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Dario M. Amagua. O, Attorney
ATTORNEY

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STATE ATTORNEY GENERAL'S OFFICE

SARMIENTO REYES ROLANDO RIGOBERTO, Ecuadorian citizen of legal age, holder of identity card No. 1723512826, residing in this city of Quito, Pichincha province, with the email address of my Legal Counsel abgdarioamagua@gmail.com, under the provisions of Article 75 of the Constitution of the Republic of Ecuador, hereby submit the following **COMPLAINT**:

FIRST. - My full name is as indicated above.

SECOND. - I submit this **COMPLAINT** against persons yet to be identified.

THIRD: OFFENSE REPORTED: The unlawful conduct reported corresponds to the crime of **INTIMIDATION**, classified and sanctioned under **Article 154 of the Comprehensive Organic Criminal Code**.

FOURTH: STATEMENT OF FACTS. - Mr. Prosecutor, I bring to your attention the following facts:

1.- On October 1, 2024, at approximately 9:00 p.m., while I was at my residence located in the Inca sector, at the intersection of Avenida El Inca and Madroños, Lot 1, together with my wife **Carina Liliana Caizaluisa Llamuca** and my children **Bryan Joel Sarmiento Caizaluisa**, **Briguite Yamile Sarmiento Caizaluisa**, and **Emilio Daniel Chalco Inapanta**, all minors, a dark-colored Jeep vehicle with no license plates and two motorcycles arrived, each motorcycle carrying two occupants. Two male individuals got out of the vehicle, based on their voices and coastal accent, and all of these individuals were armed with pistols. One man, who identified himself as **THE BOSS**, told me they belonged to the gang known as **LOS LOBOS**. He said I had to agree to sell drugs for them, that they would leave me 2 kilograms of cocaine to sell in the area, and that after one month I would have to give them **2,500 US dollars** in return. I told them to let me think about it, to which they responded "THERE IS NOTHING TO THINK ABOUT. IF YOU DON'T ACCEPT, WE WILL KILL YOU ALL AND BURN DOWN THE HOUSE". As a result, I felt forced to stay home, and in the following days they returned with the substance, which I had no choice but to accept. Up to the date of this complaint, they have not returned, but I have received phone calls telling me they are in the south distributing drugs, and that next week they will be arriving in the north.

2.- Due to the threats made by this criminal group, I hereby file this complaint, requesting that the corresponding investigation be carried out, as my life and that of my family are in imminent danger due to my refusal to belong to their criminal group and participate in the distribution of illicit substances in the northern sector of the city of Quito.

FIFTH: JUSTIFICATION OF VICTIM STATUS.- My condition as a victim will be supported by the proceedings to be conducted during the Preliminary Investigation phase.

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SIXTH. - I request that the Prosecutor in charge carry out the corresponding investigation, in order to collect elements of conviction that establish the material facts of the offense and the criminal liability of the individual under investigation, so that charges may be promptly filed against them.

SEVENTH. - I will acknowledge my signature and handwriting recorded in this COMPLAINT when so required by your authority.

EIGHTH. - Any notifications pertaining to this matter shall be sent to the email address abdarioamagua@gmail.com, which belongs to Attorney Dario Manuel Amagua Quishpe, legal professional designated as my Legal Counsel in this proceeding.

Signed jointly with my Legal Counsel.

[Signature]

Dario M. Amagua. O, Attorney
Registration No. 16628, CAP (Pichincha Bar Association)

[Signature]

Sarmiento Reyes Rolando Rigoberto

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State Attorney General's Office
Pichincha Prosecutor's Office
Fast-Track Solutions Prosecutor's Office No. 4
STATEMENT: I certify that the preceding two (2) pages are true copies of the ORIGINALS.
I CERTIFY.
Quito, November 25, 2024

[Signature]
SECRETARY



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Order No.
VT-2025-312

Certification of Translation Accuracy

Translation of a written document from Spanish to English

Completed and furnished on July 10, 2025

I, Adrian S. Franco, hereby certify that I am proficient in both English and Spanish and that I am qualified to translate written documents from Spanish into English. I further certify that the attached translation is complete, faithful, and accurate to the best of my knowledge and ability.

This translation was prepared with attention to detail and professional care, preserving the meaning and tone of the original text without omissions or additions.

I take full responsibility for the accuracy of this translation and confirm that it is suitable for official use in the United States, including but not limited to immigration, legal, and academic procedures.

A handwritten signature in black ink, appearing to read "Adrian S. Franco", is written over a horizontal line.

Adrian S. Franco

Moscow, Russia

Signed on July 10, 2025



Scan to verify this certified translation.



FISCALIA GENERAL DEL ESTADO.

SARMIENTO REYES ROLANDO RIGOBERTO, de nacionalidad ecuatoriana, mayor de edad, con cédula de identidad No. 1723512826, con domicilio en esta ciudad de Quito, provincia de Pichincha, con correo electrónico de mi Abogado Patrocinador abdarioamagua@gmail.com, al amparo de lo previsto en el Art. 75 de la Constitución de la República del Ecuador, me presento con la siguiente **DENUNCIA**:

PRIMERO.- Mis nombres y apellidos son como los dejo arriba indicados.

