



CASE

Type of Complaint:Written
 State:Refused
 Stage:Closed
 Institution:PUBLIC MINISTRY Office:SANTA CRUZ PROSECUTOR'S OFFICE BUILDING
 Registration date:25-07-2018 Check-in time:15:18:29 Registered by:

PLACE AND DATE OF THE EVENT Municipality:
 SANTA CRUZ OF THE MOUNTAINS Area:
 Address:
 Date of the event:12-02-2025

1. ACCOUNT OF THE FACT

BY MEANS OF THE FOREGOING MEMORIAL OF COMPLAINT, PRESENTED BY HAROLD MICHAEL BACTICH VARGAS IN HIS CAPACITY AS DEPARTMENTAL DIRECTOR OF THE GENERAL IDENTIFICATION SERVICE AND LIZETH XIMENA ARISPE GUERRA IN HER CAPACITY AS LEGAL OFFICER OF THE GENERAL PERSONAL IDENTIFICATION SERVICE SEGIP - SANTA CRUZ against RENE OSCAR SAMBAQUIRI FLORES, for the alleged commission of the crimes of NON-COMPLIANCE OF DUTIES, PASSIVE BRIBERY AND IDEOLOGICAL FALSEHOOD provided for and sanctioned by Articles 154, 146 and 199 of the Bolivian Penal Code; against HEIDI GIGLIOLA SEMPETEGUI OTALORA, ISABEL ZURA CRUZ, MARIA EVELYN LIMA RAMOS, VICTORIA MIRIAN CARO JUNIS DE MONTAÑO, LINDAURA PADILLA HURTADO and RUBEN MAX MARTINEZ CANEDO, for the alleged commission of the crimes of IMPROPER USE OF PUBLIC PROPERTY AND SERVICES, NON-COMPLIANCE OF DUTIES, IMPROPER USE OF INFLUENCES AND IDEOLOGICAL FALSEHOOD, provided for and sanctioned by Art. 26, 154 and 146 of Law 0004 and 199 of the Bolivian Penal Code; against COSME GONZALO ALVAREZ ALFONSO, YANINE SILVA SOLIZ, JORGE FRANCO FLORES MELGAR, GILBERTO ALVES ROCHA, JENNIFER ALVES ROCA, JOSE EDUARDO LOPEZ SAUCEDO, SANTIAGO ROJAS ESPINOZA, JOSE HURTADO LEANOS, SAAD AL SAMIR, CAMILA ALEXANDRA MOREIRA ROMAN, JOSE LUIS RIBERA JUSTINIANO, PAMELA TELLEZ SOLIZ, Pilar Justiniano Montano, Juan Carlos AYALA GUTIERREZ, MIGUEL CHAVEZ FLORES, Sebastian Cuellar Rosales, Mario Serrate Jordan, Percy Miranda Muñoz and Juan Pablo Suarez Medina, for the alleged commission of the crimes of ACTIVE BRIBERY and USE OF A FORGED INSTRUMENT provided for and sanctioned by Articles 158 and 203 OF THE BOLIVIAN PENAL CODE, AS NOTED IN THE RELATION OF FACTS THAT IS FOUND WIDELY DETAILED IN THE PRESENT DOCUMENTATION ATTACHED TO FS. (78), SO THAT IT CAN BE INVESTIGATED ACCORDING TO PROCEDURE AND LAW, IN ORDER TO ESTABLISH THE HISTORICAL TRUTH OF THE FACTS.

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2. CRIMES

No.	Cpp class	Attempt	Class of crime	Minimum penalty	Maximum penalty	Crime
1		accomplished	Anti-corruption	0 YEARS	0 YEARS	Non-compliance with Duties, Art.154
2		accomplished	Anti-corruption	0 YEARS	0 YEARS	Passive bribery own, Art.145
3		accomplished	Patrimonial	1 YEARS	6 YEARS	Ideological falsehood, Art.199
4		accomplished	Anti-corruption	0 YEARS	0 YEARS	Misuse of Goods and Services



PAUSE: 7
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5	accomplished	Anti-corruption	0 YEARS	0 YEARS	Public, Art.26 Misuse of influences, Art.146
6	accomplished	Anti-corruption	0 YEARS	0 YEARS	Active bribery, Art.158

3. ACTIVITIES

No.	Date	Guy	Activity	Origin	Responsible
1	2018-07-25 19:29:26	Start	Investigation Initiation Report <small>To the Judge</small>	MP j11-penal	Richard Camacho-Caiguara
2	2019-08-05 14:18:17	General	Memorial	MP j11-penal	Luis Ricardo Mamani Rojas
3	2019-08-08 11:03:21	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
4	2019-09-19 11:30:40	General	Memorial	MP j11-penal	Fabiola Sheila Sifuentes Alaca
5	2019-09-26 16:15:38	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
6	2019-09-27 18:06:53	General	Memorial	MP j11-penal	Katy Hoyos Salazar
7	2019-10-01 12:50:35	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
8	2019-10-02 08:46:55	General	Job	MP j11-penal	Jorge Elvis Condori Padilla
9	2019-10-09 16:09:26	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
10	2019-10-21 11:33:47	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
11	2019-12-03 11:20:51	General	Memorial	MP j11-penal	Katy Hoyos Salazar
12	2019-12-04 17:05:54	General	Memorial	MP j11-penal	Jorge Elvis Condori Padilla
13	2019-12-12 11:55:50	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
14	2019-12-19 17:29:45	General	Memorial	MP j11-penal	Katy Hoyos Salazar
15	2020-01-21 19:27:19	General	Memorial	MP j11-penal	Katy Hoyos Salazar
16	2020-01-27 10:45:20	General	Decree	MP j11-penal	KARLA VANESSA BARRON HIDALGO
17	2020-07-21 09:20:02	General	Memorial	MP j11-penal	Fabiola Sheila Sifuentes Alaca
18	2020-07-24 08:53:29	General	Decree	MP j11-penal	Ana Luisa Heredia Barron
19	2020-07-31 10:40:26	General	Decree	MP j11-penal	Ana Luisa Heredia Barron
20	2020-07-31 14:35:08	General	Memorial	MP justice-free1	
21	2020-07-09 09:49:20	General	Job	MP j11-penal	Ana Luisa Heredia Barron
22	2020-08-20 11:39:46	General	Memorial	MP j11-penal	RENE LORGIO MORENO AÑEZ
23	2020-08-21 14:13:34	General	Decree	MP j11-penal	Ana Luisa Heredia Barron
24	2020-10-28 16:23:07	General	Decree	MP j11-penal	Ana Luisa Heredia Barron
25	2021-01-26 08:55:46	General	Memorial	MP j11-penal	Beatriz Diaz Villarreal



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26	2021-01-27 12:31:00	General				Alberto Zeballos Flores
27	2021-03-12 15:45:18	Rejection	Tax Resolution Rejection 304 inc	3	MP j11-penal	Alberto Zeballos Flores
28	2021-03-23 15:53:45	Notifications	Notification of Tax Resolution		MP j11-penal	Alberto Zeballos Flores
29	2021-03-26 15:39:46	General	Memorial		MP j11-penal	Beatriz Diaz Villarroel
30	2021-03-29 17:19:57	General	Decree		MP j11-penal	Alberto Zeballos Flores
31	2022-08-12 17:35:38	General	Decree		MP j11-penal	Alberto Zeballos Flores

4. STAFF

No.	Lack	F. Low	Assignment	Official	Post	Office	Division	State
1	2018-07-25 15:19:14	2018-11-26 00:00:00	Assignment manual	RICHARD CAMACHO CAIGUARA	PROSECUTOR OF SUBJECT I	SCZ VILLA 1ST MAY	SCZ Villa 1st of Esp. in Crimes Patrimonial	Idle
2	2018-11-26 09:57:04	2019-02-14 00:00:00	Assignment manual	MABEL SANDRA ANDRADE MOLINA	PROSECUTOR OF SUBJECT I	BUILDING SANTA PROSECUTOR'S OFFICE CROSS	SCZ - Litigation - Court 4	Idle
3	2019-02-14 17:27:48	2020-07-11 00:00:00	Assignment manual	KARLA VANESSA BARRON GENTLEMAN	PROSECUTOR OF SUBJECT III	BUILDING TAX SEAT WARNES	SCZ Warnes - Public Prosecutor's Office in Spain Crimes in Reason Gender	Idle
4	2020-07-11 11:08:52	2020-11-23 00:00:00	Assignment by mass transfer	ANA LUISA HEREDIA BARRON	PROSECUTOR OF SUBJECT I	BUILDING SANTA PROSECUTOR'S OFFICE CROSS	SCZ - Public Prosecutor's Office Esp. in Anti-corruption, LGI, Crimes Customs and Taxes	Idle
5	2020-11-23 20:50:07	2024-04-09 09:04:46	Assignment manual	ALBERT ZEBALLOS FLOWERS	PROSECUTOR OF SUBJECT III	BUILDING SANTA PROSECUTOR'S OFFICE CROSS	SCZ - Public Prosecutor's Office Esp. in Anti-corruption, LGI, Crimes Customs and Taxes	Idle
6	2024-04-09 09:04:46		Assignment by mass transfer	Nestor Torrez WALL	PROSECUTOR OF SUBJECT II	BUILDING SANTA PROSECUTOR'S OFFICE CROSS	SCZ - Public Prosecutor's Office Esp. in Anti-corruption, LGI, Crimes Customs and Taxes	Asset

5. Whistleblower



Names and Surnames:HAROLD MICHAEL
BACOTICH VARGAS
Ci:6220756
Sex:MALE
Birthdate:01-11-1985
Marital status:Divorced
Phone:
Cellular:
Email:
Home:
Nationality:BOLIVIA

Place of birth:SANTA CRUZ OF THE MOUNTAINS
Education Level:
Profession/Occupation:lawyer
Workplace:
Work Address:
Work Phone:
Relationship with the Victim:
Self-identification:
Language:Abkhaz

PROTECTION MEASURES

Names and Surnames:Lizeth Ximena Arise
Guerra
Ci:5496122
Sex:FEMALE
Birthdate:20-07-1982
Marital status:Single **Phone:**

Place of birth:SUCRE
Education Level:
Profession/Occupation:lawyer
Workplace:THIRD RING INDANA MESANIME
SEGIP CITY BUILDING
Work Address:SEGIP OFFICES IN THE
INDANA COMMERCIAL CENTER, THIRD OUTER
RING **Work Phone:**
Relationship with the Victim:
Self-identification:
Language:Spanish, Castilian

Cellular:
Email:
Home:4TH RING - RADIAL 27
Nationality:BOLIVIA

PROTECTION MEASURES

6. Reported

NAME:RENE OSCAR SAMBAQUIRI FLORES

PROTECTION MEASURES

NAME:HEIDI GIGLIOLA SEMPETEGUI
OTALORA

PROTECTION MEASURES

NAME:Isabel Zura Cruz

PROTECTION MEASURES

NAME:MARIA EVELIN LIMA RAMOS

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NAME:VICTORIA MIRIAN CARO MONTANO

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NAME:Lindaura Padilla Hurtado

PROTECTION MEASURES

NAME:Ruben Max Martinez Canedo

PROTECTION MEASURES

NAME:COSME GONZALO ALVAREZ ALFONZO

PROTECTION MEASURES

NAME:Yanine Silva Soliz

PROTECTION MEASURES

NAME:Jorge Franco Flores Melgar

PROTECTION MEASURES

NAME:Gilberto Alves Rocha

PROTECTION MEASURES

NAME:Jennifer Alves Rock

PROTECTION MEASURES

NAME:JOSE EDUARDO LOPEZ SAUCEDO

PROTECTION MEASURES

NAME:Santiago Rojas Espinoza

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NAME: Juan Pablo Suarez Medina

PROTECTION MEASURES

7. Complainant and Victim

Name:
Nit: A STRANGER
Email:

Phone:
Cellular:
Address: AVENIDA COSTANERA 3rd FLOOR
MUNICIPAL SECRETARY OF INTEGRAL HUMAN
AND SOCIAL DEVELOPMENT

PROTECTION MEASURES

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