UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

NO 83-628 -Cr-JLK

M/S Imprisonment for life

18 USC §1201(a)

M/S Imprisonment for life

18 USC §1952

M/S \$10,000 - 5 years

18 USC §875(a)

M/S \$5,000 - 20 years

18 USC §3

M/S \$5,000 - 2½ years By\_\_\_

'83 JUL 22 PH 4 43

UNITED STATES OF AMERICA

VS.

R. ANTHONY GERALD JENNIFER BROWN INDICTMENT



# COUNT I

From approximately May, 1983, through July 15, 1983 in the Southern District of Florida and elsewhere, the defendants,

JUAN JOSE CACERES

a/k/a "Julio"

a/k/a "Comandante Jose"

DORA CASTRO de CACERES

a/k/a "Trina"

G. SALVADOR LACAYO, JR.

CLIFFORD R. BIBBS

MACK L. CARR

R. ANTHONY GERALD

JENNIFER BROWN

knowingly and willfully did combine, conspire, agree and reach a tacit understanding with each other, and with other persons known



and unknown to the grand jury to knowingly and willfully seize, abduct, kidnap, confine, carry away and hold for ransom and otherwise, Clelia Sol de Quinonez, a family member of Roberto Quinonez-Meza, a foreign official, who previously served as Ambassador to the United States from El Salvador, and willfully transported her in interstate commerce, in violation of Title 18, U.S.C. Section 1201(a).

### OVERT ACTS

In furtherance of the conspiracy and to effect its objects, the co-conspirators performed at least one of the following overt acts:

- 1. On or about May 15, 1983 Juan Jose Caceres met with and offered Craig Blas \$10,000 for assistance and for efforts in recruiting other people for a "job."
- 2. On or about July 3, 1983 Juan Jose Caceres, Craig Blas, Clifford R. Bibbs, Mack L. Carr and R. Anthony Gerald travelled from Washington, D. C. to Florida.
- 3. On or about July 8, 1983, Juan Jose Caceres, Craig Blas, Clifford R. Bibbs, Mack L. Carr, and R. Anthony Gerald met at a playground in Dade County, Florida to discuss the plan to kidnap Clelia Sol de Quinonez.
- 4. On July 8, 1983 Craig Blas, Clifford R. Bibbs, and Mack L. Carr abducted Clelia Sol de Quinonez in Dade County, Florida.
- 5. On July 8, 1983, following the abduction, Craig Blas, Clifford R. Bibbs, Mack L. Carr and R. Anthony Gerald met with Juan Jose Caceres in Dade County, Florida.

- ...

- 6. On or about July 8, 1983, Craig Blas, Clifford R. Bibbs; Mack L. Carr and R. Anthony Gerald transported Clelia Sol de Quinonez to Washington, D. C. from Florida.
- 7. On July 8, 1983 Juan J. Caceres told Roberto Quinonez-Meza that Clelia Sol de Guinonez was kidnapped and Caceres demanded a ransom of \$1.5 million dollars for her safe return.
- 8. On July 11, 1983, Juan Jose Caceres telephoned Dora Castro de Caceres in Alexandria, Virginia, and discussed the progress of the kidnapping of Clelia Sol de Quinonez.
- 9. On July 12, 1983 Juan Jose Caceres telephoned Dora Castro de Caceres in Washington, D. C. to arrange for his return to Alexandria, Virginia.
- 10. On July 12, 1983, Juan Jose Caceres telephoned Clifford R. Bibbs from Florida to Washington, D. C. concerning Clelia Sol de Quinonez.
- 11. On July 12, 1983, Juan Jose Caceres travelled from Florida to Virginia.
- 12. On July 13, 1983 G. Salvador Lacayo, Jr. spoke with Juan Jose Caceres and Lacayo agreed to handle the ransom negotiations and the arrangements for the ransom payment.
- 13. On July 13, 1983, Juan Jose Caceres called Craig Blas and discussed the progress of the kidnapping and ransom demand for Clelia Sol de Quinonez.
- 14. On July 13, 1983, Juan Jose Caceres and Dora Castro de Caceres telephoned Roberto Quinonez-Meza from Maryland to Florida and repeated the demand for ransom for the safe return of Clelia Sol de Ouinonez.

- On July 14, 1983 Craig Blas telephoned Roberto Cuinonez-Meza from Washington, D. C. to Florida and demanded a ransom for the safe return of Clelia Sol de Quinonez.
- 16. From July 10, 1983 through July 14, 1983 Jennifer Brown assisted in concealing, calming and guarding Clelia Sol de Quinonez in her apartment at 2327 15th St. N.W., Washington, D.C.
- 17. From July 8, 1983 through July 14, 1983, Craig Blas, Clifford R. Bibbs, Mack L. Carr, R. Anthony Gerald, and Jennifer Brown held Clelia Sol de Quinonez captive at 2327 15th St. N.W., Washington, D. C.

