

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

COMMONWEALTH OF PUERTO RICO

Plaintiff

vs.

UNITED STATES OF AMERICA;
ALBERTO R. GONZALES, in his Official
Capacity as U.S. Attorney General; ROBERT
MUELLER, in his Official Capacity as
Director of the Federal Bureau of
Investigations; HUMBERTO S. GARCÍA, in
his Official Capacity as United States Attorney
for the District of Puerto Rico; LUIS S.
FRATICELLI, in his Official Capacity as
Special Agent in Charge of the Federal Bureau
of Investigations in Puerto Rico;

Defendants

Civil No: 06-1306 (JAG)

ACTION FOR:

DECLARATORY JUDGMENT

and

INJUNCTIVE RELIEF

COMPLAINT

TO THIS HONORABLE COURT:

Comes now Plaintiff, THE COMMONWEALTH OF PUERTO RICO
("Commonwealth"), through the undersigned attorneys, and respectfully STATES and PRAYS
as follows:

I. INTRODUCTION

This is a suit seeking declaratory and injunctive relief to vindicate the Commonwealth's
sovereign authority to enforce its criminal laws, in light of Defendants' unjustified, arbitrary,
illegal and unconstitutional refusal to disclose material information necessary for the completion
of a local criminal investigation into the violent death of Mr. Filiberto Ojeda Ríos. The

Commonwealth has ample power under the principles of federalism embodied in the United States Constitution to enact and enforce criminal laws pursuant to the police power reserved to the sovereign Commonwealth and States. This includes the power to investigate possible criminal behavior within its jurisdiction. Defendants cannot hide federal officers under a cloak of absolute immunity from prosecution under state criminal laws by refusing to comply with the Commonwealth's or the States' requests for information pursuant to criminal investigations.

Defendants' blanket and wholesale failure to comply with the Commonwealth's requests for information in this case, including their denial to provide even the names of the FBI agents and officials involved in the incident being investigated, constitutes an impermissible interference with the Commonwealth's sovereign power that requires this Honorable Court's immediate intervention. Thus, through the present action the Commonwealth seeks a judgment which: (i) declares that Defendants' actions are unjustified, arbitrary, illegal and unconstitutional violations of the Commonwealth's sovereign authority; and (ii) permanently enjoins Defendants from withholding any information relevant to the Commonwealth's investigation, and orders Defendants to comply with the Commonwealth's requests and produce the subpoenaed information, objects and documents.

II. JURISDICTION AND VENUE

This court has jurisdiction under 28 U.S.C. § 1331 (federal question, arising under the Tenth Amendment to the United States Constitution¹ and/or 48 U.S.C §§ 731b-731e).

¹ The Tenth Amendment is not the exclusive textual source of protection for principles of federalism. Printz v. U.S., 521 U.S. 898, 923 n. 13 (1997). The "residuary and inviolable sovereignty" of the states is reflected throughout the Constitution's text. Printz, 521 U.S. at 919. The Tenth Amendment merely confirms that the power of the federal government is subject to limits that may, in given instances, reserve power to the states. New York v. U.S., 505 U.S. 144, 157 (1992).

Declaratory and injunctive relief is proper pursuant to 28 U.S.C. §§ 2201-2202, 5 U.S.C. § 702 and Rule 65 of the Federal Rules of Civil Procedure.²

Venue is proper in this Court pursuant to 28 U.S.C. § 1391(e)(2) because the acts complained of herein occurred within the Commonwealth.

III. PARTIES

Plaintiff (the Commonwealth) is, like a State, an autonomous political entity with sovereign authority to enforce its criminal laws and punish offenders within its territory and jurisdiction.

Defendants – (i) the United States of America; (ii) Alberto R. Gonzales, in his official capacity as the United States Attorney General; (iii) Robert Mueller, in his official capacity as the Director of the Federal Bureau of Investigations; (iv) Humberto S. García, in his official capacity as the United States Attorney for the District of Puerto Rico; and (v) Luis S. Fraticelli, in his official capacity as Special Agent in Charge of the Federal Bureau of Investigations in Puerto Rico – are the custodians of material information that is necessary to conduct a local criminal investigation into the violent death of Mr. Filiberto Ojeda Ríos.

