

FEDERAL BUREAU OF INVESTIGATION
FREEDOM OF INFORMATION/PRIVACY ACTS SECTION
COVER SHEET

SUBJECT: Christic Institute

IN
 THE UNITED STATES DISTRICT COURT
 FOR THE
 SOUTHERN DISTRICT OF FLORIDA

86-1146 CV-KING

-----X
 TONY AVIRGAN, and
 MARTHA HONEY,

Plaintiffs.

v.

JOHN HULL,
 RENE CORBO,
 FELIPE VIDAL,
 MOISE (DAGABERTO) NUNEZ,
 FRANCISCO "PACO" CHAVEZ,
 RAMON CECELIO PALACIO,
 RICARDO GRIS,
 WILLIAM GRIS,
 ROGER LEE PALLAIS, (aka ROGER LEE WONG),
 AMAC GALIL (aka PER ANKER HANSEN),
 HECTOR CORNILLON,
 JORGE GONZALES,
 BRUCE JONES,
 ADOLFO CALERO,
 ALVARO CRUZ,
 FREDERICO SAENZ,
 ROBERT OWEN,
 TOM POSEY,
 ANDY MESSING,
 JOHN SINGLAUB,
 JAMES MCCOY,
 RONALD JOSEPH MARTIN, SR.,
 RAFAEL "CHICHI" QUINTERO,
 MARIO DELAMICO,
 TOM CLINES,
 TED SHACKLEY,
 RICHARD SECORD,
 ALBERT HAKIM,
 PABLO ESCOBAR, and
 JORGE OCHOA

Defendants.
 -----X

Civil Complaint
 No. _____

For

RICO Conspiracy Injuries
 Battery, Assault,
 Intentional Infliction
 of Mental Distress

and

Intentional Interference
 With the Business of the
 Plaintiffs

MANUEL

AA-DAGABERTO NUNEZ
 COST, FL 6-64

306 W 32nd St
 Miami, FL 33130

CIVIL COMPLAINT

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persons in any terrorist plans. His captors threaten to kill him if he does not write out this statement in his own handwriting. Carlos complies. He is then released -- being told that he will be approached again, within ten days, by his captors and taken to a public press conference where he will be required to publicly read his handwritten statement before television cameras.

Carlos, once freed, seeks out the Plaintiffs and asks for their help in escaping from the Defendants. The Plaintiffs arrange for security guards to live with Carlos and his family and after several weeks arrange for them to leave Costa Rica for the second time.

Agents of the Defendants, during this period of time, also make threatening telephone calls to the Plaintiffs TONY AVIRGAN and MARTHA HONEY - threatening to kill them if they do not stop their investigation of La Penca and of the information given to Carlos. A note stating this is also slipped under Carlos' front door.

In addition, the Plaintiffs are repeatedly followed by cars without license plates and with two-way radios and one of these cars stops in front of their house. One of the male occupants takes photos of the house. Several nights, cars without lights on park in front of their house. The Plaintiffs, in fear for their lives and those of their children, keep their children out of the country briefly, adopt strict security measures whenever leaving the house, and install expensive security systems in their house and office.

The Plaintiffs share their information with Associated Press

reporter ~~Brian Barger~~ and with ~~The Christic Institute~~, a Washington, D.C.-based public interest law firm, whom they ask for help.

During 1985, AP reporter Brian Barger, with his associate Bob Perry¹³, investigate the Plaintiffs' claims and begin to break a series of nationally-publicized stories linking the Defendants with illegal drug-smuggling and arms dealing.

The Plaintiffs' information is then communicated to United States Senator John Kerry¹³⁷ on the United States Senate Foreign Relations Committee. His staff investigates this information and substantiates the Plaintiffs' charges of gun-running and cocaine trafficking by the Defendants.

Attorney Daniel Sheehan, General Counsel for The Christic Institute, also investigates the charges of the Plaintiffs and, upon obtaining evidence adequate to convince him of the likelihood of the truth of these charges, agrees to represent the Plaintiffs in this Federal lawsuit.

Despite the efforts of David, Carlos and certain Costa Rican officials, the La Penca terrorist group is still very much at large. As such, it represents a danger not only to Eden Pastora and to those around him but it represents a danger to many innocent civilians -- as well as to efforts to bring peace and stability to Central America.

As a result of this conduct on the part of the Defendants and their agents, the Plaintiff TONY AVIRGAN has been seriously injured in his person and both he and Plaintiff MARTHA HONEY have been caused great mental distress and their practice of their profession has been intentionally interfered with by the Defendants.

nuestras necesidades legítimas de seguridad operacional
ser discutidas en más detalle en el futuro.

