



FILE 01 GT · 1976

PRIMARY SUBJECT

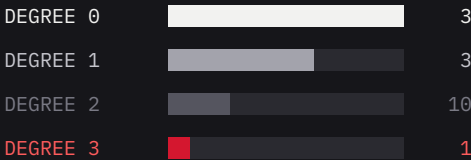
Luis Rodrigo Arenas Echeverría

Founder, publisher and chief executive of República Media Group. Co-founder and former president of the Movimiento Cívico Nacional. Finance coordinator of FCN-Nación’s 2015 presidential campaign.

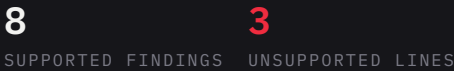
Bound over for trial on 2018-05-03 for unreported campaign financing; the case reached the trial stage and was closed in 2019 by statutory reform of the offense, not by rebuttal of the facts.

JURISDICTIONS	LINKED ENTITIES	OWN OFFSHORE ENTITIES
GT · PA · FL · DE	9 CORPORATE	0 IN ICIJ

EVIDENCE COMPOSITION BY DISTANCE FROM THE SUBJECT



The bar measures evidentiary value, not volume. Degree 0 is the subject’s own conduct; degree 3, the conduct of a third party of a third party. The file concentrates material in the high degrees and value in the low ones – \$2.



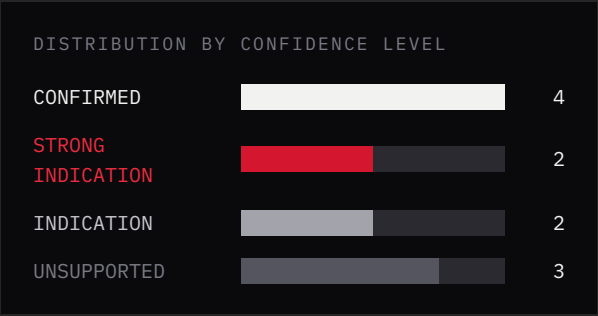
CHANNELED IN 2015 (Q)	ADMITTED RECEIPT (Q)	ANNUAL LOBBYING (US\$)	FAMILY-CIRCLE OFFSHORE	CDR RECORDS ANALYZED
7,119,300	750,000	420,000	4 entities	34,688

CONTENTS			
§1 · Findings table	§5 · 2015 precedent	§9 · Offshore layer	§13 · CDR layer
§2 · Inferential distance	§6 · Admitted receipt of Q750,000	§10 · Reading the offshore layer	§14 · Requirements
§3 · Corporate graph	§7 · Lobbying – FARA analysis	§11 · Morales-Machado chain	§15 · Conclusions
§4 · Jurisdictional layering	§8 · Consolidated timeline	§12 · Links without common operations	

§1 Findings table

8 SUPPORTED · 3 UNSUPPORTED · CONFIDENCE STATED PER FINDING

ID	FINDING	CONFIDENCE	DOCUMENTARY BASIS	SEE
H-1	Q7,119,300 channeled to FCN-Nación through an interposed company, against Q103,706 reported to the TSE	CONFIRMED	CICIG / Prosecutor · court ruling	§5
H-2	Admitted receipt of Q500,000 and Q250,000 from two state contractors, on instructions attributed to a cabinet minister	CONFIRMED UNCONTESTED FACT	Two builders' testimony + subject's admission	§6
H-3	Multigenerational offshore asset structure in the spouse's family group: 3 branches, 2 jurisdictions	CONFIRMED	ICIJ · Panama Papers and Pandora Papers	§9
H-4	No offshore entity is attributable to the subject in either leak, despite his circle's exposure	CONFIRMED NEGATIVE RESULT	Name search in the ICIJ database	§10
H-5	Shared address between the media vehicle and the political-spending vehicle, plus an asset cluster in Key Biscayne	STRONG INDICATION	Florida Div. of Corporations · DOJ FARA	§4
H-6	Source of the funds behind the US\$420,000-a-year lobbying contract, undetermined	STRONG INDICATION	FARA filings · Delaware, no beneficial owner	§7
H-7	Constitutional Court justice named in the influence scheme, holding his own company in Panama	INDICATION	Panama Papers · MAINRIVER S.A.	§10
H-8	Continuity of the same operative between the 2015 scheme and the current companies: three vehicles, ten years	INDICATION	GT company registry · FCN case file	§3



The two weightiest findings concern the subject's own conduct and are settled by accounting records. **Neither depends on a chain of association.**

UNSUPPORTED · §11

Morales–Machado chain: two broken links.

