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U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

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WILLIAM W. BLEVINS  
CLERK

# FELONY

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR CONSPIRACY TO SELL A FICTITIOUS INSTRUMENT,  
CONSPIRACY TO TRANSPORT A FICTITIOUS INSTRUMENT, ATTEMPT TO SELL  
A FICTITIOUS INSTRUMENT, TRANSPORTING A FICTITIOUS INSTRUMENT,  
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

\*

CRIMINAL NUMBER:

**15-243**

v.

\*

SECTION:

**SECT. R MAG. 1**

ALMA DE JESUS MOJICA HERRERA  
LEONARDO SERRATO POLANIA

\*

VIOLATIONS: 18 U.S.C. § 371

18 U.S.C. § 514(a)(2), (a)(3)

18 U.S.C. § 2

\*

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**CONSPIRACY TO  
SELL A FICTITIOUS INSTRUMENT**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. Defendants, ALMA DE JESUS MOJICA HERRERA ("MOJICA HERRERA") and LEONARDO SERRATO POLANIA ("SERRATO POLANIA"), were citizens of Colombia.

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2. A Bearer Bond was a security as that term was defined in Title 18, United States Code, Section 513(c)(3). *See* Title 18, United States Code, Section 514(b).

3. Bearer Bonds or Bearer instruments were similar to cash in that they had no registered owner and could be redeemed by anyone who had possession of the bond.

4. Bearer Bonds typically had interest coupons attached to the bond that could be redeemed to collect interest.

5. Bearer Bonds would typically have a maturity date printed on the face of the bond and the bonds would accrue interest up and until the maturity date.

6. Bearer Bonds were phased out of the U.S. securities market by the Tax Equity and Fiscal Responsibility Act of 1982.

7. B-1/B-2 visas were issued by the U.S. Government and allowed foreign citizens to enter the United States on a temporary basis as a tourist and/or for business related purposes.

8. A Customs Declaration Form 6059-B required all persons entering the United States to declare whether they were transporting more than \$10,000 in currency or monetary instruments.

**B. THE CONSPIRACY**

Beginning at an unknown time and continuing to on or about September 29, 2015, in the Eastern District of Louisiana and elsewhere, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, knowingly and willfully conspired and agreed together and with each other to, with the intent to defraud, pass, utter, present, offer, broker, issue, sell, and possess, within the United States, a false and fictitious instrument, document, or other item, to wit: a U.S. Bearer Bond with a face value of \$1,000,000,000, appearing, representing, purporting, and contriving through

scheme or artifice, to be an actual security or other financial instrument issued under the authority of the United States; in violation of Title 18, United States Code, Section 514(a)(2).

**C. OBJECT OF THE CONSPIRACY**

It was the object of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, devised a plan to obtain \$1,500,000,000 from a potential buyer located in the United States from the sale of a fraudulent \$1,000,000,000 U.S. Bearer Bond.

**D. MANNER AND MEANS OF THE CONSPIRACY**

In furtherance of the conspiracy, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, employed, among others, the following manner and means:

1. It was part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, created fraudulent documents in an effort to make the \$1,000,000,000 U.S. Bearer Bond appear legitimate.
2. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, obtained Colombian passports in order to travel to the United States.
3. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, obtained visas in order to enter the United States.
4. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, or someone known or unknown to the grand jury, purchased two plane tickets in Bogota, Colombia in order to travel to the United States to sell a fraudulent \$1,000,000,000 U.S. Bearer Bond.

5. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, flew from Bogota, Colombia to New Orleans, Louisiana in order to sell a fraudulent \$1,000,000,000 U.S. Bearer Bond.

6. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, transported a fraudulent \$1,000,000,000 U.S. Bearer Bond from Bogota, Colombia to the United States.

7. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, stated to a U.S. Customs and Border Protection officer that the \$1,000,000,000 U.S. Bearer Bond was fake and a joke.

8. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, lied to a potential buyer when they represented that the \$1,000,000,000 U.S. Bearer Bond was legitimate.

9. It was further a part of the conspiracy that the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, attempted to obtain two checks totaling \$750,000,000 from a potential buyer in consideration for the purchase a \$1,000,000,000 U.S. Bearer Bond.

