

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:23-mj-02256-Reid

UNITED STATES OF AMERICA
v

ARCANGEL PRETEL ORTIZ
ANTONIO INTRIAGO, and
WALTER VEINTEMILLA,
Defendants.

FILED BY dgj D.C.

Feb 10, 2023

ANGELA E. NOBLE
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CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? Yes No

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: /s/ Andrea Goldbarg

/s/ Monica Castro

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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America
v.

ARCANGEL PRETEL ORTIZ,
ANTONIO INTRIAGO, and
WALTER VEINTEMILLA,

Defendant(s)

Case No. 1:23-mj-02256-Reid

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 1, 2021 through July 7, 2021 in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. § 2339A (Conspiring to Provide and Providing Material Support and Resources Resulting in Death) and 18 U.S.C. § 956(a)(1) (Conspiracy to Kill or Kidnap a Person Outside the United States).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Complainant's signature

FBI Special Agent Michael A. Ferlazzo
Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by FaceTime

Date: 02/10/2023

Judicial signature

City and state: Miami, Florida

Hon. Lisette M. Reid, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael Ferlazzo, being first duly sworn, hereby depose and state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), having been so employed since October 2009. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in the United States Code. I am currently assigned to the FBI’s Miami Division. As a Special Agent with the FBI, I have received general law enforcement training, and I have been personally involved in investigations concerning a variety of violations of federal offenses, including the provision of material support to terrorism, attempted use of weapons of mass destruction, conspiracy to murder or kidnap outside the United States, violent crime, and other violations of federal law.

2. This Affidavit is submitted for the limited purpose of establishing probable cause to charge and arrest Arcangel Pretel ORTIZ, a/k/a “Colonel Gabriel” (“ORTIZ”), Antonio INTRIAGO, a/k/a “The General” (“INTRIAGO”) and Walter VEINTEMILLA (“VEINTEMILLA”) (collectively, the “Defendants”) for (1) a violation of 18 U.S.C. § 2339A, providing material support and resources¹ resulting in death, and conspiring to do so, knowing or intending that such support and resources are to be used to prepare for, or carry out, a violation of 18 U.S.C. § 956, which prohibits, among other things, conspiracy to murder or kidnap outside the

¹ “Material support or resources” includes, in relevant part, “any property, tangible or intangible, or service, including currency or monetary instruments or . . . financial services, lodging, training, expert advice or assistance, safehouses . . . weapons . . . personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” 18 U.S.C. § 2339A(b)(1).

United States; and (2) a violation of 18 U.S.C. § 956(a)(1), conspiring to kill or kidnap outside the United States.²

3. I have been personally involved in this investigation, along with other law enforcement agents, including other FBI agents and Homeland Security Investigations (“HSI”) agents. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, it does not contain all the information I know about this investigation. The facts and information contained in this Affidavit are based on my personal knowledge and observation, as well as information received in my official capacity from other individuals, including other law enforcement officers and witnesses involved in this investigation, as well as the review of records, documents, and other physical items obtained during the course of this investigation, among other things.

PROBABLE CAUSE

Overview of the Plot to Depose and Assassinate President Moïse

4. On July 7, 2021, the President of Haiti, Jovenel Moïse (“President Moïse” or “the President”), was assassinated in his residence in Port-au-Prince, Haiti. The First Lady (“M.M.”), suffered multiple gunshot wounds. M.M. survived and received medical treatment in the United States.