UNSUPPORTED · §12

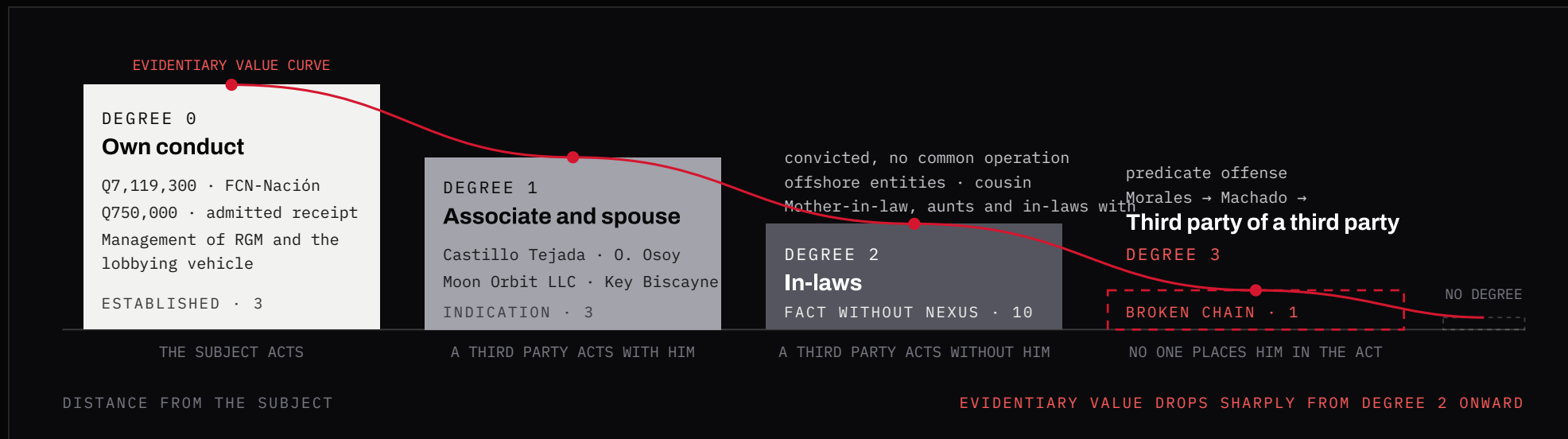
Alleged kinship: unverified.

NO NEXUS · §12

Vila Aramburú: no point of contact.

§2 Inferential distance of the case file

17 ELEMENTS PLACED · EVIDENTIARY VALUE BY DEGREE



EFFECT 01 · DILUTION

Every investigative act spent mapping a kinship tie or an aunt-in-law's company is an act not spent on the MCN's accounting books, where the data settles the matter on its own.

EFFECT 02 · FRAGILITY

An opinion that mixes degree 0 with degree 3 lets the whole be challenged by attacking the weakest link. As currently framed, the chain in §11 is precisely that link.