**E. OVERT ACTS**

On or about the following dates, in furtherance of the conspiracy and to accomplish its purposes, the defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On or about May 27, 2015, defendant, **SERRATO POLANIA**, applied for and was issued a Colombian passport.

2. On or about September 4, 2015, defendant, **MOJICA HERRERA**, was issued a Colombian passport.

3. On or about September 4, 2015, defendant, **SERRATO POLANIA**, applied for a B1/B2 Visa from the U.S. Embassy in Colombia.

4. On or about September 9, 2015, defendant, **SERRATO POLANIA**, was issued a B1/B2 Visa.

5. On or about September 10, 2015, defendant, **MOJICA HERRERA**, applied for a B1/B2 Visa from the U.S. Embassy in Colombia.

6. On or about September 16, 2015, defendant, **MOJICA HERRERA**, was issued a B1/B2 Visa.

7. On or about September 28, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, or someone known or unknown to the grand jury, purchased two airline tickets for travel from Bogota, Colombia to the United States.

8. On or about September 28, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, flew from Bogota, Colombia to New Orleans, Louisiana.

9. On or about September 28, 2015, defendant, **SERRATO POLANIA**, traveled from Bogota, Colombia with a fraudulent U.S. Bearer Bond with a face value of \$1,000,000,000 in his luggage.

10. On or about September 28, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, cleared U.S. Customs in New Orleans without declaring on a Customs Declaration Form 6059-B that they were traveling with currency or monetary instruments in excess of \$10,000.

11. On or about September 28, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, told a U.S. Customs and Border Protection officer in New Orleans that

the \$1,000,000,000 U.S. Bearer Bond located in **SERRATO POLANIA**'s luggage was a fake and a joke.

12. On or about September 28, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, checked into a hotel located in New Orleans, Louisiana.

13. On or about September 28, 2015, defendant, **MOJICA HERRERA**, used a Master Card credit card with account number XXXX XXXX XXXX 2421 to reserve one hotel room under confirmation number 62912852 for five (5) nights at the hotel located in New Orleans, Louisiana.

14. On or about September 29, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, had a meeting with a potential buyer at a restaurant in New Orleans, Louisiana and at that time represented to a potential buyer that the \$1,000,000,000 U.S. Bearer Bond in their possession was legitimate.

15. On or about September 29, 2015, defendant, **MOJICA HERRERA**, claimed she was in the commodities business and specifically involved with oil commodities.

16. On or about September 29, 2015, defendant, **MOJICA HERRERA**, claimed **SERRATO POLANIA** owned a gold mine and also dealt in emeralds.

17. On or about September 29, 2015, defendant, **SERRATO POLANIA**, claimed that he was in the import/export business and specifically involved with the fruit industry.

18. On or about September 29, 2015, defendant, **SERRATO POLANIA**, claimed that he also had Chinese Bearer Bonds for sale.

19. On or about September 29, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, agreed to sell a \$1,000,000,000 U.S. Bearer Bond for \$1,500,000,000 U.S. dollars.

20. On or about September 29, 2015, defendant, **MOJICA HERRERA**, requested the potential buyer to assist her in obtaining credit cards and with opening a bank account.

21. On or about September 29, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, went to a bank in New Orleans, Louisiana in order to sell a \$1,000,000,000 U.S. Bearer Bond to a potential buyer for \$1,500,000,000 U.S. dollars.

22. On or about September 29, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, attempted to exchange a \$1,000,000,000 U.S. Bearer Bond with a potential buyer for consideration in the amount of \$750,000,000 U.S. dollars, which constituted partial payment for the Bearer Bond.

23. On or about September 29, 2015, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, requested that the potential buyer give them two checks totaling \$750,000,000 rather than one check as consideration for the \$1,000,000,000 U.S. Bearer Bond.

24. On or about September 29, 2015, defendant, **SERRATO POLANIA**, wrote his name on an envelope with the amount of \$705,000,000 and **MOJICA HERRERA**'s name with the amount \$45,000,000 in order to give the potential buyer payment instructions for the \$1,000,000,000 U.S. Bearer Bond.

## COUNT 2

### CONSPIRACY TO TRANSPORT A FICTITIOUS INSTRUMENT

A. The allegations contained in Parts A, C, D, and E of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning at an unknown time and continuing to on or about September 29, 2015, in the Eastern District of Louisiana and elsewhere, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, knowingly and willfully conspired and agreed together and with each other, with the intent to defraud, to utilize interstate and foreign commerce, including the use of the mails and wire, radio, and other electronic communication, to transmit, transport, ship, move, and transfer, to, from, and through the United States, a false and fictitious instrument, document, or other item, to wit: a U.S. Bearer Bond with a face value of \$1,000,000,000, appearing, representing, purporting, and contriving through scheme or artifice, to be an actual security or other financial instrument issued under the authority of the United States; in violation of Title 18, United States Code, Section 514(a)(3).

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

**COUNT 3**

**ATTEMPT TO  
SELL A FICTITIOUS INSTRUMENT**

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning at an unknown time and continuing to on or about September 29, 2015, in the Eastern District of Louisiana and elsewhere, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, with the intent to defraud, did attempt to pass, utter, present, offer, broker, issue, sell, and possess, within the United States, a false and fictitious instrument, document, or other item, to wit: a U.S. Bearer Bond with a face value of \$1,000,000,000, appearing, representing, purporting, and contriving through scheme or artifice, to be an actual security or other financial instrument issued under the authority of the United States.

All in violation of Title 18, United States Code, Sections 514(a)(2) and 2.



**COUNT 4**

**TRANSPORTING A FICTITIOUS INSTRUMENT**

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning at an unknown time and continuing to on or about September 29, 2015, in the Eastern District of Louisiana and elsewhere, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, with the intent to defraud, did utilize interstate and foreign commerce, including the use of the mails and wire, radio, and other electronic communication, to transmit, transport, ship, move, and transfer, to, from, and through the United States, a false and fictitious instrument, document, or other item, to wit: a U.S. Bearer Bond with a face value of \$1,000,000,000, appearing, representing, purporting, and contriving through scheme or artifice, to be an actual security or other financial instrument issued under the authority of the United States.

All in violation of Title 18, United States Code, Sections 514(a)(3) and 2.

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1 through 4 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 492 and 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1 through 4, defendants, **MOJICA HERRERA** and **SERRATO POLANIA**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 492, made applicable through Title 28, United States Code, Section 2461(c), any material or apparatus used or fitted, or intended to be used, in the making of such

counterfeits, articles, devices, or things, found in the possession of the defendants without proper authority in violation of Title 18, United States Code, Section 514.

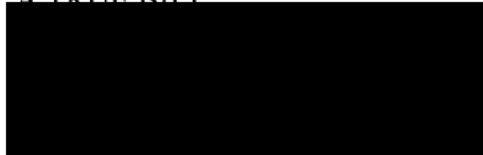
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 514, 492 and 981(a)(1)(C),  
made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:



KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "B M K", written over a horizontal line.

BRIAN M. KLEBBA  
Assistant United States Attorney  
New York Registration No. 2938728

New Orleans, Louisiana  
October 8, 2015

FORM OBD-34

No. \_\_\_\_\_

UNITED STATES DISTRICT COURT  
Eastern District of Louisiana  
Criminal Division

THE UNITED STATES OF AMERICA

vs.  
ALMA DE JESUS MOJICA HERRERA  
LEONARDO SERRATO POLANIA  
INDICTMENT

INDICTMENT FOR CONSPIRACY TO PASS SELL A FICTITIOUS INSTRUMENT; CONSPIRACY TO TRANSPORT A FICTITIOUS INSTRUMENT; ATTEMPT TO SELL A FICTITIOUS INSTRUMENT, and TRANSPORTING A FICTITIOUS INSTRUMENT  
AND NOTICE OF FORFEITURE

VIOLATIONS: 18 U.S.C. §§ 514(a)(2), (a)(3), 371, 2

A true and correct copy of this indictment was filed in open court this \_\_\_\_\_ day of \_\_\_\_\_ A.D. 2015.

\_\_\_\_\_ Clerk

Bail, \$ \_\_\_\_\_

  
Brian M. Klebba, Assistant United States Attorney