Con motivo al carácter secreto de la pos... revisión... entre
personas responsables de la Administración... Casac
exponerle lo siguiente: estoy dispuesto a aceptar dicha
entrevista en estricto secreto, deseo y deseo pruebas para todas
las partes interesadas que en esta entrevista también estén
presentes el Señor Subsecretario de Estado Elliott Abrams y
Alfredo Cesar. Considero necesario la existencia de un claro
entendimiento entre El Gobierno de los Estados Unidos y las
organizaciones del BOS y ARDE.

En cuanto a la preocupación concerniente de la posible conexión
entre los señores Jorge Morales, Gerardo Duran, y la organización
a la cual yo represento deseo establecer claramente que esta
relación no ha sido ni orgánica ni de tipo personal. Estos
individuos nunca han pertenecido a ARDE ni disfrutaron de una
amistad estrecha con mi persona. En el caso de Duran, este
individuo ha prestado servicios de piloto contratado en el pasado
tanto al ingeniero Alfonso Robelo como al Comandante Fernando
Chamorro así como a nosotros. Tan pronto llegaron a nuestro
conocimiento los rumores que el Señor Duran podía estar
relacionado con el tráfico ilícito de drogas, nuestra
organización se distanció totalmente del Señor Duran, ya hace más
de un año. El Señor Jorge Morales donó un avión C-47 a nuestra
organización a través de la primera esposa de nuestro compañero
Adolfo Chamorro. Yo conocí al Señor Morales en una oportunidad
muy breve pero posteriormente basado en rumores de otra posible
conexión con el tráfico ilícito de drogas también nos
distanciamos de ese señor. El avión C-47 en cuestión salvó a
nuestro movimiento en aquel momento y fue el mismo en el cual
usted voló cuando me visitó en La Penca en 1985. Para su
información le adjunto copia de reciente correspondencia al Señor
Abrams en la cual explicamos nuestra política con respecto al
tráfico ilícito de drogas. Quedo convencido que cualquier
persona que observe las condiciones de supervivencia en la que
sobreviven nuestra organización y nuestros miembros no puede
creer por un instante que existe alguna otra forma de un
muy lucrativo negocio del tráfico ilícito de drogas.

Con referencia al atentado en contra de mi vida en La Penca el 30
de Mayo 1984, yo le aseguro categóricamente que jamás he acusado
a ninguna entidad del gobierno de los Estados Unidos. La
desinformación sobre este hecho comenzó con un cable de la
agencia española de noticias EFE en el cual la corresponsal
Janina Camps atribuyó esa declaración falsa a mi persona. Yo
inmediatamente desautorice ese falso reporte en un comunicado
público. La rapidez con la cual el ejército comunista lanzó una
ofensiva masiva en contra de las fuerzas de ARDE, inmediatamente
después del atentado, deja poca duda que mi asesinato era parte
integral de un plan militar del EPL bajo dirección cubana.

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- Withheld in full

NEWS RELEASE
MEDIA ADVISORY FOR 10:30 AM
THURSDAY, MAY 29, 1986

Contact: Beth Bogart
(202) 745-0707

FEDERAL LAWSUIT WILL CHARGE CONTRAS
WITH DRUG AND GUN SMUGGLING, MURDER AND BOMBING U.S. JOURNALISTS

Press Conference Day of Filing, May 29th, in Washington

WASHINGTON, DC -- A federal lawsuit charging 29 Americans, Nicaraguan contras (including FDN leader Adolfo Calero), and others with criminal conspiracy involving gun-running, drug-smuggling, murder and the bombing of a press conference with American reporters will be filed in Miami Federal Court on Thursday, May 29th. The suit also names World Anti-Communist League chairman John Singlaub for violations of the Neutrality Act.

Details of the lawsuit will be announced at a press conference on Thursday, May 29, at 10:30 am in the Bourke-White/Zenger Room, 13th Floor of the National Press Club in Washington, to be attended by the plaintiffs and their attorney.

The lawsuit, filed on behalf of two U.S. journalists who investigated the 1984 bombing of a press conference called by former contra leader Eden Pastora (one of whom was crippled in the attack), charges that the contras and their American supporters committed murder, trafficked in cocaine, plotted the unsuccessful assassination attempt on Pastora and planned to kill U.S. Ambassador Lewis Tambs, laundered money, smuggled weapons, threatened investigators and obstructed justice.

The federal lawsuit naming Calero, Singlaub, and others represents the first time that allegations of contra involvement in gun and drug smuggling, terrorist bombings and murder are united in a coherent case and presented in a U.S. court of law, with specifics and sources clearly identified.

