



**SEALED**

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DISTRICT OF NEVADA  
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6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

8 -oOo-

9 UNITED STATES OF AMERICA  
10 PLAINTIFF

11 VS.

12 [1] ██████████,  
13 A.K.A. ADMIN,  
14 A.K.A. SUPPORT,  
(Counts 1-2, 19)

15 [2] ██████████,  
16 A.K.A. GRAF,  
(Counts 1-2, 33, 44, 47)

17 [3] ALEXANDER KOSTYUKOV,  
18 A.K.A. TEMP,  
A.K.A. KLBS, (Counts 1-2, 3-17)

19 [4] MACEO BOOZER III,  
20 A.K.A. XXXSIMONE,  
21 A.K.A. G4,  
22 A.K.A. EL PADRINO,  
A.K.A. MR. RIGHT,  
A.K.A. MRDC87,  
(Counts 1-2, 3-17)

23 [5] ██████████,  
24 A.K.A. ██████████,  
A.K.A. RAY,  
(Counts 1-2, 3-17)

25 [6] EDWARD MONTECALVO,  
26 A.K.A. NIGHTMARE,  
A.K.A. TENURE44,  
(Counts 1-2, 3-17, 22-55)

CRIMINAL INDICTMENT

2:12-CR- 604

VIOLATIONS:

18 U.S.C. §1962(c) and 1963: Participation  
in a Racketeer Influenced Corrupt  
Organization (Count 1);

18 U.S.C. § 1962(d): Conspiracy to  
Engage in a Racketeer Influenced  
Corrupt Organization (Count 2);

18 U.S.C. § 1028(a)(1): Unlawful  
Trafficking in and Production of Counterfeit  
Identification Documents or Authentication  
Features (Counts 3 -17);

18 U.S.C. § 1028(a)(1): Attempt to Unlawful  
Trafficking in and Production of Counterfeit  
Identification Documents or Authentication  
Features (Count -18);

18 U.S.C. § 1028(a)(2): Conspiracy to  
Unlawfully Transfer Identification  
Document, Authentication Feature, and False  
Identification Document (Count 19);

18 U.S.C. § 1028(a)(7) and (c)(3)(A):  
Unlawful Transfer, Possession, and Use of a  
Means of Identification (Count 20);

18 U.S.C. § 1029(a)(2): Trafficking in and  
Use of Counterfeit and Unauthorized Access  
Devices (Count 21);

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- 1 [7] ██████████,  
A.K.A. IBATISTUTA,  
2 (Counts 1-2)
- 3 [8] ██████████  
A.K.A. ██████████  
4 A.K.A. CC --TRADER,  
A.K.A. KENGZA,  
5 (Counts 1-2, 20, 22-55)
- 6 [9] JERMAINE SMITH,  
A.K.A. SIRCHARLIE57,  
7 A.K.A. FAIRBUSINESSMAN,  
(Counts 1-2, 61- 62)
- 8 [10] MAKYL HAGGERTY,  
9 A.K.A. WAVE,  
(Counts 1-2)
- 10 [11] ██████████,  
11 A.K.A. BANK MANAGER,  
A.K.A. DOCUMENT MANAGER,  
12 A.K.A. COREY, (Counts 1-2, 61-62)
- 13 [12] ██████████  
A.K.A. ABAGNALEFRANK, (Counts 1-2)
- 14 [13] ██████████  
15 A.K.A.DEVICA,  
(Counts 1-2)
- 16 [14] ██████████  
17 A.K.A. TRACK2,  
A.K.A. BULBA,  
18 A.K.A. NCUX,  
(Counts 1-2, 22-55)
- 19 [15] QASIR MUKHTAR,  
20 A.K.A. CALIBER,  
(Counts 1-2, 56-60)
- 21 [16] ██████████  
22 A.K.A. ██████████  
A.K.A. PATISTOTA, (Counts 1-2, 22-55)
- 23 [17] ██████████  
24 A.K.A. SOURCE,  
(Counts 1-2, 22-55)
- 25 [18] ██████████  
26 A.K.A. C4RD3R,  
(Counts 1-2, 22-55)

18 U.S.C. § 1029(a)(3): Possession of Fifteen or More Counterfeit and Unauthorized Access Devices (Counts 22 -55);

18 U.S.C. § 1029(a)(4): Unlawful Possession, Production and Trafficking in Device-Making Equipment (Counts 56-60);

18 U.S.C. § 1029(a)(4): Conspiracy to Unlawful Possession, Production and Trafficking in Device-Making Equipment (Counts 61-62); and

18 U.S.C. § 2: Aiding and Abetting (Counts 1, 3-17, 18, 20, 21, 22-56, 61-62).

1 [19] ██████████  
A.K.A. BOWL,  
2 (Counts 1-2, 22-55)

3 [20] ██████████  
A.K.A. DORBIK,  
4 A.K.A. MATADOR,  
(Count 2)

5 [21] MICHAEL LOFTON,  
6 A.K.A. KILLIT,  
A.K.A. LOFEAZY,  
7 (Counts 1-2, 3-17)

8 [22] SHIYANG GOU,  
A.K.A. CDER,  
9 (Counts 1-2, 3-17)

10 [23] DAVID RAY CAMEZ,  
A.K.A. BADMAN,  
11 A.K.A. DOCTORSEX,  
(Counts 1-2, 3-17)

12 [24] CAMERON HARRISON,  
13 A.K.A. KILOBIT,  
(Counts 1-2, 3-17)

14 [25] ██████████  
15 A.K.A. QILLER,  
(Counts 1-2, 3-17)

16 [26] DUVAUGHN BUTLER,  
17 A.K.A. MACKMANN,  
(Counts 1-2, 21, 61-62)

18 [27] FREDRICK THOMAS,  
19 A.K.A 1STUNNA,  
(Counts 1-2)

20 [28] JOHN DOE 1,  
21 A.K.A SENNA071,  
(Counts 1-2, 3-17)

22 [29] JOHN DOE 2,  
23 A.K.A. MORFIY,  
(Counts 1-2, 3-17)

24 [30] JOHN DOE 3,  
25 A.K.A. GRUBER,  
(Counts 1-2, 18)

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1 [31] JOHN DOE 4,  
2 A.K.A. MAXXTRO,  
(Counts 1-2)

3 [32] JOHN DOE 5,  
4 A.K.A. ELIT3,  
(Counts 1-2)

5 [33] JOHN DOE 6,  
6 A.K.A. FOZZY,  
(Counts 1-2, 22-55)

7 [34] JOHN DOE 7,  
8 A.K.A. VITRUM,  
A.K.A. LERMENTOV,  
(Counts 1-2, 22-55)

9 [35] ██████████  
10 A.K.A. PANTHER,  
11 A.K.A. EUPHORIC,  
A.K.A. DARKMTH,  
(Counts 1-2, 22-55)

12 [36] JOHN DOE 8,  
13 A.K.A. TM,  
(Counts 1-2, 22-55)

14 [37] JOHN DOE 9,  
15 A.K.A. ZOOMER,  
16 A.K.A. DEPUTAT,  
(Counts 1-2, 22-55)

17 [38] JOHN DOE 10,  
18 A.K.A. CENTURION,  
(Counts 1-2, 22-55)

19 [39] JOHN DOE 11,  
20 A.K.A. CONSIGLIORI,  
(Counts 1-2, 61-62)

21 DEFENDANTS.

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23 . . .  
24 . . .  
25 . . .  
26 . . .

1 **THE GRAND JURY CHARGES THAT:**

2 **GENERAL ALLEGATIONS**

3 The following General Allegations are realleged and incorporated *in toto* by reference in  
4 Count One (Participate in a Racketeer Influenced Corrupt Organization) and Count Two (Conspiracy  
5 to Engage in a Racketeer Influenced Corrupt Organization) herein.

6 **THE ENTERPRISE**

7 1. At all times relevant to this indictment,

- 8 [1] ██████████ a.k.a. Admin a.k.a. Support;
- 9 [2] ██████████ a.k.a. Graf;
- 9 [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a. Klbs;
- 10 [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino a.k.a. Mr.  
Right a.k.a. mrde87;
- 11 [5] ██████████ a.k.a. Ray Wong a.k.a. Ray;
- 11 [6] **EDWARD MONTECALVO** a.k.a. N1ghtmare a.k.a. Tenure44;
- 12 [7] ██████████ a.k.a. Ibatistuta;
- 12 [8] ██████████ a.k.a. ██████████ a.k.a. CC-- Trader  
a.k.a. Kengza;
- 13 [9] **JERMAINE SMITH** a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
- 14 [10] **MAKYL HAGGERTY** a.k.a. Wave;
- 14 [11] ██████████ a.k.a. Bank Manager a.k.a. Document  
Manager a.k.a. Corey;
- 15 [12] ██████████ a.k.a. Abagnalefrank;
- 16 [13] ██████████ a.k.a. Devica;
- 16 [14] ██████████ a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
- 17 [15] **OASIR MUKHTAR** a.k.a. Caliber;
- 17 [16] ██████████ a.k.a. ██████████ a.k.a. Patistota;
- 18 [17] ██████████ a.k.a. Source;
- 18 [18] ██████████ a.k.a. C4rd3R;
- 19 [19] ██████████ a.k.a. Bowl;
- 19 [20] ██████████ a.k.a. Dorbik a.k.a. Matad0r;
- 20 [21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy;
- 20 [22] **SHIYANG GOU** a.k.a. Cder;
- 21 [23] **DAVID RAY CAMEZ** a.k.a. Bad Man a.k.a. Doctorsex;
- 21 [24] **CAMERON HARRISON** a.k.a. Kilobit;
- 22 [25] ██████████ a.k.a. Qiller;
- 22 [26] **DUVAUGHN BUTLER** a.k.a. Mackmann;
- 23 [27] **FREDRICK THOMAS** a.k.a. 1Stunna;
- 23 [28] **JOHN DOE 1** a.k.a. Senna071;
- 24 [29] **JOHN DOE 2** a.k.a. Morfiy;
- 24 [30] **JOHN DOE 3** a.k.a. Gruber;
- 25 [31] **JOHN DOE 4** a.k.a. Maxxtro;
- 25 [32] **JOHN DOE 5** a.k.a. Elit3;
- 26 [33] **JOHN DOE 6** a.k.a. Fozzy;
- 26 [34] **JOHN DOE 7** a.k.a. Vitrum a.k.a. Lermentov;

- 1 [35] [REDACTED] a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
- 2 [36] JOHN DOE 8 a.k.a. TM;
- 3 [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;
- 4 [38] JOHN DOE 10 a.k.a. Centurion; and
- 5 [39] JOHN DOE 11 a.k.a. Consiglieri;

6 the defendants herein, and others known and unknown, are members of, employed by, and associates  
7 of a criminal organization, hereafter referred to as "the Carder.su organization," whose members  
8 engage in acts of identity theft and financial fraud, including, but not limited to, acts involving  
9 trafficking in stolen means of identification; trafficking in, production and use of counterfeit  
10 identification documents; identity theft; trafficking in, production and use of unauthorized and  
11 counterfeit access devices; and bank fraud; and whose members interfere with interstate and foreign  
12 commerce through acts of identity theft and financial fraud. Members and associates of the  
13 Carder.su organization operate principally in Las Vegas, Nevada, and elsewhere.

14 2. The Carder.su organization, including its leadership, members, and associates,  
15 constitutes an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a  
16 group of individuals associated in fact, although not a legal entity. The enterprise constitutes an  
17 ongoing organization whose members function as a continuing unit for a common purpose of  
18 achieving the objectives of the enterprise. The enterprise is engaged in, and its activities affect,  
19 interstate and foreign commerce.

#### 20 PURPOSES OF THE ENTERPRISE

21 3. The purposes of the enterprise include, but are not limited to, the following:

- 22 A. to enrich the members and associates of the enterprise through the unlawful  
23 trafficking in: means of identification, document-making implements,  
24 counterfeit identification documents, device-making equipment, and,  
25 unauthorized and counterfeit access devices;
- 26 B. to create, maintain, and control a marketplace for the distribution of stolen  
property, such as victims' personal and financial means of identification;

- 1 C. to protect the enterprise and its members from detection, apprehension and
- 2 prosecution by law enforcement;
- 3 D. to preserve and protect the operations and profit of the enterprise through the
- 4 use of discipline, expulsion, and other acts of retribution; and
- 5 E. to promote and enhance the reputation and standing of the enterprise and its
- 6 members among rivals.