All in violation of Title 18, U.S.C. §1201(c).

#### COUNT II

From July 8, 1983 through July 14, 1983 in the Southern District of Florida and elsewhere, the defendants,

JUAN JOSE CACERES

a/k/a "Julio"

a/k/a "Comandante Jose"

DORA CASTRO de CACERES

a/k/a "Trina"

G. SALVADOR LACAYO, JR.

CLIFFORD R. BIBBS

MACK L. CARR

R. ANTHONY GERALD

JENNIFER BROWN

did knowingly and willfully seize, abduct, kidnap, confine, carry away and hold for ransom, and otherwise, Clelia Sol de Quinonez, a family member of Roberto Quinonez-Meza, a foreign official, who previously served as Ambassador to the United States from El Salvador, and willfully transported her in interstate commerce, all in violation of Title 18, U.S.C. Section 1201(a) and Section 2.

## COUNT III

On or about July 3, 1983, in the Southern District of Florida and elsewhere, the defendants,

JUAN JOSE CACERES

a/k/a "Julio"

a/k/a "Comandante Jose"

CLIFFORD R. BIBBS

MACK L. CARR

R. ANTHONY GERALD

did travel in interstate commerce from the Washington, D. C. metropolitan area to Florida with intent to carry on and facilitate a kidnapping and demand for ransom in violation of Title 18 U.S.C. Section 1201(a) and thereafter did attempt to extort from Roberto Quinonez-Meza a ransom for the safe return of Clelia Sol de Quinonez, all in violation of Title 18 U.S.C. Section 1952 and Section 2.

## COUNT IV

On or about July 8, 1983, in the Southern District of Florida and elsewhere, the defendants,

JUAN JOSE CACERES

a/k/a "Julio"

a/k/a "Comandante Jose"

CLIFFORD R. BIBBS

MACK L. CARR

R. ANTHONY GERALD

did travel in interstate commerce from Florida to Washington, D.C. with intent to carry on and facilitate a kidnapping and demand for ransom in violation of Title 18 U.S.C. Section 1201(a) and thereafter did attempt to extort from Roberto Quinonez-Meza a ransom for the safe return of Clelia Sol de Quinonez, all in violation of Title 18, U.S.C. Section 1952 and Section 2.

### COUNT V

On or about July 12, 1983, in the Southern District of Florida and elsewhere, the defendant,

JUAN JOSE CACERES
a/k/a "Julio"
a/k/a "Comandante Jose"

did travel in interstate commerce from Florida to Virginia with intent to carry on and facilitate a kidnapping and demand for ransom in violation of Title 18, U.S.C. Section 1201(a) and thereafter did attempt to extort from Roberto Quinonez-Meza a ransom for the safe return of Clelia Sol de Quinonez, all in violation of Title 18, U.S.C. Section 1952.

### COUNT VI

On or about July 13,1983, the defendants,

JUAN JOSE CACERES

a/k/a "Julio"

a/k/a "Commandante Jose" and

DORA CASTRO de CACERES

a/k/a "Trina"

knowingly and willfully caused to be transmitted in interstate commerce to the Southern District of Florida from Maryland a telephone communication to Roberto Quinonez-Meza demanding ransom for the safe return of Clelia Sol de Quinonez, who had been kidnapped, all in violation of Title 18, U.S.C. Section 875(a) and Section 2.

## COUNT VII

From on or about July 8, 1983 through July 14, 1983, the defendant,

#### JENNIFER BROWN

knowing that on or about July 8, 1983, Clifford R. Bibbs, Mack L. Carr and R. Anthony Gerald, and another, had travelled in

interstate commerce from Florida to Washington, D. C. with intent to carry on and facilitate a kidnapping and demand for ransom in violation of Title 18, U.S.C. Section 1201(a) and thereafter did attempt to extort from Roberto Quinonez-Meza a ransom for the safe return of Clelia Sol de Quinonez, did knowingly and willfully receive, conceal, comfort and assist them in order to hinder and prevent their apprehension for trial and punishment, all in violation of Title 18, U.S.C. Section 3.

A TRUE BILL

FOREPERSON

STANLEY MARCUS UNITED STATES ATTORNEY

GENATION HOST THAN

CHIEF ASSISTANT UNITED STATES ATTORNEY

FREDERICK MANN

ASSISTANT UNITED STATES ATTORNEY