

AO 91
Rev. 11/82

CRIMINAL COMPLAINT

United States District Court	DISTRICT SOUTHERN DISTRICT OF FLORIDA
UNITED STATES OF AMERICA SALVADOR LACAYO, JUAN ^V JOSE CACERES, DORA ILEANA CASTRO de CACERES, MACK LEWIS CARR, ROBERT ANTHONY GERALD, JENNIFER BROWN, JORGE ALFREDO SANTIAGO CASTRO and CLIFFORD RENE BIBBS	DOCKET NO. MAGISTRATE'S CASE NO. 83-7403-PLN

Complaint for violation of Title 18 United States Code § 2; 1201(c)

NAME OF JUDGE OR MAGISTRATE HONORABLE PETER NIMKOFF	OFFICIAL TITLE U.S. MAGISTRATE	LOCATION SOUTHERN DISTRICT OF FLORIDA MIAMI, FLORIDA
DATE OF OFFENSE 7-11-83 through 7-14-83	PLACE OF OFFENSE SOUTHERN DISTRICT OF FLORIDA	
ADDRESS OF ACCUSED (If known)		

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:
 From on or about July 11, 1983, and continuing until on or about July 14, 1983, in the Southern District of Florida and elsewhere, the defendants, SALVADOR LACAYO, JUAN JOSE CACERES, DORA ILEANA CASTRO de CACERES, MACK LEWIS CARR, ROBERT ANTHONY GERALD, JENNIFER BROWN, JORGE ALFREDO SANTIAGO CASTRO and CLIFFORD RENE BIBBS did knowingly and intentionally conspire with each other and with others as yet unknown, to commit an offense against the United States, that is, to violate Title 18, United States Code, Section 1201(a). It was the purpose and object of this conspiracy to unlawfully seize, confine, kidnap, abduct, carry away, hold for ransom, and willfully transport in interstate commerce a foreign official as defined in Title 18, United States Code, Section 1116, CLELIA ELEANOR SOL de QUINONEZ, in violation of Title 18, United States Code, Sections 1201(a)(1)(2); all in violation of Title 18, United States Code, Sections 2 and 1201(c).

BASIS OF COMPLAINANTS CHARGE AGAINST THE ACCUSED:
 (See attached affidavit)

MATERIAL WITNESSES IN RELATION TO THIS CHARGE:

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.

	SIGNATURE OF COMPLAINANT (official title) <i>Terry L. Nelson</i>
	OFFICIAL TITLE Terry L. Nelson Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

SIGNATURE OF MAGISTRATE(1) <i>Peter Nimkoff</i>	DATE July 15, 1983 6:10 p.m.
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1) See Federal Rules of Criminal Procedure rules 3 and 54.
July 15, 1983

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

FERRY L. NELSON, being duly sworn, deposes and says:

1. I am a Special Agent for the Federal Bureau of Investigations assigned to the Miami, Florida Field Office. I have been a Special Agent of the Federal Bureau of Investigations for approximately fourteen (14) years. I have been assigned as lead case agent to the investigation of the kidnapping of Clelia Eleanor Sol de Quinonez and the related extortion of her husband ROBERTO QUINONEZ.

2. As a result of my personal investigation in this matter and information furnished directly to me by other Special Agents of the Federal Bureau of Investigations and citizens, I have probable cause to believe that SALVADOR LACAYO, JUAN JOSE CACERES, DORA ILEANA CACERES, MACK LEWIS CARR, ROBERT ANTHONY GERALD, JENNIFER BROWN, CLIFFORD RENE BIBBS, and JORGE ALFREDO SANTIAGO CASTRO and others have committed an offense against the United States by conspiring to unlawfully abduct, kidnap and hold for ransom, Clelia Eleanor Sol de Quinonez, the wife of Roberto Quinonez, who served as Ambassador to the United States from El Salvador, in violation of Title 18, United States Code, Section 1201(c).