5. According to statements made by Haitian authorities and a medical examiner’s report detailing an autopsy performed by Haitian officials, the President was shot twelve times and died as a result. Haitian authorities arrested and detained numerous individuals in connection with the assassination, including dual Haitian-American citizens James Solages, a/k/a “Yakov,” a/k/a

² 18 U.S.C. § 956(a)(1) provides, in relevant part, “[w]hoever, within the jurisdiction of the United States, conspires with one or more other persons, regardless of where such other person or persons are located, to commit at any place outside the United States an act that would constitute the offense of murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States shall, if any of the conspirators commits an act within the jurisdiction of the United States to effect any object of the conspiracy, be punished”

“Junior” (“Solages”); Joseph Vincent, a/k/a “Blanco,” a/k/a “Mr. White” (“Vincent”), and Christian Emmanuel Sanon, a/k/a “Kumbe,” a/k/a “Pumba,” a/k/a “Bubba” (“Sanon”); as well as a number of Colombian nationals, including German Alejandro Rivera-Garcia, a/k/a “Colonel Mike” (“Rivera”). In addition to Solages, Vincent, Sanon, and Rivera, each of whom has been charged in the United States and transferred from Haitian custody,³ the United States separately charged Mario Antonio Palacios Palacios, a/k/a “Floro” (“Palacios”), a Colombian citizen; Rodolphe Jaar, a/k/a “Dodof” (“Jaar”), a Haitian-Chilean citizen; and Joseph Joel John, a/k/a “J3” (“John”), a Haitian citizen. Palacios, Jaar, and John each fled Haiti after the assassination, and were taken into United States custody from Jamaica (Palacios and John) and the Dominican Republic (Jaar).⁴

6. Through witness interviews and the review of documents and seized electronic evidence, the investigation has revealed that beginning in or around February 2021, ORTIZ and INTRIAGO, as principals of two related South Florida-based companies, Counter Terrorist Unit Federal Academy and Counter Terrorist Unit Security (collectively “CTU”), entered into discussions with Sanon, who opposed President Moise’s administration and was interested in becoming President of Haiti.⁵ CTU agreed to support Sanon in his efforts. At the end of April 2021, another South Florida company, Worldwide Capital Lending Group (“Worldwide”), and its

³ Solages, Vincent, and Rivera have been charged by separate complaint with the same crimes alleged herein. *See United States v. Solages et. al.*, Case No. 23-mj-02178-AOR. Sanon has been charged by separate complaint with the following violations: (1) 18 U.S.C. § 371, conspiring to commit an offense against the United States by (a) smuggling goods from the United States in violation of 18 U.S.C. § 554; and (b) causing export information not to be filed in violation of 13 U.S.C. § 305; (2) 18 U.S.C. §§ 554 and 2, smuggling goods from the United States, and aiding and abetting the same; and (3) 13 U.S.C. § 305 and 18 U.S.C. § 2, causing export information not to be filed, and aiding and abetting the same. *See United States v. Sanon*, Case No. 22-mj-4161-McAliley.

⁴ Palacios, Jaar, and John have been charged by indictment with the same crimes alleged herein. *See United States v. Palacios et. al.*, Case No. 22-CR-20104-JEM(s)(s).

⁵ An initial agreement between Sanon and CTU forbade CTU and Sanon from disclosing, among other things, procedures, services, and merchandise CTU had agreed to provide Sanon in connection with his political aspirations in Haiti.

principal VEINTEMILLA, agreed to finance CTU's support of Sanon. For instance, on April 30, 2021, Worldwide provided CTU with a \$175,000 line of credit, which was executed by INTRIAGO and VEINTEMILLA, with ORTIZ signing as a witness. By that time, the men planned to foment a public uprising aimed at ousting President Moise and installing Sanon as President. ORTIZ and INTRIAGO, through CTU, and VEINTEMILLA, through Worldwide, expected to reap significant financial benefits should Sanon secure the Presidency, largely by being awarded contracts for (i) sizeable infrastructure projects in Haiti, (ii) the provision of security forces, and (iii) the provision of military-type equipment to a Sanon-led Haitian government.