Speakers at the news conference will include the plaintiffs, journalists Tony Avirgan and Martha Honey, and their attorney, Daniel Sheehan of the Christic Institute. Avirgan was injured while covering the bombed Pastora press conference for ABC. His wife, journalist Martha Honey (a stringer for ABC, CBC, and others) has been threatened with death for investigating the Pastora bombing on behalf of the Newspaper Guild. Attorney Sheehan was the lawyer in the Karen Silkwood and Greensboro Civil Rights cases.

250 West 57 Street
Suite 1730
New York NY 10107
Telephone 212: 489 5630

807 Eighteenth Street NW
Washington DC 20009

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OFFICE OF INDEPENDENT COUNSEL
555 THIRTEENTH STREET, N.W., SUITE 701
WASHINGTON, D.C. 20004
(202) 383-8940

FEDERAL GOVERNMENT

March 20, 1987

Encl 1/1
Floyd I. Clarke
Assistant Director
Criminal Investigative Division
Federal Bureau of Investigation
Washington, D.C. 20535

Dear Mr. Clarke:

Pursuant to an investigation being conducted under the Ethics in Government Act of 1978, FBI assistance is being hereby requested to assist in my inquiry. You are requested to:

Search FBI Headquarter's general and elsur indices and all FBI computerized data bases to identify all records and information identifiable to the individual(s). (See attached) Please make all such records available for review by the earliest possible date. This should be a complete and thorough search.

1- ENCLOSURE

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Sincerely,

Lawrence E. Walsh

By: 

DE-302

211-26-1592

29 JUL 31 1987

*Completed
7-28-87*

Doc # 12

Rec'd APCU, WCC 4:46 pm on 3-24-87

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Subject is described as follows:

Name: Christic Institution

DOB: _____

POB: _____

SSAN: _____

Nationality: _____

Current Residence: _____

Employment: _____

Other identifiable characteristics:

Possible address: 1324 N. Capital Street, N.W.
Washington, D.C.

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Red Pen. wcc 440 pm on 3-24-81
11:15 AM 1590

NEWS RELEASE

For Immediate Release
THURSDAY, MAY 29, 1986

Beth Bogar
(2) 745-070

FEDERAL LAWSUIT CHARGES CONTRAS
WITH DRUG & GUN SMUGGLING, MURDER AND BOMBING U.S. JOURNALISTS

WASHINGTON, DC -- A federal lawsuit charging 30 Americans, Nicaraguan contras (including FDN leader Adolfo Calero), and others with criminal conspiracy involving gun-running, drug-smuggling, murder and the bombing of a press conference with American reporters was filed today in Miami Federal Court. The suit charges the contras with violations of the Racketeer Influenced and Corrupt Organizations Act (RICO), and also names World Anti-Communist League chairman John Singlaub for violations of the Neutrality Act.

The lawsuit, filed on behalf of two U.S. journalists (one of whom was seriously injured in the attack) who investigated the 1984 bombing of a press conference called by former contra leader Eden Pastora, charges that the contras and their American supporters committed murder, trafficked in cocaine, plotted the unsuccessful assassination attempt on Pastora and planned to kill U.S. Ambassador Lewis Tambs, laundered money, smuggled weapons, threatened investigators and obstructed justice.

The federal lawsuit naming Calero, Singlaub, and others represents the first time that allegations of contra involvement in gun and drug smuggling, terrorist bombings and murder are united in a coherent case and presented in a U.S. court of law.

The lawsuit is being filed by Tony Avirgan and Martha Honey, two Costa Rica-based journalists, represented by their attorney, Daniel Sheehan of the Christic Institute. Avirgan was injured while covering the bombed Pastora press conference for ABC. He and his

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Telephone 202. 745 0707

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FOIA, journalist Martha Honey (a stringer for ABC, BBC, CBC and

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- Withheld in full

others), have been threatened with death for involvement in the Pastora bombing on behalf of the Newspaper Guild. The Committee to Protect Journalists. Dave Marsh, anchorman at WRC in Washington, spoke at the news conference representing the Committee.

The RICO conspiracy civil suit asks a total of \$2,140,000 in actual and punitive damages charged on the defendants with injuries, battery, assault, intentional infliction of mental distress and intentional interference with the business of the plaintiffs.

Attorney Sheehan was the lawyer in the Karen Silkwood and Greensboro Civil Rights cases, and has since April of 1984 been investigating private paramilitary operations directed at Central America.

In addition to this litigation, the Christic Institute is launching a nationwide campaign focusing on public education and calling for a congressional investigation into the charges outlined in the legal complaint.

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FEDERAL BUREAU OF INVESTIGATION
FOIPA DELETED PAGE INFORMATION SHEET

Page(s) withheld entirely at this location in the file. One or more of the following statements, where indicated, explain this deletion.