3. On July 8, 1983, Clelia Eleanor Sol de Quinonez was forcibly abducted from the area in front of her residence in Dade County, Florida. At approximately 4:55 p.m. that day, JUAN JOSE CACERES telephoned Roberto Quinonez and told Mr. Quinonez "We have your wife" and demanded a ransom ("war tax") of \$1.5 million

...ars in United States currency in small bills. CACERES further stated the money would have to be taken to El Salvador, Central America, by Francisco Quinonez, the cousin of Mr. Quinonez. The victim's husband told CACERES he would not be able to raise such a large amount of money on short notice, to which CACERES replied "You have a rich uncle and rich family. And besides, that is your problem."

4. On July 10, 1983, JUAN JOSE CACERES again telephoned Roberto Quinonez several times and again demanded of \$1.5 million dollars in United States currency for the safe return of his wife.

5. On July 11, 1983, JUAN JOSE CACERES was observed by agents of the Federal Bureau of Investigation (FBI) using two (2) pay telephones at times which coincided with calls to the residence of Roberto Quinonez. In the conversations with Mr. Quinonez, CACERES asked if he had come up with the ransom demand and made the arrangements for transporting the money. At this time, Mr. Quinonez demanded to know if the victim was still alive, and told CACERES to give him the answers to personal questions which only the victim would know. In a later call, CACERES gave Quinonez the correct answers to the personal questions. CACERES ended the conversation telling Quinonez that he would call him again at 8:00 p.m. that evening.

6. On July 11, 1983, CACERES was observed by agents of the FBI at Westland Mall in Hialeah. At this time, CACERES met with SALVADOR LACAYO, who was seen driving an automobile whose registered owner was ^{listed at} Apt. 212, 8550 S.W. 109th Ave., Miami,

Florida. CACERES was subsequently observed travelling to and from that address and using the apartment as his residence. Surveillance was initiated on LACAYO after his meeting with CACERES at Westland Mall.

7. At approximately 8:30 p.m., on July 11, 1983, CACERES telephoned Roberto Quinonez and gave Quinonez instructions on packaging of the ransom money, and told him that further instructions would be received upon the arrival of the money at Miami International Airport. Mr. Quinonez asked for additional time, because he was having difficulty raising the ransom. CACERES replied that Quinonez should sell some of his businesses holdings. When Quinonez requested a recent Polaroid photograph of his wife to prove she was still alive, CACERES stated such would take time because he would have to call a foreign country. CACERES told Quinonez the arrangements would conclude the next day, and he would again call at 4:00 p.m., July 12, 1983.

8. At 10:30 p.m., CACERES called his home in Virginia and talked with a female. CACERES said that they have mixed themselves up in this and that he hoped it would "all be over by Wednesday", and instructed her to place another license plate on the car and fill it up with gas.

9. On July 11, 1983, SALVADOR LACAYO telephoned CACERES at apartment #212, 8550 S.W. 109th Ave., Miami, Florida. They discussed their concerns about vehicles which CACERES had observed following him that day.

10. On July 11, 1983, JUAN CACERES called his home in Alexandria, Virginia and spoke to DORA ILEANA CASTRO de CACERES,

s wife. They discussed how things were going with Salvador Lacayo. DORA CACERES stated that "they are not going to control that thing! Understand me?" JUAN CACERES told her that it looked like he (JUAN CACERES) didn't have the "stomach" for it and DORA CACERES told him "don't worry". They discussed the timing of the payment of the money.

11. On a subsequent conversation, DORA CACERES told her husband JUAN CACERES, "what I'm only interested in is getting the girl out of here.

12. On July 12, 1983, SALVADOR LACAYO was observed departing his residence. LACAYO drove his vehicle in such a manner as to observe and defeat surveillance. He drove at an extremely slow speed on the highway; stopped, exited, and immediately re-entered the highway repeatedly, and for extended periods of time looked to see if anyone was following his vehicle. LACAYO eventually arrived and entered 7601 West Flagler Street, Miami, Florida.