IV. FACTUAL ALLEGATIONS

1. On or around September 23, 2005, the Federal Bureau of Investigations (“FBI”), under the supervision of Defendants Mueller and Fraticelli, began an operation in the

² This suit is not barred by federal sovereign immunity under: (i) 5 U.S.C. § 702 (which waives the immunity of the United States in actions for relief other than money damages, whether the suit is under the Administrative Procedure Act or not, Chamber of Commerce of U.S. v. Reich, 74 F.3d 1322, 1329 (D.C. Cir. 1996); Warin v. Director, Dept. of Treasury, 672 F.2d 590, 591 (6th Cir. 1982) (“5 U.S.C. § 702 waives the sovereign immunity defense in actions for non-monetary relief under [28 U.S.C.] Section 1331.”)); and (ii) the well-established principle that sovereign immunity does not bar suits for specific relief against government officials where the challenged actions of the officials are alleged to be unconstitutional or beyond statutory authority, Clark v. Library of Congress, 750 F.2d 89, 103 (D.C. Cir. 1984), *see also* Dugan v. Rank, 372 U.S. 609, 621-23 (1963); Malone v. Bowdoin, 369 U.S. 643, 646-48 (1962); Larson v. Domestic and Foreign Corp., 337 U.S. 682, 689-91 (1949).

Municipality of Hormigueros, Puerto Rico, with the stated purpose of executing an arrest warrant and apprehending Mr. Filiberto Ojeda Ríos, a known federal fugitive.

2. In the early evening of September 23, 2005, personnel from the United States Attorney's Office in Puerto Rico ("USAO") informed the Puerto Rico Secretary of Justice ("Secretary") that Mr. Ojeda Ríos was probably dead or injured by gunfire, and requested that the Secretary send local prosecutors to the scene.
3. Once at the scene in Hormigueros, FBI agents prevented personnel from the Department of Justice of the Commonwealth of Puerto Rico ("PRDOJ") from entering Mr. Ojeda Ríos's residence. FBI agents stated that they would not enter or allow anyone to enter Mr. Ojeda Ríos's residence until the following day. FBI agents at the scene indicated that they were not ready to secure the scene in light of a perceived risk of explosives inside Mr. Ojeda Ríos's residence.
4. In the early afternoon of the following day, September 24, 2005, the FBI and the U.S. Attorney's Office in Puerto Rico informed the Commonwealth that Mr. Ojeda Ríos had been killed during his attempted apprehension and allowed personnel from the Puerto Rico Department of Justice to go into Mr. Ojeda Ríos's residence.
5. Pursuant to its power and duty under the law, 3 P.R. Laws Ann. §§ 291 et seq., the PRDOJ began an investigation into the events leading to the death of Mr. Ojeda Ríos.
6. On September 26, 2005, the Commonwealth's Governor, Aníbal Acevedo Vilá, requested Defendant Alberto R. Gonzales, U.S. Attorney General, to ensure that both the USAO and FBI fully cooperate with the PRDOJ's investigation. See, Exhibit A.

7. On October 4, 2005, the PRDOJ properly served Defendant Fraticelli with a subpoena for the production of certain information, documents and objects pertaining to the PRDOJ's investigation into the death of Mr. Ojeda. See Exhibit B.
8. By letter dated October 5, 2005, signed by Mr. Michael Faries, Chief Division Counsel with the FBI in Puerto Rico, to Pedro G. Goyco Amador, Prosecutor General of the Commonwealth, Defendants asserted that, before the FBI could comply with the October 4, 2005 subpoena, an affidavit had to be submitted to the United States Attorney's Office for the District of Puerto Rico, setting forth a summary of the particular documents or testimony requested and their relevance to the proceedings. See Exhibit C.
9. On October 7, 2005, Plaintiffs complied with said request. See Exhibit D.
10. It should be noted that the PRDOJ had reviewed the cited regulation and applicable case law before issuing the subpoena, and had determined that, even assuming that said regulation applied in these circumstances (which the Commonwealth denies), the subpoena: (i) contained all necessary information; (ii) was addressed to the appropriate person; and (iii) otherwise complied with the regulation and all legal requirements applicable.³ See Exhibit D.
11. Nevertheless, in the interest of proceeding in good faith, and due to the urgency and public import of the investigation being conducted, the PRDOJ decided to accommodate the FBI's request, and submitted a statement under penalty of perjury, pursuant to 28