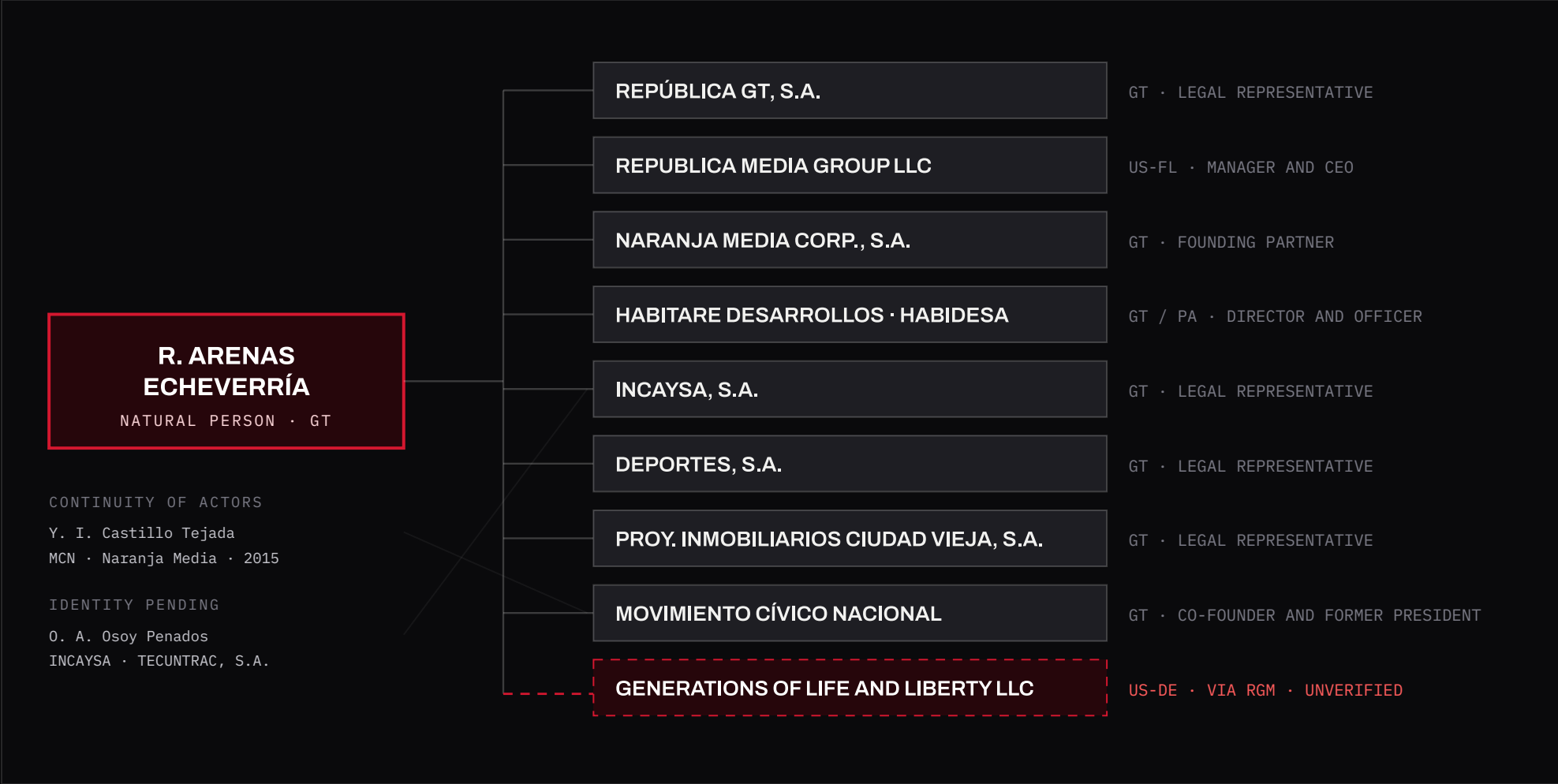
EFFECT 03 · DIRECTION

When incoming material grows steadily more remote, the correct reading is that the direct evidence has not been worked. The technical answer is to go deeper into degree 0, not to widen the perimeter.

Operating criterion for the file: **the dossier is stronger, not weaker, for excluding what does not hold**. The three lines in §11 and §12 are recorded to document their exclusion.

§3 Subject's corporate graph

9 LINKS · 4 JURISDICTIONS



ROLE PATTERN

In six of nine entities the subject appears as legal representative, not as shareholder. The profile is that of a manager of vehicles, not an asset holder.

CONVICTION IN THE NETWORK

Juan Carlos Marroquín Godoy, partner in República GT, S.A.: obstruction of criminal prosecution, 1 year 6 months commutable, plus disqualification from office.

PANAMANIAN LAYER

HABIDESA INVESTMENTS S.A. concentrates twelve nodes in Panama and is recorded as inactive. Directors, shares and resident agent remain unbroken out.

UNVERIFIED EDGE

The tie to the Delaware company rests on the lobbying contract and the shared address, not on any corporate document.

§4 Jurisdictional layering

4 LAYERS · OPACITY INCREASES TOWARD POLITICAL SPENDING

GUATEMALA

LAYER 1 · ACTUAL OPERATIONS

REPÚBLICA GT, S.A.

INCAYSA, S.A.

DEPORTES, S.A.

PROY. INMOB. CIUDAD VIEJA

NARANJA MEDIA CORP.

HABITARE DESARROLLOS

MCN

REGISTRY OPACITY

U.S. — FLORIDA

LAYER 2 · MEDIA AND PRESENCE

REPUBLICA MEDIA GROUP LLC

CITIZENS COUNCIL FOR PROGRESS

MOON ORBIT LLC

REGISTRY OPACITY

PANAMA / BVI

LAYER 3 · HOLDING AND ASSETS

HABIDESIA INVESTMENTS S.A. · 12 NODES

NOVAL OVERSEAS · WOLGATE · BAILEY TRADING

NO PUBLIC BENEFICIAL OWNER

REGISTRY OPACITY

U.S. — DELAWARE

LAYER 4 · POLITICAL SPENDING

GENERATIONS OF LIFE AND LIBERTY LLC

US\$420,000 / YEAR · SOURCE OF FUNDS UNDETERMINED

REGISTRY OPACITY

ADDRESS CONVERGENCE · MIAMI-DADE	
RGM LLC · through Feb. 2026	1040 Biscayne Blvd 1606
Generations of Life and Liberty LLC	1040 Biscayne Blvd 1606
RGM LLC · from Feb. 2026	881 Ocean Drive Apt 10A · Key Biscayne
Citizens Council for Progress	Key Biscayne
Moon Orbit LLC · spouse as manager	Key Biscayne
A shared address between the operating entity and the spending entity indicates common control, and is resolvable through the property registry.	