13. On July 12, 1983, CACERES telephoned Washington, D.C. and told "Craig" that he needed to know when he will receive "the picture of the duchess." In a second call to "Craig" both men discussed the amount of ransom to be paid for return of the victim. CACERES told "Craig" that he would be talking with Quinonez and that he needed to prove the victim was still alive by providing answers to personal questions from her husband. "Craig" told CACERES "We did our job and we are expecting you to do yours." CACERES responded he "was doing his job" but there

re "special regulations with banks" and "Craig" must be patient, because they "have been waiting for this for two years."

14. On July 12, 1983, CACERES telephoned LACAYO at 7601 West Flagler Street, Miami, Florida. LACAYO told CACERES that he had received information by way of a telex message sent from El Salvador that CACERES was being followed by the authorities.

15. On July 12, 1983, CACERES placed a series of four (4) telephone calls from pay telephones at times which coincided to calls received at the residence of Roberto Quinonez. CACERES told Quinonez that he would be leaving Miami shortly, and that Quinonez had been foolish for bringing the police into the kidnap. He further told Quinonez that he had until 10:00 a.m., July 14, 1983, to come up with the ransom, and that from then on Quinonez would be dealing with someone known as "Commander Jose."

16. On July 12, 1983, Special Agents of the FBI, Miami Division notified agents of the Washington Field Office that a public telephone numbered (202) 745-9713 was called by CACERES from the Miami area. Agents of the FBI set up round-the-clock surveillance of coin operated telephone numbered 745-9713 located at 1451 Belmont St., N.W., Washington, D.C., outside the Pitts Motor Motel.

17. On July 12, 1983, CACERES telephoned (202) 462-6710 from Miami, Florida, and spoke with an individual named CLIFF. CLIFF told CACERES that this had been hard on him. CACERAS responded saying that he would call GREG and not to worry. The affiant has cause to believe that CLIFF is CLIFFORD BIBBS and GREG is CRAIG BLAS. He knows this from the totality of the

investigation and listening to several telephone calls. Furthermore, investigation by the FBI revealed that CLIFFORD BIBBS resides at 1303 Euclid St., N.W., Washington, D.C.

18. On July 12, 1983, JUAN JOSE CACERES was observed to leave Miami, Florida, and fly to Washington National Airport aboard a commercial airline from Miami International Airport.

19. On July 13, 1983, CACERES telephoned LACAYO and expressed concern over the delay in the payoff. LACAYO told CACERES that he would handle the ransom negotiations, and the manner and timing of the payoff. LACAYO suggested that the two men then speak in code. The two men then discussed how the victim could only be "maintained" through July 17, 1983.

20. On July 13, 1983, Special Agent Charles McCabe observed JORGE ALFREDO SANTIAGO CASTRO driving around the neighborhood of 5631 Derby Court, Alexandria, Virginia. In McCabe's professional opinion as a longtime FBI agent, CASTRO was performing counter-surveillance techniques as if he were attempting to determine if anyone was conducting surveillance of him or of 5631 Derby Court.

21. On July 13, 1983, DORA CACERES called JORGE ALFREDO SANTIAGO CASTRO in Alexandria, Virginia, and CASTRO asked her what was going on. She told him she couldn't talk over the line because it "was controlled."

22. On July 13, 1983, JORGE ALFREDO SANTIAGO CASTRO was telephoned in Alexandria, Virginia, by DORA CACERES wherein she told him "If CRAIG calls again, tell him to be at that number at

...e o'clock." At 10:50 a.m., CRAIG called and CASTRO told BLASS
"He's going to call you at that number at one o'clock." At 10:51
a.m., CASTRO telephoned DORA CACERES and told her that CRAIG had
called that CASTRO had told her about that number and that JUAN
would call. At 12:58 p.m., JUAN CACERES called BLASS and
discussed with BLASS when they expected to receive the ransom
money. BLASS told CACERES that he was only going to hold on to
this until Sunday and that he would "YO TIRO" which translates
literally from Spanish as "I shoot."

