

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,)	Case No.
)	
Plaintiff,)	
)	AFFIDAVIT OF GOOD CAUSE
v.)	
)	
NORMA I. BORGONO,)	
Also known as)	
"Norma Isabel Borgono Bedoya")	
Defendant.)	

I, David Jansen, declare under penalty of perjury as follows:

1. I am a Special Agent with Homeland Security Investigations ("HSI"), a component of U.S. Immigration and Customs Enforcement ("ICE"), an agency with the U.S. Department of Homeland Security ("DHS"), and have been so employed since 2007. I am presently assigned to the Immigration Enforcement Group. I am responsible for conducting investigations of violations of immigration law and related federal criminal statutes as contained in the United States Codes. In this capacity, I have access to the official records of the DHS, including the immigration file of Norma I. Borgono, also known as Norma Isabel Borgono Bedoya ("Borgono"), A [REDACTED] 708.

2. I have examined records relating to Borgono, including, but not limited to her immigration file(s). Based upon my review of Borgono's records, I state, on information and belief, that the information set forth in this Affidavit of Good Cause is true and correct.

I. Borgono was granted U.S. citizenship on December 20, 2007.

3. On or about February 1, 2007, Borgono mailed an Application for Naturalization, Form N-400, to the U.S. Citizenship and Immigration Services ("CIS") at the Texas Service Center in Mesquite, Texas. The CIS accepted it for filing on or about February 6, 2007.

4. At the time she filed the application, Borgono used the name "Norma Isabel Borgono" and alien registration number A [REDACTED] 708.

5. On or about November 21, 2007, Borgono was interviewed under oath to determine her eligibility for naturalization. On the basis of her written application and her testimony at the naturalization interview, the CIS approved Borgono's application for naturalization on the same date.

6. On or about November 28, 2007, before taking the oath of allegiance, Borgono submitted DHS Form N-445, Notice of Naturalization Oath Ceremony, to the CIS. Based on the representations she made on this form, Borgono was allowed to take the oath of allegiance on December 20, 2007, and was granted U.S. citizenship. She was issued Certificate of Naturalization No. 30333315.

II. Borgono's Criminal Conspiracy

7. Between at least April 2003 until May 2009, Borgono was the office manager of Texon, Incorporated ("Texon"), which was headquartered in Miami, Florida. Texon was an export company in the business of purchasing U.S. goods on behalf of clients in foreign countries and shipping those goods overseas. From at least April 2003 until May 2009, Borgono conspired and assisted the co-conspirator, who was the owner of Texon, to prepare more than \$24 million in fraudulent loan applications and loan transactions in which Texon acted as the "exporter" by falsifying documents sent to the U.S. banks and to the Export-Import Bank of the United States ("Ex-Im Bank"). As a result of her conduct, Borgono misappropriated approximately \$14.1 million in loan proceeds that were guaranteed by the Ex-Im Bank.

8. Between April 2003 and May 2009, Borgono and the co-conspirator agreed to prepare and did prepare applications for insurance or guarantees that would be submitted to the Ex-Im Bank. Each of the applications represented that a lending bank intended to make a loan to a foreign borrower to enable the borrower to purchase U.S. goods and have the U.S. goods shipped out of the United States to buyers overseas. The applications requested the Ex-Im Bank to issue guarantees on the loans. Borgono and the co-conspirator knew at the time the loan applications were submitted to the Ex-Im Bank, that they falsely reported the goods that would be purchased and shipped to the foreign buyers. Neither Borgono nor the co-conspirator disclosed to the Ex-Im Bank or to the lending banks that the goods had not been, and would not be, purchased and/or shipped as stated on the false commercial invoices, bills of lading, and the Ex-Im Bank "Form of Exporter's Certificates." In some cases, the co-conspirator provided loan proceeds to foreign buyers in cash, rather than using the proceeds to purchase goods to be shipped to the buyers.

9. Between at least April 2003 and May 2009, the Ex-Im Bank issued insurance or guarantees on more than \$24 million worth of fraudulent loans based on applications submitted to the Ex-Im Bank, including false statements made by Borgono and the co-conspirator, or at their direction.

10. The co-conspirator commingled the loan proceeds with personal and other monies. Texon, and its related entities, retained approximately \$2.5 million of the proceeds of the Ex-Im Bank-insured or guaranteed loans. On October 31, 2007, the co-conspirator wire transferred \$1996.75 of Ex-Im Bank loan proceeds from a Texan bank account to Borgono's bank account located in Miami, Florida. Borgono retained those funds.

11. Between April 2003 and April 1, 2010, the Ex-Im Bank paid more than \$15.9 million to lending banks or their assignees based on claims on guaranteed loans that had defaulted. As of April 1, 2010, more than \$12.5 million of the amounts paid on claims for defaulted loans remained unrecovered.

12. On November 14, 2011, Borgono was charged by Criminal Information with Conspiracy to Defraud the United States and to Commit Mail Fraud, in violation of Title 18 U.S.C. § 371, a felony offense.

13. On December 12, 2011, Borgono pled guilty in the U.S. District Court, District of Columbia, to one count of Conspiracy to Defraud the United States and to Commit Mail Fraud, in violation of Title 18 U.S.C. § 371, in full satisfaction of the Criminal Information.

14. On May 10, 2012, Borgono was sentenced to probation for a term of sixty (60) months and ordered to pay restitution in the amount of \$5000 to the victim, the Ex-Im Bank. The probation supervision was transferred to the U.S. Probation Office in the Southern District of Florida. Borgono was also ordered forfeit \$1996.75, which constitutes the proceeds of the conspiracy offense to which she pled guilty.

III. Borgono was not eligible to naturalize and consequently illegally procured her naturalization.

15. Borgono was not eligible to naturalize and consequently illegally procured her naturalization. Borgono was ineligible to naturalize because she could not have established that she was a person of good moral character during the statutory period. As an applicant for naturalization pursuant to section 316(a) of the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1427(a), Borgono was required to prove that she was a person of good moral character from February 1, 2002, five years before she filed her application for naturalization, until

December 20, 2007, the date on which she was admitted as a citizen of the United States (the “statutory period”).

A. Borgono committed a Crime Involving Moral Turpitude thereby preventing her from establishing good moral character

16. As a matter of law, an applicant necessarily lacks good moral character if he or she commits a crime involving moral turpitude (“CIMT”) during the statutory period and later either is convicted of the crime or admits his or her commission of the criminal activity. 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(A)); 8 C.F.R. § 316.10(b)(2)(i) (providing that an applicant “shall be found to lack good moral character” if, for example, they committed and were convicted of one or more crimes involving moral turpitude).

17. From on or between April 2003 through May 2009 (during the statutory period), Borgono committed a CIMT by conspiring to obtain from the Ex-Im Bank more than \$24 million in fraudulent loan transactions and by falsifying documents sent to U.S. banks and to the Ex-Im Bank.

18. Borgono pled guilty to Conspiracy to Defraud the United States and to Commit Mail Fraud, in violation of Title 18 U.S.C. § 371, a felony offense. Borgono committed that crime and underlying fraud during the statutory period.

19. Because Borgono committed a CIMT during the statutory period, to which she later pled guilty and for which she was convicted, Borgono was barred, as a matter of law, from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

20. Because Borgono committed a CIMT and was therefore not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

Consequently, she illegally procured her naturalization.

B. Borgono committed unlawful acts that adversely reflected upon her moral character.

21. Borgono could not have established that she was a person of good moral character during the statutory period because she committed unlawful acts that adversely reflected upon her moral character.

22. Unless there are extenuating circumstances, an applicant for naturalization is precluded from establishing good moral character if, during the statutory period, she commits unlawful acts that adversely reflect upon her moral character.

23. Whether unlawful acts affect the applicant's moral character is a case-by-case determination, considering the standards of the average citizen in the applicant's community of residence.

24. From on or between April 2003 through May 2009 (during the statutory period), Borgono committed the ongoing crime of Conspiracy to Defraud the United States and to Commit Mail Fraud, in violation of Title 18 U.S.C. § 371, a felony offense.

25. Conspiracy to Defraud the United States and to Commit Mail Fraud (18 U.S.C. § 371) carries a maximum sentence of five years' imprisonment, a possible fine of \$250,000, and is an unlawful act that adversely reflects upon an individual's moral character as measured against the standards of the average citizen in the community of residence.

26. As evidenced by her post-naturalization conviction, there were no extenuating circumstances that mitigated the effect of Borgono's actions on her ability to establish good moral character.

27. Because Borgono committed unlawful acts adversely reflecting on her moral character within the period of time in which she was required to establish good moral character,

she is precluded, as a matter of law, from establishing good moral character. Consequently, she illegally procured her naturalization.

C. Borgono provided false testimony during her naturalization interview to obtain her naturalization.

28. Borgono could not have established that she was a person of good moral character because, during her naturalization interview, she provided false testimony for the purpose of obtaining her naturalization.

29. An individual who, during the statutory period, provides false testimony to obtain an immigration benefit is precluded from establishing good moral character.

30. On November 21, 2007, during the statutory period, Borgono appeared before Praveen Harris, a CIS officer, for an interview regarding her application for naturalization.

31. At the beginning of the naturalization interview, Borgono took an oath or affirmed that she would answer all questions truthfully.

32. During the course of the naturalization interview, in order to determine her eligibility for naturalization, CIS officer Praveen Harris asked Borgono whether she had knowingly committed any crime for which she had not been arrested.

33. Borgono testified under oath that she had never knowingly committed any crime for which she had not been arrested.

34. This testimony was false. In fact, during the statutory period, Borgono and the co-conspirator prepared false documents that would be submitted to the lending banks and the Ex-Im Bank causing the Ex-Im Bank to issue insurance or guarantees on more than \$24 million worth of fraudulent loans. As a consequence, the Ex-Im Bank paid \$15.9 million to lending

banks or their assignees based on claims on guaranteed loans that had defaulted. Borgono had not been arrested for this offense at the time of her naturalization interview.