7 **MEANS AND METHODS OF THE ENTERPRISE**

8 4. Among the means and methods by which the defendants and their associates conduct  
9 and participate in the conduct of the affairs of the enterprise include, but are not limited to, the  
10 following:

- 11 A. Members of the enterprise and their associates did traffic in and produce, did
- 12 attempt to traffic in and produce, and did conspire to traffic in and produce,
- 13 counterfeit identification documents, which affects interstate and foreign
- 14 commerce.
- 15 B. Members of the enterprise and their associates did unlawfully transfer, did
- 16 attempt to unlawfully transfer, and did conspire to unlawfully transfer
- 17 counterfeit identification documents, which affects interstate and foreign
- 18 commerce.
- 19 C. Members of the enterprise and their associates did possess document-making
- 20 implements, did attempt to possess document-making implements, and did
- 21 conspire to possess document-making implements, which affects interstate
- 22 and foreign commerce.
- 23 D. Members of the enterprise and their associates did unlawfully transfer,
- 24 possess and use, did attempt to unlawfully transfer, possess and use, and did
- 25 conspire to unlawfully transfer, possess and use a means of identification of
- 26



1 another person in the commission of and in connection with the crime of  
2 Bank Fraud, which affects interstate and foreign commerce.

3 E. Members of the enterprise and their associates did traffic in and use, did  
4 attempt to traffic in and use, and did conspire to traffic in an use counterfeit  
5 and unauthorized access devices, which affects interstate and foreign  
6 commerce.

7 F. Members of the enterprise and their associates did possess, did attempt to  
8 possess, and did conspire to possess fifteen (15) or more counterfeit and  
9 unauthorized access devices, which affects interstate and foreign commerce.

10 G. Members of the enterprise and their associates did traffic in and possess, did  
11 attempt to traffic in and possess, and did conspire to traffic in and possess  
12 device-making equipment, which affects interstate and foreign commerce.

13 H. Members of the enterprise and their associates did plan, attempt to plan, and  
14 conspire to plan, with the intent to defraud, schemes to unlawfully obtain  
15 money and property from banks and other financial institutions by way of  
16 fraud, and material misrepresentations and false promises.

17 I. Members of the enterprise and their associates did use various means of  
18 communication designed to protect the membership's anonymity and to  
19 provide security for the criminal organization from attack by other rival  
20 criminal organizations and from law enforcement detection, including but  
21 not limited to, the use of:

- 22 (i) Various website forums and chat rooms, such as Carder.info,  
23 Carder.su, Crdsu.su, Carder.biz, and Carder.pro, which are  
24 controlled by the Carder.su organization for use as their online  
25 gathering places, that is, as "virtual clubhouses," which  
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- provide secure meeting locations for the members and associates of the criminal organization;
- (ii) Private messaging ("PM") which is a non-forum wide message sent between individual members on the criminal organization's website forums;
  - (iii) E-mail, some of which are encrypted and password protected, or use service providers located outside the United States;
  - (iv) ICQ chat, which is a free instant messaging electronic communication services provided by ICQ, Inc., a subsidiary of AOL. ICQ user accounts are identified by a Universal Identification Number ("UIN");
  - (v) Proxies, which are achieved by bouncing from one computer to another to hide a member's true originating IP address;
  - (vi) Virtual Private Network, ("VPNs"), which are similar to a proxy, but with the addition of creating an encrypted tunnel that cannot be monitored; and
  - (vii) protected drop sites in the District of Nevada, and elsewhere, in the event that there is a need to transport, transfer, and receive physical items of contraband.

**ROLES OF THE DEFENDANTS**

**Organizational Hierarchy**

5. Leaders, members and associates of the Carder.su Organization have defined roles in the enterprise. At all times relevant to this indictment, the defendants participated in the operation and the management of the enterprise as follows:

1 a. Administrator - Defendant [1] [REDACTED] a.k.a. Admin a.k.a.  
2 Support, (hereafter "[1] [REDACTED]"), is the Administrator of the Carder.su organization.  
3 [1] [REDACTED] serves as the head of the governing council for the criminal organization who,  
4 collectively, control the destiny of the enterprise. The administrator handles day-to-day management  
5 decisions of the organization, as well as long-term strategic planning for its continued viability. As  
6 such, [1] [REDACTED] acts as a leader of the enterprise, by appointing moderators, and directing  
7 other members and associates of the enterprise in carrying out unlawful and other activities in  
8 furtherance of the conduct of the enterprise's affairs. [1] [REDACTED] determines which  
9 individuals can become and remain members of the Carder.su organization. [1] [REDACTED]  
10 regulates the functions, responsibilities and levels of access to information accorded to each member.  
11 [1] [REDACTED] bestows the rewards accorded members for their loyalty to the Carder.su  
12 organization, and sets the punishments to be meted out to members evidencing disloyalty to the  
13 organization. [1] [REDACTED] decides when, how, and under what circumstances to attack and  
14 to retaliate against members of rival criminal organizations and their associated Internet website  
15 forums. As the administrator, [1] [REDACTED] has full access to, and privileges on, the computer  
16 servers hosting the Carder.su organization's websites. [1] [REDACTED] has ultimate responsibility  
17 for the administration, maintenance, anonymity and security of the Carder.su organization's  
18 computer servers, as well as for the content of the Carder.su organization's Internet website forums.  
19 [1] [REDACTED]'s criminal activities in furtherance of the enterprise, include, but are not limited  
20 to, the commission of conspiracy to unlawfully transfer and sell false identification documents, and  
21 access device fraud.

22 b. Moderators - Defendants [2] [REDACTED] a.k.a. Graf,  
23 (hereafter "[2] [REDACTED]"), and [31] JOHN DOE 4 a.k.a. Maxxtro (hereafter "[31] MAXXTRO"),  
24 are Moderators within the Carder.su organization. As such, these defendants act as leaders of the  
25 enterprise, directing other members and associates in carrying out unlawful and other activities in  
26 furtherance of the conduct of the enterprise's affairs. Moderators are members of the Carder.su

1 organization's governing counsel; as such, they oversee and manage one or more subject matter  
2 specific areas on the Carder.su organization's websites that either fall within an area of the  
3 Moderators' expertise, or cover their geographic location. As Moderators, [2] [REDACTED] and [31]  
4 MAXXTRO assist [1] [REDACTED] in monitoring and policing the Carder.su organization's  
5 websites by editing and deleting members' posts on these forums and by mediating disputes among  
6 the members. Moderators also frequently serve as Reviewers for particular products or services  
7 provided through the enterprise with which they have an expertise. [2] [REDACTED]'s criminal  
8 activities in furtherance of the enterprise include, but are not limited to, conspiracy to possess and  
9 possession of fifteen (15) or more counterfeit and unauthorized access devices. [31] MAXXTRO's  
10 criminal activities in furtherance of the enterprise include, but are not limited to, transfer and use of  
11 means of identification, and possession of fifteen (15) or more counterfeit and unauthorized access  
12 devices.

13 c. Reviewers - The Carder.su organization allows members to sell contraband,  
14 including, but not limited to, counterfeit documents and stolen bank account and credit card  
15 information by way of the Carder.su organization's websites to further the activities of the enterprise.  
16 Reviewers examine and test products and services that members of the Carder.su organization wish  
17 to advertise and sell on its websites. Once Reviewers complete their examination of the products and  
18 services, they post a written summary of that examination or testing on the Carder.su organization's  
19 websites. A favorable written review is a prerequisite to selling contraband on the websites. While  
20 most Reviewers primarily serve in the capacity of Administrator or Moderator for the enterprise, any  
21 qualified individual, even a general member, can be appointed by the Administrator to conduct a  
22 review. Any member of the Carder.su organization could be appointed to serve as a Reviewer at any  
23 time.

24 d. Vendors - Vendors advertise and sell products, services, and other contraband  
25 to members of the Carder.su organization by way of the Carder.su organization's websites after  
26 receiving a favorable written review from a Reviewer. Once a Reviewer is designated, a prospective

1 Vendor is required to ship multiple samples of the product or provide the reviewer with access to  
2 the vendor's services to facilitate completion of the review. This contact between the prospective  
3 Vendor and the Reviewer is usually made through private email messaging or through a public post  
4 in the appropriate section on the Carder.su organization's websites.

5 (i) Defendant [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a.  
6 Klbs, (hereafter "[3] **KOSTYUKOV**"), is a Vendor of cashout services in the Carder.su  
7 organization. [3] **KOSTYUKOV**'s cashout services provide members of the Carder.su organization  
8 with a method to transfer funds, typically used in connection with obtaining and laundering illicitly  
9 obtained funds from stolen bank and credit card accounts. [3] **KOSTYUKOV** receives a fee,  
10 generally between forty-five percent (45%) and sixty-two percent (62%) of the total funds  
11 laundered, in exchange for providing members with cashout services. [3] **KOSTYUKOV**'s criminal  
12 activities in furtherance of the enterprise include, but are not limited to, the production and  
13 trafficking in counterfeit identification documents.

14 (ii) Defendant [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4  
15 a.k.a. El Padrino a.k.a. Mr. Right a.k.a. mrdc87, (hereafter "[4] **BOOZER III**"), is a Vendor of  
16 "dumps," that is, stolen and otherwise stolen credit card and debit card account data, in the Carder.su  
17 organization. [4] **BOOZER III** sells dumps to members for prices ranging from fifteen dollars (\$15)  
18 to one hundred fifty dollars (\$150), depending on the quantity purchased and the geographical  
19 location from which the dumps originate. Dumps from the United States are sold as the least  
20 expensive and dumps from the Europe are sold as the most expensive. [4] **BOOZER III**'s criminal  
21 activities in furtherance of the enterprise include, but are not limited to, the production and  
22 trafficking in counterfeit identification documents, and possession of fifteen (15) or more counterfeit  
23 and unauthorized access devices.

24 (iii) Defendant [5] [REDACTED] a.k.a. [REDACTED] a.k.a. Ray,  
25 (hereafter "[5] [REDACTED]"), is a Vendor of counterfeit plastic, which is a device-making implement  
26 used to produce counterfeit credit cards, in the Carder.su organization. [5] [REDACTED] sells blank

1 counterfeit plastic cards to members for twenty dollars (\$20) to twenty five dollars (\$25) each,  
2 depending on the amount ordered, and he requires a minimum order of fifty (50). [5] [REDACTED] also  
3 sells embossed counterfeit credit cards for sixty five dollars (\$65) to seventy five dollars (\$75) each,  
4 with a minimum order of ten (10). Additionally, [5] [REDACTED] also advertises on the Carder.su  
5 organization's websites as a Vendor of dumps, that is, stolen Visa credit card account numbers  
6 priced from standard cards at thirty dollars (\$30) each, to platinum or business cards at forty five  
7 dollars (\$45) each. [5] [REDACTED]'s criminal activities in furtherance of the enterprise include, but are  
8 not limited to, the production and trafficking in counterfeit identification documents, unlawful  
9 transfer and use of a means of identification, and conspiracy to possess device making equipment.

10 (iv) Defendant [6] EDWARD MONTECALVO a.k.a Nightmare a.k.a.  
11 Tenure44, (hereafter "[6] MONTECALVO"), is a Vendor of dumps in the Carder.su organization  
12 who also provides to members a dumps checking service, which checks with the issuing financial  
13 institution to make sure, at the time of the member's purchase, that the credit card account being sold  
14 is still valid and open. [6] MONTECALVO's criminal activities in furtherance of the enterprise  
15 include, but are not limited to, the production and trafficking in counterfeit identification documents,  
16 possession of document-making equipment, and possession of fifteen (15) or more counterfeit and  
17 unauthorized access devices.

