

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

CR24-00569 VC

UNITED STATES OF AMERICA,

V.

CARLOS ADOLFO HAECKERMANN CARDENAS,

**FILED**

Nov 13 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 1546(a) – False Statement on Immigration Document;  
18 U.S.C. § 2 – Aiding and Abetting;  
18 U.S.C. § 982(a)(6) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

\_\_\_\_\_  
A true bill.

\_\_\_\_\_  
*/S/ Foreperson of the Grand Jury*

\_\_\_\_\_  
Foreman

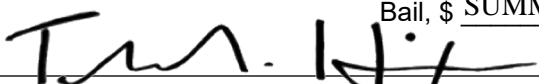
Filed in open court this 12th day of

November, 2024.

\_\_\_\_\_  
Rose Maher, Courtroom Deputy

\_\_\_\_\_  
Clerk

Bail, \$ SUMMONS

  
\_\_\_\_\_  
Hon. Thomas S. Hixson, U.S. Magistrate Judge

**FILED**

Nov 13 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.	CR24-00569 VC
	)		
Plaintiff,	)	VIOLATIONS:	
	)	18 U.S.C. § 1546(a) – False Statement on	
v.	)	Immigration Document;	
	)	18 U.S.C. § 2 – Aiding and Abetting;	
CARLOS ADOLFO HAECKERMANN	)	18 U.S.C. § 982(a)(6) and 28 U.S.C. § 2461(c) –	
CARDENAS,	)	Forfeiture Allegation	
	)		
Defendant.	)	SAN FRANCISCO VENUE	
	)		
	)		

INDICTMENT

The Grand Jury charges:

**Introductory Allegations**

At times relevant to this Indictment:

Relevant Persons and Entities

1. Defendant Carlos Adolfo Haeckermann Cardenas (“HAECKERMANN”) resided in the Western District of Washington.
2. HAECKERMANN, a Colombian national, purported to provide individuals with assistance in applying for immigration documents and benefits, including asylum.
3. R.A.C. is a Colombian national who resided in the Northern District of California and who paid HAECKERMANN approximately \$1,500 to assist him in applying for asylum in 2019. R.A.C.’s asylum application was ultimately received by United States Citizenship and Immigration Services

1 (“USCIS”) in its San Francisco Asylum Office and is on hold pending an asylum interview and  
2 assessment; it has not been granted.

3 4. N.H.E. is a Colombian national who resided in the Northern District of California and who  
4 paid HAECKERMANN approximately \$2,000 to assist her in applying for asylum in 2019. N.H.E.’s  
5 asylum application was ultimately received by USCIS in its San Francisco Asylum Office and was  
6 referred to an immigration judge; it has not been granted.

7 5. J.C.P. is a Colombian national who resided in the Northern District of California and who  
8 paid HAECKERMANN approximately \$1,000 to assist him in applying for asylum in 2020. J.C.P.’s  
9 asylum application was ultimately received by USCIS in its San Francisco Asylum Office and is on hold  
10 pending an asylum interview and assessment; it has not been granted.

11 6. J.R.D. is a Colombian national who resided in the Northern District of California and who  
12 paid HAECKERMANN approximately \$1,500 to assist him in applying for asylum in 2020. J.R.D.’s  
13 asylum application was ultimately received by USCIS in its San Francisco Asylum Office and is on hold  
14 pending an asylum interview and assessment; it has not been granted.

15 Overview of Asylum Application Process

16 7. Subject to certain rules, non-citizens who are physically present in the United States may  
17 be granted asylum and permitted to remain in the United States if they are able to demonstrate they were  
18 persecuted or have a well-founded fear of future persecution in their home country due to their race,  
19 religion, nationality, membership in a particular social group, or political opinion.

20 8. Eligible non-citizens may affirmatively apply for asylum by submitting Form I-589  
21 (Application for Asylum and for Withholding of Removal) to USCIS, which is an agency of the U.S.  
22 Department of Homeland Security. There is no fee to apply for asylum.

23 9. Among other things, Form I-589 prompts asylum applicants to provide basic biographical  
24 information along with specific details to substantiate their claim of past persecution or well-founded  
25 fear of future persecution. Form I-589 also prompts applicants to certify, under penalty of perjury, that  
26 their application and the evidence submitted with it are all true and correct.

