

INTERNATIONAL TRANSLATION CENTER, INC.

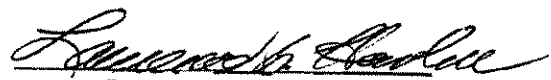


DECLARATION OF TRANSLATOR

I, Lawrence B. Hanlon, of the International Translation Center, Inc., do hereby avow and declare that I am conversant with the English and Spanish languages and am a competent translator of Spanish into English.

I declare further that the attached English translation was prepared and reviewed by me and is, to the best of my knowledge and belief, a true and correct translation of the original Spanish-language Declaration of Rafael García, the Spanish original of which is also attached hereto.

I hereby further declare that the statements made above are true and that these statements are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.


Lawrence B. Hanlon

Date: 05/16/2006

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

In re Juan Aguas Romero et al.

Case No. CV-03-BE-0575-W

This document relates to: All Actions

Declaration of Rafael García

1. My name is Rafael García. I am forty-two (42) years old, and I am a citizen and resident of the Republic of Colombia. I am giving this declaration voluntarily. I have personal knowledge of the following facts.
2. I am a Systems Engineer by profession, and in 2002 I was appointed Director of Office Systems at DAS (Administrative Department of Security). I was assigned to this position by the Director of DAS, Jorge Noguera, after I had become the brain behind a successful election fraud scheme on behalf of several candidates from the Northern Coast of Colombia elected to the Congress who were supported by the Northern Bloc of the AUC paramilitaries. During my employment with DAS I also served, by order of Jorge Noguera Cotos, acting in his capacity as Director of DAS, as the liaison between Director Jorge Noguera and the leader of the AUC Northern Bloc Rodrigo Tovar Pupo (alias "Jorge 40" or "Jorge Cuarenta).
3. I am now in prison accused of having erased the migration records of the drug traffickers when I was in charge of Office Systems at DAS. I have given my testimony to the General Prosecutor of Colombia regarding corruption inside DAS of which I personally have knowledge. This corruption includes the creation and maintenance by

DAS of a list of union leaders that was delivered to the AUC for the assassination of these union leaders, in spite of the fact that DAS's legal mandate is to protect the work of union leaders who are being threatened. I am a state witness in the case filed by the General Prosecutor of Colombia against DAS. On May 9, 2006, Jorge Noguera, the Director of DAS, was formally indicted.

4. Sometime in 2001, during a period when I was living in Santa Marta and was connected with a political movement that had named itself "The United Province" [La Provincia Unida], I traveled to Valledupar with a representative of the AUC Northern Bloc leader Rodrigo Tovar Pupo. When we were in Valledupar we met in a hotel with Augusto Jiménez, whom I was told held some type of management position at Drummond, but I did not know what position exactly. I now understand that he is in fact the President of Mining Operations for Drummond in Colombia. At this meeting, I witnessed Mr. Jiménez give to the representative of Rodrigo Tovar Pupo a suitcase full of money, but I do not know the exact amount. Mr. Jiménez and this AUC representative spoke openly at this meeting about the purpose of this money, namely to undertake violent actions against union workers at Drummond. (Victor Hugo Orcasita and a man with the last name of Locarno). According to what I heard, Mr. Jiménez indicated at this meeting that this money was to be given to Rodrigo Tovar Pupo to assassinate specific union leaders at Drummond. The things he said in this conversation were very clear, namely that the plan to violently attack union leaders had been drawn up sometime ago and had been a subject discussed between Mr. Jiménez and the Northern Bloc of AUC. I took notes concerning this meeting, notes that include the names of the

union leaders who were talked about at this meeting, as a form of life insurance for my own life. Ever since I have been in prison, I have not had access to these notes.

5. Some time after the meeting described above in Paragraph 4, I learned about the assassination of the union leaders who worked at Drummond. These men were the same union leaders who were discussed at the aforementioned meeting that I attended with Augusto Jiménez.

Under penalty of perjury of the laws of the United States I do hereby solemnly swear that the declaration that I have made herein is true and correct.

Bogotá, May 13, 2006

/ signature / [fingerprint]

Rafael García