35. Borgono's false testimony concealed that she committed criminal acts that precluded her naturalization.

36. Because Borgono provided false testimony to obtain naturalization during the statutory period, she could not have established good moral character. Therefore, she was ineligible to naturalize.

IV. Borgono willfully misrepresented and concealed her criminal activity when she failed to disclose her criminal activity at the CIS interview, and therefore procured her naturalization by willful misrepresentation and concealment of material facts.

37. On November 21, 2007, the CIS interviewed Borgono on her Form N-400, Application for Naturalization.

38. Part 10, Question D-15, on the Form N-400 asked whether Borgono had knowingly committed any crime for which she had not been arrested.

39. In January 2007¹, Borgono completed the questions on the Form N-400, and at her November 2007 interview on her Form N-400, she certified her answers were true.

40. In response to Question D-15 on the Form N-400, Borgono represented that she had not knowingly committed any crime for which she had not been arrested. This representation was false. In fact, during the statutory period, Borgono and the co-conspirator prepared fraudulent documents that would be submitted to the lending banks and the Ex-Im Bank causing the Ex-Im Bank to issue insurance or guarantees on more than \$24 million worth of fraudulent loans. As a consequence, the Ex-Im Bank paid \$15.9 million to lending banks or their assignees based on claims on guaranteed loans that had defaulted. Texon, and its related entities, retained approximately \$2.5 million of the proceeds of the Ex-Im Bank-insured or guaranteed

¹ Borgono signed the Form N-400 and submitted it to the CIS on or about February 1, 2007.

loans. The co-conspirator retained approximately \$170,000 of the loan proceeds for his own benefit and use. The co-conspirator transferred approximately \$6.4 million to bank accounts controlled by co-conspirators. On October 31, 2007, the co-conspirator wire transferred \$1996.75 from an account in the name of Texon to the bank account of Borgono, located in Miami, Florida. Borgono retained the funds.

41. On December 12, 2011, Borgono pled guilty in the U.S. District Court for the District of Columbia, to one count of Conspiracy to Defraud the United States and to Commit Mail Fraud, in violation of Title 18 U.S.C. § 371.

42. Borgono's ongoing criminal activity of Conspiracy to Defraud the United States and to Commit Mail Fraud was material to determining her eligibility to naturalize because it would have had the natural tendency to influence CIS's decision whether to approve her application. In fact, Borgono's criminal activity precluded her from establishing good moral character, and thus would have resulted in a denial of her naturalization application.

43. Based on the facts outlined in the foregoing paragraphs, good cause exists to institute proceedings pursuant to section 340(a) of the INA, 8 U.S.C. § 1451(a), to revoke Borgono's citizenship, and to cancel her certificate of naturalization.

44. Borgono's last known residence is at [REDACTED] Miami, Florida, 33186 located within the jurisdiction of the U.S. District Court for the Southern District of Florida.

DECLARATION IN LIEU OF JURAT
(28 U.S.C. § 1746)

I declare under penalty of perjury that the foregoing is true and correct. Executed on

March 23, 2018.



David Jansen
Special Agent
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
Homeland Security Investigations
Miami, Florida

Exhibit B

FILED

DEC 12 2011

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**Clerk, U.S. District and
Bankruptcy Courts**

UNITED STATES OF AMERICA,	:	CRIMINAL NO.	CR -11-332
	:		
v.	:	VIOLATIONS:	
	:		
NORMA I. BORGONO,	:	18 U.S.C. § 371 (Count 1)	
	:	Conspiracy to Defraud the United	
Defendant.	:	States and to Commit Mail Fraud	
	:		

STATEMENT OF THE OFFENSE

1. Between at least April 2003 until May 2009, NORMA I. BORGONO (“BORGONO”) was the office manager of Texon, Incorporated (“Texon”). Texon was headquartered in Miami, Florida, and was an exporting company that was in the business of purchasing United States goods on behalf of clients in the Caribbean, Central America, South America and other foreign countries and shipping those goods overseas. Texon was owned by Co-Conspirator 1 (“CC-1”), who lived in Miami, Florida.

2. From at least April 2003 until May 2009, BORGONO conspired with CC-1 and others, to obtain from the Export-Import Bank of the United States (“Ex-Im Bank”), more than \$24 million in fraudulent loan transactions in which Texon acted as the “exporter,” to falsify documents sent to United States banks and to the Ex-Im Bank, and to misappropriate approximately \$14.1 million in loan proceeds that were guaranteed by the Ex-Im Bank.

3. Between at least April 2003 and May 2009, Borgono and CC-1 agreed to prepare, and did prepare or cause to be prepared, applications for insurance or guarantees that would be submitted to the Ex-Im Bank. Each of the applications represented that a lending bank intended to make a loan to a foreign borrower to enable the borrower to purchase goods meeting the Ex-Im Bank’s definition of “United States goods,” and have

the equipment shipped out of the U.S., usually to the borrower's home country. The applications requested Ex-Im Bank to issue guarantees on the loans.

4. On approximately September 11, 2003, an application for insurance or guarantee for \$364,905 for a buyer located in South America was sent by a "broker" for the transaction located in San Antonio, Texas, to Ex-Im Bank in Washington, D.C. by commercial interstate carrier. Texon was identified on the application as the "exporter" for the transaction and CC-1 was the contact person for the transaction.

5. BORGONO and CC-1 knew at the time that the applications were submitted to the Ex-Im Bank that they falsely reported the goods that would be purchased and shipped to the foreign buyer. The September 11, 2003 application stated that the loan proceeds would be used to purchase and ship to South America motor graders and compactors. In fact, although invoices submitted to the Ex-Im Bank and prepared at the direction of CC-1 indicated that six pieces of equipment were purchased and shipped to the South American buyer, only one piece of equipment actually was purchased and shipped. This information was not submitted to or shared with transaction officials at the Ex-Im Bank.

6. Between at least April 2003 and May 2009, CC-1 instructed BORGONO and others to prepare false documents that would be submitted to the lending banks and the Ex-Im Bank to facilitate the fraudulent loan transactions. On December 10, 2007, a lending bank located in Birmingham, Alabama sent to the Ex-Im Bank a claim for payment on the Ex-Im Bank guarantee of a defaulted loan, including a commercial invoice prepared by BORGONO, falsely stating that \$429,300 worth of goods were purchased for shipment to a buyer located in South America.

7. At CC-1's instruction, BORGONO and others prepared false documents stating that U.S. goods had been or would be purchased and shipped to the foreign buyers, and then CC-1 submitted those documents to the Ex-Im Bank through the lending banks. BORGONO and others prepared, or caused to be prepared, at the direction of CC-1 or pursuant to the established practice of BORGONO and CC-1 to prepare false documents for submission to United States banks or the Ex-Im Bank, false commercial invoices, bills of lading, and Ex-Im Bank "Form of Exporter's Certificates", stating that certain goods had been purchased and had been or would be shipped, but knowing that they had not been and would not be purchased and/or shipped.

8. On March 18, 2009, a lending bank located in Miami, Florida sent to the Ex-Im Bank via commercial interstate carrier a bill of lading that was prepared by BORGONO, falsely stating that Caterpillar equipment identified on that document were shipped to a South American buyer. In truth, none of the goods identified on the document were purchased or shipped to the buyer. In this and in other fraudulent loan transactions, neither BORGONO nor CC-1 disclosed to the Ex-Im Bank or to the lending banks the true goods that were shipped.

9. Between at least April 2003 and May 2009, the Ex-Im Bank issued insurance or guarantees on more than \$24 million worth of fraudulent loans based on applications submitted to the Ex-Im Bank, including false statements made by BORGONO or CC-1, or at their direction.

10. Between at least April 2003 and May 2009, BORGONO, CC-1 and others also agreed that a smaller amount of the loan proceeds than was represented to the Ex-Im Bank would actually be used to purchase U.S. goods for foreign buyers. In some cases,

CC-1 provided loan proceeds to foreign buyers in cash, rather than using the proceeds to purchase goods to be shipped to the buyers.

11. CC-1 commingled the loan proceeds with personal and other monies. Texon and its related entities retained approximately \$2.5 million of the proceeds of the Ex-Im Bank-insured or guaranteed loans. On October 31, 2007, CC-1 transferred by wire \$1,996.75 from an account in the name of Texon at a bank located in Miami, Florida to the bank account of BORGONO at a bank located in Miami, Florida, which were Ex-Im Bank-guaranteed loan proceeds. BORGONO retained those funds.

12. Many of the fraudulent loans that were insured or guaranteed by the Ex-Im Bank based on applications including false statements by BORGONO, CC-1 or others at their direction went into default. Between April 2003 and October 1, 2011, Ex-Im Bank paid more than \$15 million to lending banks or their assignees based on claims on guaranteed loans that had gone into default. As of April 1, 2010, more than \$12.9 million of the amounts paid on claims for defaulted loans remained unrecovered. Additional loans remain outstanding and it will not be known for some time whether they will go into default.

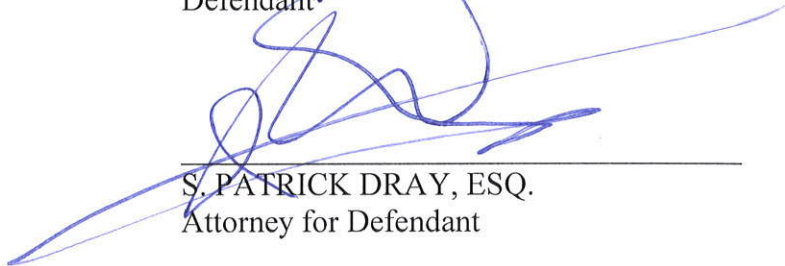
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The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the charges against me. It does not include all of the facts known to me concerning criminal activity in which I and others engaged. I make this statement knowingly and voluntarily and because I am in fact guilty of the crimes charged.