27 10. Form I-589 can be completed with the assistance of a third-party preparer. Where a  
28 preparer assists an applicant in applying for asylum, Form I-589 prompts the preparer to sign the form.

1 In signing Form I-589, the preparer declares that he or she is aware that the knowing placement of false  
2 information on the application may subject the preparer to civil and/or criminal penalties.

3 11. After a Form I-589 is submitted, USCIS may schedule an interview for the applicant at  
4 one of its asylum offices. The location of the interview is based on the applicant's residential address on  
5 file with USCIS.

6 12. Asylum interviews may be conducted by USCIS asylum officers, who ask applicants  
7 questions about their background and the information in their asylum applications. Applicants take an  
8 oath at the start of the interview and swear to tell the truth. At the end of the interview, the asylum  
9 officer reviews any corrections to the asylum application with the applicant, who then signs Form I-589  
10 again to reaffirm the truthfulness of the contents of his or her application.

11 13. After the interview, the asylum officer determines whether asylum should be granted or  
12 whether the application should be referred to an immigration judge for further proceedings.

13 HAECKERMANN's Asylum Operation

14 14. Between 2019 and 2021, HAECKERMANN submitted or assisted in the submission of  
15 more than 100 asylum applications to USCIS.

16 15. HAECKERMANN charged asylum applicants between \$1,000 and \$2,000 for his  
17 assistance in applying for asylum.

18 16. It was HAECKERMANN's practice to ask his clients to send him their biographical  
19 information via email, which HAECKERMANN then used to fill out Form I-589 asylum applications on  
20 their behalf.

21 17. It was further HAECKERMANN's practice to draft his clients' personal statements,  
22 which frequently included stories of political persecution that formed the basis for his clients' asylum  
23 claims. In doing so, it was HAECKERMANN's practice to include false and embellished details that  
24 were intended to substantiate his clients' asylum claims and that he believed would increase the chances  
25 that his clients would be granted asylum.

26 18. Rather than sign and submit his clients' applications as a third-party preparer, it was  
27 HAECKERMANN's practice to send completed applications back to his clients for them to sign and  
28 submit themselves.

19. At times, HAECKERMANN solicited additional fees from his clients in exchange for falsified documents that he told his clients were necessary to support their asylum claims, including falsified letters and other documents purporting to corroborate his clients' alleged ties to persecuted political parties in Colombia.

COUNT ONE: (18 U.S.C. §§ 1546(a) and 2 – False Statement on Immigration Document, Aiding and Abetting)

20. On or about November 18, 2019, in the Northern District of California, the defendant, CARLOS ADOLFO HAECKERMANN CARDENAS, did knowingly aid, abet, counsel, and induce asylum applicant R.A.C. to knowingly make under oath and subscribe as true, as permitted under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application, affidavit, or other document required by the immigration laws and regulations, specifically an asylum application, that is, a statement falsely indicating R.A.C. had been the victim of a politically motivated attack in Bogotá, Colombia, which statement the defendant then and there knew was false, in violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT TWO: (18 U.S.C. §§ 1546(a) and 2 – False Statement on Immigration Document, Aiding and Abetting)

21. On or about December 13, 2019, and March 2, 2020, in the Northern District of California, the defendant,

CARLOS ADOLFO HAECKERMANN CARDENAS, did knowingly aid, abet, counsel, and induce asylum applicant N.H.E. to knowingly make under oath and subscribe as true, as permitted under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application, affidavit, or other document required by the immigration laws and regulations, specifically an asylum application, that is, a statement falsely indicating N.H.E. had been the victim of a politically motivated attack in Bello, Colombia, which statement the defendant then and there knew was false, in violation of Title 18, United States Code, Sections 1546(a) and 2.

1 COUNT THREE: (18 U.S.C. §§ 1546(a) and 2 – False Statement on Immigration Document, Aiding  
2 and Abetting)

3 22. On or about January 8, 2020, in the Northern District of California, the defendant,  
4 CARLOS ADOLFO HAECKERMANN CARDENAS,  
5 did knowingly aid, abet, counsel, and induce asylum applicant J.C.P. to knowingly make under oath and  
6 subscribe as true, as permitted under penalty of perjury under Title 28, United States Code, Section 1746,  
7 a false statement with respect to a material fact in an application, affidavit, or other document required  
8 by the immigration laws and regulations, specifically an asylum application, that is, a statement falsely  
9 indicating J.C.P. had been the victim of a politically motivated attack in Bucaramanga, Colombia, which  
10 statement the defendant then and there knew was false, in violation of Title 18, United States Code,  
11 Sections 1546(a) and 2.