7. Beginning in or around April 2021, and continuing through early June 2021, ORTIZ and INTRIAGO, as principals of CTU, retained a group of approximately 20 Colombian nationals with military training (including Rivera and Palacios) purportedly to provide security for Sanon. CTU, Worldwide, and others (to include Frederick Bergmann⁶) began expending funds with the expectation that Sanon would be able to replace President Moise, at which time CTU claimed that it would contract, fly in, and outfit hundreds of additional Colombian nationals to protect Sanon and train Haitian law enforcement. As the plan evolved, ORTIZ, INTRIAGO, VEINTEMILLA, and others (collectively, the "conspirators") apparently realized that Sanon had neither the constitutional qualifications nor the popular support of the Haitian people to become President. The conspirators shifted their support to a former Haitian Supreme Court judge ("Individual-2"),⁷ after Individual-2 contracted with CTU and Worldwide to serve their financial interests when Individual-2 was installed as President. The conspirators' plan to remove President

⁶ Concurrently herewith, the United States has submitted a complaint under seal proposing to charge Bergmann with the identical violations to Sanon, as set forth above, as a result of his participation in the illegal shipment of armored vests.

⁷ In order to maintain consistency and clarity across legal process, certain individuals are referred to herein using the numbering conventions assigned to them in related cases. Individual-2 was first so designated, for instance, in related case *United States v. Solages et. al.* Case No. 23-mj-02178-AOR.

forcibly remove President Moise and install Sanon as President.⁸ At various meetings in early April 2021, which occurred in the Southern District of Florida, the conspirators discussed acquiring weapons and military equipment to facilitate their plan to remove President Moise and replace him with Sanon, who would then direct valuable infrastructure and/or government contracts to the companies owned by ORTIZ, INTRIAGO, and VEINTEMILLA; that is, CTU and Worldwide.

12. At the April meetings, CTU represented that it was associated with the United States Department of Justice and/or the FBI, and took steps to falsely suggest that the United States Government sanctioned its operational plan.⁹ For instance, ORTIZ arranged a meeting with the FBI by advising the FBI that those accompanying ORTIZ had information to provide the FBI about terrorism. Thus, on or about April 6, 2021, a meeting took place with the FBI at which ORTIZ and other conspirators were present. Those present attempted to draw the FBI personnel attending the meeting into a discussion about regime change in Haiti. In response, an FBI agent told the men, in substance, that the FBI could not help them because Haiti had to solve its own political problems.¹⁰

⁸ A photograph purportedly taken at a meeting on April 7, 2021, shows INTRIAGO, VEINTEMILLA, Solages, Sanon, and John, among others, around a conference table. According to witness interviews, ORTIZ was also present.

⁹ “Counter Terrorist Unit” or “CTU” is also the name of the federal government law enforcement and intelligence agency dramatized in the fictional television series “24.” ORTIZ apparently purchased patches on the internet that were modeled after the television show’s “CTU” logo.

¹⁰ At the time, ORTIZ was a confidential source for the FBI with respect to matters unrelated to the plot to remove President Moise. It appears that ORTIZ may have tried to use that pre-existing relationship and the above-referenced meeting to suggest to others that CTU was affiliated with the FBI and/or the Department of Justice (“DOJ”). It was not, and ORTIZ did not disclose to the FBI the criminal conduct alleged herein. After the events described in this affidavit, ORTIZ was deactivated as a source. In addition to the false suggestion that CTU had ties to the FBI/DOJ, Solages falsely claimed that he had been in the U.S. military, and Vincent wore a pin that created the false impression that he was affiliated with the Department of State and he also had fake CIA credentials.

Moise from office involved attempts to physically remove him from power, including an unsuccessful effort to seize President Moise when he returned from a trip and spirit him away by airplane to a location outside of Haiti. When that failed, the plan ultimately changed to using the Colombian nationals to assassinate the President, after which the conspirators expected that Individual-2 would be sworn in as President and grant them immunity from Haitian prosecution for their criminal conduct.