DATE: 8 Nov 2011



NORMA D. BORGONO
Defendant



S. PATRICK DRAY, ESQ.
Attorney for Defendant

Exhibit C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	CRIMINAL NO.
	:	
v.	:	VIOLATIONS:
	:	
NORMA I. BORGONO,	:	18 U.S.C. § 371 (Count 1)
	:	Conspiracy to Defraud the United
Defendant.	:	States and to Commit Mail Fraud
	:	

INFORMATION

The United States Department of Justice, Criminal Division, Fraud Section, charges that at all times material to this Information:

INTRODUCTION

1. NORMA I. BORGONO (“BORGONO”) was the office manager of Texon, Incorporated (“Texon”), an exporting company that was headquartered in Miami, Florida, that was in the business of purchasing United States goods on behalf of clients in the Caribbean, Central America, South America and other foreign countries and shipping those goods overseas.

2. Co-conspirator 1 (“CC-1”) was the owner of Texon, living in Miami, Florida.

3. United States banks provided loans to borrowers in the Caribbean, Central America, South America and other foreign countries for the purchase of United States goods.

4. The Export-Import Bank of the United States (the “Ex-Im Bank”) was an independent agency of the executive branch of the United States and located in Washington, D.C. It was also the official export credit agency of the United States. The mission of the Ex-Im Bank was to assist in the export of United States goods and services to companies overseas. One of the ways the Ex-Im Bank fulfilled this mission was by

issuing loan guarantees to United States lending banks on behalf of creditworthy foreign companies for the purpose of purchasing United States goods. Once the Ex-Im Bank issued a loan guarantee, if the foreign borrower defaulted on its loan repayments to a United States bank, the Ex-Im Bank paid the amount of the outstanding loan to the United States bank. Before issuing a loan guarantee, the Ex-Im Bank required that a United States exporter – the person or entity shipping the United States goods on behalf of the foreign borrower – certify to the Ex-Im Bank the type, amount, and value of the United States goods that it would be shipping and that the goods shipped were made in the United States.

5. The above introductory allegations are realleged and incorporated in each count of this Information as if fully set forth in each count.

**COUNT ONE
(CONSPIRACY)**

THE CONSPIRACY

6. From at least April 2003 until in or about May 2009, in the District of Columbia and elsewhere, BORGONO and CC-1, together, and with others known and unknown, did knowingly and intentionally conspire, combine, confederate and agree to defraud the United States and agencies thereof and to commit an offense against them, to wit, to knowingly devise, and intend to devise, through the use of the mail, a scheme and artifice to defraud the United States and the Ex-Im Bank, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1341.

PURPOSE OF THE CONSPIRACY

7. The purpose of the conspiracy was for the co-conspirators, including BORGONO, to unlawfully enrich themselves financially by submitting false and fraudulent information to the Ex-Im Bank, through various lending banks, to obtain and misappropriate certain loan proceeds.

THE MANNER AND MEANS OF THE CONSPIRACY

8. To achieve the purpose of the conspiracy, BORGONO, CC-1, and others used the following manners and means, among others:

a. From at least April 2003 until in or about May 2009, BORGONO and CC-1 would agree to prepare, and did prepare or cause to be prepared, false applications for insurance or guarantees that would be submitted to the Ex-Im Bank to induce Ex-Im Bank to insure or guarantee approximately \$24 million of loans to the debtors from commercial banks, knowing and intending that all or some of the goods identified on the applications would not be purchased and/or would not be shipped to the debtor;

b. CC-1 would and did instruct BORGONO and others to prepare false documents that would be submitted to the lending banks and the Ex-Im Bank to facilitate the fraudulent loan transactions;

c. BORGONO would and did prepare false documents stating that United States goods had been purchased and shipped to the foreign companies totaling approximately \$24 million, and then BORGONO would submit those documents to the Ex-Im Bank, through the lending banks;

d. BORGONO or other co-conspirators would and did prepare, or cause to be prepared, at the direction of CC-1 or pursuant to the established practice of BORGONO and CC-1, false documents for submission to United States banks or the Ex-Im Bank, false commercial invoices, bills of lading, and Ex-Im Bank "Form of Exporter's Certificates" ("Exporter's Certificates"), stating that certain goods had been purchased and had been or would be shipped, but knowing that they had not been and would not be purchased and/or shipped;

e. BORGONO and CC-1 would and did fail to disclose to the Ex-Im Bank or to the lending banks the true goods that were shipped;

f. Texon would and did receive approximately \$2.5 million of the proceeds of the bank loans;

g. CC-1 would and did in some cases provide loan proceeds to borrowers in cash, rather than using the proceeds to purchase goods to be shipped to the borrowers;

g. CC-1 would and did commingle the loan proceeds with personal and other monies; and

h. CC-1 would and did transfer loan proceeds to bank accounts controlled by co-conspirators.

i. BORGONO would and did retain approximately \$1,996.75 of the loan proceeds for her own benefit and use.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

9. Within the District of Columbia and elsewhere, in furtherance of the above-described conspiracy, and in order to carry out the goal thereof, BORGONO, CC-1, and others known and unknown, committed the following overt acts, among others:

a. On or about September 11, 2003, an application for insurance or guarantee for \$364,905 for a buyer located in South America was sent by a “broker” located in San Antonio, Texas to Ex-Im Bank in Washington, D.C. by commercial interstate carrier, stating that Texon was the “exporter” for the transaction and CC-1 was the contact person for the transaction, falsely reporting the goods that would be purchased and shipped to the debtor;

b. On or about July 27, 2006, CC-1 sent an e-mail to a buyer in the Dominican Republic, instructing the buyer to create false documents by altering true documents, including a bill of lading and a commercial invoice, to change the name of the buyer and the date of the invoice;

c. On or about November 24, 2006, a lending bank sent to CC-1 at an account in the name of Texon at a bank located in Miami, Florida, a wire transfer in the amount of \$608,599.68;

d. On or about July 9, 2007, an application for insurance or guarantee for \$900,000 was sent by wire transfer from the lending bank in Miami, Florida to the Ex-Im Bank’s computer server in Washington, D.C., indicating that Texon was the “exporter” for the transaction, falsely reporting the goods that would be purchased and shipped to the debtor;

e. On or about August 7, 2007, a lending bank sent to CC-1 at an account in the name of Texon at a bank located in Miami, Florida a wire transfer in the amount of \$363,986.15;

f. On or about October 31, 2007, CC-1 transferred by wire \$1,996.75 from an account in the name of Texon at a bank located in Miami, Florida to the bank account of BORGONO at a bank located in Miami, Florida;

g. On or about December 10, 2007, a lending bank located in Birmingham, Alabama sent to the Ex-Im Bank a claim for payment on the Ex-Im Bank guarantee of a defaulted loan, including a commercial invoice prepared by BORGONO, falsely stating that \$429,300 worth of goods were purchased for shipment to a buyer located in South America;

h. On or about April 18, 2008, a lending bank sent to CC-1 at an account in the name of Texon at a bank located in Miami, Florida a wire transfer in the amount of \$427,295;

i. On or about September 8, 2008, CC-1 transferred by wire \$217,647 from an account in the name of Texon at a bank located in Miami, Florida to the bank account of a freight forwarder at a bank located in Laredo, Texas;

j. On or about December 22, 2008, CC-1 transferred by wire \$79,026.13 from an account in the name of Texon at a bank located in Miami, Florida to the account of a buyer at a bank located in Laredo, Texas;

k. On or about January 20, 2009, CC-1 transferred by wire \$100,000 from an account in the name of Texon at a bank located in Miami, Florida to the account of a buyer at a bank located in the Dominican Republic;


l. On or about March 18, 2009, a lending bank located in Miami, Florida sent to the Ex-Im Bank via commercial interstate carrier a bill of lading that was prepared by BORGONO, falsely stating that the goods identified on that document were shipped to a South American buyer; and

m. On or about April 6, 2009, a lending bank located in Miami, Florida sent to the Ex-Im Bank via commercial interstate carrier a claim for payment on the Ex-Im Bank guarantee of a defaulted loan, including an Exporter's Certificate that was prepared by CC-1 or BORGONO pursuant to CC-1's instructions or their established practice to prepare false documents for submission to the Ex-Im Bank, falsely stating that goods and services totaling \$1,410,200 were purchased and the goods were shipped to a Central American buyer.

(In violation of Title 18, United States Code, Section 371.)

DENIS J. McINERNEY
Chief, Fraud Section

By:


NICOLE H. SPRINZEN
D.C. Bar # 468568
Trial Attorney
Fraud-Section, Criminal Division
United States Department of Justice
1400 New York Avenue, N.W.
Washington, D.C. 20530
(202) 305-3063
Nicole.Sprinzen@usdoj.gov

Dated: November 14, 2011

Exhibit D



U.S. Department of Justice

Criminal Division

FILED

DEC 12 2011

**Clerk, U.S. District and
Bankruptcy Courts**

*1400 New York Avenue NW
Washington, D.C. 20530*

November 2, 2011

S. Patrick Dray, P.A.
1111 Brickell Ave., Ste 2050
Miami, FL 33131

Re: United States v. Norma Borgono

Dear Mr. Dray:

This letter sets forth the full and complete plea offer to your client, Ms. Norma Borgono (the “defendant”). This offer is binding only upon the Fraud Section, Criminal Division of the United States Department of Justice (hereinafter “the Government”), and will expire on November 10, 2011. Upon the Government’s receipt of the executed letter, the letter itself will become the plea agreement. The terms of the offer are as follows:

1. Charges. The defendant agrees to waive Indictment and plead guilty to a one-count Information, charging her with one count of conspiracy to defraud the United States and to commit mail fraud (18 U.S.C. § 371). It is understood that the guilty plea will be based on a factual admission of guilt to the offenses charged to be made before the Court by the defendant. The defendant agrees that the attached “Statement of the Offense” fairly and accurately describes the defendant’s actions and involvement in the charged offenses. During the plea hearing, the Defendant will adopt the Statement of the Offense as a written proffer of evidence.