ASSEMBLY SEQUENCE OF THE U.S. STRUCTURE

- 2025-03-25

RGM LLC incorporated in Florida
- 2025-11-05

Lobbying contract signed
- 2026-02

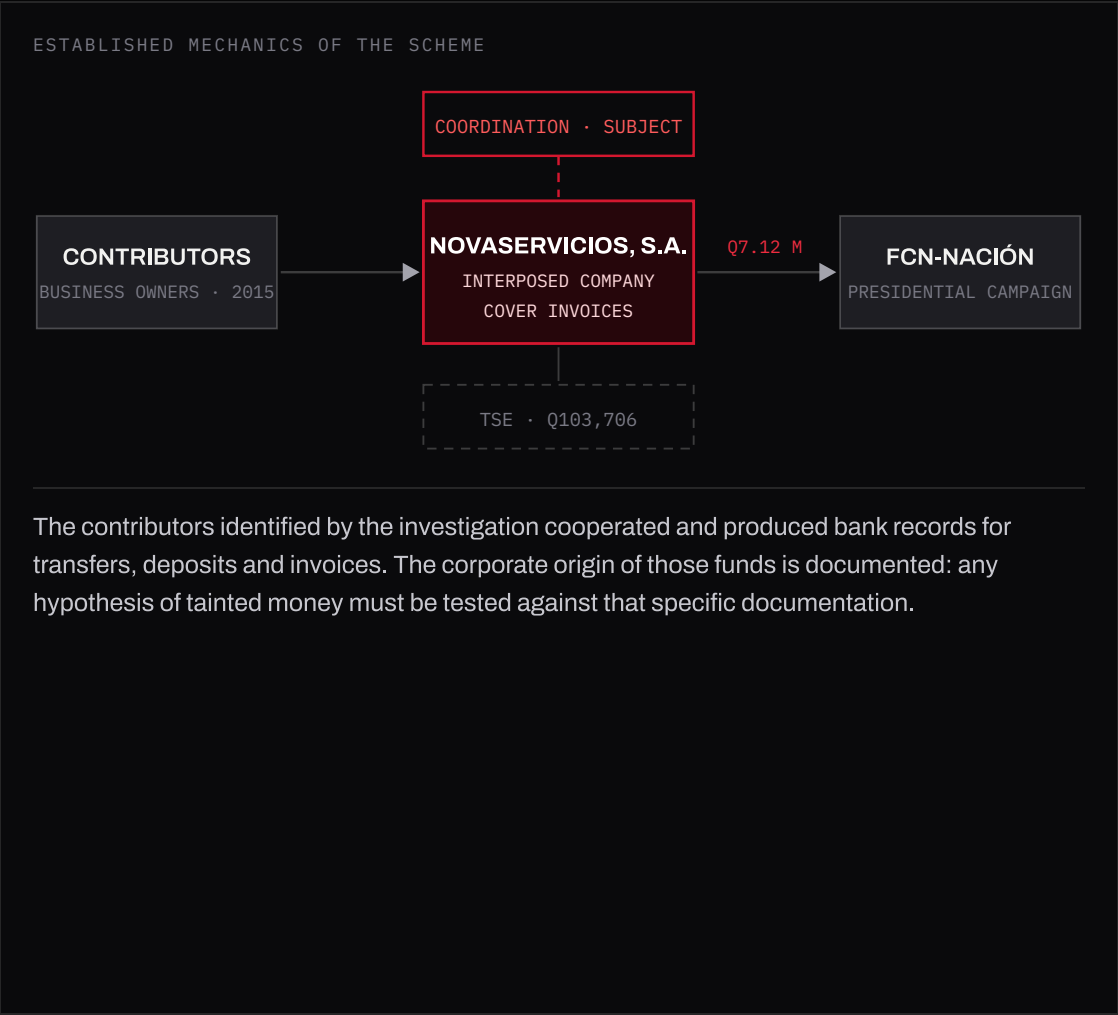
Registered address moved to Key Biscayne
- 2026-02-25

First payment substantiated with the DOJ

Incorporation, contracting, relocation and payment within eleven months: a sequence consistent with structured preparation, not an improvised operation.

§5 2015 precedent — FCN-Nación campaign financing

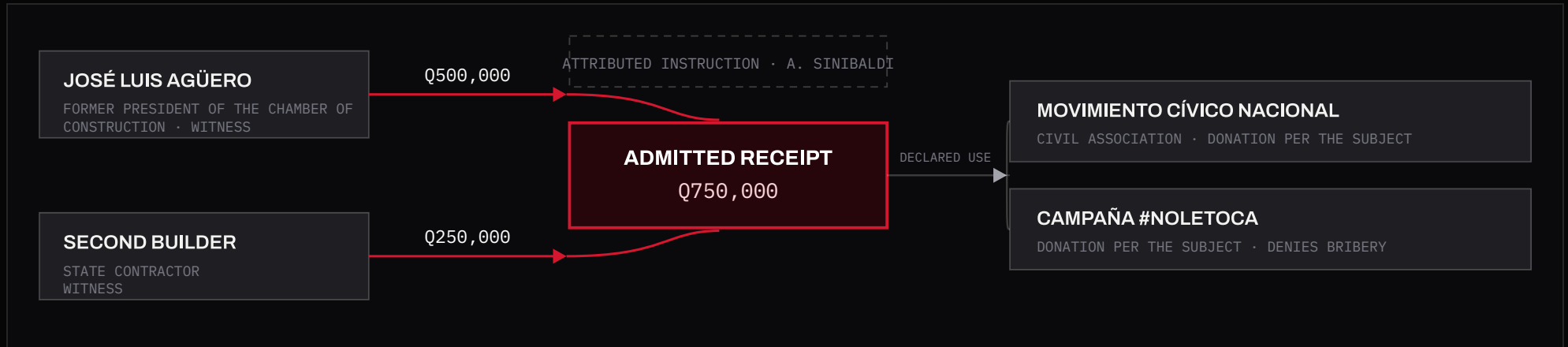
DEGREE 0 · ESTABLISHED



PROCEDURAL HISTORY	
2015	Scheme executed during the campaign
2017	Named as co-defendant
2018-05-03	Bound over for trial before Judge Erika Aifán
2018	Formal indictment by the Public Prosecutor
2019	Case opened for trial
2019	Closed by statutory reform of the offense, not by rebuttal of the facts
Co-defendant: José Andrés Botrán Briz. The repeal of the offense alters neither the registry record nor the reported shortfall.	

