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19 Attorneys for Plaintiff  
20 J. DOE

21 UNITED STATES DISTRICT COURT  
22 EASTERN DISTRICT OF CALIFORNIA

23 J. Doe,

24 Plaintiff,

25 v.

26 Alvaro Rafael Saravia; and DOES 1-10  
27 inclusive,

28 Defendant.

Case No.: Civ-F-03-6249

**DECLARATION OF  
LECIA SMITH IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
JUDGMENT BY DEFAULT**

1. My name is LECIA SMITH, and I have personal knowledge of the matters set forth in this declaration. If called upon to do so, I could and would testify competently thereto.

1 2. I am an investigator with the James Mintz Group (“JMG”), an investigative  
2 firm of more than thirty experienced investigators, including former investigative  
3 reporters, federal investigators and prosecutors, with offices in New York, Washington,  
4 D.C., Miami, Chicago, San Francisco and London. JMG is involved in a broad range of  
5 fact-gathering assignments, including assisting attorneys and their clients in connection  
6 with litigation. I joined the Mintz Group in 1998 and co-manage the firm’s litigation-  
7 support practice.

8 3. JMG has assisted plaintiff’s counsel in the investigation of this case involving  
9 the assassination of Archbishop Romero. Among the assistance we have provided is to  
10 conduct searches for information relating to the defendant, Alvaro Rafael Saravia, also  
11 known as Alvaro Rafael Saravia Merino.

12 4. Counsel has advised me that information obtained from a criminal complaint  
13 filed against Mr. Saravia in Miami, Florida in 1987 indicates that his date of birth is  
14 February 16, 1946. Using that date of birth and Mr. Saravia’s name, we conducted a  
15 search of a ChoicePoint Public Records, Inc. subscription database. The report we  
16 obtained from the search indicated that an Alvaro Saravia with the same date of birth –  
17 February 16, 1946 -- has a last known address of 2401 Manor Oak Drive, Modesto, CA,  
18 95355. According to the report, this Mr. Saravia also had previous addresses in Florida  
19 dating from sometime between 1986 and 1988. The report indicated that the Mr.  
20 Saravia residing in California has a Social Security number issued in Florida. Phone  
21 listings and other information also are provided. Attached hereto as Exhibit A is a true  
22 and correct copy of the ChoicePoint report relating to Alvaro Saravia.

23 5. Through other investigators we have engaged, we have also conducted  
24 interviews of Mr. Saravia’s children and a former friend named Julio Villatoro, all of  
25 whom live in South Florida. The field investigator that did the interviews reported to  
26 me that Mr. Saravia’s son said that he, his sister and their mother had not had any  
27 contact with Mr. Saravia for many years. The friend, Julio Villatoro, said Mr. Saravia  
28 had moved to California more than 8 years earlier and had established himself in

1 California. Mr. Villatoro also said that Mr. Saravia was part of a car dealership in  
2 California.

3  
4  
5 I declare under penalty of perjury under the laws of the United States of America that  
6 the foregoing is true and correct.

7  
8 Executed on this 1st day of September 2004, in New York, New York.

9  
10   
11 \_\_\_\_\_  
12 LECIA SMITH

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SEP-1998/SEP-1998      **MODESTO, CA 95355**  
                                 - **2225 PEPPERMINT DR**  
                                 **MODESTO, CA 95355**  
OCT-1986/OCT-1986      - **5007 SW 137TH CT**  
                                 **MIAMI, FL 33175**

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**Phone Listings for Subject's Addresses**

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**1105 YOSEMITE BL MODESTO, CA 95354**

**NORTH STAR AUTO SALE**

(209) 575-1336

**MODESTO AUTO MART**

(209) 550-5555

**2100 WYLIE DR 88 MODESTO, CA 95355**

38 phone numbers found, only same last name considered.

\*\* No Phone numbers found during search \*\*

\*Attempt to reach one or more gateways in this report was successful.

**The following databases were searched but data for the Subject was not found:**

Infractions

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