2. Potential penalties and assessments. The defendant understands that 18 U.S.C. § 371 carries a maximum sentence of 5 years imprisonment, a possible fine of \$250,000, or a fine of twice the gross gain or gross loss pursuant to 18 U.S.C. § 3571(d), a \$100 special assessment, a three-year term of supervised release, an order of restitution, and an obligation to pay any applicable interest or penalties on fines or restitution not timely made.

Notwithstanding the maximum sentence, the defendant understands that the sentence to be imposed in this case will be determined by the Court, guided by the factors enumerated in 18 U.S.C. § 3553(a), including a consideration of the guidelines and policies promulgated by the United States Sentencing Guidelines Commission, Guidelines Manual, 2010 Edition (hereinafter “Sentencing Guidelines” or “U.S.S.G.”). The defendant understands that his sentence, including the applicable Sentencing

Guideline range, will be determined solely by the Court, and the Government cannot and does not make any promises, representations, or predictions regarding what sentence the Court will impose. The defendant further understands that if the Court imposes a sentence greater than that provided in the Sentencing Guidelines range as determined by the Court, or which is in any other way unsatisfactory to her, she cannot withdraw her guilty plea. This does not, however, limit the defendant's right to appeal an unlawful sentence.

3. Forfeiture. The defendant agrees to entry of a money judgment against her in the amount of \$1,996.75, which constitutes proceeds of the conspiracy offense to which she will plead guilty. The defendant will pay this money judgment at the time of sentencing by way of certified check in the amount of \$1,996.75, made payable to the United States Marshal Service, in satisfaction of the money judgment, and this amount will constitute the total amount forfeitable from the defendant as a result of the conspiracy offense to which she will plead guilty. In order to effectuate the forfeiture, the defendant agrees to the entry of a Consent Order of Forfeiture, a copy of which is attached hereto. The defendant warrants that he is the sole owner of the \$1,996.75 being submitted to the United States and agrees to hold the United States, its agents and employees harmless from any claims whatsoever in connection with the forfeiture of such money and property.

The defendant further agrees to waive all interest in the forfeited assets in any administrative or judicial forfeiture proceeding, whether criminal or civil, state or federal. The defendant agrees to consent to the entry of orders of forfeiture for such property and waives the requirements of Federal Rules of Criminal Procedures 32.2 regarding notice of the forfeiture in the charging instrument, announcement of the forfeiture at sentencing, and incorporation of the forfeiture in the judgment. The defendant understands that the forfeiture of assets is part of the plea agreement and waives any failure by the Court to advise her of this, pursuant to Rule 11(b)(1)(J), at the time her guilty plea is accepted.

The defendant further agrees to waive all constitutional and statutory challenges in any manner (including direct appeal, habeas corpus, or any other means) to any forfeiture carried out in accordance with this plea agreement on any grounds, including that the forfeiture constitutes an excessive fine or punishment. The defendant agrees to take all steps as requested by the Government to pass clear title to forfeitable assets to the United States, and to testify truthfully in any judicial forfeiture proceeding. The defendant acknowledges that all property covered by this plea agreement is subject to forfeiture as proceeds of illegal conduct and/or substitute assets for property otherwise subject to forfeiture.

4. Restitution. In addition to the other penalties provided by law, the Court must also order that the defendant make restitution under 18 U.S.C. § 3663A. In addition to any restitution that may be ordered by the Court, the defendant agrees that restitution will be due and payable in full as of the date of sentencing, which we understand as of this date to be approximately \$13.4 million, jointly and severally with all other

defendants, to all victims of the defendant's criminal conduct, in this case, to the Export-Import Bank of the United States.

5. Defendant's Obligations. The defendant agrees that she shall cooperate fully with the Government by providing truthful, candid, and complete information as to all matters within his knowledge concerning her wrongful conduct as well as any wrongful conduct involving others. The defendant understands that such cooperation will include:

- a. Attending all meetings at which the Government requests her presence;
- b. Providing to the Government, upon request, any document, record, or other evidence relating to matters about which the Government or any designated law enforcement agency inquires, including but not limited to a full, complete and accurate personal financial statement;
- c. Testifying truthfully at any trial, hearing, or other grand jury or court proceeding if requested to do so by the Government; and
- d. Bringing to the attention of the Government all crimes which she has committed, and all administrative, civil, or criminal proceedings, investigations, or prosecutions in which he has been or is a subject, target, party, or witness.

6. The Government reserves the right to evaluate the nature and extent of the defendant's cooperation and to make the defendant's cooperation, or lack thereof, known to the Court at the time of sentencing. If in the sole and unreviewable judgment of the Government the defendant's cooperation is of such quality and significance to the investigation or prosecution of other criminal matters as to warrant the Court's downward departure from the sentence calculated by the Sentencing Guidelines, the Government may at or before sentencing make a motion pursuant to Section 5K1.1 of the Sentencing Guidelines reflecting that the defendant has provided substantial assistance and recommending a downward departure from the applicable guideline range. The defendant acknowledges and agrees, however, that nothing in this Agreement may be construed to require the Government to file such a motion and that the Government's assessment of the nature, value, truthfulness, completeness, and accuracy of the defendant's cooperation shall be binding on the defendant.

7. The defendant understands and acknowledges that the Court is under no obligation to grant a Government motion pursuant to Section 5K1.1 of the Sentencing Guidelines as referred to in paragraph 6 of this agreement, should the Government exercise its discretion to file such a motion.

8. Federal Sentencing Guidelines. Although not binding on the Court, the parties agree that the 2010 Sentencing Guidelines apply as follows:

(i) Base Offense Level [U.S.S.G. §§ 2S1.1 and 2B1.1(a)(1)]	7
(ii) Loss (more than \$20 million, less than \$50 million) [U.S.S.G. § 2B1.1(b)(1)(L)]	+22
(iii) Minimal Participant [U.S.S.G. § 3B1.2(a)]	-4
Subtotal	25
(iv) Acceptance of Responsibility [U.S.S.G. § 3E1.1(a)]	-2
(v) Assistance [U.S.S.G. § 3E1.1(b)]	-1
Adjusted Offense Level	22

9. In the event that this plea offer is either not accepted or is accepted and subsequently withdrawn, the parties will not be bound by the proposed interpretations of applicable Sentencing Guidelines provisions contained herein.

10. Financial Arrangements. The defendant agrees that prior to or at the time of the sentencing, he will deliver to the Clerk's Office, United States District Court, a certified check in the amount of \$100 to cover the special assessment, as required in Title 18, United States Code, Section 3013. The defendant also agrees to provide to the Government a full and complete accounting of all assets, real or tangible, held by her or in any other name for her benefit, and, to that end, to submit a standard form 500 (Financial Statement of Debtor).

11. Reservation of Allocation. The Government reserves its full right of allocation for purposes of sentencing and post-sentencing in this matter, including the right to set forth at sentencing and any proceedings(s) before the Bureau of Prisons all of its evidence with respect to the defendant's criminal activities.

12. The Government reserves the right to inform the presentence report writer and the Court of any relevant facts, to dispute any factual inaccuracies in the presentence report and to contest any matters not provided for in this plea agreement.

13. If in this plea agreement the Government has agreed to recommend or refrain from recommending to the sentencing judge a particular resolution of any sentencing issue, the Government reserves the right to full allocution in any post-sentence litigation in order to defend the sentencing judge's ultimate decision on such issues.

14. Waiver of Certain Rights. The defendant understands that by pleading guilty, she relinquishes certain constitutional rights – including the right to a jury trial – as well as the right to collaterally attack her conviction. Additionally, the defendant acknowledges and agrees that the Court has jurisdiction and authority over this case and that it has the right to impose any sentence within the statutory maximum set for the offenses to which the defendant pleads guilty. The defendant is aware that the Government's factual stipulations and predictions about the calculation of the Sentencing Guidelines are not binding on the sentencing judge. Knowing that, the defendant waives the right to appeal her sentence or the manner in which it was determined pursuant to 18 U.S.C. § 3742, except to the extent that (a) the Court sentences the defendant to a period of imprisonment longer than the statutory maximum, or (b) the defendant's sentence is otherwise unlawful. The defendant also waives any challenges to her plea based upon any statute of limitations. The defendant agrees that she is not a "prevailing party" within the meaning of the "Hyde Amendment," Section 617, P.L. 105-119 (Nov. 26, 1997), and will not file any claim under that law.

15. Government Concessions. In exchange for the defendant's guilty plea, the Government agrees to recommend a two-level adjustment for acceptance of responsibility and a one-level adjustment for assisting authorities pursuant to U.S.S.G. § 3E1.1 based upon the defendant's recognition and timely acceptance of personal responsibility. The Government, however, will not be required to make these recommendations if any of the following occurs: (1) defendant fails or refuses to make a full, accurate, and complete disclosure to the Government or the probation office of the circumstances surrounding the relevant offense conduct and her present financial condition; (2) defendant is found to have misrepresented facts to the Government prior to entering into this plea agreement; (3) defendant commits any misconduct after entering into this plea agreement, including but not limited to, committing a state or federal offense, violating any term of release, or making a false statement or misrepresentation to any governmental entity or official; or (4) defendant fails to comply with any terms of this plea agreement.

16. Also, subject to other paragraphs in this agreement, the Government agrees not to bring any additional criminal charges against the defendant for the criminal activity outlined in the attached Statement of the Offense. This agreement not to prosecute the defendant does not extend to crimes of violence. It is understood that the United States has no evidence, as of the date of the agreement, of any crimes of violence involving the defendant.

17. Pre-Sentence Conditions. The defendant agrees that prior to or at the time of entry of his guilty plea before the Court, the defendant will surrender her passport(s) to the U.S. Marshals Service. The defendant also agrees that the government may make recommendations regarding the defendant's bond status at the time of entry of her guilty plea, including the recommendation of detention pending sentencing.

18. Breach of agreement. Defendant agrees that if she fails to comply with any of the provisions of this plea agreement, including the failure to tender such plea agreement to the Court, makes false or misleading statements before the Court, commits any further crimes, or attempts to withdraw the plea, the Government will have the right to characterize such conduct as a breach of this plea agreement. In the event of such a breach, (a) the United States will be free from its obligations under the agreement and further may take whatever position it believes appropriate as to the sentence and the conditions of the defendant's release (for example, should the defendant commit any conduct after the date of this agreement that would form the basis for an increase in the defendant's offense level or justify an upward departure – examples of which include but are not limited to, obstruction of justice, failure to appear for a court proceeding, criminal conduct while pending sentencing, and false statements to law enforcement agents, the probation officer, or Court – the Government is free under this agreement to seek an increase in the offense level based on that post-agreement conduct); (b) the defendant will not have the right to withdraw the guilty plea; (c) the defendant shall be fully subject to criminal prosecution for any other crimes which she has committed or might commit, if any, including perjury and obstruction of justice; and (d) the United States will be free to use against the defendant, directly and indirectly, in any criminal or civil proceeding any of the information or materials provided by her pursuant to this agreement.


19. In the event of a breach of this plea agreement, any such prosecution of the defendant not time-barred by the applicable statute of limitations on the date of the signing of this agreement may be commenced against the defendant in accordance with this paragraph, notwithstanding the running of the applicable statute of limitations before the commencement of such prosecutions. The defendant knowingly and voluntarily agrees to waive any and all defenses based on the statute of limitations for any prosecutions commenced pursuant to the provisions of this paragraph.

20. Fraud Section, Criminal Division of the United States Department of Justice Bound. The defendant understands that this agreement is binding only upon the Fraud Section, Criminal Division of the United States Department of Justice. This agreement does not bind any United States Attorney's Office, nor does it bind any other state, local, or federal prosecutor. It also does not bar or compromise any civil, tax, or administrative claim pending or that may be made against the defendant.

21. Complete Agreement. No other agreements, promises, understandings, or representations have been made by the parties or their counsel other than those contained in writing herein, nor will any such agreements, promises, understandings, or representations be made unless committed to writing and signed by the defendant, the defendant's counsel, and the Government.

DENIS J. McINERNEY
Chief, Fraud Section
Criminal Division
United States Department of Justice

By:


NICOLE H. SPRINZEN
DC BAR NO. 468568
Trial Attorney
Fraud Section, Criminal Division
United States Department of Justice
1400 New York Avenue, NW
Washington, D.C. 20005
(202) 305-3063
Nicole.Sprinzen@usdoj.gov

Acceptances:

I have read this plea agreement and discussed it with my attorney, S. Patrick Dray, Esq. I fully understand this agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this agreement fully. I am pleading guilty because I am in fact guilty of the offense(s) identified in paragraph one.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in connection with this plea agreement and matters related to it.

Date: 8 Nov 2011


Norma D. Borgono

I have read each of the pages constituting this plea agreement, reviewed them with my client, and discussed the provisions of the agreement with my client fully. These pages accurately and completely set forth the entire plea agreement. I concur in my client's desire to plead guilty as set forth in this agreement.

Date: 8 Nov 2011

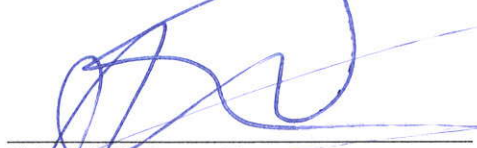

S. Patrick Dray, Esq.

Exhibit E

FILED

UNITED STATES DISTRICT COURT

MAY 17 2012

District of Columbia

Clerk, U.S. District and Bankruptcy Courts

UNITED STATES OF AMERICA

v.

NORMA I. BORGONO

JUDGMENT IN A CRIMINAL CASE

Case Number: 11CR332-01

USM Number: 31854-016

Patrick S. Dray, Esquire and John P. Elwood, Esquire

Defendant's Attorney

THE DEFENDANT:

pleaded guilty to count(s) One (1) of the Information filed on 11/14/2012 (plea 12/12/2011)

pleaded nolo contendere to count(s) _____ which was accepted by the court.

was found guilty on count(s) _____ after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:

<u>Title & Section</u>	<u>Nature of Offense</u>	<u>Offense Ended</u>	<u>Count</u>
18 USC 371	Conspiracy to Defraud the United States and to Commit Mail Fraud.	May 2009	1

The defendant is sentenced as provided in pages 2 through 6 of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

The defendant has been found not guilty on count(s) _____

Count(s) _____ is are dismissed on the motion of the United States.

It is ordered that the defendant must notify the United States attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States attorney of material changes in economic circumstances.

May 10, 2012
Date of Imposition of Judgment

Signature of Judge

Ricardo M. Urbina

U.S. District Judge

Name and Title of Judge

Date

5-17-12

DEFENDANT: NORMA I. BORGONO
CASE NUMBER: 11CR332-01

PROBATION

The defendant is hereby sentenced to probation for a term of :

SIXTY (60) MONTHS ON COUNT ONE (1) WITH CONDITIONS.

The defendant shall not commit another federal, state or local crime.

The defendant shall not unlawfully possess a controlled substance. The defendant shall refrain from any unlawful use of a controlled substance. The defendant shall submit to one drug test within 15 days of placement on probation and at least two periodic drug tests thereafter, as determined by the court.

- The above drug testing condition is suspended, based on the court's determination that the defendant poses a low risk of future substance abuse. *(Check, if applicable.)*
- The defendant shall not possess a firearm, ammunition, destructive device, or any other dangerous weapon. *(Check, if applicable)*
- The defendant shall cooperate in the collection of DNA as directed by the probation officer. *(Check, if applicable)*
- The defendant shall comply with the requirements of the Sex Offender Registration and Notification Act (42 U.S.C. § 16901, *et seq.*) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in which he or she resides, works, is a student, or was convicted of a qualifying offense. *(Check, if applicable)*
- The defendant shall participate in an approved program for domestic violence. *(Check, if applicable)*

If this judgment imposes a fine or restitution, it is a condition of probation that the defendant pay in accordance with the Schedule of Payments sheet of this judgment.

The defendant must comply with the standard conditions that have been adopted by this court as well as with any additional conditions on the attached page.

STANDARD CONDITIONS OF SUPERVISION

- 1) the defendant shall not leave the judicial district without the permission of the court or probation officer;
- 2) the defendant shall report to the probation officer in a manner and frequency directed by the court or probation officer;
- 3) the defendant shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
- 4) the defendant shall support his or her dependents and meet other family responsibilities;
- 5) the defendant shall work regularly at a lawful occupation, unless excused by the probation officer for schooling, training, or other acceptable reasons;
- 6) the defendant shall notify the probation officer at least ten days prior to any change in residence or employment;
- 7) the defendant shall refrain from excessive use of alcohol and shall not purchase, possess, use, distribute, or administer any controlled substance or any paraphernalia related to any controlled substances, except as prescribed by a physician;
- 8) the defendant shall not frequent places where controlled substances are illegally sold, used, distributed, or administered;
- 9) the defendant shall not associate with any persons engaged in criminal activity and shall not associate with any person convicted of a felony, unless granted permission to do so by the probation officer;
- 10) the defendant shall permit a probation officer to visit him or her at any time at home or elsewhere and shall permit confiscation of any contraband observed in plain view of the probation officer;
- 11) the defendant shall notify the probation officer within seventy-two hours of being arrested or questioned by a law enforcement officer;
- 12) the defendant shall not enter into any agreement to act as an informer or a special agent of a law enforcement agency without the permission of the court; and
- 13) as directed by the probation officer, the defendant shall notify third parties of risks that may be occasioned by the defendant's criminal record or personal history or characteristics and shall permit the probation officer to make such notifications and to confirm the defendant's compliance with such notification requirement.

DEFENDANT: NORMA I. BORGONO
CASE NUMBER: 11CR332-01

ADDITIONAL STANDARD CONDITIONS OF SUPERVISION

1. Special Assessment - The defendant shall pay a \$100.00 special assessment which shall be due immediately and shall be payable to the Clerk of the Court for the U.S. District Court, District of Columbia.
2. Restitution Obligation - The defendant shall pay \$5,000.00 in restitution which shall be due immediately and shall be payable to the Clerk of the Court for the U.S. District Court, District of Columbia, for its disbursement to the victim:
Attn: Richard Brackley, Managing Director of Claims and Recovery Unit, Ex-Im Bank, 811 Vermont Avenue, NW, Washington, DC 20571.
3. Report to Probation Office - The Court authorizes the transfer of probation supervision to the United States Probation Office in the Southern District of Florida. Within 72 hours, the defendant shall report in person to the Probation Office for the Southern District of Florida.
4. Change of Address - Within 30 days of any change of address, the defendant shall notify the Clerk of the Court for the U.S. District Court, District of Columbia, of the change until such time as the financial obligation is paid in full.

DEFENDANT: NORMA I. BORGONO
CASE NUMBER: 11CR332-01

SPECIAL CONDITIONS OF SUPERVISION

1. The defendant shall be placed in the Location Monitoring Program without electronic monitoring (Voice Recognition) for a period of 365 days, to commence within thirty (30) days of being placed on probation. The Court finds that the defendant does not have the ability to pay both restitution and the cost of electronic monitoring. Therefore, the Court waives the costs of electronic monitoring. The defendant is restricted to her residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities as pre-approved by the officer.
2. DNA Sample Requirement - Pursuant to 42 USC 14135a, for all felony offenses, the defendant shall submit to the collection and use of DNA identification information while incarcerated in the Bureau of Prisons, or at the direction of the U.S. Probation Office.
3. Restitution Obligation - The defendant shall pay the balance of any restitution owed at a rate of no less than \$100 each month and provide verification of same to the Probation Office.
4. Financial Disclosure - The defendant shall provide the Probation Office with her income tax returns, authorization for release of credit information, and information about any business or finances in which she has a control or interest until all restitution is satisfied.
5. Financial Restrictions - The defendant is prohibited from incurring new credit charges, opening additional lines of credit, or negotiating or consummating any financial contracts without the approval of the Probation Office.
6. Employment Restrictions - The defendant shall be restricted from engaging in employment, consulting, or association in a position which affords access to her employer's financial accounts and/or finances for the duration of supervision, unless approved by the Probation Office.

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedures, the defendant Norma Borgono, is ordered to forfeit the following property which was identified as related to the offense of conviction: specifically a money judgment in the amount of \$1,996.75, which constitutes proceeds of the conspiracy offense to which she pled guilty.

IT IS FURTHER ORDERED that Pretrial Services shall return defendant's passport to her attorney.

The Probation Office shall release the presentence investigation report to all appropriate agencies in order to execute the sentence of the Court.

DEFENDANT: NORMA I. BORGONO
 CASE NUMBER: 11CR332-01

CRIMINAL MONETARY PENALTIES

The defendant must pay the total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>Fine</u>	<u>Restitution</u>
TOTALS	\$ 100.00	\$ 0.00	\$ 5,000.00

The determination of restitution is deferred until _____. An *Amended Judgment in a Criminal Case (AO 245C)* will be entered after such determination.

The defendant must make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss*</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
Attn: Richard Brackley Managing Director of Claims and Recovery Unit Ex-Im Bank 811 Verming Avenue, NW Washington, DC 20571	\$ 0.00	\$5,000.00	

TOTALS	\$ _____	0.00	\$ _____	5,000.00
---------------	----------	------	----------	----------

Restitution amount ordered pursuant to plea agreement \$ _____

The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).

The court determined that the defendant does not have the ability to pay interest and it is ordered that:

the interest requirement is waived for the fine restitution.

the interest requirement for the fine restitution is modified as follows:

* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT: NORMA I. BORGONO
 CASE NUMBER: 11CR332-01

SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties is due as follows:

- A Lump sum payment of \$ 100.00 due immediately, balance due
 - not later than _____, or
 - in accordance C, D, E, or F below; or
- B Payment to begin immediately (may be combined with C, D, or F below); or
- C Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after the date of this judgment; or
- D Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E Payment during the term of supervised release will commence within _____ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or

F Special instructions regarding the payment of criminal monetary penalties:
 The defendant shall pay a special assessment of \$100.00 and \$5,000.00 restitution. These amounts are immediately payable to the Clerk of the U.S. District Court, DC. The Clerk of the Court shall disburse the restitution amount to the victim, Attn: Richard Brackley, Managing Director of Claims and Recovery Unit, Ex-Im Bank, 811 Vermont Avenue, NW, Washington, DC 20571. Balances of any restitution owed shall be paid at a rate of no less than \$100.00 per month and verification of payment shall be provided to the Probation Office.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

Joint and Several
 Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

- The defendant shall pay the cost of prosecution.
- The defendant shall pay the following court cost(s):
- The defendant shall forfeit the defendant's interest in the following property to the United States:
 Pursuant to Rule 32.2(a) of the Fed. Rules of Crim. Proc., the defendant is ordered to forfeit a money judgment in the amount of \$1,996.75, which constitutes proceeds of the conspiracy offense to which she pled guilty.

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) penalties, and (8) costs, including cost of prosecution and court costs.

Exhibit F

OMB No. 1615-0052; Expires 10/31/07

Department of Homeland Security
U.S. Citizenship and Immigration Services

**N-400 Application
for Naturalization**

Print clearly or type your answers using CAPITAL letters. Failure to print clearly may delay your application. Use black ink.

Part 1. Your Name. (The Person Applying for Naturalization)

Write your USCIS "A" number here:
A [REDACTED] 708

A. Your current legal name.

Family Name (Last Name)

BOR GONO Bedoya

Given Name (First Name)

NORMA

Full Middle Name (If applicable)

ISABEL

B. Your name exactly as it appears on your Permanent Resident Card.

Family Name (Last Name)

BORGONO

Given Name (First Name)

NORMA

Full Middle Name (If applicable)

I

C. If you have ever used other names, provide them below.

Family Name (Last Name)

Given Name (First Name)

Middle Name

None

D. Name change (optional)

Please read the Instructions before you decide whether to change your name.

1. Would you like to legally change your name? Yes No
2. If "Yes," print the new name you would like to use. Do not use initials or abbreviations when writing your new name.

Family Name (Last Name)

Borgono

Given Name (First Name)

Norma

Full Middle Name

For USCIS Use Only

Bar Code

Date Stamp



Remarks

best possible
signature
m/11-2107

NORMA
BORGONO
FEB 06 2007

Action Block



Part 2. Information About Your Eligibility. (Check Only One)

I am at least 18 years old AND

- I have been a Lawful Permanent Resident of the United States for at least five years.
- I have been a Lawful Permanent Resident of the United States for at least three years, and I have been married to and living with the same U.S. citizen for the last three years, and my spouse has been a U.S. citizen for the last three years.
- I am applying on the basis of qualifying military service.
- Other (Please explain) _____

250270
FEB 06 2007

Part 3. Information About You.

Write your USCIS "A"- number here:
A [redacted] 708

A. U.S. Social Security Number [redacted] 9994
B. Date of Birth (mm/dd/yyyy) [redacted] 1954
C. Date You Became a Permanent Resident (mm/dd/yyyy) 02/22/2002

D. Country of Birth PERU
E. Country of Nationality PERU

F. Are either of your parents U.S. citizens? (If yes, see Instructions) Yes No
G. What is your current marital status? Single, Never Married Married Divorced Widowed
 Marriage Annulled or Other (Explain)

H. Are you requesting a waiver of the English and/or U.S. History and Government requirements based on a disability or impairment and attaching a Form N-648 with your application? Yes No

I. Are you requesting an accommodation to the naturalization process because of a disability or impairment? (See Instructions for some examples of accommodations.) Yes No

If you answered "Yes," check the box below that applies:

- I am deaf or hearing impaired and need a sign language interpreter who uses the following language: _____
- I use a wheelchair.
- I am blind or sight impaired.
- I will need another type of accommodation. Please explain: _____

6

Part 4. Addresses and Telephone Numbers.

A. Home Address - Street Number and Name (Do not write a P.O. Box in this space) Apartment Number
[redacted] 94 CIR LN [redacted]
City: MIAMI County: DADE State: FLORIDA ZIP Code: 33186 Country: USA

B. Care of Mailing Address - Street Number and Name (If different from home address) Apartment Number
SAME AS ABOVE
City: State: ZIP Code: Country:

C. Daytime Phone Number (If any) Evening Phone Number (If any) E-mail Address (If any)
[redacted] [redacted] @TEXONINC.COM

[redacted]

cell

Part 5. Information for Criminal Records Search.

Write your USCIS "A"- number here:

A [REDACTED] 708

NOTE: The categories below are those required by the FBI. See Instructions for more information.

A. Gender

Male Female

B. Height

5 Feet 06 Inches

C. Weight

128 Pounds

D. Are you Hispanic or Latino?

Yes No

E. Race (Select one or more.)

White Asian Black or African American American Indian or Alaskan Native Native Hawaiian or Other Pacific Islander

F. Hair color

Black Brown Blonde Gray White Red Sandy Bald (No Hair)

G. Eye color

Brown Blue Green Hazel Gray Black Pink Maroon Other

Part 6. Information About Your Residence and Employment.

A. Where have you lived during the last five years? Begin with where you live now and then list every place you lived for the last five years. If you need more space, use a separate sheet(s) of paper.

Street Number and Name, Apartment Number, City, State, Zip Code and Country	Dates (mm/dd/yyyy)	
	From	To
Current Home Address - Same as Part 4.A		Present
[REDACTED] 94 CIRLN 104-33 MI-FL 33186-USA	02/22/2002	PRESENT

B. Where have you worked (or, if you were a student, what schools did you attend) during the last five years? Include military service. Begin with your current or latest employer and then list every place you have worked or studied for the last five years. If you need more space, use a separate sheet of paper.

Employer or School Name	Employer or School Address (Street, City and State)	Dates (mm/dd/yyyy)		Your Occupation
		From	To	
TEXON INC	13501 SW 128 ST #216- MI- FL 33186	02/22/2002	PRESENT	OFFICE MANAGER

Part 7. Time Outside the United States.
(Including Trips to Canada, Mexico and the Caribbean Islands)

Write your USCIS "A"- number here:
 A [redacted] 708

- A. How many total days did you spend outside of the United States during the past five years? 24 days
- B. How many trips of 24 hours or more have you taken outside of the United States during the past five years? 2 trips
- C. List below all the trips of 24 hours or more that you have taken outside of the United States since becoming a Lawful Permanent Resident. Begin with your most recent trip. If you need more space, use a separate sheet(s) of paper.

Date You Left the United States <i>(mm/dd/yyyy)</i>	Date You Returned to the United States <i>(mm/dd/yyyy)</i>	Did Trip Last Six Months or More?		Countries to Which You Traveled	Total Days Out of the United States
07/12/2002	07/26/2002	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	PERU	14
10/02/2004	10/12/2004	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	PERU	10
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		

Part 8. Information About Your Marital History.

A. How many times have you been married (including annulled marriages)? 0 If you have **never** been married, go to Part 9.

B. If you are now married, give the following information about your spouse:

1. Spouse's Family Name *(Last Name)* Given Name *(First Name)* Full Middle Name *(If applicable)*

2. Date of Birth *(mm/dd/yyyy)* 3. Date of Marriage *(mm/dd/yyyy)* 4. Spouse's U.S. Social Security #

5. Home Address - Street Number and Name Apartment Number

City State Zip Code

Part 8. Information About Your Marital History.*(Continued)*

Write your USCIS "A"- number here:

A [Redacted] 708

C. Is your spouse a U.S. citizen? Yes No

D. If your spouse is a U.S. citizen, give the following information:

1. When did your spouse become a U.S. citizen? At Birth Other

If "Other," give the following information:

2. Date your spouse became a U.S. citizen

[Empty text box]

3. Place your spouse became a U.S. citizen *(Please see Instructions)*

[Empty text box]

City and State

E. If your spouse is **not** a U.S. citizen, give the following information :

1. Spouse's Country of Citizenship

[Empty text box]

2. Spouse's USCIS "A"- Number *(If applicable)*

A [Empty text box]

3. Spouse's Immigration Status

Lawful Permanent Resident Other _____

F. If you were married before, provide the following information about your prior spouse. If you have more than one previous marriage, use a separate sheet(s) of paper to provide the information requested in Questions 1-5 below.

1. Prior Spouse's Family Name *(Last Name)*

[Empty text box]

Given Name *(First Name)*

[Empty text box]

Full Middle Name *(If applicable)*

[Empty text box]

2. Prior Spouse's Immigration Status

U.S. Citizen
 Lawful Permanent Resident
 Other _____

3. Date of Marriage *(mm/dd/yyyy)*

[Empty text box]

4. Date Marriage Ended *(mm/dd/yyyy)*

[Empty text box]

5. How Marriage Ended

Divorce Spouse Died Other _____

G. How many times has your current spouse been married (including annulled marriages)?

If your spouse has **ever** been married before, give the following information about **your spouse's** prior marriage.

If your spouse has more than one previous marriage, use a separate sheet(s) of paper to provide the information requested in Questions 1 - 5 below.

1. Prior Spouse's Family Name *(Last Name)*

[Empty text box]

Given Name *(First Name)*

[Empty text box]

Full Middle Name *(If applicable)*

[Empty text box]

2. Prior Spouse's Immigration Status

U.S. Citizen
 Lawful Permanent Resident
 Other _____

3. Date of Marriage *(mm/dd/yyyy)*

[Empty text box]

4. Date Marriage Ended *(mm/dd/yyyy)*

[Empty text box]

5. How Marriage Ended

Divorce Spouse Died Other _____

Part 9. Information About Your Children.

Write your USCIS "A"- number here:
 A [REDACTED] 708

2

A. How many sons and daughters have you had? For more information on which sons and daughters you should include and how to complete this section, see the Instructions.

B. Provide the following information about all of your sons and daughters. If you need more space, use a separate sheet(s) of paper.

Full Name of Son or Daughter	Date of Birth (mm/dd/yyyy)	USCIS "A"- number (if child has one)	Country of Birth	Current Address (Street, City, State and Country)
A. [REDACTED] R. [REDACTED]	10/15/1977	A	PERU	[REDACTED] #104-33-MI-FL 33186
U. [REDACTED] R. [REDACTED]	03/17/1983	A	PERU	[REDACTED] #104-33 MI-FL 33186
		A		
		A		
		A		
		A		
		A		
		A		

2 children

Handwritten circled '2' with a diagonal line through it.

Handwritten note: "I have no other children."

Add Children

Go to continuation page

Part 10. Additional Questions.

Please answer Questions 1 through 14. If you answer "Yes" to any of these questions, include a written explanation with this form. Your written explanation should (1) explain why your answer was "Yes" and (2) provide any additional information that helps to explain your answer.

A. General Questions.

- Have you ever claimed to be a U.S. citizen (in writing or any other way)? Yes No
- Have you ever registered to vote in any Federal, state or local election in the United States? Yes No
- Have you ever voted in any Federal, state or local election in the United States? Yes No
- Since becoming a Lawful Permanent Resident, have you ever failed to file a required Federal state or local tax return? Yes No
- Do you owe any Federal, state or local taxes that are overdue? Yes No
- Do you have any title of nobility in any foreign country? Yes No
- Have you ever been declared legally incompetent or been confined to a mental institution within the last five years? Yes No

Part 10. Additional Questions. (Continued)

Write your USCIS "A"- number here:

A [REDACTED] 708

B. Affiliations.

8. a. Have you **ever** been a member of or associated with any organization, association, fund foundation, party, club, society or similar group in the United States or in any other place? Yes No

b. If you answered "Yes," list the name of each group below. If you need more space, attach the names of the other group(s) on a separate sheet(s) of paper.

Name of Group	Name of Group
1. GOOD SHEPHERD CATHOLIC CHURCH SAN VICENTE DE PAUL	6.
2.	7.
3.	8.
4.	9.
5.	10.

9. Have you **ever** been a member of or in any way associated (either directly or indirectly) with:

a. The Communist Party?

Yes No

b. Any other totalitarian party?

Yes No

c. A terrorist organization?

Yes No

10. Have you **ever** advocated (either directly or indirectly) the overthrow of any government by force or violence?

Yes No

11. Have you **ever** persecuted (either directly or indirectly) any person because of race, religion, national origin, membership in a particular social group or political opinion?

Yes No

12. Between March 23, 1933 and May 8, 1945, did you work for or associate in any way (either directly or indirectly) with:

a. The Nazi government of Germany?

Yes No

b. Any government in any area (1) occupied by, (2) allied with, or (3) established with the help of the Nazi government of Germany?

Yes No

c. Any German, Nazi, or S.S. military unit, paramilitary unit, self-defense unit, vigilante unit, citizen unit, police unit, government agency or office, extermination camp, concentration camp, prisoner of war camp, prison, labor camp or transit camp?

Yes No

C. Continuous Residence.

Since becoming a Lawful Permanent Resident of the United States:

13. Have you **ever** called yourself a "nonresident" on a Federal, state or local tax return?

Yes No

14. Have you **ever** failed to file a Federal, state or local tax return because you considered yourself to be a "nonresident"?

Yes No

Part 10. Additional Questions. (Continued)

Write your USCIS "A"- number here:

A [REDACTED] 708

D. Good Moral Character.

For the purposes of this application, you must answer "Yes" to the following questions, if applicable, even if your records were sealed or otherwise cleared or if anyone, including a judge, law enforcement officer or attorney, told you that you no longer have a record.

- 15. Have you **ever** committed a crime or offense for which you were **not** arrested? Yes No
- 16. Have you **ever** been arrested, cited or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason? Yes No
- 17. Have you **ever** been charged with committing any crime or offense? Yes No
- 18. Have you **ever** been convicted of a crime or offense? Yes No
- 19. Have you **ever** been placed in an alternative sentencing or a rehabilitative program (for example: diversion, deferred prosecution, withheld adjudication, deferred adjudication)? Yes No
- 20. Have you **ever** received a suspended sentence, been placed on probation or been paroled? Yes No
- 21. Have you **ever** been in jail or prison? Yes No

If you answered "Yes" to any of Questions 15 through 21, complete the following table. If you need more space, use a separate sheet (s) of paper to give the same information.

Why were you arrested, cited, detained or charged?	Date arrested, cited, detained or charged? (mm/dd/yyyy)	Where were you arrested, cited, detained or charged? (City, State, Country)	Outcome or disposition of the arrest, citation, detention or charge (No charges filed, charges dismissed, jail, probation, etc.)
(10)			
Claim no offenses, no arrests, no DUI's			

Answer Questions 22 through 33. If you answer "Yes" to any of these questions, attach (1) your written explanation why your answer was "Yes" and (2) any additional information or documentation that helps explain your answer.

- 22. Have you **ever**:
 - a. Been a habitual drunkard? Yes No
 - b. Been a prostitute, or procured anyone for prostitution? Yes No
 - c. Sold or smuggled controlled substances, illegal drugs or narcotics? Yes No
 - d. Been married to more than one person at the same time? Yes No
 - e. Helped anyone enter or try to enter the United States illegally? Yes No
 - f. Gambled illegally or received income from illegal gambling? Yes No
 - g. Failed to support your dependents or to pay alimony? Yes No
- 23. Have you **ever** given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion or removal? Yes No
- 24. Have you **ever** lied to any U.S. government official to gain entry or admission into the United States? Yes No

Part 10. Additional Questions. (Continued)

Write your USCIS "A"- number here:
A [redacted] 708

E. Removal, Exclusion and Deportation Proceedings.

- 25. Are removal, exclusion, rescission or deportation proceedings pending against you? Yes No
- 26. Have you **ever** been removed, excluded or deported from the United States? Yes No
- 27. Have you **ever** been ordered to be removed, excluded or deported from the United States? Yes No
- 28. Have you **ever** applied for any kind of relief from removal, exclusion or deportation? Yes No

F. Military Service.

- 29. Have you **ever** served in the U.S. Armed Forces? Yes No
- 30. Have you **ever** left the United States to avoid being drafted into the U.S. Armed Forces? Yes No
- 31. Have you **ever** applied for any kind of exemption from military service in the U.S. Armed Forces? Yes No
- 32. Have you **ever** deserted from the U.S. Armed Forces? Yes No

*INS
was
prosecuted*

G. Selective Service Registration.

- 33. Are you a male who lived in the United States at any time between your 18th and 26th birthdays in any status except as a lawful nonimmigrant? Yes No
- If you answered "NO," go on to question 34.

If you answered "YES," provide the information below.

If you answered "YES," but you did not register with the Selective Service System and are still under 26 years of age, you must register before you apply for naturalization, so that you can complete the information below:

Date Registered (mm/dd/yyyy) Selective Service Number

If you answered "YES," but you did not register with the Selective Service and you are now 26 years old or older, attach a statement explaining why you did not register.

H. Oath Requirements. (See Part 14 for the Text of the Oath)

Answer Questions 34 through 39. If you answer "No" to any of these questions, attach (1) your written explanation why the answer was "No" and (2) any additional information or documentation that helps to explain your answer.

- 34. Do you support the Constitution and form of government of the United States? Yes No
- 35. Do you understand the full Oath of Allegiance to the United States? Yes No
- 36. Are you willing to take the full Oath of Allegiance to the United States? Yes No
- 37. If the law requires it, are you willing to bear arms on behalf of the United States? Yes No
- 38. If the law requires it, are you willing to perform noncombatant services in the U.S. Armed Forces? Yes No
- 39. If the law requires it, are you willing to perform work of national importance under civilian direction? Yes No

Part 11. Your Signature.

Write your USCIS "A"- number here:
A [redacted] 708

I certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it, are all true and correct. I authorize the release of any information that the USCIS needs to determine my eligibility for naturalization.

Your Signature: Norma Borgono Date (mm/dd/yyyy): 01/31/2007

Part 12. Signature of Person Who Prepared This Application for You. (If Applicable)

I declare under penalty of perjury that I prepared this application at the request of the above person. The answers provided are based on information of which I have personal knowledge and/or were provided to me by the above named person in response to the exact questions contained on this form.

Preparer's Printed Name: [] Preparer's Signature: []
Date (mm/dd/yyyy): [] Preparer's Firm or Organization Name (If applicable): [] Preparer's Daytime Phone Number: []
Preparer's Address - Street Number and Name: [] City: [] State: [] Zip Code: []

NOTE: Do not complete Parts 13 and 14 until a USCIS Officer instructs you to do so.

Part 13. Signature at Interview.

I swear (affirm) and certify under penalty of perjury under the laws of the United States of America that I know that the contents of this application for naturalization subscribed by me, including corrections numbered 1 through 11 and the evidence submitted by me numbered pages 1 through 0, are true and correct to the best of my knowledge and belief.

Subscribed to and sworn to (affirmed) before me: Praven Mooten Date (mm/dd/yyyy): 11-21-07
Officer's Printed Name or Stamp: [] Date (mm/dd/yyyy): []

Complete Signature of Applicant: Norma Borgono Officer's Signature: Praven Mooten

Part 14. Oath of Allegiance.

If your application is approved, you will be scheduled for a public oath ceremony at which time you will be required to take the following oath of allegiance immediately prior to becoming a naturalized citizen. By signing, you acknowledge your willingness and ability to take this oath:

- I hereby declare, on oath, that I absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty, of whom or which I have heretofore been a subject or citizen;
- that I will support and defend the Constitution and laws of the United States of America against all enemies, foreign and domestic;
- that I will bear true faith and allegiance to the same;
- that I will bear arms on behalf of the United States when required by the law;
- that I will perform noncombatant service in the Armed Forces of the United States when required by the law;
- that I will perform work of national importance under civilian direction when required by the law; and
- that I take this obligation freely, without any mental reservation or purpose of evasion; so help me God.

Printed Name of Applicant: Norma Borgono Complete Signature of Applicant: Norma Borgono

Exhibit G

Department of Homeland Security
U.S. Citizenship and Immigration Services

OMB No. 1615-0054; Expires 10/31/05

Form N-445, Notice of Naturalization Oath Ceremony

A# AC [REDACTED] 708 SSC*001165194

Date November 28, 2007

APPLICANT COPY

NORMA BORGONO



MIAMI FL 33186



You are hereby notified to appear for a Naturalization Oath Ceremony on:

Thursday, December 20 2007

at: MIAMI BEACH CONVENTION CENTER
1901 CONVENTION CENTER DRIVE
MIAMI BEACH, FL 33139
HALL D, GATE: 7

Please report promptly at 8:00 AM

You must bring the following with you:

- This letter, WITH ALL THE QUESTIONS ON PAGE 2 ANSWERED. TYPE OR PRINT ANSWERS IN BLACK INK.
- Permanent Resident Card.
- Reentry Permit or Refugee Travel Document.
- Any Immigration documents you may have.
- If the naturalization application is on behalf of your child (children), bring your child (children).
- Other.



Proper attire should be worn.

If you cannot come to this ceremony, return this notice immediately and state why you cannot appear. In such case, you will be sent another notice of ceremony at a later date. You must appear at an oath ceremony to complete the naturalization process.

In connection with your application for naturalization, please answer each of the questions by checking "Yes" or "No." You must answer these questions the day you are to appear for your citizenship oath ceremony. These questions refer to actions since the date you were first interviewed on your Application for Naturalization. The questions do not refer to anything that happened before the interview.

After you have answered every question, sign your name and fill in the date and place of signing, and provide your current address.

You must bring this completed questionnaire with you to the oath ceremony, as well as the documents indicated on the front, and give them to the employee of the U.S. Citizenship and Immigration Services at the oath ceremony. You may be questioned further on your answers at that time.

AFTER the date you were first interviewed on your Application for Naturalization, Form N-400:

ANSWERS

- | | |
|---|--|
| <p>1. Have you married, or been widowed, separated or divorced? (If "Yes," please bring documented proof of marriage, death, separation or divorce.)</p> <p>2. Have you traveled outside the United States?</p> <p>3. Have you knowingly committed any crime or offense, for which you have not been arrested?</p> <p>4. Have you been arrested, cited, charged, indicted, convicted, fined or imprisoned for breaking or violating any law or ordinance, including traffic violations?</p> <p>5. Have you joined any organization, including the Communist Party, or become associated or connected therewith in any way?</p> <p>6. Have you claimed exemption from military service?</p> <p>7. Has there been any change in your willingness to bear arms on behalf of the United States; to perform non-combatant service in the armed forces of the United States; to perform work of national importance under civilian direction, if the law requires it?</p> <p>8. Have you practiced polygamy, received income from illegal gambling, been a prostitute, procured anyone for prostitution or been involved in any other unlawful commercialized vice, encouraged or helped any alien to enter the United States illegally, illicitly trafficked in drugs or marijuana, given any false testimony to obtain immigration benefits, or been a habitual drunkard?</p> | <p>1. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>2. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>3. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>4. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>5. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>6. <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>7. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>8. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
|---|--|

I certify that each of the answers shown above were made by me or at my direction, and that they are true and correct as of the date of my naturalization oath ceremony.

Signed at Miami, Florida, on 12-20-2007
(City and State) (Date)

Mormon Sosa [REDACTED] 94 CR LN 104-33 MIAMI-FL 33146
(Full Signature) (Full Address and Zip Code)

OUR AUTHORITY for collection of the information requested on Form N-445 is contained in Sections 101(f), 313, 316, 332, 335 and 336 of the Immigration and Nationality Act (8 U.S.C. 1101 (f), 1427, 1443, 1446 and 1447). Submission of the information is voluntary. The principal purposes for requesting the information are to enable Adjudications Officers of the U.S. Citizenship and Immigration Services to determine an applicant's eligibility for naturalization. The information requested may, as a matter of routine use, be disclosed to naturalization courts and to other federal, state, local or foreign law enforcement and regulatory agencies, the Department of Defense, including any component thereof, Selective Service System, Department of State, Department of Treasury, Department of Transportation, Central Intelligence Agency, Interpol and individuals and organizations in the processing of any application for naturalization, or during the course of investigation, to elicit further information required by the U.S. Citizenship and Immigration Services to carry out its functions. Information solicited which indicates a violation or potential violation of law, whether civil, criminal or regulatory in nature, may be referred as a routine use to the appropriate agency, whether federal, state, local or foreign, charged with the responsibility of investigating, enforcing or prosecuting such violations. Failure to provide all or any of the requested information may result in a denial of the application for naturalization.

THE PUBLIC REPORTING BURDEN for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden to: U.S. Citizenship and Immigration Services, Regulations and Forms Services Division (HQRFS), 425 I Street, N.W., Room 4304, Washington, DC 20536.

Exhibit H

UNITED STATES DEPARTMENT OF HOMELAND SECURITY



No. 30 333 315

OPERATION CAMPEON

Personal description of holder as of date of naturalization:

Date of birth: [redacted] 1954

Sex: FEMALE

Height: 5 feet 6 inches

Marital status: SINGLE

Country of former nationality: PERU

CIS Registration No. A [redacted] 708

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security

at: MIAMI, FLORIDA

The Secretary having found that:

NORMA BORGONO

then residing in the United States, intends to reside in the United States when so required by the Naturalization Laws of the United States, and had in all other respects complied with the applicable provisions of such naturalization laws and was entitled to be admitted to citizenship, such person having taken the oath of allegiance in a ceremony conducted by the

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

at: MIAMI BEACH, FLORIDA

on: DECEMBER 20, 2007

that such person is admitted as a citizen of the United States of America.



IT IS PUNISHABLE BY U. S. LAW TO COPY, PRINT OR PHOTOGRAPH THIS CERTIFICATE, WITHOUT LAWFUL AUTHORITY.

Director, U. S. Citizenship and Immigration Services

M. Mitchell

DEPARTMENT OF HOMELAND SECURITY