted to cross the street when a big grey sedan drove so close that it hurt me with the right side mirror. I complained and the car stopped. A man holding visibly a gun stepped out of the car and asked me if I had any problem. I was scared and did not answer, he proceeded to say, "If you have any problems we can resolve this right now since we have other pending matters", making very clear they know who I am and what I am doing. The men looked to me like former members of the AUC. I called the police and police agents escorted me until my bus stop. I immediately contacted Pedro Mahecha, an attorney who has been working with us and supporting my family since my mom was assassinated, and my attorneys in the US. They advised me to not go home right away and spend the night at a friend's instead in an effort to not endanger the rest of my family members.

6. I am genuinely very concerned about my safety and the safety of my family. I am currently in touch with human rights organizations in Colombia to obtain protection and security for myself and my family members.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 5, 2011
Executed at San Pablo, Colombia.

By: 
JESUS CABRERA JARAMILLO
Dic-05/2011-

I, Julie C. Ferguson, am the ECF User whose identification and password are being used to file this Declaration of Jesus Cabrera Jaramillo in Support of Plaintiffs' Opposition to Defendant's Motion For Reconsideration of Court's Order on Plaintiffs' Motion to Proceed Anonymously. I hereby attest that Jesus Cabrera Jaramillo has concurred in this filing.

Dated: December 5, 2011

By: /s/ Julie C. Ferguson
Julie C. Ferguson, Florida State Bar #93858
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Declaration of Jesus Cabrera Jaramillo in Support of Plaintiffs' Opposition to Defendant's Motion for Reconsideration of Court's Order on Plaintiffs' Motion to Proceed Anonymously was served through the Court's CM/ECF System on December 5, 2011, on counsel or parties of record on the service list.

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/s/ Julie C. Ferguson
JULIE C. FERGUSON