

be used for limited international travel, but also could be used for domestic travel and other purposes. A passport card could be used as proof of United States citizenship.

3. Capital One Bank, N.A. ("Capital One") was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

4. A "means of identification" was any name or number that could be used, alone or in conjunction with any other information, to identify a specific individual, including a name, credit card number, social security number, and date of birth.

B. THE CONSPIRACY:

Beginning at a time unknown to the Grand Jury, and continuing until on or about February 19, 2020, in the Eastern District of Louisiana, and elsewhere, the defendants, **THIERNO O. BAH** and **MANUELA GONZALEZ-BOOKMAN**, and others known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree, to commit offenses against the United States of America, that is: to knowingly and willfully use and attempt to use a false, forged, counterfeited, mutilated and altered passport and instrument purporting to be a passport, to wit: a false United States passport card containing the identification of Victim A and the photograph of **MANUELA GONZALEZ-BOOKMAN**, in violation of Title 18, United States Code, Section 1543.

C. SCHEME TO DEFRAUD:

1. It was part of the scheme and artifice to defraud that co-conspirators unlawfully obtained the means of identification of other actual people, including their names, addresses, and dates of birth.

2. It was further part of the scheme and artifice to defraud that co-conspirators traveled from New York to other locations, such as the Eastern District of Louisiana, in order to execute the scheme and artifice to defraud.

3. It was further part of the scheme and artifice to defraud that co-conspirators unlawfully used the means of identification of other actual people in order to cash false or stolen checks at financial institutions.

D. OVERT ACTS:

In furtherance of the conspiracy, and to effect the objects thereof, members of the conspiracy and others known and unknown to the Grand Jury, committed or caused to be committed the overt acts below, among others, within the Eastern District of Louisiana and elsewhere:

1. On or about February 18, 2020, **THIERNO O. BAH** and **MANUELA GONZALEZ-BOOKMAN** traveled by air from Newark Liberty International Airport to Louis Armstrong International Airport located in Kenner, Louisiana.

2. On or about February 19, 2020, **THIERNO O. BAH** rented a vehicle from a rental car location at Louis Armstrong International Airport.

3. On or about February 19, 2020, **THIERNO O. BAH** and **MANUELA GONZALEZ-BOOKMAN** drove to a Capital One branch located in Metairie, Louisiana. **BAH** waited in the parking lot while **GONZALEZ-BOOKMAN** entered the branch and presented a counterfeit credit card and counterfeit passport card in the name of Victim 1, an actual Capital One account holder, in order to cash a fraudulent check.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
(Conspiracy to Commit Bank Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

B. THE CONSPIRACY:

Beginning at a time unknown to the Grand Jury, and continuing until on or about February 19, 2020, in the Eastern District of Louisiana, and elsewhere, the defendants, **THIERNO O. BAH** and **MANUELA GONZALEZ-BOOKMAN**, and others known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree, to execute a scheme to defraud Capital One and to obtain moneys, funds, assets, credits, and securities owned by, and under the custody and control of Capital One, by means of false and fraudulent pretenses, representations, and promises, namely by misrepresenting identification, in violation of Title 18, United States Code, Section 1344(1).

C. SCHEME TO DEFRAUD:

The allegations of Sections C and D of Count 1 are incorporated as though fully set forth herein.

All in violation of Title 18, United States Code, Section 1349.

COUNT 3
(Aggravated Identity Theft)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations in Section A of Count 1 are incorporated as though fully set forth herein.

B. THE OFFENSE OF AGGRAVATED IDENTITY THEFT:

On or about February 19, 2020, in the Eastern District of Louisiana, and elsewhere, the defendants, **THIERNO O. BAH** and **MANUELA GONZALEZ-BOOKMAN**, did knowingly transfer, possess, and use the means of identification of another person, without lawful authority,

during and in relation to a conspiracy to commit bank fraud, in violation of Title 18, United States Code, Sections 1344 and 1349, knowing that the means of identification belonged to an actual person, namely Victim 1, in violation of Title 18, United States Code, Sections 1028A and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 3 are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Counts 1 and 2, the defendants, **THIERNO O. BAH** and **MANUELA GONZALEZ-BOOKMAN**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offenses.

3. If any of the above-described property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

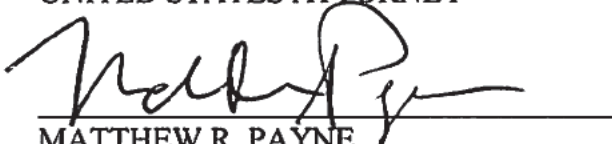
the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



FOREPERSON

PETER G. STRASSER
UNITED STATES ATTORNEY


MATTHEW R. PAYNE
La. Bar Roll No. 32631
Assistant United States Attorney

New Orleans, Louisiana
June 26, 2020