8. Operating primarily from the Southern District of Florida, ORTIZ and INTRIAGO managed and directed other members of the conspiracy, including Solages (who coordinated with Vincent and Sanon) and the Colombian nationals who participated in the assassination (through Rivera and/or another Colombian leader in Haiti). ORTIZ and INTRIAGO also enlisted the help of John, a former Haitian senator. Other Haitian citizens, including Jaar, later joined the operation with the shared goal of ousting President Moise.

9. As set forth herein, the conspirators knew their planning, financing, and actions were in support of a violent coup d'état aimed at deposing President Moise and replacing him with a candidate who would serve their political goals and/or financial interests.

Coup d'État Meetings in the Southern District of Florida

10. On or about March 15, 2021, CTU entered into an agreement with Solages, giving him “exclusive authorization” as CTU’s “authorized representative” in Haiti. This agreement was signed by INTRIAGO and Solages.

11. According to witness interviews, flight records, and review of seized electronic evidence and documents, in the beginning of April 2021, several of the conspirators (including ORTIZ, INTRIAGO, VEINTEMILLA) met in the Southern District of Florida to discuss how to

Text Messages Showing the Conspirators' Intent to Forcibly Attack President Moise

13. In the course of the conspiracy, ORTIZ, INTRIAGO, and VEINTEMILLA exchanged a number of written and audio communications in furtherance of their operational planning. I have reviewed a number of these communications, some of which are excerpted below. To the extent that I have provided my interpretations of these messages, noted in brackets, these interpretations are based upon my training and experience, my involvement in the investigation to date, my review of documents relevant to the investigation, and conversations I have had with law enforcement and witnesses.¹¹

14. On or about April 20, 2021, ORTIZ told Solages that the “current President [of Haiti] is the thief delete the messages that could compromise you in case of being captured.” On or about April 21, 2021, Solages sent ORTIZ a list of military equipment needed for the operation, which included, among other things: “M-4” rifles, “M-60” machineguns, “Kalashnikov” rifles, “combat boots,” “hand grenades,” “gas mask,” “full bulletproof [sic] vests,” 6 “RPG” [rocket-propelled grenades], and over 20,000 rounds of ammunition. On or about April 23, 2021, ORTIZ told Solages to see “with your own eyes” the security at both the Haitian Presidential Palace (the “Palace”) and President Moise’s house (the “Residence”).¹²

15. On or about April 27, 2021, ORTIZ sent a text message to Rivera with a photo of a whiteboard with a drawing of the assault plan for the Palace. The whiteboard appears to describe the use of “snipers” and references a “milicia [sic] team” that comprises “10 warriors - neutralizers” and shows “palace security.” Rivera responded, in substance, that they would need to contemplate reserve and arrival time, principal route, and alternative communication. Based on

¹¹ Some of the communications described herein were written in Spanish. I have reviewed draft translations of these communications in English, which are subject to change upon further review by linguists.

¹² The Presidential Palace of Haiti was in the process of being rebuilt after it was devastated in a 2010 earthquake. In the meantime, President Moise was living in a different residence.

my training and experience, and my familiarity with this investigation, I understand Rivera to have conveyed to ORTIZ that the conspirators needed to plan the time they should arrive at the Palace, what route would best be taken from their location(s) to the Palace, and whether they needed to secure alternative means of communication among the conspirators. ORTIZ sent the same photo to VEINTEMILLA on May 6, 2021.

16. On or about May 22, 2021, ORTIZ sent Solages the following text message: “If things do not go well in the next few days, things could come against us. You are still an American citizen and for conspiracy you can get 25 years in prison, you have to be very careful with everything you say, especially in a group, and I know you were very uncomfortable with everything I was saying, losing control.”

17. On or about June 2, 2021, Solages texted INTRIAGO a photograph of himself [Solages], John, Vincent, and other conspirators sitting around a table with the message “conducting the hitting plans right now.”