³ For instance, the Code of Federal Regulations does not mandate that the request of information be directed to the United States Attorney; it only requires that the United States Attorney review the request once it is received by the holder of the information requested. See 28 C.F.R. § 16.22(b). It does not require, either, that the request be accompanied by an affidavit or statement. 28 C.F.R. § 16.21(2) (**defining "demand" as "subpoena, order, or other demand"**) (emphasis added); see also F.A.C., Inc. v. Cooperativa de Seguros de Vida, 188 F.R.D. 181 (D.P.R. 1999). The affidavit is **recommended** by the Code of Federal Regulations **only** when oral testimony is sought. 28 C.F.R. § 16.22(c). Moreover, the Commonwealth did not, and still does not, concede that the cited provisions of the Code of Federal Regulations even apply in the present circumstances, where a state law enforcement agency is requesting information from a federal agency or official in the course of a criminal investigation. See 28 C.F.R. § 16.21(c).

U.S.C. § 1746, which included a detailed explanation of the relevance of every item of information, every object, and every document requested through the subpoena. See Exhibit D.

12. By letter dated October 17, 2005, Defendant García informed the Commonwealth that a determination had been made pursuant to 28 C.F.R. § 16.26(b)(5) not to disclose any of the information, objects and documents requested by the Puerto Rico Department of Justice. See Exhibit E. Defendant García also informed that his decision was a final agency decision reviewable pursuant to the provisions of the Administrative Procedures Act, 5 U.S.C. §§ 701-06. Id.
13. On October 19, 2005, the Commonwealth reiterated its request that Defendants produce the requested information. See Exhibit F.
14. By letter dated October 21, 2005, Defendant García reiterated the decision not to disclose the information requested by the PRDOJ in its October 4, 2005 subpoena. See Exhibit G.
15. On November 2, 2005, in response to the September 26, 2005 letter sent by the Commonwealth's Governor, Defendant Gonzales informed that the Department of Justice Inspector General would conduct a review of the circumstances surrounding the death of Mr. Ojeda Ríos. See Exhibit H.
16. On November 2, 2005, the Commonwealth, in a letter to Defendant García, and without waiving its rights to demand full compliance with the October 4, 2005, subpoena, requested that, at a minimum, Defendants produce a subset of items that were critical to the investigation. See Exhibit I.
17. On November 3, 2005, the PRDOJ requested Defendant Gonzalez's intervention to obtain the requested information. See Exhibit J.

18. On November 5, 2005, Defendant García stated that he would only consider complying with the information requested to the extent that 28 C.F.R. § 16.26(b)(5) permitted it, and only after the Office of Inspector General (“OIG”) of the United States Department of Justice (“USDOJ”) concluded its investigation into the events leading to the death of Mr. Ojeda Ríos. See Exhibit K.
19. In a change of course, on November 9, 2005, Defendant García agreed to the inspection and testing (under certain conditions) by the Puerto Rico Forensic Science Institute of items 4, 5, 6, 11 and 16 of the October 4, 2005, subpoena issued by the PRDOJ. See Exhibit L. Defendant García also stated that his decision was a final agency decision reviewable pursuant to provisions of the Administrative Procedures Act, 5 U.S.C. §§ 701-06. Id.
20. On December 27, 2005, the USDOJ informed the PRDOJ of its efforts to inquire into the USAO’s and the FBI’s cooperation with the PRDOJ’s requests for information. See Exhibit M.
21. On January 20, 2006, the PRDOJ again requested that Defendants produce the remaining items listed in its subpoena of October 4, 2005. See Exhibit N.
22. By letter dated January 26, 2006, Defendant García reiterated the refusal to produce the information, objects and documents requested in the PRDOJ’s October 4, 2005, subpoena. See Exhibit O.
23. On February 13, 2006 the PRDOJ again requested Defendant Gonzalez’s intervention to obtain the requested information. See Exhibit P.
24. During the last six months, from September 23, 2005 through the present, several officials from the Commonwealth’s Executive Branch have engaged in continuous

communications, in person, in writing and by telephone, with different federal government personnel in an attempt to convince such personnel of the urgent need and the desirability, for all parties involved, of the USAO's and the FBI's cooperation with the PRDOJ's investigation. See Exhibits A to P.

