

District of Columbia Indictment Summary, Case No. 97-CR-485(SS)

Count	Defendants Charged	Statutory Offense Charged	Acts Alleged
1	Cisneros, Medlar, Arce-Garcia, Rosales	18 U.S.C. § 371	Conspired to impede the Senate in passing on and the FBI in investigating the Cisneros nomination; conspiring to commit various criminal offenses to do so.
2	Cisneros	18 U.S.C. § 1001	Falsely stated on Standard Form SF-86 that there was no basis upon which he could be subjected to coercion or blackmail.
3	Cisneros	18 U.S.C. § 1001	Falsely stated in 12/30/92 FBI interview that his answers on Standard Form were accurate and correct.
4	Cisneros	18 U.S.C. § 1001	Falsely stated in 12/30/92 FBI interview that he was unaware of any basis upon which he could be subjected to coercion or blackmail.
5	Cisneros	18 U.S.C. § 1001	Falsely stated in 12/30/92 FBI interview that he had "been with" one woman, other than Medlar, during his marriage to his wife.
6	Cisneros	18 U.S.C. § 1001	Concealed in 12/30/92 FBI interview that he was making payments to Medlar.
7	Cisneros	18 U.S.C. § 1001	Concealed in 12/30/92 FBI interview that Medlar threatened to disclose publicly that he was making payments to her.

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8	Cisneros	18 U.S.C. § 1001	Concealed in 12/30/92 FBI interview that he had structured payments to Medlar to avoid making a Currency Transaction Report.
9	Cisneros	18 U.S.C. § 1001	Concealed in 12/30/92 FBI interview that he had not filed informational Gift Tax Returns with the IRS for payments to Medlar in excess of \$10,000 per year.
10	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that his payments to Medlar were not "hush money."
11	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that he was not "currently" making payments to Medlar.
12	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that the single highest payment he had made to Medlar was about \$2500.
13	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that his total payments to Medlar had never exceeded \$10,000 per year.
14	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that Medlar had never threatened, coerced, or tried to obtain money from him.

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15	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that he had not had substantial at length conversations with Medlar since early 1991.
16	Cisneros	18 U.S.C. § 1001	Falsely stated in 1/7/93 FBI interview that he had had only one extramarital relationship, other than with Medlar, during his marriage to his wife.
17	Cisneros	18 U.S.C. § 1001	Failed to disclose in 1/7/93 FBI interview that he had directed defendants Arce-Garcia and Rosales not to inform the FBI that he was making payments to Medlar, or the amount of such payments.
18	Cisneros	18 U.S.C. § 1505	Corruptly influenced, obstructed, and impeded proceeding of DOJ Personnel Security Office in deciding whether to issue him security clearance, by making false statements.
19	Rosales	18 U.S.C. § 1001	Falsely stated to IRS that he did not know of Cisneros's payments to Medlar before he came to D.C.
20	Rosales	18 U.S.C. § 1001	Falsely stated to FBI that he did not know of Cisneros's payments to Medlar while he was employed at Cisneros Communications.

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21	Medlar	18 U.S.C. § 1001	Falsely stated to FBI that she had provided to the IRS the original tapes of her recorded conversations with Cisneros.