§6 Admitted receipt of Q750,000

DEGREE 0 · UNCONTESTED MATERIAL FACT



ACCOUNTING VERIFICATION PATH · THE DISPUTE IS OVER THE LEGAL CAUSE, NOT THE FACT

01 Recorded in MCN's books as a donation, with named donor and bank support?

02 Reported to the SAT and, per its use, to the TSE?

03 Does the date of receipt match the payments declared by the builders?

04 Under what heading did the builders book the outflow: donation or other?

IF RECORDED

The line weakens substantially.

IF NOT RECORDED

The subject's explanation loses documentary support.

EITHER WAY, THE DATA SETTLES IT

This is the file's densest point of evidence, and its value comes from the fact that **the subject admits receiving the money**. What is disputed is the legal cause of the transfer: a donation to a civil association versus the channeling of funds demanded from state contractors.

PRIORITY REQUIREMENT

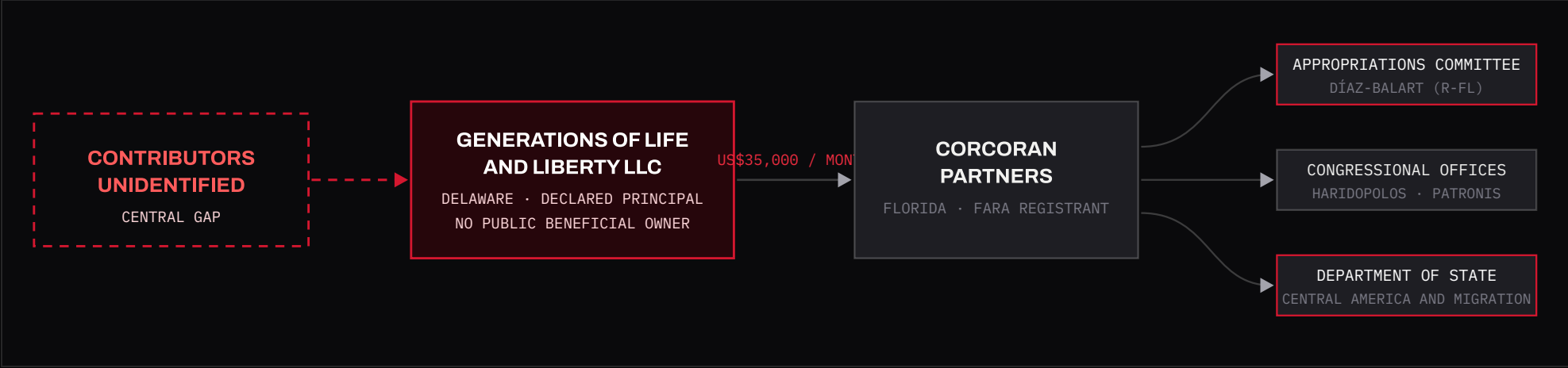
Accounting books and financial statements of the Movimiento Cívico Nacional, fiscal years 2015–2017; SAT tax filings; and the accounting records of both construction firms for the declared outflows.

WHY IT YIELDS MORE THAN ANY OTHER LINE

It is verifiable through accounting rather than testimony, and depends on no chain of association.

§7 Lobbying — FARA analysis

DOJ eFILE · US\$35,000 / MONTH · TERM 2025-11-05 - 2026-11-04



CONTACTS LOBBIED · MAY 7-20, 2026	
Gisselle G. Reynolds	LEGISLATIVE DIRECTOR · DÍAZ-BALART
Ana Rosa Quintana-Lovett	STATE DEPT. · CENTRAL AMERICA
Gloria Oliveros	LEGISLATIVE AND DISTRICT DIRECTOR
Hannah Fraher	CHIEF OF STAFF · HARIDOPOLOS
Mary Grace Chandler	SCHEDULER · PATRONIS
The subject matter converges on budget appropriations and migration policy toward Central America: public purpose, opaque funding.	

§8 Consolidated timeline

2009 → 2026



REPEATED FORM · 2015 VERSUS 2026		
ELEMENT	2015 SCHEME	2026 STRUCTURE
VEHICLE	Interposed commercial company in Guatemala	Delaware company with no public beneficial owner
CONTRIBUTORS	A group of business owners, identified by the investigation	"Latin American media and business owners," unidentified
COVER	Invoicing for services	Representation contract registered with the DOJ
SUBJECT'S POSITION	Coordinator, not owner	Manager of the vehicle, not owner

The relevant match is not one of people but of form: **corporate interposition, pooled contributors and the role of manager**. Confirming it depends on a single data point: the source of the funds.