12 COUNT FOUR: (18 U.S.C. §§ 1546(a) and 2 – False Statement on Immigration Document, Aiding  
13 and Abetting)

14 23. On or about May 26, 2020, in the Northern District of California, the defendant,  
15 CARLOS ADOLFO HAECKERMANN CARDENAS,  
16 did knowingly aid, abet, counsel, and induce asylum applicant J.R.D. to knowingly make under oath and  
17 subscribe as true, as permitted under penalty of perjury under Title 28, United States Code, Section  
18 1746, a false statement with respect to a material fact in an application, affidavit, or other document  
19 required by the immigration laws and regulations, specifically an asylum application, that is, a statement  
20 falsely indicating J.R.D. had been the victim of a politically motivated attack in Chinú, Colombia, which  
21 statement the defendant then and there knew was false, in violation of Title 18, United States Code,  
22 Sections 1546(a) and 2.

23 FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(6) and 28 U.S.C. § 2461(c))

24 24. The allegations contained in this Indictment are re-alleged and incorporated by reference  
25 for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(6) and  
26 Title 28, United States Code, Section 2461(c).

27 25. Upon conviction for any of the offenses set forth in this Indictment, the defendant,  
28 CARLOS ADOLFO HAECKERMANN CARDENAS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6) and Title 28, United States Code, Section 2461(c), any property real or personal that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted and any such property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted, including but not limited to a forfeiture money judgment.

26. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 982(a)(6), Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.

DATED: November 12, 2024

A TRUE BILL.

/s/ Foreperson

FOREPERSON

San Francisco, California

ISMAIL J. RAMSEY  
United States Attorney

/s/ Nicholas Parker

NICHOLAS M. PARKER

Assistant United States Attorney

**FILED**

Nov 13 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**CRIMINAL COVER SHEET**

***Instructions:*** Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

**CASE NAME:**

**USA V. CARLOS ADOLFO HAECKERMANN  
CARDENAS**

**CASE NUMBER:** CR24-00569 VC

**This Case Under Seal?**

Yes ☒ No

**Total Number of Defendants:**

1 ☒ 2-7 8 or more

**Does this case involve ONLY charges  
under 8 U.S.C. § 1325 and/or 1326?**

Yes No ☒

**Venue (Per Crim. L.R. 18-1):**

SF ☒ OAK SJ

**Is this a potential high-cost case?**

Yes No ☒

**Is any defendant charged with  
a death-penalty-eligible crime?**

Yes No ☒

**Is this a RICO Act gang case?**

Yes No ☒

**Assigned AUSA**

**(Lead Attorney):** Nicholas M. Parker

**Date Submitted:** November 12, 2024

**Comments:**



**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 1546(a) – False Statement on Immigration Document  
18 U.S.C. § 2 – Aiding and Abetting☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ FelonyPENALTY: Imprisonment: 10 years  
Fine: \$250,000  
Supervised release: 3 years  
Special assessment: \$100 per count  
Forfeiture | Restitution | Potential deportation

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA  
DIVISION- SAN FRANCISCO**DEFENDANT - U.S.**

▶ Carlos Adolfo Haeckermann Cardenas

DISTRICT COURT NUMBER

CR24-00569 VC

**PROCEEDING**Name of Complainant Agency, or Person (& Title, if any)  
USCIS-FDNS; US Dept of State - Diplomatic Security Service☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
☐ U.S. ATTORNEY ☐ DEFENSESHOW  
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE  
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underName and Office of Person  
Furnishing Information on this form ISMAIL J. RAMSEY☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.  
Attorney (if assigned) Nicholas M. Parker**IS NOT IN CUSTODY**1) ☒ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons was served on above charges ▶2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from**FILED**

Nov 13 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF ARREST** ▶

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY** ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☒ SUMMONS ☐ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☒ Arraignment ☒ Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: Jan 22, 2025 | 10:30 am Before Judge: Kang

Comments: 450 Golden Gate Avenue, San Francisco, CA 94102: Courtroom F – 15th Floor