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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY:

DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

January 2006 Grand Jury

07 CR 0835 H

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN ALAN CARMAN,

Defendant.

Criminal Case No. _____

I N D I C T M E N T

Title 18, U.S.C., Sec. 956 -
Conspiracy to Kidnap a Person
in a Foreign Country

The grand jury charges:

Beginning on or about January 2007, and continuing up to and including March 16, 2007, within the Southern District of California, and elsewhere, defendant JOHN ALAN CARMAN did knowingly and intentionally conspire with persons known and unknown to the grand jury to commit an act outside the United States that would constitute the offense of kidnapping if committed in the territorial jurisdiction of the United States, that is, defendant JOHN ALAN CARMAN conspired with persons known and unknown to the grand jury to unlawfully seize, confine, kidnap, abduct and carry away and hold for ransom or reward and otherwise, K.A.M. from Mexico.

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ALT:jla:San Diego
4/2/07

OVERT ACTS

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2 In furtherance of said conspiracy and to effect and accomplish
3 the objects thereof, the following overt acts, among others, were
4 committed within the Southern District of California and elsewhere:

- 5 1. On or about February 3, 2007, defendant JOHN ALAN CARMAN
6 emailed a Source of Information (hereinafter SOI) about
7 K.A.M., saying, "we will need to concentrate on [K.A.M.]
8 and her boyfriend during Easter in Cabo or Cancun,"
9 calling it a "BIG MONEY CASE," "[i]t is imperative that
10 she is arrested," and "WE get to keep any money which is
11 paid for her release."
12 2. On or about February 22, 2007, defendant JOHN ALAN CARMAN
13 emailed the SOI about K.A.M. and provided her social
14 security number, date of birth, home address, telephone
15 number, vehicle registration information, and admitted to
16 having "personally observed her driving"
17 3. On or about February 27, 2007, defendant JOHN ALAN CARMAN
18 emailed the SOI about K.A.M. and stated, "I am doing all
19 I can to develope [sic] information on [K.]," "She may be
20 leaving for Spring Break but can you check hotels in
21 Cancun area NOW," "I went by her place and she wasn;t
22 [sic] at home on the weekend," and "We ARE supposed to
23 get advance information on her flight."
24 4. On or about February 28, 2007, defendant JOHN ALAN CARMAN
25 emailed the SOI about K.A.M. and provided information
26 about K.A.M.'s two children and the hotel in Playa del
27 Carmen, Mexico, that K.A.M. was expected to stay at
28 during her spring break vacation.

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5. On or about March 13, 2007, defendant JOHN ALAN CARMAN spoke by telephone with the SOI and instructed the SOI to stage an arrest of K.A.M. at her hotel in Playa del Carmen, Mexico, and to tell K.A.M. that she is going to jail for a long time and will lose her children unless she pays a fine.

6. On or about March 14, 2007, in La Mesa, California, defendant JOHN ALAN CARMAN spoke by telephone with the SOI and encouraged the SOI to demand \$500,000 from K.A.M.'s parents in exchange for her release.

7. On or about March 15, 2007, defendant JOHN ALAN CARMAN spoke by telephone with the SOI and confirmed that he sent the SOI photographs of K.A.M. and her children via electronic mail and told the SOI it would be a good idea to put something in K.A.M.'s hotel room so that the SOI and his associates could pretend to respond to an anonymous tip.

All in violation of Title 18, United States Code, Section 956.

DATED: April 3, 2007.

A TRUE BILL:

Ellen M. Bach
Foreperson

KAREN P. HEWITT
United States Attorney

By: Annalou Tirol
ANNALOU TIROL
Assistant U.S. Attorney