2026 MILESTONES

- 02 Registered address moved to Key Biscayne
- 02-25 First payment substantiated with the DOJ
- 04 Effective window of the call-record corpus
- 05 Contact activity reported under FARA

§9 Offshore layer of the family circle

ICIJ · 4 ENTITIES · 3 BRANCHES · 9 INDIVIDUALS



ENTITY	JURISD.	LEAK	POSITION RELATIVE TO THE SUBJECT
NOVAL OVERSEAS LTD.	BVI	ICIJ	Spouse's family
WOLGATE LIMITED	PANAMA	PANDORA	In-law branch
BAILEY TRADING ESTATE GROUP LTD.	BVI	PANAMA	CEMPRO leadership
MAINRIVER S.A.	PANAMA	PANAMA	Public office flagged
None attributable to the subject	—	—	See §10

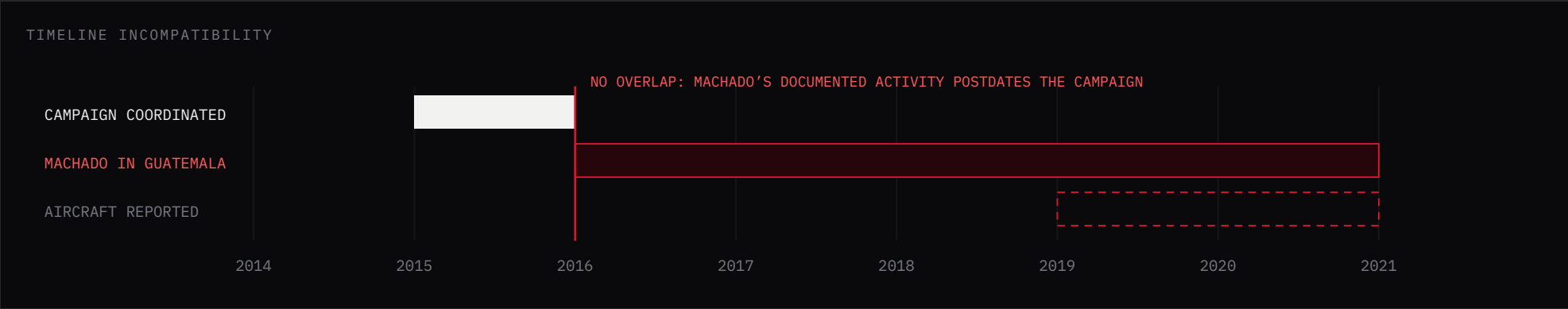
WHY NOVAL OVERSEAS IS THE MOST RELEVANT ENTITY

The name is self-explanatory: NOVella ALvarado. It is a family asset vehicle named after the founding generation, not an anonymous shell. Its three beneficiaries are the widow and two sisters of the subject's father-in-law.

The Panamanian entities in which Sofía and Enrique Novella Harrison appear remain unidentified: NOVAL is incorporated in the BVI, so the Panamanian layer is still unmapped.

§11 Morales–Machado chain: not usable

4 LINKS · 1 ESTABLISHED · 2 BROKEN · 1 INCOMPATIBLE



CLAIM SUBMITTED	VERIFICATION AGAINST SOURCE	RESULT
Convicted of laundering drug-trafficking proceeds	He pleaded guilty to conspiracy to launder money and to commit wire fraud; the drug-trafficking count was dropped under the plea agreement.	INACCURATE
Morales admitted receiving support	He confirmed meeting him two years after the campaign and denied any financing; the Public Prosecutor dismissed that investigation.	INACCURATE
Machado financed the 2015 campaign	Asserted in a foreign parliamentary complaint of 2025-02, not in any court ruling.	UNVERIFIED
Carrying the chain forward as a live line would expose the opinion to the simplest challenge available: producing the plea agreement and the dismissal. The legitimate question is already documented: the identified corporate origin of the funds the subject coordinated in 2015.		

§12 Links without common operations

INTERSECTION MATRIX · 7 CRITERIA

Carlos Eduardo Echeverría Pedraza
KINSHIP TO BE CONFIRMED

Sentenced on 2019-10-15 in the Southern District of New York to 72 months for laundering drug-trafficking proceeds. He is reported to have laundered some US\$9 million between 2014 and 2016 through sham agricultural trade, using third parties' agro-export firms as a front.

The alleged first-cousin relationship comes with no filiation record. Surname analysis shows only that it is structurally possible; "Echeverría" is a high-frequency surname in Guatemala. RENAP certification of both lines is required.

Alfredo Vila Aramburú
NO DECLARED NEXUS

Beneficial owner of RALWOOD OVERSEAS S.A. and SENDERCROSS INC., both active, with ownership shared with a third party and its own registered intermediary.

He shares no company, address, intermediary or counterparty with the subject, his spouse, his companies, the Novella group, Cementos Progreso or República Media Group. He is recorded solely to trace the input received: with no declared link, the inclusion cannot be analyzed.

INTERSECTION CRITERION WITH THE SUBJECT	ECHEVERRÍA PEDRAZA	VILA ARAMBURÚ
Shared company	NOT ON RECORD	NOT ON RECORD
Common bank account	NOT ON RECORD	NOT ON RECORD
Shared address or property	NOT ON RECORD	NOT ON RECORD
Common legal representative or intermediary	NOT ON RECORD	NOT ON RECORD
Transactional flow between entities	NOT ON RECORD	NOT ON RECORD
Subject mentioned in the court file	NOT MENTIONED	NOT APPLICABLE
Mentioned in the press investigation	NOT MENTIONED	NOT APPLICABLE

A person does not become suspect through the conduct of a relative with whom they share no company, account, address or operation. **Kinship, even if proven, is not an indication.** The reporting on that network is detailed and names more than ten people: the subject appears in no role.