- Deletions were made pursuant to the exemptions indicated below with no segregable material available for release to you.

Section 552

Section 552a

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- Information pertained only to a third party with no reference to you or the subject of your request.
- Information pertained only to a third party. Your name is listed in the title only.
- Documents originated with another Government agency(ies). These documents were referred to that agency(ies) for review and direct response to you.

Pages contain information furnished by another Government agency(ies). You will be advised by the FBI as to the releasability of this information following our consultation with the other agency(ies).

Page(s) withheld for the following reason(s): _____

For your information: The information denied you from the following page was withheld by the Office of Independent Counsel/

The following number is to be used for reference regarding these pages: Iran Contra

Document number 13

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THE CHRISTIC INSTITUTE

FOIA

The Christic Institute is a non-profit, nonpartisan public interest law firm and public policy center, formed in 1981 by the people who coordinated the investigation, trial and Supreme Court victory in the Karen Silkwood case. The Institute only takes cases which are in the public interest and have an important public policy component.

Besides handling the Silkwood case, the Christic Institute has worked on the Greensboro Civil Rights trial, the Sandusky Movement's first defense case, represented the victims of the Union Carbide disaster at Bhopal, and freed black mayor Eddie Earthen who had been imprisoned on contrived charges of robbery and murder.

The Institute is funded through the support of foundations, religious groups and private citizens.

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United States District Court
SOUTHERN DISTRICT OF FLORIDA

SUMMONS IN A CIVIL ACTION

CASE NUMBER

CIV-KING

86-1140

~~TONY AVIRGAN and
MARTHA HONEY~~

~~JOHN HULL, ET AL.~~

TO: (Name and Address of Defendant)

~~Adolfo Calero
11600SW 107th Terrace
Miami, Florida~~

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

~~DANIEL P. SHEEHAN, ESQUIRE
The Christic Institute
1324 North Capitol Street, N.W.
Washington, D.C. 20002~~

~~DAVID A. SNYDER, P.A.
45 Southwest 36th Court
Miami, Florida 33135-1040~~

an answer to the complaint which is herewith served upon you, within -20- days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

~~Robert M. March~~ FL

MAY 29 1986

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NEWS RELEASE
MEDIA ADVISORY FOR 10:30 AM
THURSDAY, MAY 29, 1986

Contact: Beth...
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PR

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PA: [Signature]

AC
Sr. David Sullivan
Oficina del Senador Jesse Helms
Dirksen Building
Washington, D.C.

14 Abril 1986

Estimado Sr. Sullivan,

He evaluado con gran atencion los comentarios que usted me comunico en nuestra reunion de ayer. Considero que debido a la gran importancia atribuida a los puntos discutidos durante la misma es preciso que mis opiniones queden claramente establecidas por escrito y asi evitar interpretaciones erroneas que puedan afectar la naturaleza de nuestra relaciones con el gobierno de los Estados Unidos.

En cuanto a la preocupacion concerniente a la supuesta falta de cooperacion con el gobierno de los Estados Unidos, permitame explicarle que creo que he cooperado de forma amplia y seguire cooperando como aliado siempre y cuando esta relacion sea mutua y basada en estricto reconocimiento de comprension y respeto mutuo. No creo que ninguna agencia del gobierno de los Estados Unidos puede esperar cooperacion sobre medidas que tiendan a legitimar a la dictadura Marxista de Managua y que puedan demorar o impedir que nuestro pueblo obtenga su libertad e independencia dentro de un marco verdaderamente democratico y nacionalista. Nosotros reconocemos a los Estados Unidos como nuestro gran aliado y de la misma manera esperamos que el gobierno de los Estados Unidos nos extienda esa misma consideracion.

En referencia a la preocupacion que concierne la posible penetracion enemiga dentro de los cuadros dirigentes de nuestra organizacion deseo exponerle las siguientes ideas. Como aliado del gobierno americano estimo como hecho imprescindible en preservar la relacion y consideracion explicada en el parrafo anterior. Desde ese punto de vista, esperamos que cualquier informacion sobre posible penetracion enemiga en nuestra organizacion sea puesto ante nuestro conocimiento en una forma profesional y expedita que preserve la seguridad de nuestra organizacion asi como a las vidas de los hombres que luchan bajo mi mando y que permita el buen desarrollo de medidas de contrainteligencia que sirvan nuestros intereses mutuos sin menospreciar la dignidad entre aliados que luchan contra un enemigo comun. El uso del detector de mentiras de forma generalizada por el gobierno de los Estados Unidos sobre los cuadros de nuestra organizacion no es apropiado. Sin embargo adiestramiento y asistencia de este tipo como contribucion a

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