18 (v) Defendant [7] [REDACTED] a.k.a Ibatistuta, (hereafter "[7]  
19 [REDACTED]"), is a Vendor of dumps in the Carder.su organization, as well as a Vendor of counterfeit  
20 credit cards, counterfeit holograms, and signature panels that can be used to manufacture counterfeit  
21 credit cards. [7] [REDACTED] sells blank plastic cards to members for ten dollars (\$10) to fifteen dollars  
22 (\$15) each, depending on the quantity ordered. [7] [REDACTED] sells the counterfeit holograms and  
23 signatures for one dollar (\$1) each. [7] [REDACTED]'s criminal activities in furtherance of the enterprise  
24 include, but are not limited to, possession of fifteen (15) or more counterfeit and unauthorized access  
25 devices.  
26

1 (vi) Defendant [8] [REDACTED] a.k.a. [REDACTED]  
2 [REDACTED] a.k.a. CC - - Trader a.k.a. Kengza, (hereafter "[8] [REDACTED]"), is a Vendor in the  
3 Carder.su organization of "CVV," that is, stolen credit card account data which typically contains  
4 all of a cardholder's information, except not the magnetic track information contained on the rear of  
5 the physical credit card. CVV information includes an account holders name, date of birth, Social  
6 Security number, address, telephone number and mother's maiden name, as well as the security code  
7 on the rear of the credit card. [8] [REDACTED] also sells to members, for ten dollars (\$10) each,  
8 stolen PayPal accounts, which include username and the password needed to access the PayPal  
9 account. [8] [REDACTED] also sells "Fullz," which include full name, billing address, credit card  
10 account number, expiration date, Personal Identification Numbers ("PINs"), Social Security number,  
11 mother's maiden name, date of birth and the security code on the rear of a credit card, for a victim  
12 account for twenty dollars (\$20) each, with a minimum order of two hundred dollars (\$200). Also,  
13 [8] [REDACTED] sells "Enroll/COBs," which include full name, billing address, credit card account  
14 number, expiration date, PIN, Social Security number, mother's maiden name, date of birth, the  
15 security code on the rear of a credit card, and the username and password to access the account  
16 online, for one hundred forty dollars (\$140) to two hundred dollars (\$200) each, depending on the  
17 amount of money in the victim account. [8] [REDACTED]'s criminal activities in furtherance of the  
18 enterprise include, but are not limited to, transfer and use of means of identification, and possession  
19 of fifteen (15) or more counterfeit and unauthorized access devices.

20 (vii) Defendant [9] **JERMAINE SMITH** a.k.a. Sircharlie57 a.k.a.  
21 Fairbusinessman, (hereafter "[9] **SMITH**"), is a Vendor of counterfeit plastic and counterfeit credit  
22 cards in the Carder.su organization. [9] **SMITH**'s criminal activities in furtherance of the enterprise  
23 include, but are not limited to, possession of fifteen (15) or more counterfeit and unauthorized access  
24 devices, and conspiracy to possess and possession of device-making equipment.

25 (viii) Defendant [10] **MAKYL HAGGERTY** a.k.a. Wave, (hereafter "[10]  
26 **HAGGERTY**"), is a Vendor of counterfeit identification documents and counterfeit credit cards in

1 the Carder.su organization. [10] Haggerty manufactures and sells counterfeit drivers licenses  
2 to members for the states of California, Texas, Wisconsin, Ohio, Rhode Island, Nevada,  
3 Pennsylvania, Illinois, Florida, Louisiana, Arizona, Hawaii, South Carolina, Georgia and New  
4 Jersey, as well as British Columbia, Canada. The prices range from one hundred dollars (\$100) to  
5 two hundred dollars (\$200), depending on the state. [10] Haggerty also sells blank counterfeit  
6 plastic for twenty dollars (\$20) each and embossed counterfeit credit cards for thirty dollars (\$30)  
7 each. [10] Haggerty criminal activities in furtherance of the enterprise include, but are not  
8 limited to, conspiracy to produce counterfeit identification documents, possession of fifteen (15) or  
9 more counterfeit and unauthorized access devices, and conspiracy to possess device-making  
10 equipment.

11 (ix) Defendant [11] [REDACTED] a.k.a. Bank  
12 Manager a.k.a. Document Manager a.k.a. Corey, (hereafter "[11] [REDACTED]"), is a Vendor of  
13 counterfeit identification documents, stolen or otherwise stolen corporate account information,  
14 dumps, and counterfeit credit cards in the Carder.su organization. [11] [REDACTED]'s criminal activities  
15 in furtherance of the enterprise include, but are not limited to, possession of fifteen (15) or more  
16 counterfeit and unauthorized access devices, and conspiracy to possess device-making equipment.

17 (x) Defendant [12] [REDACTED] a.k.a. Abagnalefrank, (hereafter  
18 "[12] [REDACTED]") is a Vendor of dumps in the Carder.su organization. [12] [REDACTED] sells members bulk  
19 quantities of one hundred (100) mixed Visa and MasterCard accounts for one thousand five hundred  
20 dollars (\$1,500) and one hundred (100) American Express cards for one thousand dollars (\$1,000).  
21 [12] [REDACTED]'s criminal activities in furtherance of the enterprise include, but are not limited to,  
22 unlawful transfer and use of a means of identification, and possession of fifteen (15) or more  
23 counterfeit and unauthorized access devices.

24 (xi) Defendant [13] [REDACTED] a.k.a. Devica, (hereafter  
25 "[13] [REDACTED]"), is a Vendor in the Carder.su organization of counterfeit credit cards, as  
26 well as counterfeit holograms that can be used to manufacture counterfeit credit cards.



1 [13] [REDACTED] sells blank counterfeit plastic cards to members for forty five dollars (\$45)  
2 each and embossed counterfeit credit cards for seventy five dollars (\$75) each.

3 [13] [REDACTED]'s prices for the counterfeit holograms vary by the quantity purchased.

4 [13] [REDACTED]'s criminal activities in furtherance of the enterprise include, but are not  
5 limited to, possession of fifteen (15) or more counterfeit and unauthorized access devices, and  
6 conspiracy to possess and possession of device making equipment.

7 (xii) Defendant [14] [REDACTED] a.k.a. Track2 a.k.a. Bulba  
8 a.k.a. Ncux, (hereafter "[14] [REDACTED]"), is a Vendor in the Carder.su organization of dumps.

9 [14] [REDACTED] sells members such a large volume of product that he has created an automated  
10 website, which he advertises on the Carder.su organization's websites. [14] [REDACTED]'s  
11 automated website allows members to log into and purchase stolen and otherwise stolen credit card  
12 account data without personal interaction with [14] [REDACTED]. [14] [REDACTED]'s website has  
13 a simple interface that allows members to search for the particular type of credit card information  
14 they want to buy, add the number of accounts they wish to purchase to their "shopping cart" and then  
15 check out. Payment of funds is automatically deducted from an already-established account funded  
16 through L. R., an on-line digital currency payment system. Upon checking out, the purchased credit  
17 card account data is available for the members to download. [14] [REDACTED] sells each stolen  
18 account number for approximately twenty dollars (\$20). [14] [REDACTED]'s criminal activities in  
19 furtherance of the enterprise include, but are not limited to, conspiracy to possess and possession of  
20 fifteen (15) or more counterfeit and unauthorized access devices.

21 (xiii) Defendant [15] QASIR MUKHTAR a.k.a. Caliber, (hereafter "[15]  
22 MUKHTAR"), is a Vendor in the Carder.su organization of counterfeit plastic and counterfeit credit  
23 cards, as well as counterfeit holograms and signature panels that can be used to manufacture  
24 counterfeit credit cards. [15] MUKHTAR sells blank counterfeit plastic cards to members for  
25 fifteen dollars (\$15) each and embossed counterfeit credit cards for twenty dollars (\$20) each.  
26 Counterfeit credit cards with a photograph or chip on them cost twenty five dollars (\$25) un-

1 embossed, and thirty dollars (\$30) embossed. [15] MUKHTAR sells counterfeit cards with both  
2 chip and photograph for thirty dollars (\$30) un-embossed, and thirty five (\$35) embossed.

3 [15] MUKHTAR's prices for the counterfeit holograms vary by the quantity purchased.

4 [15] MUKHTAR's criminal activities in furtherance of the enterprise include, but are not limited  
5 to, possession of fifteen (15) or more counterfeit and unauthorized access devices, and conspiracy  
6 to possess and possession of device making equipment.

7 (xiv) Defendant [16] [REDACTED] a.k.a. [REDACTED] a.k.a. Patistota,  
8 (hereafter "[16] [REDACTED]"), is a Vendor of CVVs in the Carder.su organization. [16] [REDACTED] sells the  
9 CVVs through an automated website, which he advertises on the Carder.su organization's websites.

10 [16] [REDACTED]'s website allows members to view his products by looking up specific bank  
11 identification numbers ("BINs"), and by looking up the geographical location of the victim CVVs.

12 [16] [REDACTED] also sells a lookup service to members that they can use to make sure the CVVs are  
13 valid at the time the member purchases them. [16] [REDACTED]'s criminal activities in furtherance of the  
14 enterprise include, but are not limited to, unlawful transfer and use of a means of identification, and  
15 possession of fifteen (15) or more counterfeit and unauthorized access devices.

16 (xv) Defendant [17] [REDACTED] a.k.a. Source, (hereafter "[17]  
17 [REDACTED]"), is a Vendor of dumps in the Carder.su organization, which he sells to members at prices  
18 ranging from twelve dollars (\$12) to one hundred fifty dollars (\$150), depending on the quantity  
19 purchased and the geographical location from which the dumps originate. [17] [REDACTED] sells  
20 dumps from the United States as the least expensive, and dumps from Europe, the Middle East and  
21 Asia as the most expensive. [REDACTED] also has an automated website, which he advertises on the  
22 Carder.su organization's websites. [17] [REDACTED] website allows members to look up dumps by  
23 BIN to purchase accounts issued from a particular financial institution. [17] [REDACTED] criminal  
24 activities in furtherance of the enterprise include, but are not limited to, conspiracy to possess and  
25 possession of fifteen (15) or more counterfeit and unauthorized access devices.

1 (xvi) Defendant [18] [REDACTED] a.k.a. C4rd3R, (hereafter "[18]  
2 [REDACTED]"), is a Vendor in the Carder.su organization of CVVs, which contain full name, billing  
3 address, credit card account number, expiration date and the security code on the rear of a credit card,  
4 for the victim accounts. [18] [REDACTED] sells the CVVs to members through his automated website.  
5 [18] [REDACTED] advertises his website on the Carder.su organization's websites, and his advertisement  
6 includes his Universal Identification Number ("UIN"), which facilitates member-to-member "ICQ"  
7 chats. ICQ chat is a free instant messaging electronic communication service provided by ICQ, Inc.,  
8 a subsidiary of AOL. [18] [REDACTED] also sells Fullz, which include full name, billing address, credit  
9 card account number, expiration date, Social Security number, mother's maiden name, date of birth,  
10 the security code on the rear of a credit card, and occasionally the PIN. [18] [REDACTED]'s criminal  
11 activities in furtherance of the enterprise include, but are not limited to, possession of fifteen (15)  
12 or more counterfeit and unauthorized access devices.

13 (xvii) Defendant [19] [REDACTED] a.k.a. Bowl, (hereafter "[19]  
14 [REDACTED]"), is a Vendor in the Carder.su organization of CVVs, which he sells through his  
15 automated website. [19] [REDACTED] advertises his website on the Carder.su organization's websites.  
16 [19] [REDACTED]'s criminal activities in furtherance of the enterprise include, but are not limited to,  
17 possession of fifteen (15) or more counterfeit and unauthorized access devices.

18 (xviii) Defendant [20] [REDACTED] a.k.a. Dorbik a.k.a.  
19 Matad0r, (hereafter "[20] [REDACTED]"), is a Vendor in the Carder.su organization of "bullet  
20 proof hosting" services and infrastructure for criminal websites, including the Carder.su  
21 organization's websites. "Bullet proof hosting" is a term of art utilized by carders to describe an  
22 Internet Service Provider ("ISP") that will allow an individual to run a website that contains illegal  
23 content, such as a fake website utilized for "phishing," a criminal carding forum (e.g., the Carder.su  
24 organization's websites), or an automated website that sells dumps. "Phishing" is targeted method  
25 of obtaining personal or financial information, typically done by the use of emails or counterfeit web  
26 pages presented to a potential victim that induces the victim under false pretenses to give their

1 information to the attacker. [20] [REDACTED]'s criminal activities in furtherance of the enterprise  
2 include, but are not limited to, conspiracy to possess fifteen (15) or more counterfeit and  
3 unauthorized access devices.

4 (xix) Defendant [30] **JOHN DOE 3** a.k.a. Gruber (hereafter "[30]  
5 **GRUBER**") is a Vendor of counterfeit identification documents in the Carder.su organization."  
6 [30] **GRUBER** manufactures and sells counterfeit drivers licenses to members for the states of  
7 California, Texas, Wisconsin, Ohio, Rhode Island, Nevada, Pennsylvania, Illinois, Florida,  
8 Louisiana, Arizona, Hawaii, South Carolina, Georgia and New Jersey, as well as British Columbia,  
9 Canada. The prices range from one hundred fifty dollars (\$150) to two hundred dollars (\$200),  
10 depending on the state. [30] **GRUBER**'s criminal activities in furtherance of the enterprise include,  
11 but are not limited to, conspiracy to produce counterfeit identification documents, and possession  
12 of fifteen (15) or more counterfeit and unauthorized access devices.

13 (xx) Defendant [32] **JOHN DOE 5** a.k.a. Elit3 (hereafter "[32] **ELIT3**")  
14 is a Vendor in the Carder.su organization of Fullz, which include full name, billing address, credit  
15 card account number, expiration date, PIN, Social Security number, mother's maiden name, date of  
16 birth and the security code on the rear of a credit card, at prices of five dollars (\$5) to seven dollars  
17 (\$7) each, with a minimum order of fifteen dollars (\$15). [32] **ELIT3** also sells Enroll/COBs, which  
18 includes the victim's full name, billing address, credit card account number, expiration date, Social  
19 Security number, mother's maiden name, date of birth, the security code on the rear of a credit card,  
20 driver license number, mother's date of birth, checking account number, routing number and the  
21 username and password to access the account online, for fifteen dollars (\$15) each or twenty dollars  
22 (\$20) each, if the Enroll also includes the PIN. [32] **ELIT3**'s criminal activities in furtherance of  
23 the enterprise include, but are not limited to, unlawful transfer and use of a means of identification.

24 (xxi) Defendant [33] **JOHN DOE 6** a.k.a. Fozzy (hereafter "[33]  
25 **FOZZY**") is a Vendor of dumps in the Carder.su organization, whose prices range from twelve  
26 dollars (\$12) to one hundred dollars (\$100), depending on the quantity purchased and the

1 geographical location from which the dumps originate. Dumps from the United States are sold to  
2 members as the least expensive and dumps from Europe are sold as the most expensive.

3 [33] **FOZZY**'s criminal activities in furtherance of the enterprise include, but are not limited to,  
4 possession of fifteen (15) or more counterfeit and unauthorized access devices.

5 (xxii) Defendant [34] **JOHN DOE 7** a.k.a. Vitrum a.k.a. Lermentov  
6 (hereafter "[34] **VITRUM**") is a Vendor of dumps in the Carder.su organization, whose prices range  
7 from fifteen dollars (\$15) to one hundred dollars (\$100), depending on the quantity purchased and  
8 the geographical location from which the dumps originate. Dumps from the United States are sold  
9 to members as the least expensive and dumps from Europe are sold as the most expensive.

10 [34] **VITRUM**'s criminal activities in furtherance of the enterprise include, but are not limited to,  
11 possession of fifteen (15) or more counterfeit and unauthorized access devices.

12 (xxiii) Defendant [35] [REDACTED] a.k.a. Panther a.k.a. Euphoric  
13 a.k.a. Darkmth, (hereafter "[35] [REDACTED]"), is a Vendor of dumps in the Carder.su organization,  
14 whose least expensive prices begin at twenty dollars (\$20) for United States dumps. [35]  
15 [REDACTED]'s criminal activities in furtherance of the enterprise include, but are not limited to,  
16 possession of fifteen (15) or more counterfeit and unauthorized access devices.

17 (xxiv) Defendant [36] **JOHN DOE 8** a.k.a. TM (hereafter "[36] **TM**") is  
18 a Vendor of dumps and CVVs in the Carder.su organization, which he sells to members through his  
19 automated website. [36] **TM** advertises his automated website on the Carder.su organization's  
20 websites. [36] **TM**'s criminal activities in furtherance of the enterprise include, but are not limited  
21 to, possession of fifteen (15) or more counterfeit and unauthorized access devices.

22 (xxv) Defendant [37] **JOHN DOE 9** a.k.a. Zo0mer a.k.a. Deputat (hereafter  
23 "[37] **ZOOMER**") is a Vendor in the Carder.su organization of: stolen PayPal accounts, which  
24 include a victim's username and the password necessary to access the account; Proxies, which are  
25 achieved by bouncing from one computer to another to hide a member's true originating IP address;  
26 Fullz; and Credit Card Checking and Information Lookups, which include Social Security numbers,

1 dates of birth and mothers' maiden names. [37] **ZOOMER** provides this service to members through  
2 an automated website, which he advertises on "the Carder.su organization's" websites. [37]  
3 **ZOOMER** is also a Vendor of dumps, which he sells to members at prices ranging from fifteen  
4 dollars (\$15) to one hundred fifty dollars (\$150), depending on the quantity purchased and the  
5 geographical location from which the dumps originate. [37] **ZOOMER** sell dumps from the United  
6 States as the least expensive and dumps from Europe as the most expensive. [37] **ZOOMER's**  
7 criminal activities in furtherance of the enterprise include, but are not limited to, possession of fifteen  
8 (15) or more counterfeit and unauthorized access devices.

9 (xxvi) Defendant [38] **JOHN DOE 10** a.k.a. Centurion (hereafter "[38]  
10 **CENTURION**") is a Vendor of dumps in the Carder.su organization, which he sells to members at  
11 prices ranging from fifteen dollars (\$15) to eighty dollars (\$80), depending on the quantity purchased  
12 and the geographical location from which the dumps originate. [38] **CENTURION** sells dumps from  
13 the United States as the least expensive and dumps from Europe as the most expensive.  
14 [38] **CENTURION's** criminal activities in furtherance of the enterprise include, but are not limited  
15 to, possession of fifteen (15) or more counterfeit and unauthorized access devices.

16 (xxvii) Defendant [39] **JOHN DOE 11** a.k.a. Consigliori (hereafter "[39]  
17 **CONSIGLIORI**") is a Vendor of dumps in the Carder.su organization and sells counterfeit blank  
18 plastic cards to members for fifteen dollars (\$15) each, and embossed counterfeit credit cards for  
19 twenty dollars (\$20) each. "[39] **CONSIGLIORI's** criminal activities in furtherance of the  
20 enterprise include, but are not limited to, possession of device-making equipment.

21 e. Members - An individual seeking membership in the Carder.su organization  
22 must successfully complete a number of security features designed to protect the organization from  
23 infiltration by law enforcement or members of rival criminal organizations. One such security  
24 feature requires a prospective member to be formally vouched for by at least two other members in  
25 good standing. Once membership is granted, members use the Carder.su organization's websites as  
26 "virtual clubhouses" to gather together with other members to share information and to solicit and

1 recruit other members to engage in activities, including but not limited to criminal activities, in order  
2 to achieve the common objectives of the enterprise. Members use the Carder.su organization's  
3 vendors, by way of the organization's websites, to buy products and services, such as, credit card  
4 dumps, false identification documents, and other contraband. Members share information through  
5 the organization's websites to teach other members how to engage in new criminal activities and  
6 how best to perpetuate existing criminal schemes. Members are periodically appointed by the  
7 Administrator to act as a Reviewer. Reviewers examine and test products and services that members  
8 of the Carder.su organization desire to advertise and sell on the Carder.su organization's websites.  
9 Individual disputes between members are settled by the Administrator and Moderators. If a dispute  
10 is decided adversely to a particular Member, if Members are found to be disloyal to the Carder.su  
11 organization, or if Members behave in a manner that impedes achieving the common objectives of  
12 the enterprise, the Administrator will mete out punishments, up to and including, stripping them of  
13 their memberships and barring them from accessing the Carder.su organization's websites.

14 (i) Defendant [21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy,  
15 (hereafter "[21] **LOFTON**"), is a member of the Carder.su organization. [21] **LOFTON** participates  
16 in the enterprise, acting under the direction of and in concert with other members of the enterprise  
17 in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs.  
18 [21] **LOFTON**'s criminal activities in furtherance of the enterprise include, but are not limited to,  
19 production and trafficking in counterfeit identification documents, and unlawful transfer and use of  
20 a means of identification.

21 (ii) Defendant [22] **SHIYANG GOU** a.k.a. Cder, (hereafter "[22]  
22 **GOU**"), is a member of the Carder.su organization. [22] **GOU** participates in the enterprise, acting  
23 under the direction of and in concert with other members of the enterprise in carrying out unlawful  
24 and other activities in furtherance of the conduct of the enterprise's affairs. [22] **GOU**'s criminal  
25 activities in furtherance of the enterprise include, but are not limited to, production and trafficking  
26

1 in counterfeit identification documents, and possession of fifteen (15) or more counterfeit and  
2 unauthorized access devices.

3 (iii) Defendant [23] **DAVID RAY CAMEZ** a.k.a. Bad Man a.k.a.  
4 Doctorsex, (hereafter "[23] **CAMEZ**"), is a member of the Carder.su organization. [23] **CAMEZ**  
5 participates in the enterprise, acting under the direction of and in concert with other members of the  
6 enterprise in carrying out unlawful and other activities in furtherance of the conduct of the  
7 enterprise's affairs. [23] **CAMEZ**'s criminal activities in furtherance of the enterprise include, but  
8 are not limited to, production and trafficking in counterfeit identification documents, possession of  
9 fifteen (15) or more counterfeit and unauthorized access devices, and conspiracy to possess device-  
10 making equipment.

11 (iv) Defendant [24] **CAMERON HARRISON** a.k.a. Kilobit, (hereafter  
12 "[24] **HARRISON**"), is a member of the Carder.su organization. [24] **HARRISON** participates  
13 in the enterprise, acting under the direction of and in concert with other members of the enterprise  
14 in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs.  
15 [24] **HARRISON**'s criminal activities in furtherance of the enterprise include, but are not limited  
16 to, production and trafficking in counterfeit identification documents, possession of fifteen (15) or  
17 more counterfeit and unauthorized access devices, and unlawful transfer and use of a means of  
18 identification.

19 (v) Defendant [25] [REDACTED] a.k.a. Qiller,  
20 (hereafter "[25] [REDACTED]"), is a member of the Carder.su organization. [25] [REDACTED]  
21 participates in the enterprise, acting under the direction of and in concert with other members of the  
22 enterprise in carrying out unlawful and other activities in furtherance of the conduct of the  
23 enterprise's affairs. [25] [REDACTED]'s criminal activities in furtherance of the enterprise include,  
24 but are not limited to, production and trafficking in counterfeit identification documents, conspiracy  
25 to produce and traffic in counterfeit identification documents, and possession of fifteen (15) or more  
26 counterfeit and unauthorized access devices.



1 (vi) Defendant [26] **DUVAUGHN BUTLER** a.k.a. Mackmann, (hereafter  
2 “[26] **BUTLER**”), is a member of the Carder.su organization. [26] **BUTLER** participates in the  
3 enterprise, acting under the direction of and in concert with other members of the enterprise in  
4 carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
5 [26] **BUTLER**’s criminal activities in furtherance of the enterprise include, but are not limited to,  
6 using and trafficking in unauthorized access devices, possession of fifteen (15) or more counterfeit  
7 and unauthorized access devices, and conspiracy to possess device-making equipment.

8 (vii) Defendant [27] **FREDRICK THOMAS** a.k.a 1Stunna, (hereafter  
9 “[27] **THOMAS**”), is a member of the Carder.su organization. [27] **THOMAS** participates in the  
10 enterprise, acting under the direction of and in concert with other members of the enterprise in  
11 carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
12 [27] **THOMAS**’s criminal activities in furtherance of the enterprise include, but are not limited to,  
13 unlawful transfer and use of a means of identification, and possession of fifteen (15) or more  
14 counterfeit and unauthorized access devices.

15 (viii) Defendant [28] **JOHN DOE 1** a.k.a Senna071, (hereafter “[28]  
16 **SENNA071**”) is a member of the Carder.su organization. As such, the defendant participates in the  
17 enterprise, acting under the direction of and in concert with other members of the enterprise in  
18 carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
19 “[28] **SENNA071**’s criminal activities in furtherance of the enterprise include, but are not limited  
20 to, production and trafficking in counterfeit identification documents, and conspiracy to produce and  
21 traffic in counterfeit identification documents.

22 (ix) Defendant [29] **JOHN DOE 2** a.k.a. Morfiy, (hereafter “[29]  
23 **MORFIY**”), is a member of the Carder.su organization. As such, the defendant participates in the  
24 enterprise, acting under the direction of and in concert with other members of the enterprise in  
25 carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
26 [29] **MORFIY**’s criminal activities in furtherance of the enterprise include, but are not limited to,

1 production and trafficking in counterfeit identification documents, conspiracy to produce and traffic  
2 in counterfeit identification documents, and conspiracy to possess device-making equipment.

3  
4 **COUNT ONE**  
5 **Participate in a Racketeer Influenced Corrupt Organization**

6 **THE RACKETEERING VIOLATION**

7 1. Paragraphs 1 through 5 of the General Allegations Section are hereby realleged and  
8 incorporated as if fully set forth herein.

9 2. From a date unknown but not later than on or about November 22, 2005, through on  
10 or about June 2011, with both dates being approximate and inclusive, in the District of Nevada and  
11 elsewhere,

- 12 [1] [REDACTED]  
13 [2] [REDACTED]  
14 [3] KOSTYUKOV;  
15 [4] BOOZER III;  
16 [5] [REDACTED]  
17 [6] MONTECALVO;  
18 [7] [REDACTED]  
19 [8] [REDACTED]  
20 [9] SMITH;  
21 [10] HAGGERTY;  
22 [11] [REDACTED]  
23 [12] [REDACTED]  
24 [13] [REDACTED]  
25 [14] [REDACTED]  
26 [15] MUKHTAR;  
[16] [REDACTED]  
[17] [REDACTED]  
[18] [REDACTED]  
[19] [REDACTED]  
[20] LOFTON;  
[21] GOU;  
[22] CAMEZ;  
[23] HARRISON;  
[24] [REDACTED]  
[25] [REDACTED]  
[26] BUTLER;  
[27] THOMAS;  
[28] SENNA071;  
[29] MORFIY;  
[30] GRUBER;

1 [31] MAXXTRO;  
2 [32] ELIT3;  
3 [33] FOZZY;  
4 [34] .VITRUM;  
5 [35] ██████████  
6 [36] TM;  
7 [37] ZOOMER;  
8 [38] CENTURION; and  
9 [39] CONSIGLIORI;

6 the defendants herein, including others known and unknown, being persons who are members of,  
7 employed by, and associated with the Carder.su organization described above, an enterprise engaging  
8 in, and the activities of which affects interstate and foreign commerce, unlawfully, and knowingly  
9 did conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise  
10 through a pattern of racketeering activity, that is, through the commission of the following acts, more  
11 fully described in Racketeering Acts 1 through 109, below.

12 **THE PATTERN OF RACKETEERING ACTIVITY**

13 3. The pattern of racketeering activity, as that term is defined in Title 18, United States  
14 Code, Sections 1961(1) and (5), consisted of:

15 **RACKETEERING ACTS INVOLVING STOLEN MEANS OF IDENTIFICATION  
16 AND COUNTERFEIT IDENTIFICATION DOCUMENTS**

17 **Racketeering Acts 1 through 15**

18 **Unlawful Trafficking in and Production of False Identification Documents**

19 4. On or about each of the dates set forth below, in the State and Federal District of  
20 Nevada, and elsewhere,

21 [3] KOSTYUKOV;  
22 [4] BOOZER III;  
23 [5] ██████████  
24 [6] MONTECALVO;  
25 [21] LOFTON;  
26 [22] GOU;  
[23] CAMEZ;  
[24] HARRISON;  
[25] ██████████  
[28] SENNA071; and  
[29] MORFIY;

1 defendants herein, together with and aiding and abetting one another and other members and  
 2 associates of the Carder.su organization, including others known and unknown, did knowingly and  
 3 without lawful authority produce, and did cause others to produce, false identification documents,  
 4 which were transported in the mail in the course of the unauthorized production, in and affecting  
 5 interstate and foreign commerce, and the offense involved the production and transfer of false  
 6 identification documents that are and appear to be driver's licenses, with each false identification  
 7 document set forth below constituting a separate violation of Title 18, United States Code, Section  
 8 1028(a)(1), and Title 18, United States Code, Section 2:

9	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
10	1	[21] LOFTON	January 23, 2009	NV Driver's License	M. Webb
11	2	[3] KOSTYUKOV	April 24, 2009	NV Driver's License	A. Kostyukov
12	3	[4] BOOZER III	May 19, 2009	TX Driver's License	M. Wright
13	4	[22] GOU	May 26, 2009	NV Driver's License	J. Wang
14	5	[23] CAMEZ	May 28, 2009	NV Driver's License	J. Henry
15	6	[3] KOSTYUKOV	June 30, 2009	NV Driver's License	M. Ulitin
16	7	[5] ██████████	September 14, 2009	NY Driver's License	D. Pena
17	8	[28] SENNA071	October 6, 2009	NV Driver's License	L. Sadik
18	9	[3] KOSTYUKOV	October 13, 2009	WA Driver's License	R. Sadriev
19	10	[28] SENNA071	October 20, 2009	NV Driver's License	A. Davis
20	11	[6] MONTECALVO	November 9, 2009	VA Driver's License	E. Montecalvo
21	12	[29] MORFIY	November 19, 2009	NV Driver's License	F. Grolsh
22	13	[21] LOFTON	February 11, 2010	NV Driver's License	K. Marshall
23	14	[24] HARRISON	February 25, 2010	GA Driver's License	D. Mock
24	15	[25] ██████████	April 7, 2011	GA Driver's License	D. Vasic



1 with others, to commit offenses against the laws of the United States, namely to knowingly and  
2 without lawful authority produce a false identification document, in and affecting interstate and  
3 foreign commerce, and the offense involved the production and transfer of a false identification  
4 document that is and appears to be a California driver's license, bearing the name I. Kipnes, all in  
5 violation of Title 18, United States Code, Sections 1028(a)(1), and (f).

6 **Racketeering Act 19**  
7 **Conspiracy to Unlawfully Produce False Identification Documents**

8 8. Beginning on an unknown date, but not later than May 22, 2010, and continuing to  
9 on or about June 1, 2010, in the States of Iowa, Illinois, California, and elsewhere, the defendants,  
10 [25] [REDACTED] and [10] HAGGERTY, together with other members and associates of the  
11 Carder.su organization, including others known and unknown, did unlawfully, knowingly and  
12 intentionally combine, conspire and agree among themselves, and with others, to commit offenses  
13 against the laws of the United States, namely to knowingly and without lawful authority produce a  
14 false identification document, in and affecting interstate and foreign commerce, and the offense  
15 involved the production and transfer of a false identification document that is and appears to be a  
16 driver's license, bearing the name P. Petrovic, all in violation of Title 18, United States Code,  
17 Sections 1028(a)(1), and (f).

18 **Racketeering Act 20**  
19 **Conspiracy to Unlawfully Produce False Identification Documents**

20 9. Beginning on an unknown date, but not later than June 8, 2010, and continuing to on  
21 or about June 27, 2010, in the State of California, and elsewhere, the defendants, [29] MORFIY,  
22 and [10] HAGGERTY, together with other members and associates of the Carder.su organization,  
23 including others unknown, did unlawfully, knowingly and intentionally combine, conspire and agree  
24 among themselves, and with others, to commit offenses against the laws of the United States, namely  
25 to knowingly and without lawful authority produce a false identification document; in and affecting  
26 interstate and foreign commerce, and the offense involved the production and transfer of a false

1 identification document that is and appears to be a Texas driver's license, bearing the name A. Ladd,  
2 all in violation of Title 18, United States Code, Sections 1028(a)(1), and (f).

3 **Racketeering Act 21**  
4 **Conspiracy to Unlawfully Produce False Identification Documents**

5 10. Beginning on an unknown date, but not later than June 18, 2010, and continuing to  
6 on or about June 25, 2010, in the States of New York, California, and elsewhere, the defendant,  
7 [10] HAGGERTY, together with other members and associates of the Carder.su organization,  
8 including others known and unknown, did unlawfully, knowingly and intentionally combine,  
9 conspire and agree among themselves, and with others, to commit offenses against the laws of the  
10 United States, namely to knowingly and without lawful authority produce a false identification  
11 document, in and affecting interstate and foreign commerce, and the offense involved the production  
12 and transfer of false identification documents that are and appears to be two (2) driver's licenses, one  
13 bearing the name R. Harrison, and one bearing the name A. Huber, all in violation of Title 18, United  
14 States Code, Sections 1028(a)(1), and (f).

15 **Racketeering Act 22**  
16 **Conspiracy to Unlawfully Transfer False Identification Documents**

17 11. Beginning on or about August 22, 2008, and continuing to on or about March 23,  
18 2009, in the State of Nevada, and elsewhere, the defendant [1] [REDACTED] together with other  
19 members and associates of the Carder.su organization, including others known and unknown, did  
20 unlawfully, knowingly and intentionally combine, conspire and agree among themselves, and with  
21 others, to commit offenses against the laws of the United States, namely to knowingly transfer and  
22 cause others to transfer false identification documents, knowing that such documents were produced  
23 without lawful authority, and the production and transfer of the false identification documents was  
24 in and affecting interstate and foreign commerce, and the offense involved the production and  
25 transfer of false identification documents that are and appear to be driver's licenses, all in violation  
26 of Title 18, United States Code, Sections 1028(a)(2), and (f).

**Racketeering Act 23**  
**Possession of Document-making Implements**

1  
2  
3       12.     On or about January 11, 2011, in the States of Virginia, West Virginia, Michigan,  
4 California, and elsewhere, the defendant [6] MONTECALVO, together with other members and  
5 associates of the Carder.su organization, including others known and unknown, did knowingly  
6 produce, transfer and possess a document-making implement and authentication features, to wit:  
7 laminates used in the production of counterfeit Illinois driver's licences; and Photoshop templates  
8 used to create counterfeit Maryland driver's licenses and counterfeit Florida driver's licenses; with  
9 the intent such document-making implements and authentication features would be used in the  
10 production of a false identification document, or used in conjunction with another document-making  
11 implement or authentication feature which would be so used, and the production, transfer and  
12 possession of the document-making implement and authentication feature was in and affected  
13 interstate and foreign commerce, all in violation of Title 18, United States Code, Section 1028 (a)(5).

**Racketeering Act 24**  
**Conspiracy to Unlawfully Transfer, Possess, and Use A Means of Identification**

14  
15  
16       13.     On or about March 15, 2009, in the in the State of Connecticut and elsewhere,  
17 [5] ██████ defendant herein, together with other members and associates of the Carder.su  
18 organization, including others known and unknown, did knowingly and intentionally combine,  
19 conspire and agree among themselves, and with others, to commit offenses against the laws of the  
20 United States, namely to knowingly transfer, possess and use, in and effecting interstate and foreign  
21 commerce, without lawful authority, one or more means of identification of other persons, including  
22 but not limited to, stolen credit and debit card account numbers, to wit: a Visa credit card account,  
23 number ending in X-6329, with the intent to commit and to aid and abet the commission of and in  
24 connection with any unlawful activity that constitutes a violation of Federal law, to wit: Wire Fraud  
25 in violation of Title 18, United States Code, Section 1343, and as a result of the offense the  
26 defendants and any other individual committing the offense, obtained something of value



1 aggregating one thousand dollars, (\$1,000) or more in a one-year period, that is, at least two  
 2 thousand dollars (\$2,000.00) in United States currency, from the Foxwoods Resort, Preston,  
 3 Connecticut, all in violation of Title 18, United States Code, Sections 1028(a)(7), and (f).

4 **Racketeering Acts 25 through 36**  
**Unlawful Transfer, Possession, and Use of A Means of Identification**

5  
 6 14. On or about each of the dates set forth below, in the States of Nevada, Georgia,  
 7 California, New York, Missouri, and elsewhere,

8 [8] ██████████  
 9 [12] ██████████  
 10 [16] ██████████  
 11 [21] **LOFTON;**  
 12 [24] **HARRISON;**  
 13 [27] **THOMAS;**  
 14 [31] **MAXXTRO; and**  
 15 [32] **ELIT3;**

16 defendants herein, together with other members and associates of the Carder.su organization,  
 17 including others known and unknown, did knowingly transfer, possess and use, in and effecting  
 18 interstate and foreign commerce, without lawful authority, one or more means of identification of  
 19 other persons, including but not limited to, stolen and otherwise stolen credit and debit card account  
 20 numbers, account holders' names, dates of birth, Social Security numbers, addresses, and telephone  
 21 numbers, with the intent to commit and to aid and abet the commission of and in connection with  
 any unlawful activity that constitutes a violation of Federal law, to wit: Wire Fraud in violation of  
 Title 18, United States Code, Section 1343, with each instance set forth below constituting a separate  
 violation of Title 18, United States Code, Section 1028(a)(7):

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Account Number</u>	<u>Name</u>
22 25	[31] <b>MAXXTRO</b>	November 25, 2006	X-5696	K. Kehoe
23 26	[8] ██████████	October 19, 2007	X-5598	B. Detrich
24 27	[31] <b>MAXXTRO</b>	February 28, 2008	X-1914	D. Stickler
25 28	[24] <b>HARRISON</b>	June 26, 2008	X-6433	D. Olsen

1	29	[32] ELIT3 & [21] LOFTON	January 29, 2009	X-5462	T. Biggs
2					
3	30	[27] THOMAS & [8] ██████████	March 8, 2009	X-5580	D. Ewart
4	31	[32] ELIT3	October 30, 2009	X-4478	T. Miska
5	32	[32] ELIT3	November 10, 2009	X-8237	S. Smith
6	33	[27] THOMAS & [32] ELIT3	November 12, 2009	X-5637	J. Smith
7					
8	34	[32] ELIT3	November 13, 2009	X-5002	S. McDonald
9	35	[12] ██████████	August 3, 2010	X-3337	D. Bossman
10	36	[16] ██████████	September 16, 2010	X-5079	K. Young

**RACKETEERING ACTS INVOLVING  
COUNTERFEIT AND UNAUTHORIZED ACCESS DEVICES**

**Racketeering Act 37  
Using and Trafficking in Unauthorized Access Devices**

15. On or about March 1, 2011, in the State and Federal District of Nevada, and elsewhere, [26] BUTLER, defendant herein, together with other members and associates of the Carder.su organization, including others unknown, did knowingly and with intent to defraud, traffic in and use an unauthorized access device, to wit: a Chase Bank MasterCard credit card account, number ending in X-8088, which was stolen and obtained with the intent to defraud, and by such conduct did, on or about that same date, obtain things of value in excess of one thousand dollars (\$1,000.00), that is, approximately one thousand fifty three dollars (\$1,053.00) in goods and merchandise, from Walmart, store number 2593, in or around Las Vegas, Nevada, with said trafficking and use in and affecting interstate commerce, all in violation of Title 18, United States Code, Section 1029(a)(2).

**Racketeering Acts 38 through 97**  
**Possession of Fifteen or More Unauthorized Access Devices**

16. On or about each of the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

- [1] [REDACTED]
- [2] [REDACTED]
- [4] **BOOZER III;**
- [6] **MONTECALVO;**
- [7] [REDACTED]
- [8] [REDACTED]
- [9] **SMITH;**
- [10] **HAGGERTY;**
- [11] [REDACTED]
- [12] [REDACTED]
- [13] [REDACTED]
- [14] [REDACTED]
- [15] **MUKHTAR;**
- [16] [REDACTED]
- [17] [REDACTED]
- [18] [REDACTED]
- [19] [REDACTED]
- [22] **GOU;**
- [23] **CAMEZ;**
- [24] **HARRISON;**
- [25] [REDACTED]
- [26] **BUTLER;**
- [27] **THOMAS;**
- [30] **GRUBER;**
- [31] **MAXXTRO;**
- [33] **FOZZY;**
- [34] **VITRUM;**
- [35] [REDACTED]
- [36] **TM;**
- [37] **ZOOMER; and**
- [38] **CENTURION;**

defendants herein, together with other members and associates of the Carder.su organization, including others known and unknown, knowingly and with intent to defraud, did possess fifteen or more unauthorized access devices, that is, stolen credit and debit card account numbers issued to persons other than the defendants, and which are issued, owned, managed and controlled by a financial institution, account issuer, or credit card system member within the jurisdiction of the

1 United States, in and affecting interstate and foreign commerce, with each instance set forth below  
 2 constituting a separate violation of Title 18, United States Code, Sections 1029(a)(3), and (h):

3	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
4	38	[1] [REDACTED] & [31] MAXXTRO	February 13, 2007	20
5	39	[1] [REDACTED] & [33] FOZZY;	February 15, 2007	17
6				
7	40	[7] [REDACTED]	April 10, 2007	more than 490
8	41	[8] [REDACTED]	February 22, 2008	22
9	42	[30] GRUBER & [34] .VITRUM	February 23, 2008	25
10	43	[34] .VITRUM	May 7, 2008	40
11	44	[7] [REDACTED]	February 2, 2009	30
12	45	[8] [REDACTED]	March 9, 2009	25
13	46	[6] MONTECALVO	January 21, 2010	50
14	47	[6] MONTECALVO	April 5, 2010	220
15	48	[26] BUTLER & [9] SMITH	April 14, 2010	15
16				
17	49	[25] [REDACTED]	May 16, 2010	17
18	50	[10] HAGGERTY	May 27, 2010	20
19	51	[10] HAGGERTY	June 2, 2010	40
20	52	[23] CAMEZ	June 7, 2010	30
21	53a.	[4] BOOZER III	June 9, 2010	200
22	53b.	[4] BOOZER III	June 10, 2010	50
23	54	[11] [REDACTED]	July 15, 2010	50
24	55	[11] [REDACTED]	July 21, 2010	146
25	56	[7] [REDACTED]	July 26, 2010	23
26	57	[11] [REDACTED]	July 27, 2010	99

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
1 58	[22] GOU	July 29, 2010	34
2 59	[12] [REDACTED] [35] [REDACTED]	August 30, 2010	22
3 60	[24] HARRISON & [35] [REDACTED]	September 7, 2010	21
4 61	[12] [REDACTED]	October 15, 2010	more than 50
5 62	[13] [REDACTED]	October 15, 2010	more than 36
6 63	[22] GOU	January 12, 2011	69
7 64	[14] [REDACTED]	January 20, 2011	29
8 65	[35] [REDACTED]	February 11, 2011	69
9 66	[27] THOMAS	March 5, 2011	28
10 67	[15] MUKHTAR	March 6, 2011	46
11 68	[11] [REDACTED]	March 15, 2011	15
12 69	[36] TM	March 16, 2011	20
13 70	[14] [REDACTED]	March 18, 2011	20
14 71	[37] ZOOMER	March 18, 2011	20
15 72	[17] [REDACTED]	March 18, 2011	20
16 73	[18] [REDACTED]	March 23, 2011	20
17 74	[2] [REDACTED]	March 24, 2011	18
18 75	[11] [REDACTED]	March 24, 2011	20
19 76	[33] FOZZY	March 24, 2011	22
20 77	[36] TM	March 24, 2011	20
21 78	[37] ZOOMER	March 24, 2011	23
22 79	[38] CENTURION	March 24, 2011	23
23 80	[18] [REDACTED]	March 26, 2011	60
24 81	[34] .VITRUM	March 28, 2011	20

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
82	[38] CENTURION	March 28, 2011	74
83	[33] FOZZY	March 28, 2011	22
84	[35] ██████████	March 28, 2011	20
85	[2] ██████████	March 29, 2011	21
86	[35] ██████████	April 6, 2011	38
87	[35] ██████████	April 8, 2011	20
88	[2] ██████████	April 10, 2011	21
89	[18] ██████████	April 11, 2011	20
90	[36] TM	April 11, 2011	20
91	[37] ZOOMER	April 11, 2011	19
92	[19] ██████████	April 12, 2011	49
93	[38] CENTURION	April 12, 2011	22
94	[19] ██████████	April 22, 2011	12,710
95	[17] ██████████	April 29, 2011	22
96	[14] ██████████	May 12, 2011	100
97	[17] ██████████	June 14, 2011	20

**Racketeering Acts 98 to 103.**  
**Trafficking In and Possessing Access Device-Making Equipment**

17. On or about each of the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

[9] SMITH;  
 [13] ██████████  
 [15] MUKHTAR; and  
 [39] CONSIGLIORI;

defendants herein, together with other members and associates of the Carder.su organization, including others known and unknown, did knowingly and with the intent to defraud, traffic in, have

1 control and custody over, and possess device-making equipment, that is blank plastic cards used in  
 2 the production of counterfeit access devices, which are issued, owned, managed and controlled by  
 3 a financial institution, account issuer, or credit card system member within the jurisdiction of the  
 4 United States, in and affecting interstate and foreign commerce, with each instance set forth below  
 5 constituting a separate violation of Title 18, United States Code, Sections 1029(a)(4), and (h):

6	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approx. No. Plastic Cards</u>
7	98	[13] ██████████	January 5, 2011	7
8	99	[15] MUKHTAR	March 22, 2011	26
9	100	[9] SMITH	April 5, 2011	10
10	101	[39] CONSIGLIORI	April 15, 2011	20
11	102	[39] CONSIGLIORI	May 23, 2011	20
12	103	[39] CONSIGLIORI	June 9, 2011	20

13 **Racketeering Acts 104 to 109**  
 14 **Conspiracy to Trafficking In and Possess Access Device-Making Equipment**

15 18. On or about each of the dates set forth below, in the States of Nevada, Connecticut,  
 16 Florida, New York, California, Arizona, New Jersey, North Carolina, Michigan, and elsewhere,

- 17 [5] ██████████
- 18 [9] SMITH;
- 19 [10] HAGGERTY;
- 20 [11] ██████████
- 21 [13] ██████████
- 22 [15] MUKHTAR;
- 23 [23] CAMEZ;
- 24 [26] BUTLER; and
- 25 [29] MORFIY;

22 defendants herein, together with other members and associates of the Carder.su organization,  
 23 including others known and unknown, did knowingly and intentionally combine, conspire and agree  
 24 among themselves, and with others, to commit offenses against the laws of the United States, namely  
 25 to knowingly and with the intent to defraud, traffic in, have control and custody over, and possess  
 26

1 device-making equipment, that is blank plastic cards used in the production of counterfeit access  
 2 devices, which are issued, owned, managed and controlled by a financial institution, account issuer,  
 3 or credit card system member within the jurisdiction of the United States, in and affecting interstate  
 4 and foreign commerce, with each instance set forth below constituting a separate violation of Title  
 5 18, United States Code, Sections 1029(a)(4), and (h):

6	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approx. No. Plastic Cards</u>
7	104	[5] ██████████	March 5, 2009 to March 9, 2009	50
8	105	[13] ██████████	March 19, 2009	27
9	106	[15] MUKHTAR & [23] CAMEZ	February 4, 2010	26
10				
11	107	[29] MORFIY & [10] HAGGERTY	May 18, 2010	10
12	108	[9] SMITH & [26] BUTLER	August 31, 2010	10
13				
14	109	[11] ██████████ [26] BUTLER	February 16, 2011	10

15  
 16 **ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1962(c).**

17 **COUNT TWO**

18 **Conspiracy to Engage in a Racketeer Influenced Corrupt Organization**

19 1. Paragraphs 1 through 5 of the General Allegations Section are hereby realleged and  
 20 incorporated as if fully set forth herein.

21 2. From on or about November 22, 2005, up through and including June 2011, the  
 22 defendants,

- 23 [1] ██████████ a.k.a. Admin a.k.a. Support;
- 24 [2] ██████████ a.k.a. Graf;
- 25 [3] ALEXANDER KOSTYUKOV a.k.a. Temp a.k.a. Klbs;
- 26 [4] MACEO BOOZER III a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino  
a.k.a. Mr. Right a.k.a. mrdc87;
- [5] ██████████ a.k.a. Ray Wong a.k.a. Ray;
- [6] EDWARD MONTECALVO a.k.a. Nightmare a.k.a. Tenure44;



- [7] ██████████ a.k.a. Ibatistuta;
- [8] ██████████ a.k.a. ██████████ a.k.a. ██████████
- CC- - Trader a.k.a. Kengza;
- [9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
- [10] MAKYL HAGGERTY a.k.a. Wave;
- [11] ██████████ a.k.a. Bank Manager a.k.a. Document Manager a.k.a. Corey;
- [12] ██████████ a.k.a. Abagnalefrank;
- [13] ██████████ a.k.a. Devica;
- [14] ██████████ a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
- [15] OASIR MUKHTAR a.k.a. Caliber;
- [16] ██████████ a.k.a. RABIE AYAD a.k.a. Patistota;
- [17] ██████████ a.k.a. Source;
- [18] ██████████ a.k.a. C4rd3R;
- [19] ██████████ a.k.a. Bowl;
- [20] ██████████ a.k.a. Dorbik a.k.a. Matad0r;
- [21] MICHAEL LOFTON a.k.a. Killit a.k.a. Lofeazy;
- [22] SHIYANG GOU a.k.a. Cder;
- [23] DAVID RAY CAMEZ a.k.a. Bad Man a.k.a. Doctorsex;
- [24] CAMERON HARRISON a.k.a. Kilobit;
- [25] ██████████ a.k.a. Qiller;
- [26] DUVAUGHN BUTLER a.k.a. Mackmann;
- [27] FREDRICK THOMAS a.k.a. lStunna;
- [28] JOHN DOE 1 a.k.a. Senna071;
- [29] JOHN DOE 2 a.k.a. Morfiy;
- [30] JOHN DOE 3 a.k.a. Gruber;
- [31] JOHN DOE 4 a.k.a. Maxxtro;
- [32] JOHN DOE 5 a.k.a. Elit3;
- [33] JOHN DOE 6 a.k.a. Fozzy;
- [34] JOHN DOE 7 a.k.a. Vitrum a.k.a. Lermentov;
- [35] ██████████ a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
- [36] JOHN DOE 8 a.k.a. TM;
- [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;
- [38] JOHN DOE 10 a.k.a. Centurion; and
- [39] JOHN DOE 11 a.k.a. Consigliori;

together with other persons known and unknown and others known and unknown, being persons who are members of, employed by, and associated with "the Carder.su organization," an enterprise, which engaged in, and the activities of which affected interstate and foreign commerce, knowingly, and intentionally conspired to violate Title 18, United States Code Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity involving multiple acts indictable under:

A. Title 18, United States Code, Section 1028, identity theft and fraud related to identification documents; and

1 B. Title 18, United States Code, Section 1029, access device fraud.

2 3. It was a part of the conspiracy that each defendant agreed that a conspirator would  
 3 commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

4 **ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1962(D).**

5 **COUNTS THREE THROUGH SEVENTEEN**  
**Trafficking in and Production of False Identification Documents**

6 On or about each of the dates set forth below, in the State and Federal District of Nevada, and  
 7 elsewhere,

- 8 [3] ALEXANDER KOSTYUKOV a.k.a. Temp a.k.a. Klbs;
- 9 [4] MACEO BOOZER III a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino  
 a.k.a. Mr. Right a.k.a. mrdc87;
- 10 [5] [REDACTED] a.k.a. Ray Wong a.k.a. Ray;
- 11 [6] EDWARD MONTECALVO a.k.a. Nightmare a.k.a. Tenure44;
- 12 [21] MICHAEL LOFTON a.k.a. Killit a.k.a. Lofeazy;
- 13 [22] SHIYANG GOU a.k.a. Cder;
- 14 [23] DAVID RAY CAMEZ a.k.a. Bad Man a.k.a. Doctorsex;
- [24] CAMERON HARRISON a.k.a. Kilobit;
- [25] [REDACTED] a.k.a. Qiller;
- [28] JOHN DOE 1 a.k.a. Senna071; and
- [29] JOHN DOE 2 a.k.a. Morfy;

15 defendants herein, together with and aiding and abetting one another, and others known and  
 16 unknown, did knowingly and without lawful authority produce, and did cause others to produce,  
 17 false identification documents, which were transported in the mail in the course of the unauthorized  
 18 production, in and affecting interstate and foreign commerce, and the offense involved the  
 19 production and transfer of false identification documents that are and appear to be driver's licenses,  
 20 with each false identification document set forth below constituting a separate violation of Title 18,  
 21 United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (c)(3); and Title 18, United States Code,  
 22 Section 2, as follows:

<u>Counts</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
THREE	[21] LOFTON	January 23, 2009	NV DL	M. Webb
FOUR	[3] KOSTYUKOV	April 24, 2009	NV DL	A. Kostyukov

1	FIVE	[4] BOOZER III	May 19, 2009	TX DL	M. Wright
2	SIX	[22] GOU	May 26, 2009	NV DL	J. Wang
3	SEVEN	[23] CAMEZ	May 28, 2009	NV DL	J. Henry
4	EIGHT	[3] KOSTYUKOV	June 30, 2009	NV DL	M. Ulitin
5	NINE	[5] ██████████	September 14, 2009	NY DL	D. Pena
6	TEN	[28] SENNA071	October 6, 2009	NV DL	L. Sadik
7	ELEVEN	[3] KOSTYUKOV	October 13, 2009	WA DL	R. Sadriev
8	TWELVE	[28] SENNA071	October 20, 2009	NV DL	A. Davis
9	THIRTEEN	[6] MONTECALVO	November 9, 2009	VA DL	E. Montecalvo
10	FOURTEEN	[24] MORFIY	November 19, 2009	NV DL	F. Grolsh
11	FIFTEEN	[21] LOFTON	February 11, 2010	NV DL	K. Marshall
12	SIXTEEN	[24] HARRISON	February 25, 2010	GA DL	D. Mock
13	SEVENTEEN	[25] ██████████	April 12, 2011	GA DL	D. Vasic

**COUNT EIGHTEEN**

**Attempt to Unlawful Produce False Identification Documents; Aiding and Abetting**

From on or about April 16, 2011, until on or after May 18, 2011, in the State and Federal District of Nevada, and elsewhere, [30] JOHN DOE 3 a.k.a. Gruber, defendant herein, together with and aiding and abetting others known and unknown, did knowingly and without lawful authority attempt to produce, and did attempt to cause others to produce, false identification documents, in and affecting interstate and foreign commerce, and the offense involved the production and transfer of false identification documents that are and appear to be approximately two (2) Florida driver's licenses, in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(I), and (c)(3)(A); and (f); and Title 18, United States Code, Section 2.

**COUNT NINETEEN**

**Conspiracy to Unlawfully Transfer False Identification Documents**

Beginning on or about August 22, 2008, and continuing to on or about March 23, 2009, in the State of Nevada, and elsewhere, [1] ██████████ a.k.a. Admin a.k.a. Support,

1 defendant herein, did knowingly and intentionally combine, conspire and agree with others known  
2 and unknown, to commit offenses against the laws of the United States, namely to knowingly  
3 transfer and cause others to transfer false identification documents, knowing that such documents  
4 were produced without lawful authority, and the production and transfer of the false identification  
5 documents was in and affecting interstate and foreign commerce, and the offense involved the  
6 production and transfer of false identification documents that are and appear to be driver's licenses,  
7 all in violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A)(ii), (c)(3)(A), and (f).

8 **COUNT TWENTY**

9 **Unlawful Transfer, Possession and Use of A Means of Identification;  
Aiding and Abetting**

10 On or about October 19, 2007, in the State and Federal District of Nevada, and elsewhere,  
11 [8] ██████████ a.k.a. ██████████ a.k.a. CC - - Trader a.k.a. Kengza,  
12 defendant herein, together with and aiding and abetting others known and unknown, did knowingly  
13 transfer, possess and use, in and effecting interstate and foreign commerce, without lawful authority,  
14 a means of identification of another person, including but not limited to, a stolen credit card account  
15 number, account holder's name, date of birth, Social Security number, address, and telephone  
16 number, that is, Discover Card account number X-5598; account holder's name B. Detrich; Social  
17 Security number X-9986; and telephone number X-5662; with the intent to commit and to aid and  
18 abet the commission of and in connection with any unlawful activity that constitutes a violation of  
19 Federal law, to wit: Wire Fraud in violation of Title 18, United States Code, Section 1343, all in  
20 violation of Title 18, United States Code Sections 1028(a)(7), (b)(2)(B), and (c)(3)(A); and Title 18,  
21 United States Code, Section 2.

22 **COUNT TWENTY ONE**

23 **Trafficking in and Use of Counterfeit and Unauthorized Access Devices;  
Aiding and Abetting**

24 On or about March 1, 2011, in the State and Federal District of Nevada, and elsewhere, [26]  
25 **DUVAUGHN BUTLER** a.k.a. Mackmann, defendant herein, together with and aiding and abetting  
26 others known and unknown, did knowingly and with intent to defraud, traffic in and use an

1 unauthorized access device, to wit: a Chase Bank MasterCard credit card account, number ending  
2 in X-8088, which was stolen and obtained with the intent to defraud, and by such conduct did, on  
3 or about that same date, obtain things of value in excess of one thousand dollars (\$1,000.00), that  
4 is, approximately one thousand fifty three dollars (\$1,053.00) in goods and merchandise, from  
5 Walmart, store number 2593, in or around Las Vegas, Nevada, with said trafficking and use in and  
6 affecting interstate commerce, all in violation of Title 18, United States Code, Sections 1029(a)(2)  
7 and (c)(1)(a)(I); and Title 18, United States Code, Section 2.

8 **COUNTS TWENTY TWO THROUGH FIFTY FIVE**

9 **Possession of Fifteen or More Counterfeit and Unauthorized Access Devices;  
10 Aiding and Abetting**

11 On or about each of the dates set forth below, in the State and Federal District of Nevada, and  
12 elsewhere,

- 13 [2] ██████████ a.k.a. Graf;
- 14 [6] EDWARD MONTECALVO a.k.a Nightmare a.k.a. Tenure44;
- 15 [8] ██████████ a.k.a. ██████████ a.k.a.
- 16 CC- - Trader a.k.a. Kengza;
- 17 [14] ██████████ a.k.a. Track2 a.k.a. Bulba a.k.a. Neux;
- 18 [16] ██████████ a.k.a. RABIE AYAD a.k.a. Patistota;
- 19 [17] ██████████ a.k.a. Source;
- 20 [18] ██████████ a.k.a. C4rd3R;
- 21 [19] ██████████ a.k.a. Bowl;
- 22 [33] JOHN DOE 6 a.k.a. Fozzy;
- 23 [34] JOHN DOE 7 a.k.a. Vitrum a.k.a. Lermentov;
- 24 [35] ██████████ a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
- 25 [36] JOHN DOE 8 a.k.a. TM;
- 26 [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;and
- [38] JOHN DOE 10 a.k.a. Centurion;

20 defendants herein, together with and aiding and abetting one another and others, known and  
21 unknown, knowingly and with intent to defraud, did possess fifteen (15) or more unauthorized access  
22 devices, that is stolen credit and debit card account numbers issued to persons other than the  
23 defendants, in and affecting interstate and foreign commerce, with each instance set forth below  
24 constituting a separate violation of Title 18, United States Code, Sections 1029(a)(3), and  
25 (c)(1)(A)(I); and Title 18 United States Code, Section 2, as follows:

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
2	TWENTY TWO [8] ██████████	February 22, 2008	22
3	TWENTY THREE [8] ██████████	March 9, 2009	25
4	TWENTY FOUR [6] MONTECALVO	January 21, 2010	50
5	TWENTY FIVE [6] MONTECALVO	April 5, 2010	220
6	TWENTY SIX [14] ██████████	January 20, 2011	29
7	TWENTY SEVEN [11] ██████████	March 15, 2011	15
8	TWENTY EIGHT [36] TM	March 16, 2011	20
9	TWENTY NINE [14] ██████████	March 18, 2011	20
10	THIRTY [37] ZOOMER	March 18, 2011	20
11	THIRTY ONE [17] ██████████	March 18, 2011	17
12	THIRTY TWO [18] ██████████	March 23, 2011	20
13	THIRTY THREE [2] ██████████	March 24, 2011	20
14	THIRTY FOUR [11] ██████████	March 24, 2011	20
15	THIRTY FIVE [33] FOZZY	March 24, 2011	20
16	THIRTY SIX [36] TM	March 24, 2011	20
17	THIRTY SEVEN [37] ZOOMER	March 24, 2011	23
18	THIRTY EIGHT [38] CENTURION	March 24, 2011	18
19	THIRTY NINE [18] ██████████	March 26, 2011	60
20	FORTY [34] .VITRUM	March 28, 2011	20
21	FORTY ONE [38] CENTURION	March 28, 2011	74
22	FORTY TWO [33] FOZZY	March 28, 2011	22
23	FORTY THREE [35] ██████████	March 28, 2011	20
24	FORTY FOUR [2] ██████████	March 29, 2011	21
25	FORTY FIVE [35] ██████████	April 6, 2011	38
26	FORTY SIX [35] ██████████	April 8, 2011	20

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
FORTY SEVEN	[2] ██████████	April 10, 2011	21
FORTY EIGHT	[18] ██████████	April 11, 2011	20
FORTY NINE	[36] <del>TM</del>	April 11, 2011	20
FIFTY	[37] ZOOMER	April 11, 2011	19
FIFTY ONE	[19] ██████████	April 12, 2011	49
FIFTY TWO	[38] CENTURION	April 12, 2011	22
FIFTY THREE	[19] ██████████	April 22, 2011	12,710
FIFTY FOUR	[17] ██████████	April 29, 2011	15
FIFTY FIVE	[14] ██████████	May 12, 2011	100

**COUNTS FIFTY SIX THROUGH SIXTY**

**Trafficking In and Possessing Access Device-Making Equipment; Aiding and Abetting**

On or about each of the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

[9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;  
 [15] QASIR MUKHTAR a.k.a. Caliber; and  
 [39] JOHN DOE 11 a.k.a. Consigliori;

defendants herein, together with and aiding and abetting one another, and others known and unknown, did knowingly and with the intent to defraud, traffic in, have control and custody over, and possess device-making equipment, that is blank plastic cards used in the production of counterfeit access devices, which are issued, owned, managed and controlled by a financial institution, account issuer, or credit card system member within the jurisdiction of the United States, in and affecting interstate and foreign commerce, with each instance set forth below constituting a separate violation of Title 18, United States Code, Sections 1029(a)(4), (c)(1)(A)(ii), and (h); and Title 18, United States Code, Section 2, as more fully set forth below:

. . .  
 . . .

<u>COUNT</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Plastic Cards</u>
FIFTY SIX	[15] MUKHTAR	March 22, 2011	26
FIFTY SEVEN	[9] SMITH	April 5, 2011	10
FIFTY EIGHT	[39] CONSIGLIORI	April 15, 2011	20
FIFTY NINE	[39] CONSIGLIORI	May 23, 2011	20
SIXTY	[39] CONSIGLIORI	June 9, 2011	20

**COUNTS SIXTY ONE AND SIXTY TWO  
Conspiracy to Trafficking In and Possess Access Device-Making Equipment**

On or about the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

[9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;  
 [11] ██████████ a.k.a. Bank Manager a.k.a. Document Manager a.k.a. Corey; and  
 [26] DUVAUGHN BUTLER a.k.a. Mackmann;

defendants herein, together with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree among themselves, and with others, to commit offenses against the laws of the United States, namely, to knowingly and with the intent to defraud, traffic in, have control and custody over, and possess device-making equipment, that is, blank plastic cards used in the production of counterfeit access devices, which are issued, owned, managed and controlled by a financial institution, account issuer, or credit card system member within the jurisdiction of the United States, in and affecting interstate and foreign commerce, with each instance set forth below constituting a separate violation of Title 18, United States Code, Sections 1029(a)(4), (b)(2), (c)(1)(A)(ii), and (h), as more fully set forth below:

<u>COUNT</u>	<u>Defendant</u>	<u>Date</u>	<u>Approx. No. Plastic Cards</u>
SIXTY ONE	[9] SMITH & [26] BUTLER	August 31, 2010	10
SIXTY TWO	[11] ██████████ [26] BUTLER	February 16, 2011	10



**FORFEITURE ALLEGATION**

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1. The allegations contained in Counts One and Two of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963 and Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Counts One and Two.

2. The defendants,

- 10 [1] ██████████ a.k.a. Admin a.k.a. Support;  
11 [2] ██████████ a.k.a. Graf;  
12 [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a. Klbs;  
13 [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino a.k.a. Mr.  
14 Right a.k.a. mrdc87;  
15 [5] ██████████ a.k.a. Ray Wong a.k.a. Ray;  
16 [6] **EDWARD MONTECALVO** a.k.a. Nightmare a.k.a. Tenure44;  
17 [7] ██████████ a.k.a. Ibatistuta;  
18 [8] ██████████ a.k.a. ██████████ a.k.a. CC -- Trader  
19 a.k.a. Kengza;  
20 [9] **JERMAINE SMITH** a.k.a. Sircharlie57 a.k.a. Fairbusinessman;  
21 [10] **MAKYL HAGGERTY** a.k.a. Wave;  
22 [11] ██████████ a.k.a. Bank Manager a.k.a. Document  
23 Manager a.k.a. Corey;  
24 [12] ██████████ a.k.a. Abagnalefrank;  
25 [13] ██████████ a.k.a. Devica;  
26 [14] ██████████ a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;  
[15] **OASIR MUKHTAR** a.k.a. Caliber;  
[16] ██████████ a.k.a. ██████████ a.k.a. Patistota;  
[17] ██████████ a.k.a. Source;  
[18] ██████████ a.k.a. C4rd3R;  
[19] ██████████ a.k.a. Bowl;  
[20] ██████████ a.k.a. Dorbik a.k.a. Matad0r;  
[21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy;  
[22] **SHIYANG GOU** a.k.a. Cder;  
[23] **DAVID RAY CAMEZ** a.k.a. Bad Man a.k.a. Doctorsex;  
[24] **CAMERON HARRISON** a.k.a. Kilobit;  
[25] ██████████ a.k.a. Qiller;  
[26] **DUVAUGHN BUTLER** a.k.a. Mackmann;  
[27] **FREDRICK THOMAS** a.k.a. 1Stunna;  
[28] **JOHN DOE 1** a.k.a. Senna071;  
[29] **JOHN DOE 2** a.k.a. Morfiy;  
[30] **JOHN DOE 3** a.k.a. Gruber;  
[31] **JOHN DOE 4** a.k.a. Maxxtro;

- [32] JOHN DOE 5 a.k.a. Elit3;
- [33] JOHN DOE 6 a.k.a. Fozzy;
- [34] JOHN DOE 7 a.k.a. Vitrum a.k.a. Lermentov;
- [35] [REDACTED] a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
- [36] JOHN DOE 8 a.k.a. TM;
- [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;
- [38] JOHN DOE 10 a.k.a. Centurion; and
- [39] JOHN DOE 11 a.k.a. Consigliori;

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5 i. have acquired and maintained interests in violation of Title 18, United States  
6 Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title  
7 18, United States Code, Section 1963(a)(1);

8 ii. have an interest in, security of, claims against, and property and contractual  
9 rights which afford a source of influence over, the enterprise named and described herein which the  
10 defendants established, operated, controlled, conducted, and participated in the conduct of, in  
11 violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights  
12 are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963  
13 (a)(2);

14 iii. have property constituting and derived from proceeds obtained, directly and  
15 indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962,  
16 which property is subject to forfeiture to the United States pursuant to Title 18, United States Code,  
17 Section 1963(a)(3).

18 3. The interests of the defendants subject to forfeiture to the United States pursuant to  
19 Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), include but are not limited to at  
20 least twenty (20) million dollars and all interests and proceeds traceable thereto.

21 4. If any of the property cannot be located, has been transferred or sold to or deposited  
22 with a third party, has been placed beyond the jurisdiction of the court, has been substantially  
23 diminished in value, or has been commingled with other property which cannot be divided without  
24 difficulty, the court shall order the forfeiture of any other property of the defendants up to the value  
25 of at least twenty (20) million dollars and all interests and proceeds traceable thereto as set forth in  
26 Section 1963(m).



**SEALED**

**ATTACHMENT B**

AFFIDAVIT OF MICHAEL ADAMS

STATE OF NEVADA            )  
  ) ss  
COUNTY OF CLARK         )

1.     I, Michael Adams, Special Agent, Homeland Security Investigation (HSI), being duly sworn, state that:

2.     I am a Special Agent of the Immigration and Customs Enforcement, Homeland Security Investigations, and have been so employed since July of 2011. Prior to becoming a Special Agent with Immigration and Customs Enforcement, Homeland Security Investigations I was employed as a Special Agent with the United States Secret Service from June of 2000 up to my employment beginning with Immigration and Customs Enforcement, Homeland Security Investigations. I investigate violations of federal law relating to financial crimes and the cross-border flow of people and goods. I have investigated numerous cases involving patterns of conduct similar to that described in the sealed Indictment, case number 2:12-CR-0004-JCM-GWF. I have also completed the Criminal Investigator training course offered by the Federal Law Enforcement Training Center and the Special Agent Training program offered by the Immigration and Customs Enforcement, Homeland Security Investigations and the United States Secret Service, which included training on detecting and investigating the use and manufacture counterfeit credit cards and wire fraud.

3.     The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses.

4. As a result of this investigation, I know, based on my own personal knowledge, my participation in the investigation, and also based information provided to me by other law enforcement officers, the partial sealing of the indictment in case number 2:12-CR-0004-JCM-GWF, as proposed in Attachment A, which is incorporated by reference herein, is necessary because continued secrecy in the indictment serves a number of legitimate government needs. The investigation into the criminal organization, "the Carder.su organization," is ongoing. Not all of the defendants named in the indictment will be arrested during the nationwide arrest sweep scheduled for on or about March 15, 2012. Moreover, not all of the targets of the investigation are named as defendants in the initial indictment in case number 2:12-CR-0004-JCM-GWF. Continued secrecy by only partially unsealing the indictment is necessary to give law enforcement time to gather more evidence.

5. For at least the past four years, your affiant and other federal agents have been investigating those individuals who are members of, employed by and associates of an international criminal organization, the Carder.su organization, that are engaging in an ongoing criminal enterprise consisting, in part, of acts of identity theft, and financial fraud. The criminal organization is comprised of approximately five thousand (5000) members located within and outside of the United States, who function as a continuing unit for a common purpose of achieving the objectives of the criminal enterprise. While a sealed indictment was returned as to 39 defendants, on or about January 10, 2012, the investigation into the remaining unindicted members of the criminal organization and its ongoing criminal enterprise continues. As recently as March 5, 2012, your affiant, acting in an undercover capacity, was contacted by a Carder.su member and encouraged to engage in trafficking in counterfeit identification documents with that member in furtherance of the criminal enterprise.

Based on my own personal knowledge, my participation in the investigation, and also based on information provided to me by other law enforcement officers, legitimate prosecutorial purposes support the proposed partial unsealing of the indictment.

6. From your affiant's experience, online criminals, like members of the Carder.su organization, actively search for criminal complaints, indictments, criminal affidavits and search warrants by way of the internet, and disseminate them to other online criminals as they deem appropriate, i.e., post them publicly online through the carding forums. Once posted online, the cyber-criminals then publicly engaged in an ongoing dialogue, discussing law enforcement tactics and procedures for targeting online criminals engaged in fraud and related criminal activities. In other words, premature disclosure of the contents of the redacted portions of the indictment in Attachment A may have a significant and negative impact on the continuing investigation and may severely jeopardize the investigation's effectiveness.

7. During the course of this investigation, your affiant and other law enforcement officers have been able to identify certain members of the Carder.su organization by tracking their on-line means of communication with other members of the criminal enterprise. ICQ addresses (a commonly used on-line chat protocol) and e-mail addresses have been identified for all 39 members. Many of those means of communication can be, and are being, lawfully monitored by law enforcement, by way of search warrants and court orders. The content of these communications will assist in ascertaining the physical location of the users, thus facilitating their arrest. Additionally, as to those defendants who are named as John Does, monitoring of their communication is one of the best way of gaining personal information, connections to friends, family, school, work, which will allow your affiant to learn the John Does' true identities. Based on your affiant's training and

experience, if the indictment is not kept partially sealed, those defendants who are not arrested on or about March 15, 2012, will likely stop using the known ICQ addresses, and email addresses, and will change their nicknames and on-line identities, as soon as the unsealed indictment is filed in Pacer. The partially sealed indictment will make it less likely for wide spread panic to cause unarrested defendants, both in and outside of the United States, to dump their on-line personas. Moreover, by partially sealing the indictment, it may embolden Carder.su members located overseas to continue in their criminal pursuits and remain in contact with other members, such as your affiant, acting in his undercover capacity, by engendering a false sense of security that roles in the organization, their true identities, and their physical locations remain unknown to law enforcement. Such ongoing criminal conduct and continued contact with your affiant in his undercover capacity will allow the investigation to continue moving forward.

8. Defendants [28] through [34], and [36] though [39], are charged as John Does because their true identities remain unknown, and therefore their physical locations also remains unknown. Based on my own personal knowledge, my participation in the investigation, and also based information provided to me by other law enforcement officers, continued contact with your affiant by Carder.su members during the consternation and confusion your affiant anticipates will arise after the arrest national sweep and the on-line sharing of the partially unsealed indictment, may well cause Defendants [28] through [34], and [36] though [39] to slip up by disclosing something which facilitates law enforcement's discovery of information leading to their true identities and their actual physical locations.

9. Defendants [1], [2], [5], [7], [8], [11], [12], [13], [14], [16], [17], [18], [19], [25], and [35] are believed to reside in countries other than the United States. Your affiant, based on his




training and experience, believes that sealing the true names and real world aliases of the overseas defendants will allow the extradition process to move forward more expediently, with more likelihood of securing provisional arrest warrants in those foreign countries which have extradition treaties with the United States.

10. Unless defendants' [1], [2], [5], [7], [8], [11], [12], [13], [14], [16], [17], [18], [19], [25], and [35] true names and real world aliases are redacted from the indictment, these defendant will know they are the persons wanted as soon as the indictment is posted on line in PACER. Such knowledge would chill these defendants' international travel to the United States, where they could be easily arrested. Also, it may cause these foreign subjects to flee to countries who do not have extradition treaties with the United States.


11. For all these reasons, your affiant believes that legitimate prosecutorial purposes will be served by keep the indictment partially sealed and to unseal the remainder of the indictment in the normal course upon the arrest and initial appearance of any one of the 39 defendants until further order of this court.

DATED this 5<sup>th</sup> day of March, 2012.

  
\_\_\_\_\_  
Michael P. Adams, Special Agent  
Immigration and Customs Enforcement  
Homeland Security Investigations

SUBSCRIBED and SWORN to before me, a Notary Public, on this date, March 5<sup>th</sup>, 2012, by  
Michael Adams



  
\_\_\_\_\_  
NOTARY