WHAT WOULD OPEN THE LINE

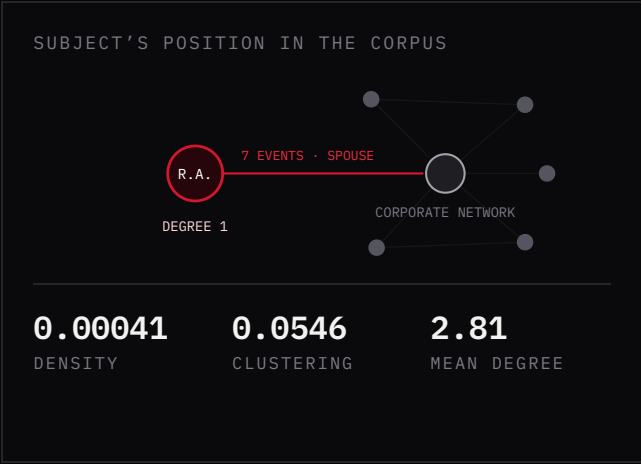
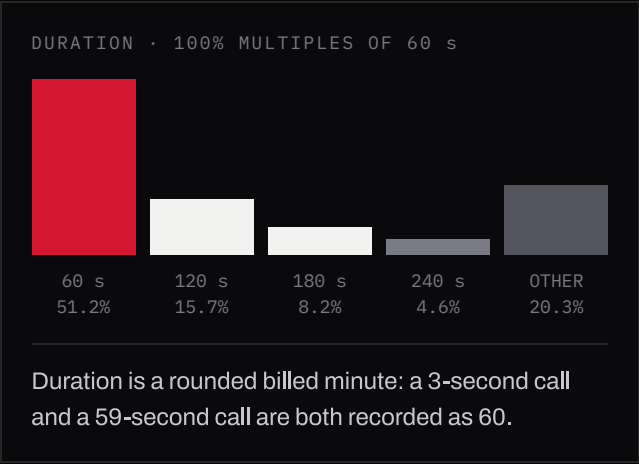
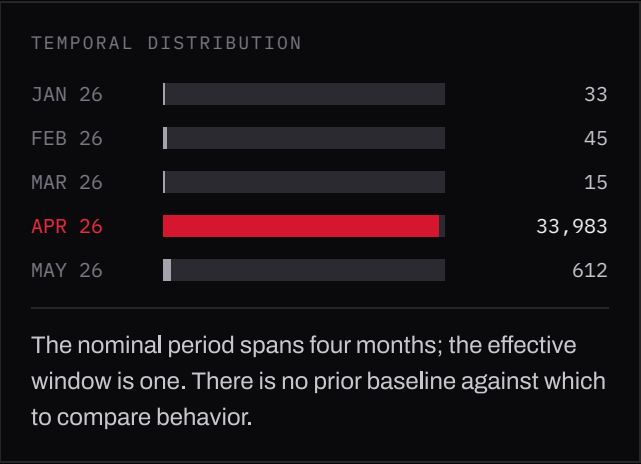
01 · Shared company, account or property

02 · Transactional flow between the two

03 · Subject named in the U.S. case file, via mutual legal assistance

§13 Communications layer — value in exclusion

34,688 RECORDS · 6,821 NODES · 9,586 EDGES



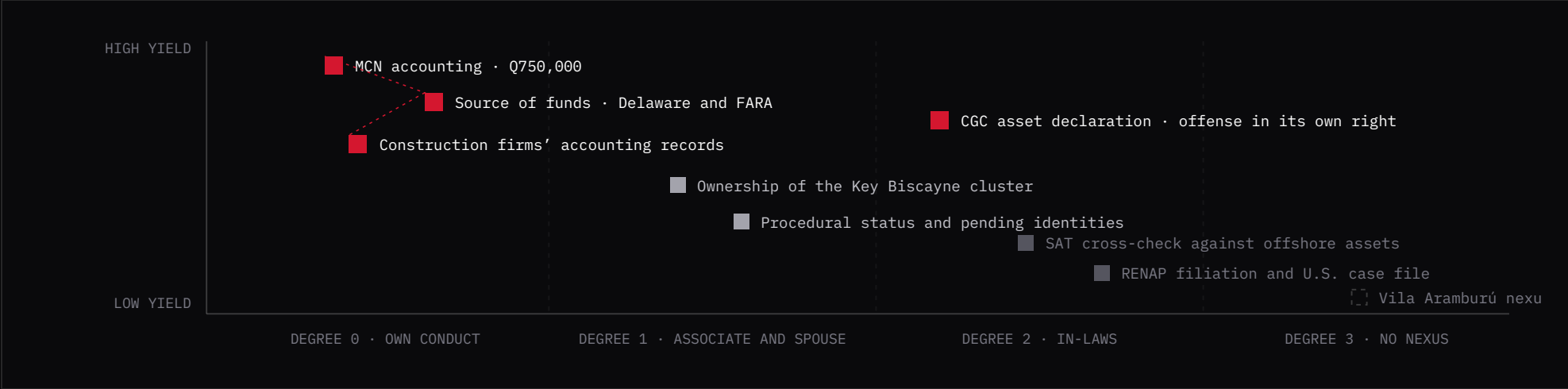
HYPOTHESIS TESTED	RESULT	BASIS
Operational communication between the subject and the corporate network	RULED OUT	Degree 1; sole counterpart, the spouse
Financial or corporate traffic on the spouse's line	RULED OUT	61 events reviewed one by one; 0 findings
Topology of a clandestine organization	RULED OUT	Clustering 0.055 · density 0.0004
Anomalous night or weekend activity	RULED OUT	2.9% and 14.0%, ordinary ranges
Burner lines, shared SIM or rotating IMEI	NOT ASSESSABLE	IMEI and IMSI 100% null
Home anchoring or co-location between subjects	NOT ASSESSABLE	Coordinates and cell ID 100% null
Communication bursts around key dates	NOT ASSESSABLE	One-month window, no baseline
Benford's law on durations	NOT APPLICABLE	Artificial quantization to the minute

MAIN BRIDGES · SERVICE NODES	
Banco Industrial	33
Cementos Progreso	25
Banco Promerica	21
Servicios ODH Cempro	18
Telecom operator	17

The structure is the signature of a corporate work network. The corpus provides no incriminating evidence on the subject or on the corporate actors: **its value in the file is exclusion and diagnosis.**

§14 Requirements by expected yield

15 INVESTIGATIVE ACTS · 4 PRIORITIES



P1 Degree 0 · settles on its own

- 1. MCN accounting books and financial statements, 2015–2017, plus SAT filings.
- 2. Accounting records of both construction firms for the declared outflows.
- 3. Incorporation and beneficial owner of the Delaware company; financial statements of both LLCs.
- 4. Complete FARA filings, including Nov. 2025 – Feb. 2026.

P2 Degree 1 · high yield

- 5. Miami-Dade property records for both cluster addresses.
- 6. Articles and management of Moon Orbit LLC and the Key Biscayne civic council.
- 7. Prosecutor's certification of Y. I. Castillo Tejada's exact procedural status.
- 8. INCAYSA, S.A. trade licence and articles; RENAP certification for the Osoy Penados.

P3 Offshore layer

- 9. Cross-check of offshore holdings against SAT declarations. Without it, the layer yields no indication.
- 10. CGC asset declarations and the MAINRIVER S.A. file.
- 11. HABIDESIA and NOVAL OVERSEAS files; unmapped Panamanian entities.
- 12. Identity confirmation in the Dougherty branch.

P4 Closing questioned lines

- 13. RENAP filiation certification regarding Echeverría Pedraza.
- 14. Mutual legal assistance request to the DOJ on the U.S. case file. If the subject is not named, the line closes.
- 15. Statement of the Vila Aramburú nexus, if the requesting authority holds one.

REGISTRY SOURCES TO CROSS-CHECK

GT COMPANY REGISTRY

SAT GUATEMALA

COMPTROLLER GENERAL (CGC)

RENAP

PANAMA PUBLIC REGISTRY

FLORIDA DIV. OF CORPORATIONS

DELAWARE DIV. OF CORPORATIONS

DOJ FARA eFILE

MIAMI-DADE PROPERTY APPRAISER

GUATECOMPRAS

ICIJ OFFSHORE LEAKS

§15 Conclusions

6 CONCLUSIONS · 1 OPERATING CRITERION

- 01

The strongest elements concern the subject’s own conduct: the established coordination of Q7,119,300 to FCN-Nación, with a 98.5% gap against the amount reported to the TSE, and the admitted receipt of Q750,000 from state contractors.
- 02

The second element carries the greatest potential yield because the material fact is uncontested: the dispute over its legal cause is settled by accounting records, not by testimony.
- 03

The 2026 structure reproduces the 2015 form: an interposed company in an opaque jurisdiction, pooled unidentified contributors and the subject as manager. Confirming it depends on the source of the funds.
- 04

The offshore layer documents a systematic family asset structure, of legitimate interest for mapping the cement group’s beneficial ownership, and produces one target with an offense of its own: a justice’s possible omission in his asset declaration.
- 05

The subject does not appear in the offshore leaks. The result is consistent with the profile of a manager of vehicles rather than an asset holder, and is recorded with the same weight as the incriminating findings.
- 06

Three of the association lines submitted do not survive verification: the Machado chain has two broken links and a timeline incompatibility; the alleged kinship is unproven and yields no indication; and a third person has no declared nexus.

07 **The evidentiary weight of this case lies not in the associations but in the accounting and financial records. The file has accumulated names around its perimeter while the four questions that settle it — MCN’s accounting, the source of the Delaware vehicle’s funds, ownership of the Key Biscayne cluster and the tax cross-check of the offshore layer — remain unrequested.**

DOCUMENTARY SOURCES	EXTERNAL VERIFICATION	OFFSHORE LAYER
Subject’s corporate record · corporate link graph · corpus of 34,688 traffic records · FARA filings for the lobbying contract	CICIG · Public Prosecutor · Judiciary · DOJ / FARA · Florida and Delaware corporate registries · Panama Public Registry	ICIJ Offshore Leaks Database · Panama Papers · Pandora Papers · Guatemalan investigative press