SEGUNDO.- La presente DENUNCIA, la dirijo en contra de personas por descubrir.

TERCERO: LA INFRACCIÓN DENUNCIADA: la conducta antijurídica que denunciado corresponde al delito de INTIMIDACIÓN tipificado y sancionada en el artículo 154 del Código Orgánico Integral Penal.

CUARTO: FUNDAMENTOS DE HECHO.- Señor Fiscal, pongo en su conocimiento los siguientes hechos:

1.- El día 01 de octubre del 2024, aproximadamente a las 21h00, mientras me encontraba en mi domicilio ubicado en el sector del Inca, calles avenida el Inca y Madroños, lote 1, conjuntamente con mi esposa CARINA LILIANA CAIZALUISA LLAMUCA y mis hijos BRYAN JOEL SARMIENTO CAIZALUISA, BRIGUITE YAMILE SARMIENTO CAIZALUISA; EMILIO DANIEL CHALCO INAPANTA; menores de edad, llega un vehículo Jeep, color oscuro, sin placas y dos motocicletas con dos ocupantes cada una de ellas, del vehículo se bajan dos personas de sexo masculino por su vos, de acento costeños, todas estas personas estaban armadas con pistolas, el un señor que se identificó como EL JEFE me dice que pertenecen a la mafia los LOBOS, que tengo que aceptar vender drogas para ellos, que me dejan 2 kilos de cocaína para que venda en el sector y al cabo de un mes tenía que entregarles el valor de 2500 DOLARES AMERICANOS, yo les dije que me dejen pensar, a lo que respondieron NO TENGO NADA QUE PENSAR, POR QUE SI NO ACEPTO, NOS MATABAN A TODOS Y QUEMABAN LA CASA, quedando en regresar nuevamente a mi casa con la sustancia en días posteriores y tenía que recibirles, hasta la presente fecha no han llegado, pero recibo llamadas telefónicas indicándome que están en la distribución de drogas por el Sur y que la próxima semana llegan al norte.

2.- Ante las amenazas de este grupo criminal, pongo la respectiva denuncia, a fin que se proceda con la respectiva investigación, porque mi vida y la de mi familia se encuentran en eminente peligro, al no aceptar

Abg. DARIO M. AMAGUA Q.
A B O G A D O

pertenecer a su grupo criminal con la distribución de sustancias ilícitas en el sector norte de la ciudad de Quito.

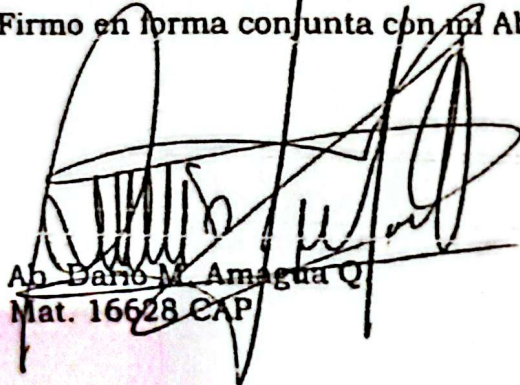
QUINTO: JUSTIFICACIÓN DE LA CONDICIÓN DE VICTIMA.- Mi condición de víctima, la justificaré con las diligencias que se practicarán en la etapa de Investigación Previa.

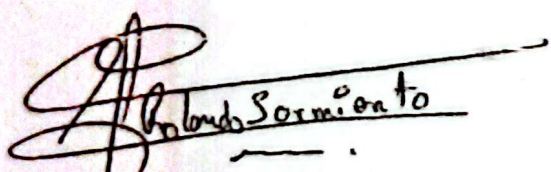
SEXTO.- Solicito que el señor Fiscal a cargo proceda con las respectivas investigación, a fin de recolectar elementos de convicción que establezcan la materialidad de la infracción y responsabilidad penal del investigado, para que de manera inmediata se proceda a formular cargos en su contra.


SEPTIMO: Reconoceré mi firma y rubrica, interpuesta en esta DENUNCIA cuando su autoridad a si lo disponga.

OCTAVO: Notificaciones que me correspondan las recibiré en el correo electrónico abdarioamagua@gmail.com perteneciente al Ab. Dario Manuel Amagua Quishpe, profesional del derecho a quien designo como mi Abogado Patrocinador dentro del presente proceso.

Firmo en forma conjunta con mi Abogado Patrocinador.


Ab. Dario M. Amagua Q.
Mat. 16628 CAP


Sarmiento Reyes Rolando Rigoberto

FGE	FISCALIA GENERAL DEL ESTADO
	FISCALIA DE PICHINCHA
	FISCALIA DE SOLUCIONES RÁPIDAS No. 4
RAZÓN: Siento por tal que la(s) <u>(2) ds</u>	
foja(s) que anteceden son fiel copia(s) de los ORIGINALES.	
LO CERTIFICO.	
Quito, <u>25</u> de <u>noviembre</u> del <u>2024</u>	
	
SECRETARIO	