

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 20-cv-24294-KMM**

**RAQUEL CAMPS, et al.,**

**Plaintiffs,**

**v.**

**ROBERTO GUILLERMO BRAVO,**

**Defendant.**

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**DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFFS' COMPLAINT**

Defendant **ROBERTO GUILLERMO BRAVO**, by and through his undersigned counsel, responds to Plaintiffs' Complaint for Damages and states as follows:

**PRELIMINARY STATEMENT <sup>1</sup>**

1. Denied that Mr. Bravo participated in a "massacre" or that he violated United States and international law. Mr. Bravo has no knowledge of whether Plaintiffs are surviving family members.

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<sup>1</sup> The centered categories utilized throughout this pleading are taken directly from the Complaint.

## INTRODUCTION

2. Admitted that nineteen terrorists were detained at Almirante Zar Naval Base on August 15, 1972 , after they had escaped from a nearby prison, but denies that they were “political prisoners.”

3. Admits that Mr. Bravo was a commissioned officer in the Argentine military, but **denies** that he “threatened the prisoners and tortured them, subjecting them to stress positions, forced nudity, and mock executions.”

4. Denies the factual allegations in this paragraph.

5, 6, 7, Mr. Bravo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in these paragraphs, and therefore denies those allegations.

## JURISDICTION AND VENUE.

8. Mr. Bravo denies that the Court has jurisdiction over the Plaintiffs' claims under the Torture Victim Protection Act, or that the TVPA is applicable in this case.

9. Mr. Bravo admits that he is a naturalized citizen of the United States, and currently resides in North Miami, Florida.

10. Mr. Bravo denies that the United States District Court for the Southern District of Florida is a proper venue for this action

## **PARTIES**

### *Defendant*

11. Mr. Bravo admits the facts alleged in these paragraphs, but denies the characterization of “Massacre.”

12. Mr. Bravo admits that he became a permanent resident of the United States in 1980 and a naturalized citizen in 1987.

### *Plaintiffs*

13-17. Mr. Bravo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in these paragraphs and demands strict proof.

## **STATEMENT OF FACTS**

*General Lanusse’s dictatorship  
The prisoners’ transfer to Almirante Zar  
The night of the massacre  
Bravo and the Argentine military’s cover-up*

18-66. These paragraphs constitute inaccurate arguments and are replete with incorrect and misleading factual allegations to which no response is required. To the extent a response is deemed required, the allegations are denied.

*Plaintiffs have exhausted remedies in Argentina as to Bravo .*

67-72. Mr. Bravo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in these paragraphs and demands strict proof of them. To the extent a response is deemed required, the allegations are denied.

*Extraordinary circumstances prevented Plaintiffs  
from bringing this case until now*

73-83. Mr. Bravo lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in these paragraphs and demands strict proof of them. To the extent a response is deemed required, the allegations are denied.

### **GENERAL ALLEGATIONS**

84-92. Mr. Bravo denies each and every accusation and allegation in these paragraphs, except that he admits, pursuant to ¶85, that he was stationed at Almirante Zar as a commissioned officer.

### **FIRST CLAIM FOR RELIEF**

Extrajudicial Killing of Rubén Bonet, Eduardo Cappello I,  
and Ana María Villarreal de Santucho

93-102 Mr. Bravo denies each and every accusation and allegation in these paragraphs,

### **SECOND CLAIM FOR RELIEF**

By Plaintiff Raquel Camps as representative of Alberto Camps's Estate  
Attempted Extrajudicial Killing of Alberto Camps

103-110. Mr. Bravo denies each and every accusation and allegation in these paragraphs,

### **THIRD CLAIM FOR RELIEF**

*By Plaintiff Raquel Camps as representative of Alberto Camps's Estate,  
Plaintiff Eduardo Cappello II as representative of Eduardo Cappello I's  
Estate, Plaintiff Alicia Krueger as representative of Rubén Bonet's Estate,  
and Plaintiff Marcela Santucho as representative of Ana María Villarreal  
de Santucho's Estate*

111-124. Mr. Bravo denies each and every accusation and allegation in these paragraphs,

**ROBERTO GUILLERMO BRAVO'S AFFIRMATIVE DEFENSES**

1. The Complaint fails to state a claim upon which relief may be granted.
2. The claims are barred by the applicable statutes of limitations.
3. The claims are barred by the doctrine of laches.
4. The claims are barred by the doctrine of waiver.
5. Plaintiffs have failed to exhaust remedies available to them in Argentina..
6. Plaintiffs lack standing or capacity under applicable law to bring these claims.
7. Mr. Bravo was acquitted of all charges by a full military investigation in 1972 and later received full amnesty, so the Complaint must be dismissed.

**WHEREFORE**, having fully answered Plaintiffs' Complaint, Defendant Roberto Guillermo Bravo prays for a judgment dismissing the complaint with prejudice and for such further relief as the Court may deem just.

Dated: January 25, 2021

Respectfully submitted,

**NEAL R. SONNETT, P.A.**

Counsel for Roberto Guillermo Bravo

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By /s/ Neal R. Sonnett

**NEAL R. SONNETT**

**Florida Bar No. 105986**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on January 25, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

By: /s/ Neal R. Sonnett  
**NEAL R. SONNETT**