23. On July 13, 1983, at 4:24 p.m., CASTRO called DORA
CACERES and told her that her husband, JUAN CACERES was upset and
had been crying. On 4:49 p.m., CASTRO called DORA CACERES again
and told her that JUAN CACERES was all nervous and wanted to
leave immediately. He asked her what was going to happen to him
(CASTRO). She replied that she could not worry about everybody
right now.

24. On July 14, 1983, CASTRO had several conversations with
DORA CACERES and DORA CACERES' brother about obtaining money for
airplane tickets and leaving with DORA CACERES on July 15, 1983
by air. Also on that day, CASTRO conducted numerous telephone
conversations concerning the sale of his motorcycle.

25. On July 13, 1983, at approximately 8 o'clock p.m., FBI
agents observed JUAN and DORA CACERES leave their home at 5631
Derby Court, and drive a circuited route to northern Virginia for
15 to 20 minutes. Then the CACERES' drove to the inner harbor of
Baltimore, Maryland, There they were observed to go to a pay
telephone. She pulled a piece of paper from her purse, held it

nder a light apparently for JUAN to read. JUAN appeared to read from the paper and immediately made a brief telephone call. They walked around the inner harbor for a few minutes and then drove out of Baltimore on I-95 south. There they stopped at another pay telephone where FBI agents observed them to make a brief telephone call. Then they drove back to their residence at 5631 Derby Court.

26. On July 13, 1983, at 10:20 a.m., DORA cautioned CASTRO in a telephone conversation to not use the CACERES station wagon because her husband "is expecting the same thing here as there." A station wagon has been identified by the FBI as the vehicle by which the victim was transported from Florida to the District of Columbia.

27. On July 14, 1983, at 3:55 p.m., DORA had a telephone conversation with JUAN and CASTRO and JUAN told her to pay for airline tickets with her credit card.

28. On July 15, 1983, CASTRO was arrested by FBI agents as he attempted to leave 5631 Derby Court, Alexandria, Virginia, with JUAN JOSE CACERES and DORA CACERES.

29. On July 14, 1983, CLIFFORD BIBBS was observed by surveillance conducted by the FBI in the vicinity of 2327-15th St., N.W., Washington, D.C.

30. On July 13, 1983, at approximately 12:52 p.m., CACERES placed a telephone call to the telephone outside the Pitts Motor Hotel which was at that time under observation by Special Agents of the FBI and an individual later identified as CRAIG BLASS, also known as GREG, answered the telephone and carried on a

conversation. Following the conversation agents of the FBI followed BLASS to 2327-15th St., N.W., where he entered by using a security locked device. BLASS was "buzzed in" by a Black female, who appeared to be his companion.

31. The telephone credit card records of JUAN JOSE CACERES show that on June 28, 1983, there was a long distance call made that was charged on CACERES' credit card to telephone numbered (202)462-6710. This telephone number is listed to be the home of CLIFFORD BIBBS at 1303 Euclid Street, N.W.

32. On July 14, 1983, Roberto Quinonez, after being contacted again by the kidnapers demanded to hear the voice of his wife before he would pay the demanded ransom. During the evening hours on July 14, 1983, at approximately 10:00 p.m., Special Agents of the FBI on surveillance in the vicinity of 2327 15th St., N.W., and 1451 Belmont St., N.W., observed Mrs. Quinonez in the company of two males, later identified as CRAIG J. BLAS and ROBERT A. GERALD and a Black female later as JENNIFER BROWN. These individuals were standing at the coin operated telephone outside the Pitts Motor Hotel.

33. At that time, Special Agents of the FBI swiftly moved in and rescued Mrs. Quinonez from her captors. The agents placed ROBERT A. GERALD and CRAIG J. BLASS under arrest and JENNIFER BROWN fled the scene. Mrs. Quinonez positively identified ROBERT A. GERALD, CRAIG J. BLASS and JENNIFER BROWN as individuals who held her captive at 2327-15th St., N.W. Mrs. Quinonez further stated that there was one individual left at the apartment when she was taken out to make the telephone call. Mrs. Quinonez

stated she was taken captive by four males in Miami and transported by car to the District of Columbia where she was held against her will at 2327-15th Street.