18. On or about June 3, 2021, VEINTEMILLA messaged Bergmann that he “just wired 15k to James [Solages] for screws.” The same day, INTRIAGO texted Solages that “15k on the way” and “please make it happens [sic].” Solages responded “getting the screws as we speak.” INTRIAGO responded “Ok hope you got enough screws But remember the 20 workers don’t work without tools,” and then asked what type of tools Solages had, noting that it “must be the complete set short drills and long ones.” Solages texted that “the screws cases 556 cost \$3500.” According to witness statements, I have learned that “screws” and “nails” were words used as coded references by the conspirators for ammunition, and “tools” or “instruments” were words used as coded references to firearms. Thus, I understand these communications to indicate that VEINTEMILLA had provided \$15,000 to Solages to purchase ammunition, which INTRIAGO confirmed with Solages; INTRIAGO then reminded Solages that the Colombian nationals

["workers"] would not be able to do their jobs without weapons ["tools"] and that Solages needed to obtain a variety of firearms ["short drills and long ones"] for the operation.

19. On or about June 7, 2021, VEINTEMILLA sent ORTIZ a document titled "Loan Provided to Christian Sanon" that included \$15,000 to "James [Solages] for screws and nails," and \$250,000 for "100 Complete vest." Based upon my involvement in the investigation, I know that CTU had access to a large number of armored vests and planned to use these vests to outfit the Colombian nationals and others, for the benefit of Sanon. Thus, I understand these communications to indicate that VEINTEMILLA intended to loan Sanon funds to both support the purchase of ammunition ["screws and nails"] and for armored vests ["100 Complete vest"].

20. In text messages sent on June 7, 2021, VEINTEMILLA stated, in substance, that if ORTIZ does not give the order, people will always use the excuse that someone is not ready, and those who are ready should go out and demonstrate on the street. It is the only way to attract the news stations and make the president nervous enough to leave. Based upon my review of the text message chain and my familiarity with the investigation, I believe that in these messages, VEINTEMILLA advised ORTIZ that ORTIZ must order the operation to remove President Moise to go forward and that people needed to engage in a public protest against Moise's presidency in order to assist in Moise's removal. As set forth below, additional electronic evidence establishes that VEINTEMILLA knew that the operation involved President Moise's forcible and violent removal, rather than a peaceful transition of power.

21. On or about June 8, 2021, ORTIZ sent Solages an audio message stating, "we are in red numbers and we need go [sic] forward." The next day, ORTIZ sent another audio message to Solages, in which VEINTEMILLA also spoke. VEINTEMILLA told Solages "the plan has to be simultaneously . . . it cannot be just be hit the rat, that's not how that's going to work 'cause then we are going to look horrible." Based on electronic evidence reviewed during the

investigation and witness statements, I understand that the conspirators frequently used the word “rat” or “thief” to refer to President Moise. Thus, I understand this exchange to reflect ORTIZ’s concern that the delay in replacing President Moise had resulted in CTU not recouping its expenses [“we are in red numbers”] and that the operation needed to go forward; VEINTEMILLA then responded that the public demonstrations and the “hit” on the President needed to occur at the same time [“the plan has to be simultaneously “it can’t just be hit the rat”] because if President Moise was forcibly removed or murdered without the appearance of public support, the conspirators would suffer reputational damage [“then we are going to look horrible”].

22. On or about June 9, 2021, VEINTEMILLA sent a text message to Bergmann stating:

Fred it is very important that you and everyone there understand that we have lost the element of surprise. Every day Mr. P and everyone there run the risk of having 200 or 300 personal [sic] of the rat going there and arresting everyone. If this happened then what are you going to do. From what we are told mr. P has meetings with many people. And ant [sic] one of these people can inform the rat. This is very dangerous for this reason is that we are pressuring for things to happen. Later we do not want for you guys to tell us why didn’t you factor this in and let us know. So please understand the party has to happen or the personal [sic] is coming back because they do not want to get caught in this situation.