25. In a show of good faith and restraint, the PRDOJ had chosen not to make public the FBI's and the USAO's lack of cooperation in its investigation, with the expectation that such restraint would make it easier for all parties to reach an extrajudicial and amicable resolution to this dispute.
26. To date, Defendants have not fully complied with the PRDOJ's October 4, 2005, subpoena.

V. CLAIMS FOR RELIEF

27. The allegations contained in paragraphs 1 through 26 of this Complaint are incorporated by reference as if fully set forth herein.
28. This is a suit to protect the Commonwealth's sovereign authority to enforce its criminal laws within its territory.
29. As Head of the Department of Justice of the Commonwealth of Puerto Rico, the Secretary is endowed, pursuant to Article IV, Sections 5 and 6, of the Constitution of Puerto Rico and the Organic Act of the Puerto Rico Department of Justice, 3 P.R. Laws Ann. §§ 291 et seq., with a mandate to ensure full compliance with the Laws of the Commonwealth of Puerto Rico.
30. The Secretary, and any person in whom the Secretary delegates such faculties, may conduct any necessary investigation in order to carry out any of the Secretary's duties and

responsibilities to enforce the Commonwealth's criminal laws pursuant to 3 P.R. Laws Ann. §§ 291 et seq.

31. Among the faculties available to the PRDOJ in carrying out its responsibilities are the power to interview witnesses, obtain statements, and issue subpoenas for documents and objects that it considers essential or relevant to its investigation. 3 P.R. Laws Ann. § 292(h).
32. The events surrounding the death of Mr. Ojeda Ríos triggered one of the Secretary's ministerial duties of utmost import – the investigation of conduct by those who ultimately caused the violent shooting death of a Puerto Rican citizen on Puerto Rican soil.
33. Pursuant to constitutional and statutory law, the Secretary, and any person in whom he delegates such faculties, are entitled to investigate and conduct interviews of the individuals who participated in the apprehension of Mr. Ojeda Ríos, as well as to obtain all documentary evidence and objects relevant to the events and the intervention which led to Mr. Ojeda Ríos's death.
34. The Commonwealth has the power and the obligation of enacting and enforcing its criminal laws.
35. As a quintessential part of said process, the Commonwealth must be free to investigate those individuals who may be reasonably suspected of wrongdoing.
36. Officers of the federal government are not absolutely immune from the exercise of the Commonwealth's and the States' police power.
37. With the passage of time, Defendants' refusal to produce the information, documents and objects demanded in the October 4, 2005, subpoena seriously threatens the authority and

efficiency of the Secretary's investigatory power regarding the death of a human being within the confines and jurisdiction of Puerto Rico.

38. To allow Defendants' decision not to comply with the October 4, 2005, subpoena linger any further undoubtedly undermines the Commonwealth's constitutional authority to properly conduct investigations over purely-local matters.
39. Consequently, the Commonwealth is entitled to a judgment: (i) declaring that Defendants are in violation of the Commonwealth's sovereign authority; (ii) permanently enjoining Defendants from withholding any information relevant to the Commonwealth's investigation, and; (iii) ordering Defendants to comply with the Commonwealth's requests and produce the subpoenaed information, objects and documents.

A. First Cause of Action:

The Commonwealth is entitled to the declaratory and injunctive relief requested because the Defendants' actions are not premised upon any federal regulation or statute.

40. The allegations contained in paragraphs 1 through 39 of this Complaint are incorporated by reference as if fully set forth herein.
41. The Commonwealth is entitled to the declaratory and injunctive relief requested because the Defendants actions are not premised upon any federal regulation or statute.
42. The regulations invoked by Defendants to deny the information do not: (a) create an independent privilege authorizing the USDOJ to withhold information; or (b) apply to a law enforcement request by the Commonwealth or a State, such as the one here in question.
43. As even the federal government has acknowledged in past cases, "the regulations simply set forth administrative procedures to be followed when demands for information are

received” and “do not ‘create an independent privilege’ authorizing the Department of Justice to withhold information.” Fai Mak v. FBI, 252 F.3d 1089, 1092 (9th Cir. 2001).