34. Immediately following the freeing of Mrs. Quinonez agents of the FBI went to 2327-15th St., N.W., Apt. 31 and placed MACK L. CARR under arrest.

35. Mrs. Quinonez related to the affiant that she was kidnapped in Miami, Florida, driven to the District of Columbia by four males who took her to the apartment that she had left immediately prior to her liberation by the FBI. She stated that the same four individuals who took her in Miami, Florida, held her captive here in the District of Columbia. She also stated that a Black female came to the apartment after she was there and also tended her while she was held captive in the apartment.

36. JENNIFER BROWN turned herself in to members of the Metropolitan Police Department and then was subsequently taken into custody by the FBI.

37. After the arrest each defendant was advised of his constitutional rights and told the agents of the FBI as follows:

1. JENNIFER BROWN stated that she returned from vacation and told by MACK CARR that they had a woman in the backroom that they had kidnapped. JENNIFER BROWN stayed in the apartment for the remainder of the week helping to take care of Mrs. Quinonez.

2. CLIFFORD BIBBS stated that on July 8, 1983, "I helped kidnap Clelia Eleanor Quinonez. After she was kidnapped I took her Mercedes automobile, and drove it a couple of blocks away

from her home. Afterwards, I travelled back to Washington, D.C. and arrived in Washington, D.C. on Sunday, July 10th.

3. MACK L. CARR stated that on Friday, July 8, 1983, at about 2:30 a.m., he got into the bushes by the lady's house in Miami, Florida. After about 2 or 3 hours in the bushes the lady drove into her driveway in her Mercedes about 5:30 p.m. He stayed in the bushes watching until the lady was kidnapped. He then got in the back seat with the lady and rode about a block away. He and another individual tied the lady up with a rope in the bushes about a block from the house and then got in a green stationwagon which he came to Florida with along with others. They proceeded with others in the green stationwagon north on I-95 all the way.

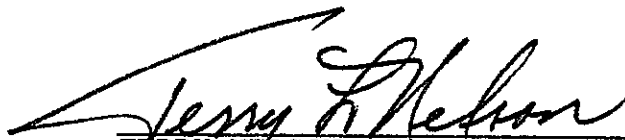
4. ROBERT A. GERALD stated that approximately on Friday, July 8, 1983, I was put in the bushes at a location in Miami, Florida, and a Mercedes Benz drove up with a lady lying on the back of a stationwagon and drove off. I rode up Route 95 to Washington, D.C., the stationwagon windows were all spray painted black except the windshield and front passenger windows. I gave her something to drink and have her nose drops a couple times on the way to Washington. I helped untie the lady and take her into Apt. 31 where she was put in the back bedroom and I was told to stay with the lady.

38. Special Agent Frank Waikart, III, of the Federal Bureau of Investigations has advised that JENNIFER BROWN is a resident of 2327-15th St., N.W., Washington, D.C., and is the girlfriend of defendant MACK LEWIS CARR, arrested July 14, 1983. BROWN

returned to her apartment while it was used to conceal the victim, and had several conversations with the victim while being held in her apartment, and then fled from agents of the Federal Bureau of Investigations at the time her boyfriend, defendant CARR, was taken into custody.

39. MACK LEWIS CARR was interviewed by agents of the FBI on July 15, 1983, and gave a signed statement admitting participation in a kidnapping of a woman from her home in Miami, Florida, on July 8, 1983, in that he transported the victim to the apartment of defendant JENNIFER BROWN in Washington, D.C., for approximately \$75,000.

40. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of knowledge.


TERRY NELSON, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to before me, and subscribed this 15th day of July,
1983. 6:10 p.m.


UNITED STATES MAGISTRATE