VEINTEMILLA then sent the same text message to Solages. Based upon review of multiple text messages and interviews with witnesses, I understand the term “party” was used to refer to the operation, and that the conspirators referred to Sanon as “Mr. President,” and therefore I believe that references herein to “Mr. P” are references to Sanon. Thus, I understand that in this exchange, VEINTEMILLA warned Bergman that the operation to replace President Moise had likely leaked [“we have lost the element of surprise”], as Sanon had held a number of meetings relating to his presidential aspirations [“mr. P has meetings with many people” any one of whom could “inform the rat”] and therefore the conspirators were risking arrest by the President’s personnel [“200 or

300 personal of the rat”]. VEINTEMILLA then urged Bergman to help move the operation forward quickly [“the party has to happen”] because otherwise it was “very dangerous” for those involved if they were to “get caught.”

23. On or about June 10, 2021, Solages asked INTRIAGO in a text message for 150-200 zip-tied handcuffs, and INTRIAGO replied with a photograph of the zip-tied handcuffs and said, “No ankle.” Based on my training and experience and my familiarity with the investigation, I understand that in this exchange, Solages sent INTRIAGO a photograph of the restraints the conspirators intended to use during the operation, and INTRIAGO sent back a photograph indicating the conspirators had wrist restraints, but that they were lacking ankle restraints [“no ankle”].

24. On or about June 15, 2021, Rivera sent ORTIZ a text message stating, in substance, that the Colombian nationals needed a battering ram to breach doors, as well as black caps, cash, balaclavas, gun holsters, and other materials.

The Conspirators Shift Support from Sanon to Individual-2 for President

25. From witness interviews and from seized electronic evidence and documents I have reviewed, I have learned that in or around mid-June of 2021, the conspirators discussed that Sanon lacked the necessary qualifications to serve as President of Haiti. For example, on or about June 11, 2021, ORTIZ messaged Solages that “if Sanon is American / Haitian he cannot be a Minister and because he does not reside for 5 years, he cannot be President or Prime Minister.”

26. In or around mid-June 2021, the conspirators began to support Individual-2 to serve as President of Haiti; as a result, CTU and Worldwide took steps to ensure that their financial interests would be protected if they assisted Individual-2 in obtaining the Presidency.¹³ For

¹³ Based upon the investigation, Sanon continued to communicate with the conspirators and support President Moise’s forcible removal, presumably in the hopes of obtaining a political position in the new Haitian government.

instance, as they had with Sanon, CTU and Worldwide signed “consultation agreements” with Individual-2 in which Individual-2 promised them future business contracts. On or about June 14, 2021, VEINTEMILLA and ORTIZ texted each other about getting these agreements with Individual-2 notarized. In particular, VEINTEMILLA sent a message to ORTIZ stating, in substance, that these agreements could not be notarized until Individual-2 was in power. ORTIZ responded, in substance, with the suggestion that they send the documents to Solages so they could plan ahead. Based upon witness interviews, I understand that in this text exchange, VEINTEMILLA and ORTIZ discussed Individual-2’s signing of the new consultation agreements with CTU and Worldwide, and the need to wait until Individual-2 was sworn in as President before notarizing the agreements.

*The Conspirators Plot to Kill President Moise and
Attempt to Immunize Themselves from Prosecution*

27. On or about June 20, 2021, Solages texted ORTIZ that they need “10 DEA Velcro patches, Front & Back and 26 mask full face cover” to arrive by June 22, to which ORTIZ responded, “costume party.” Based on my familiarity with the investigation, I understand that Haitian law enforcement recovered DEA patches from the crime scene after President Moise’s assassination, and that witnesses identified Solages as the person who falsely identified the assassins as “DEA” as they approached the President’s Residence. Thus, in this exchange, I understand ORTIZ to acknowledge that the DEA patches they sought to use in the operation would result in a “costume party,” that is, that the individuals who would wear the DEA patches while conducting the operation were not, in fact, agents with the DEA.