44. Moreover, the cited regulations do not even apply to a law enforcement request by the Commonwealth or a State, such as the one here in question. See 28 C.F.R. § 16.21(c) (“Nothing in this subpart is intended to impede the appropriate disclosure, in the absence of a demand, of information by Department law enforcement agencies to federal, state, local and foreign law enforcement, prospective, or regulatory agencies.”).

B. Second Cause of Action:

The Commonwealth is entitled to the declaratory and injunctive relief requested because, even assuming that the cited regulations do purport to establish a valid ground for denying the Commonwealth’s or a State’s request for information pursuant to a criminal investigation, such administrative action would be *ultra vires* and well outside the Congress’s intent and the authority granted to the Executive under the Housekeeping Act.

45. The allegations contained in paragraphs 1 through 44 of this Complaint are incorporated by reference as if fully set forth herein.
46. The Commonwealth is entitled to the declaratory and injunctive relief requested because, even assuming that the cited regulations do purport to establish a valid ground for denying the Commonwealth’s or a State’s request for information pursuant to a criminal investigation, such administrative action would be *ultra vires* and well outside the Congress’s intent and the authority granted to the Executive under the Housekeeping Act, 5 U.S.C. § 301.
47. Section 16.26(b)(5) of Title 28 of the Code of Federal Regulations was approved pursuant to the statutory authority vested, by the Housekeeping Act, upon the Attorney General to prescribe regulations for the government of his department, the conduct of its

employees, the distribution and performance of its business, and the custody, use and preservation of its records, papers, and property. 5 U.S.C. § 301. This section does not authorize withholding information from the public or limiting the availability of records to the public. Id.

48. The Defendants' interpretation of the Attorney General's regulation, 28 C.F.R. § 16.26(b)(5), which purports to create a privilege through said regulation, is not justified by the text or the intent of the Housekeeping Act.
49. The Housekeeping Act should be interpreted in a restrictive manner so as to avoid an unconstitutional reading which would implicate the Commonwealth's sovereignty.
50. The USDOJ's legal interpretation of the Housekeeping Act is not entitled to any type of deference.
51. This Court should not read a preemptive breadth into the Housekeeping Act which would result in an unconstitutional intervention with the Commonwealth's and the States' sovereignty, absent a clear statement from Congress in the Act itself necessitating such ample preemption.
52. The "clear statement" requirement and the absence of a deferential treatment with respect to the agency's interpretations of law are of particular and forceful application in cases, such as the present one, where a different course of action would unduly interfere with the sovereign authority of the Commonwealth and the States to wield the most traditional and core functions of their police power.

C. **Third Cause of Action:**

The Commonwealth is entitled to the declaratory and injunctive relief requested because, even if this Court chose to make a liberal interpretation of the Housekeeping Act, a Congressional authorization of the actions undertaken by Defendants would unconstitutionally limit the Commonwealth's and the States' sovereignty.

53. The allegations contained in paragraphs 1 through 52 of this Complaint are incorporated by reference as if fully set forth herein.
54. The Commonwealth is entitled to the declaratory and injunctive relief requested because, even if this Court chose to make a liberal interpretation of the Housekeeping Act, a Congressional authorization of the actions undertaken by Defendants would unconstitutionally limit the Commonwealth's and the States' sovereignty.
55. The Commonwealth has the power and the obligation of enacting and enforcing its criminal laws.
56. As a quintessential part of said process, the Commonwealth must be free to investigate those individuals who may be reasonably suspected of wrongdoing.
57. Officers of the federal government are not absolutely immune from the exercise of the Commonwealth's and the States' police power.
58. Defendants' actions involve a blanket wholesale denial of the Commonwealth's police power.
59. The only statutory authority cited by the federal defendants to substantiate such action is the Housekeeping Act. To the extent that the Housekeeping Act could have possibly served to grant such an absolute immunity from criminal investigation and prosecution to federal officials, it constitutes an unconstitutional affront to the States' and the

Commonwealth's sovereignty under the principles of federalism contained in the Constitution.

60. The Defendants' actions anchored on 28 C.F.R. §16.26(b)(5) are unconstitutional for they abridge the Secretary's constitutional and statutory right, as Head of the Puerto Rico Department of Justice for the Commonwealth of Puerto Rico, to investigate the death of a human being within the geographical and jurisdictional confines of Puerto Rico.

D. Fourth Cause of Action:

The Commonwealth is entitled to the declaratory and injunctive relief requested because an Administrative Procedure Act claim is unwarranted in this case.

61. The allegations contained in paragraphs 1 through 60 of this Complaint are incorporated by reference as if fully set forth herein.
62. The Commonwealth is entitled to the declaratory and injunctive relief requested because an Administrative Procedure Act claim is unwarranted in this case.
63. Although Defendants have directed the Commonwealth to the Administrative Procedure Act ("APA"), as the proper procedure to question their decision, under the law of the First Circuit, the Commonwealth is not barred from invoking this Court's equitable powers to protect its sovereign interests through the present suit. See Rhode Island Dept. of Environmental Management v. U.S., 304 F.3d 31, 41-44 (1st Cir. 2002).
64. APA review is unwarranted in this case because it would impose an undue burden on the exercise of sovereign criminal authority that would run afoul of the Tenth Amendment.

E. Fifth Cause of Action:

Even if this Honorable Court entertains the present proceeding as an APA claim, the requested information should be disclosed because Defendants' denial is, by definition, arbitrary and capricious, in abuse of discretion, in excess of statutory authority, and not substantiated by any valid privilege.

65. The allegations contained in paragraphs 1 through 64 of this Complaint are incorporated by reference as if fully set forth herein.
66. Even if this Honorable Court entertains the present proceeding as an APA claim, the requested information should be disclosed because Defendants' denial is, by definition, arbitrary and capricious, in abuse of discretion, in excess of statutory authority, and not substantiated by any valid privilege.
67. Although the Commonwealth does not concede that APA review is applicable, it has duly complied with the USDOJ's Touhy regulations.
68. The subpoena was a proper "demand" under such regulations. See 28 C.F.R. § 16.21(a)(2) ("demand" is a "subpoena, order, or other demand [...] of a court or other authority.>").
69. Thus, having complied with said regulations, APA review may be proper in the event this Honorable Court deemed it applicable, which we deny.
70. As has been resolved in this district, once a party complies with the pertinent regulations it is for this Court to properly examine the agency's reasons for the denial of information. See A.C., Inc. v. Cooperativa de Seguros de Vida, 188 F.R.D. 181, 186 (D. P.R. 1999).
71. Defendants' actions are arbitrary and capricious, and constitute an abuse of discretion, since they constitute an unjustified and unexplained blanket denial to produce any information, including even the names of the FBI agents and officials involved in the incident under investigation.

72. Defendants' actions are in excess of statutory authority since they are only supported on a regulation that does not itself create a privilege.
73. Defendants' actions are not substantiated by any valid privilege. None of the information or items requested by the Commonwealth in the October 4, 2005, subpoena would elicit production of investigatory records of the federal government. Disclosure of such information and items would not interfere with federal enforcement proceedings nor would disclosure impair federal investigative techniques and procedures as set forth in section 16.26(b)(5) of Title 28 of the Code of Federal Regulations.
74. Defendants are now foreclosed from coming up with additional reasons or justifications which are not part of the administrative record on the basis of which they decided to disclose the requested information. Burlington Truck Lines, Inc. v. U.S., 371 U.S. 156, 168-169 (1962).

F. Request For Costs and Attorney Fees

75. The allegations contained in paragraphs 1 through 74 of this Complaint are incorporated by reference as if fully set forth herein.
76. Pursuant to 28 U.S.C. §§ 1920 and 2412 (a)(1), the Commonwealth is entitled to recover its costs of suit. Pursuant to 28 U.S.C. § 2412(b) and (d)(1)(A), the Commonwealth is entitled to recover reasonable attorney fees incurred in connection with this litigation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for: (i) entry of a declaratory judgment recognizing the rights of the Commonwealth of Puerto Rico and the Secretary, as Head of the Department of Justice for the Commonwealth of Puerto Rico, to conduct a full investigation into the events leading into the death of Mr. Ojeda Ríos; (ii) entry of judgment permanently enjoining

Defendants from withholding any information relevant to the Commonwealth's investigation, and ordering Defendants to comply with the Commonwealth's requests and produce the subpoenaed information, objects and documents; and (iii) any other applicable remedy at law or equity.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on the 23rd day of March, 2006.

ROBERTO J. SÁNCHEZ RAMOS
Secretary of Justice

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