

**To:** Riksenheten mot corruption  
Swedish Prosecution Authority  
Sweden

**From:** Camilo Enciso

**Subject:** Request for Preliminary Investigation Regarding Alleged Foreign Bribery in  
Swedish Defence Exports to Colombia

**Date:** 18 November 2025

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## **I. Introduction**

I respectfully submit this request to the Swedish National Anti-Corruption Unit for the initiation of a preliminary investigation into alleged offences under Chapter 10 of the Swedish Penal Code, relating to foreign bribery, in connection with transactions involving Swedish defence exports to the Republic of Colombia, and alleged associated benefits conferred upon persons closely connected to high-level Colombian public office.

The request is prompted by publicly reported allegations: first, concerning the sale of military aircraft involving Swedish interests; and second, concerning the alleged provision of lavish benefits or exertion of improper influence involving the Colombian First Lady, who has been recently included in the OFAC list by the United States Treasury, and persons connected to high-level Colombian government officials.

These circumstances raise reasonable grounds for suspicion that improper advantages may have been offered or provided to foreign public officials (or persons closely related to them) for the purpose of influencing a procurement decision.

Given that Sweden has ratified the OECD Anti-Bribery Convention and incorporates foreign bribery offences into its penal law, I ask your office to assess whether investigative steps are warranted.

## **II. Statement of Facts**

Based on publicly reported information from [Semana](#), 2023 (Colombia) and [Expressen](#), 2025 (Sweden), the alleged facts relevant to a possible foreign bribery scheme include:

### **1. Alleged Bribe Offer Directly Connected to the Acquisition of Military Aircraft**

- Former Deputy Minister of Defense Ricardo Díaz stated in 2023 that he was offered COP 700 million to secure the purchase of three military helicopters offered to Colombia by a non-determined foreign country.

- According to Mr. Díaz, this offer occurred in early September 2022, precisely during the period when the Colombian Government was evaluating aircraft procurement options.
- The alleged intermediaries included a retired Colombian Army colonel (Eduardo Mejía), who, according to Díaz, conveyed that he was working with Camilo and Ángela Benedetti, siblings of Armando Benedetti, the current Minister of Interior of Colombia. Both Camilo and Angela are individuals with political connections and influence in high-level government circles.
- Semana reports that both the retired colonel and a presidential advisor (Juan Fernández) told Mr. Díaz that First Lady Verónica Alcocer had a “special interest” in the acquisition of three helicopters at the time.
- Her alleged interest was reportedly mentioned as a way to legitimize or increase pressure on the Deputy Minister to authorize the purchase.
- Semana describes a long-standing ecosystem of aviation companies benefiting from inflated maintenance costs, flight-hour manipulations, and procurement decisions favoring specific suppliers.
- These companies allegedly maintain connections with powerful political families and retired military generals (*e.g.*, *Mario Montoya*, *Javier Rey*), many of whom are reportedly close to the Benedetti network—also mentioned as intermediaries in the helicopter proposal.
- According to Swedish media reporting by Expressen, Verónica Alcocer is residing as of 2025 in a luxury apartment in central Stockholm, Sweden, and has been participating in high-end social activities in Stockholm’s Stureplan district—frequenting exclusive clubs and mingling with wealthy Swedish individuals. [Omni+3Expressen+3Diario del Sur+3](#)
- The same reporting notes that Ms. Alcocer told a Swedish journalist in the summer of 2024 that she preferred Sweden because she found it “calmer” and with “more order and control” than Colombia. [Omni+1](#)
- Meanwhile, on 15 November 2025, President Gustavo Petro publicly announced that Colombia had signed a contract with the Swedish defence manufacturer SAAB for the purchase of 17 Gripen jets from Sweden. [Al Jazeera+2Shephard Media+2](#)
- Earlier in 2025 (April), Colombia had publicly stated its selection of the Swedish company (among competitors) for the fighter-jet deal. [Reuters+1](#)
- The temporal and geographic overlap is as follows: Ms. Alcocer’s extended presence in Stockholm and her high-luxury lifestyle in Sweden coincide with – or precede – the public closing of the Swedish aircraft deal between Colombia and SAAB. The convergence of (i) a

Swedish-origin high-value defence procurement, (ii) a politically exposed person (the First Lady) with a Sweden-residence nexus, and (iii) unexplained lavish expenditures in Sweden creates a plausible link that benefits may have been channeled through Sweden or Swedish-based intermediaries in connection with the aircraft transaction.

- The combination of these facts strengthens a *correlation* (though not proof) between Ms. Alcocer's stay in Sweden, her high-luxury lifestyle there, and the concluding of a major Swedish-origin defence contract. This correlation merits further scrutiny: in particular whether (a) any funds or benefits flowed into or out of Sweden; (b) any Swedish individuals or companies provided services, hospitality, accommodation or gifts to Ms. Alcocer or her close associates; (c) whether those benefits were provided contemporaneously with key decisions in the procurement process; (d) whether any intermediaries facilitated advantageous conditions for SAAB or Swedish parties via Ms. Alcocer or her social circle.
- This raises the possibility that benefits (or part of them) connected to the alleged improper influence could have been channeled through Sweden, either via accommodation, gifts, hospitality, or financial flows from Swedish intermediaries.

All the above creates a direct Swedish nexus: any benefit provided from Sweden to the First Lady, while she was allegedly being invoked to influence the helicopter purchase, falls squarely within Sweden's foreign bribery jurisdiction.

## **2. Potential Influence Through Social and Economic Elites in Sweden**

Expressen's reporting suggests:

- Ms. Alcocer has access to individuals in Sweden who are themselves connected to international business environments.
- The article notes that she and her husband may also be of interest to U.S. authorities (linked to actions under the OFAC list), heightening the importance of legitimate financial flows and compliance scrutiny.

If any of the Swedish individuals in her social circle provided benefits to her with an understanding—explicit or implicit—that her proximity to the President of Colombia could advantage a defense transaction, this would constitute foreign bribery under Swedish law.

## **III. Applicable Law**

As previously stated:

### **1. Swedish Penal Code (Brottsbalken) – Chapter 10**

- Section 5a: Giving a bribe, including offering or promising an improper benefit to influence performance of duties.
- Section 5b: Aggravated bribery: high value, procurement context, abuse of public office.
- Swedish law covers both domestic and foreign public officials, treating bribery of foreign public officials as equivalent.

## **2. Corporate Liability**

- Under Chapter 36, Swedish companies and legal entities may incur fines for failing to prevent bribery.

## **3. OECD Anti-Bribery Convention**

- Article 1: The bribery of a foreign public official shall be an offence.
- Article 3: Each Party shall take all measures to establish jurisdiction over such offences.
- Article 5: Each Party shall ensure effective investigations and prosecutions.
- Article 9: Parties shall afford one another prompt and effective mutual legal assistance and cooperate extensively in investigations.

Given these rules, Sweden has the obligation to investigate where there is suspicion of bribery of a foreign public official, especially when its nationals, residents, or companies may be involved, or there is another Swedish nexus.

## **IV. Legal Argument for Investigation**

The facts presented above, together with the applicable Swedish law and Sweden’s binding commitments under the OECD Anti-Bribery Convention, establish more than sufficient grounds for the initiation of a preliminary investigation. The following considerations are most relevant:

### **1. The “Reasonable Suspicion” Threshold Under Swedish Law Is Met**

Under Swedish procedural law, only a reasonable basis to suspect that an offence may have occurred—is required to open a preliminary investigation. This threshold is clearly met, as:

- There is clear circumstantial evidence that suggest that specific and quantifiable improper advantages were offered to Colombian public officials.
- Publicly available information indicates the potential involvement of the First Lady of Colombia.

No conclusive evidence of guilt is required at this stage—only reasonable grounds to believe that improper influence may have occurred.

### **2. The First Lady of Colombia Qualifies as a “Foreign Public Official” Under Swedish Law**

Chapter 10 of the Swedish Penal Code treats as a public official not only those who formally exercise public authority, but also individuals who, due to their position, may influence a public decision-making process.

The allegations establish that:

- The First Lady’s “interest” in aircraft procurement dealings was allegedly invoked to pressure a Deputy Minister; and
- The First Lady’s extended presence in Sweden coincided with the decisive phase of Sweden’s largest defence sale to Colombia in decades.

Her proximity to the President—who ultimately authorizes high-level defence procurements—brings her squarely within the scope of the “foreign public official” definition for purposes of Swedish bribery law.

### **3. Defence Procurement Is a Recognized High-Risk Sector for Foreign Bribery**

The OECD Working Group on Bribery and the UN Office on Drugs and Crime consistently identify military aircraft procurement as among the highest-risk sectors for corruption, due to:

- Reliance on brokers or unofficial intermediaries;
- Enormous contract values;
- Limited transparency;
- Political involvement at the highest levels; and
- Vulnerability of procurement officials to personal, political, or financial pressure.

Here, the factual pattern includes **each** of these classic OECD red flags.

### **4. A Swedish Nexus Exists Through Residence, Benefit Location, and Transaction Origin**

The allegations describe:

- The residence of a foreign public official (the First Lady) in Stockholm;
- Luxury accommodation and hospitality received in Sweden;
- The closing of a major Swedish-origin defence export contemporaneously with her stay; and
- A plausible link between Swedish intermediaries or Swedish-based social circles and the benefits received.

Under Swedish law, it is sufficient that any part of the benefit, facilitation, or improper advantage was provided from Swedish territory, by a Swedish person, or through Swedish financial or commercial structures.

The First Lady’s presence in Sweden while being invoked in procurement discussions in Colombia and her inclusion by the US Government in the OFAC list strengthens the reasonable suspicion

shared by the media and civil society organizations that improper benefits may have been provided—partly or wholly—during her stay in Sweden.

#### **5. Sweden’s Obligations Under the OECD Anti-Bribery Convention Require Investigation**

Articles 1, 3, 5, and 9 of the OECD Anti-Bribery Convention obligate Sweden to:

- Criminalize bribery of foreign public officials;
- Investigate and prosecute such cases effectively, without regard to national economic interest or political considerations;
- Establish jurisdiction wherever Swedish nationals or companies may be involved; and
- Cooperate with foreign authorities in cross-border bribery cases.

Given the direct involvement of a Swedish defence manufacturer (SAAB) in a multi-billion-dollar contract, Sweden has an international duty—not merely discretion—to examine whether intermediaries, consultants, social contacts, or other actors operating from Swedish territory played any role in providing improper benefits.

#### **6. Immediate Investigation Is Necessary to Preserve Evidence**

The Swedish nexus involves:

- Potential financial transfers within Sweden;
- Hospitality or accommodation benefits provided in Sweden;
- Swedish intermediaries or social contacts; and
- Procurement communications involving Swedish or Sweden-based actors.

Such evidence is perishable. Delay could result in the loss of:

- Financial transaction records;
- Hotel or rental payment documents;
- Restaurant, club, or hospitality logs;
- Electronic communications; or
- Witness recollections.

Under Swedish law and OECD guidance, initiating a preliminary investigation is necessary to prevent evidence destruction and ensure accountability.

Based on the allegations, the applicable law, and Sweden’s obligations as an OECD Convention Party, the initiation of a preliminary investigation is fully justified, required by international standards, and essential to safeguarding the integrity of Swedish defence exports.

### **V. Request**

Accordingly, I respectfully request that the Swedish National Anti-Corruption Unit:

1. Initiate a **preliminary investigation** to assess whether persons or entities within Swedish jurisdiction (citizens, residents, companies) may have provided, offered or facilitated the offering of improper advantages to foreign public officials in Colombia in connection with defence-procurement transactions.
2. Seek to identify any Swedish exporters, agents, intermediaries or financial intermediaries who may have been party to the transaction or to the alleged benefits to the Colombian First Lady and/or other persons.
3. Collect and preserve documents, communications, financial flows and other evidence related to the procurement and investigate whether any part of that involved Swedish origin goods or services, Swedish financing, or Swedish intermediaries.
4. Cooperate with Colombian and other foreign authorities, as needed under Article 9 of the OECD Convention, to obtain mutual legal assistance, joint investigation, or exchange of information, given the international dimension of the alleged wrongdoing.
5. Ensure that the investigation is **independent** and free from political or economic influence, as required by the OECD Convention and Swedish law.

## VI. Closing

The gravitas of the defence-procurement sector and the public trust implications of allegations involving a First Lady, senior military officers, and high-value aircraft acquisitions make this matter highly significant. For Sweden to maintain its reputation for integrity in international business and to fulfil its obligations under international law, a prompt and diligent assessment is warranted.

I stand ready to provide any additional detail or assist in identifying relevant Swedish persons or companies, if required.

**Respectfully submitted,**



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