28. On or about June 28, 2021, INTRIAGO texted Solages and asked, “When do you think we are going to have all the instruments ready for the party?” As noted above, I am aware that the word “instruments” was a code word the conspirators used to refer to weapons, and “party”

was used to refer to the planned removal of President Moise by kidnapping or assassination. Thus, I understand that in this exchange, INTRIAGO asked Solages when the weapons [“instruments”] would be ready for the operation [“the party”].

29. On or about June 28, 2021, Solages flew from Haiti to the Southern District of Florida to deliver a purported Haitian immunity agreement to ORTIZ, INTRIAGO, and VEINTEMILLA. The document, dated and ostensibly executed on June 22, 2021 by Individual-2, claimed President Moise “illegally and unconstitutionally extended his presidential mandate,” and requested CTU for its “urgent HELP and assistance,” promising “immunity, protection, and security to their actions in our favor.” Upon comparing the signatures on the signed immunity agreement to other examples of Individual-2’s purported signature, it is not clear to your affiant whether the immunity agreement was in fact signed by Individual-2.

30. On or about June 30, 2021, ORTIZ texted a copy of the signed immunity document to INTRIAGO, VEINTEMILLA, Solages, Rivera, and another conspirator (a Colombian national who was killed in the aftermath of the assassination). According to messages sent amongst the conspirators regarding the purported Haitian immunity agreement, the conspirators believed that this document would protect them from prosecution in Haiti once Individual-2 was sworn in as President.

31. On or about July 1, 2021, Solages returned to Haiti to participate in the operation against President Moise.

32. From speaking with witnesses and reviewing travel documents, I am aware that by July 6, 2021, over 20 individuals from Colombia had traveled to Haiti to participate in the operation to remove President Moise by kidnapping or killing him. Their travel was arranged for and funded by VEINTEMILLA.

33. On or about July 6, 2021, ORTIZ and INTRIAGO, in a series of text messages, in substance, asked VEINTEMILLA to pay the Colombians. VEINTEMILLA responded, in substance, that things took too long and that there was no money or investors; that until Individual-2 is sworn in and President Moise was out of office, the investors would not contribute any more money. VEINTEMILLA stated, in substance, that they must accept that the operation had failed. ORTIZ responded, in substance, that he did not have permission to fail and that by the end of the following day, VEINTEMILLA would see things better. ORTIZ told VEINTEMILLA, in substance, to calm down, that things were just getting started.

The Assassination

34. According to witness interviews, on or about July 6, 2021, several conspirators (including Solages, Vincent, Rivera, John, Jaar, and Palacios,) met prior to the assassination at the home of a family member of Jaar's, which was located near the Residence. At that meeting, firearms and equipment were distributed, and Solages falsely announced to the group that it was a "CIA Operation," and thereafter further explained that, in substance, he meant the mission would involve killing President Moise.

35. According to witness interviews, on or about July 7, 2021, several conspirators drove a convoy to President Moise's residence. Solages, Rivera, and Vincent traveled together in one of the vehicles. Once the group of conspirators arrived outside the Residence, Solages falsely announced to those inside the residence that they were engaged in a "DEA Operation" in an attempt to ensure compliance by the President's security (some of whom had been bribed with money provided by Jaar in order to comply with the conspirators' commands) and other civilians. A subset of Colombian conspirators, including Palacios, was assigned to find the President and assassinate him, and in fact the President was killed.


36. Based on the foregoing, your Affiant respectfully submits that there exists probable cause to believe that ORTIZ, INTRIAGO, and VEINTEMILLA committed the offenses of 18 U.S.C. § 2339A, Conspiring to Provide and Providing Material Support or Resources to Carry Out a Violation of Section 956, Resulting in Death; and 18 U.S.C. § 956(a)(1), Conspiring to Kill or Kidnap a Person Outside the United States.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Special Agent Michael Ferlazzo
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime this 10th day of February 2023.



HONORABLE LISETTE M. REID
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA