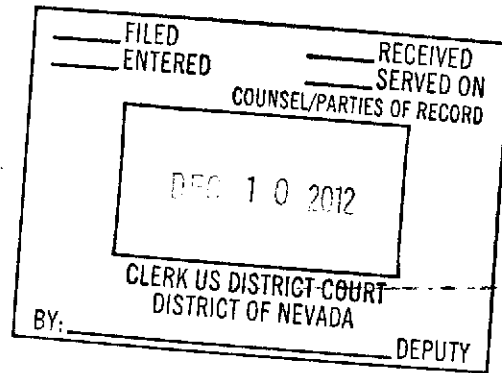


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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA
PLAINTIFF

VS.

[1] ROMAN ZOLOTAREV,
A.K.A. ADMIN,
A.K.A. SUPPORT,
(Counts 1-2, 19)
[2] KONSTANTIN LOPATIN,
A.K.A. GRAF,
(Counts 1-2, 33, 44, 47)
[3] ALEXANDER KOSTYUKOV,
A.K.A. TEMP,
A.K.A. KLBS, (Counts 1-2, 3-17)

[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,
(Counts 1-2, 3-17)

[5] TIN-YUEN WONG,
A.K.A. RAY WONG,
A.K.A. RAY,
(Counts 1-2, 3-17)

[6] EDWARD MONTECALVO,
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);

- 1 [7] YU FENG WANG ,)
A.K.A IBATISTUTA,)
2 (Counts 1-2))
3 [8] MOHAMED AMR MAHMOUD,)
A.K.A. AMR MAHMOUD,)
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] ALADELOLA TESLIM AJAYI,)
11 A.K.A. BANK MANAGER,)
A.K.A. DOCUMENT MANAGER,)
12 A.K.A. COREY, (Counts 1-2, 61-62))
13 [12] ALEXANDRU ION,)
A.K.A. ABAGNALEFRANK, (Counts 1-2))
14 [13] JORDAN GEORGIEVSKI,)
15 A.K.A.DEVICA,)
(Counts 1-2))
16 [14] ROMAN SELEZNEV,)
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] ROY AYAD,)
22 A.K.A. RABIE AYAD)
A.K.A. PATISTOTA, (Counts 1-2, 22-55))
23 [17] MINA MORRIS,)
24 A.K.A. SOURCE,)
(Counts 1-2, 22-55))
25 [18] RACHID IDAALI,)
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] LIRIDON MUSLIU,
A.K.A. BOWL,
2 (Counts 1-2, 22-55)
- 3 [20] SERGEI LITVINENKO,
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,
A.K.A. KILOBIT,
13 (Counts 1-2, 3-17)
- 14 [25] ALEKSANDAR BESAROVIC,
A.K.A. QILLER,
15 (Counts 1-2, 3-17)
- 16 [26] DUVAUGHN BUTLER,
A.K.A. MACKMANN,
17 (Counts 1-2, 21, 61-62)
- 18 [27] FREDRICK THOMAS,
A.K.A 1STUNNA,
19 (Counts 1-2)
- 20 [28] JOHN DOE 1,
A.K.A SENNA071,
21 (Counts 1-2, 3-17)
- 22 [29] JOHN DOE 2,
A.K.A. MORFIY,
23 (Counts 1-2, 3-17)
- 24 [30] JOHN DOE 3,
A.K.A. GRUBER,
25 (Counts 1-2, 18)
- 26

- 1 [31] JOHN DOE 4,)
 - 2 A.K.A. MAXXTRO,)
 - 3 (Counts 1-2))
 - 4 [32] JOHN DOE 5,)
 - 5 A.K.A. ELIT3,)
 - 6 (Counts 1-2))
 - 7 [33] JOHN DOE 6,)
 - 8 A.K.A. FOZZY,)
 - 9 (Counts 1-2, 22-55))
 - 10 [34] JOHN DOE 7,)
 - 11 A.K.A. VITRUM,)
 - 12 A.K.A. LERMENTOV,)
 - 13 (Counts 1-2, 22-55))
 - 14 [35] ANDREI BOLOVAN,)
 - 15 A.K.A. PANTHER,)
 - 16 A.K.A. EUPHORIC,)
 - 17 A.K.A. DARKMTH,)
 - 18 (Counts 1-2, 22-55))
 - 19 [36] JOHN DOE 8,)
 - 20 A.K.A. TM,)
 - 21 (Counts 1-2, 22-55))
 - 22 [37] JOHN DOE 9,)
 - 23 A.K.A. ZOOMER,)
 - 24 A.K.A. DEPUTAT,)
 - 25 (Counts 1-2, 22-55))
 - 26 [38] JOHN DOE 10,)
 - 27 A.K.A. CENTURION,)
 - 28 (Counts 1-2, 22-55))
 - 29 [39] JOHN DOE 11,)
 - 30 A.K.A. CONSIGLIORI,)
 - 31 (Counts 1-2, 61-62))
- DEFENDANTS.

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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] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a. Support;
9 [2] **KONSTANTIN LOPATIN** a.k.a. Graf;
10 [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a. Klbs;
11 [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino a.k.a. Mr.
12 Right a.k.a. mrdc87;
13 [5] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray;
14 [6] **EDWARD MONTECALVO** a.k.a. Nightmare a.k.a. Tenure44;
15 [7] **YU FENG WANG** a.k.a. Ibatistuta;
16 [8] **MOHAMED AMR MAHMOUD** a.k.a. AMR MAHMOUD a.k.a. CC-- Trader
17 a.k.a. Kengza;
18 [9] **JERMAINE SMITH** a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
19 [10] **MAKYL HAGGERTY** a.k.a. Wave;
20 [11] **ALADELOLA TESLIM AJAYI** a.k.a. Bank Manager a.k.a. Document
21 Manager a.k.a. Corey;
22 [12] **ALEXANDRU ION** a.k.a. Abagnalefrank;
23 [13] **JORDAN GEORGIEVSKI** a.k.a. Devica;
24 [14] **ROMAN SELEZNEV** a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
25 [15] **QASIR MUKHTAR** a.k.a. Caliber;
26 [16] **ROY AYAD** a.k.a. RABIE AYAD a.k.a. Patistota;
[17] **MINA MORRIS** a.k.a. Source;
[18] **RACHID IDAALI** a.k.a. C4rd3R;
[19] **LIRIDON MUSLIU** a.k.a. Bowl;
[20] **SERGEI LITVINENKO** 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] **ALEKSANDAR BESAROVIC** 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] ANDREI BOLOVAN 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. Consiglieri;

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

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

PURPOSES OF THE ENTERPRISE

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

- A. to enrich the members and associates of the enterprise through the unlawful trafficking in: means of identification, document-making implements, counterfeit identification documents, device-making equipment, and, unauthorized and counterfeit access devices;
- 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
26

1 provide secure meeting locations for the members and
2 associates of the criminal organization;

3 (ii) Private messaging ("PM") which is a non-forum wide message
4 sent between individual members on the criminal organization's
5 website forums;

6 (iii) E-mail, some of which are encrypted and password protected,
7 or use service providers located outside the United States;

8 (iv) ICQ chat, which is a free instant messaging electronic
9 communication services provided by ICQ, Inc., a
10 subsidiary of AOL. ICQ user accounts are identified by a
11 Universal Identification Number ("UIN");

12 (v) Proxies, which are achieved by bouncing from one computer
13 to another to hide a member's true originating IP address;

14 (vi) Virtual Private Network, ("VPNs"), which are similar to a
15 proxy, but with the addition of creating an encrypted tunnel that
16 cannot be monitored; and

17 (vii) protected drop sites in the District of Nevada, and elsewhere,
18 in the event that there is a need to transport, transfer, and
19 receive physical items of contraband.

20 21 **ROLES OF THE DEFENDANTS**

22 **Organizational Hierarchy**

23 5. Leaders, members and associates of the Carder.su Organization have defined roles
24 in the enterprise. At all times relevant to this indictment, the defendants participated in the operation
25 and the management of the enterprise as follows:
26

1 a. Administrator - Defendant [1] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a.
2 Support, (hereafter “[1] **ZOLOTAREV**”), is the Administrator of the Carder.su organization.
3 [1] **ZOLOTAREV** 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] **ZOLOTAREV** 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] **ZOLOTAREV** determines which
9 individuals can become and remain members of the Carder.su organization. [1] **ZOLOTAREV**
10 regulates the functions, responsibilities and levels of access to information accorded to each member.
11 [1] **ZOLOTAREV** 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] **ZOLOTAREV** 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] **ZOLOTAREV** has full access to, and privileges on, the computer
16 servers hosting the Carder.su organization’s websites. [1] **ZOLOTAREV** 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] **ZOLOTAREV**’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] **KONSTANTIN LOPATIN** a.k.a. Graf,
23 (hereafter “[2] **LOPATIN**”), 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] LOPATIN and [31]
4 MAXXTRO assist [1] ZOLOTAREV 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] LOPATIN'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] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray,
25 (hereafter "[5] **WONG**"), 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] **WONG** 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] WONG 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] WONG 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] WONG'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] YU FENG WANG a.k.a Ibatistuta, (hereafter "[7]
19 WANG"), 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] WANG sells blank plastic cards to members for ten dollars (\$10) to fifteen dollars
22 (\$15) each, depending on the quantity ordered. [7] WANG sells the counterfeit holograms and
23 signatures for one dollar (\$1) each. [7] WANG'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] **MOHAMED AMR MAHMOUD** a.k.a. AMR
2 MAHMOUD a.k.a. CC -- Trader a.k.a. Kengza, (hereafter "[8] MAHMOUD"), 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] MAHMOUD 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] MAHMOUD 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] MAHMOUD 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] MAHMOUD'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] **ALADELOLA TESLIM AJAYI** a.k.a. Bank
12 Manager a.k.a. Document Manager a.k.a. Corey, (hereafter "[11] **AJAYI**"), 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] **AJAYI**'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] **ALEXANDRU ION** a.k.a. Abagnalefrank, (hereafter
18 "[12] **ION**") is a Vendor of dumps in the Carder.su organization. [12] **ION** 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] **ION**'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] **JORDAN GEORGIEVSKI** a.k.a. Devica, (hereafter
25 "[13] **GEORGIEVSKI**"), 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] **GEORGIEVSKI** 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] **GEORGIEVSKI**'s prices for the counterfeit holograms vary by the quantity purchased.

4 [13] ~~**GEORGIEVSKI**'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] **ROMAN SELEZNEV** a.k.a. Track2 a.k.a. Bulba
8 a.k.a. Neux, (hereafter "[14] **SELEZNEV**"), is a Vendor in the Carder.su organization of dumps.

9 [14] **SELEZNEV** 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] **SELEZNEV**'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] **SELEZNEV**. [14] **SELEZNEV**'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] **SELEZNEV** sells each stolen
18 account number for approximately twenty dollars (\$20). [14] **SELEZNEV**'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] **ROY AYAD** a.k.a. **RABIE AYAD** a.k.a. Patistota,
8 (hereafter "[16] **AYAD**"), is a Vendor of CVVs in the Carder.su organization. [16] **AYAD** sells the
9 CVVs through an automated website, which he advertises on the Carder.su organization's websites.

10 [16] **AYAD**'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] **AYAD** 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] **AYAD**'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] **MINA MORRIS** a.k.a. Source, (hereafter "[17]
17 **MORRIS**"), 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] **MORRIS** 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. **MORRIS** also has an automated website, which he advertises on the
22 Carder.su organization's websites. [17] **MORRIS**' website allows members to look up dumps by
23 BIN to purchase accounts issued from a particular financial institution. [17] **MORRIS**' 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] **RACHID IDAALI** a.k.a. C4rd3R, (hereafter “[18]
2 **IDAALI**”), 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] **IDAALI** sells the CVVs to members through his automated website.~~
5 [18] **IDAALI** 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] **IDAALI** 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] **IDAALI**'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] **LIRIDON MUSLIU** a.k.a. Bowl, (hereafter “[19]
14 **MUSLIU**”), is a Vendor in the Carder.su organization of CVVs, which he sells through his
15 automated website. [19] **MUSLIU** advertises his website on the Carder.su organization’s websites.
16 [19] **MUSLIU**'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] **SERGEI LITVINENKO** a.k.a. Dorbik a.k.a.
19 Matad0r, (hereafter “[20] **LITVINENKO**”), 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] LITVINENKO'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] **ANDREI BOLOVAN** a.k.a. Panther a.k.a. Euphoric
13 a.k.a. Darkmth, (hereafter "[35] **BOLOVAN**"), 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 **BOLOVAN**'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 Vender 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] **ALEKSANDAR BESAROVIC** a.k.a. Qiller,
20 (hereafter “[25] **BESAROVIC**”), is a member of the Carder.su organization. [25] **BESAROVIC**
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] **BESAROVIC**’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] ZOLOTAREV;
- 13 [2] LOPATIN;
- 14 [3] KOSTYUKOV;
- 15 [4] BOOZER III;
- 16 [5] WONG;
- 17 [6] MONTECALVO;
- 18 [7] WANG;
- 19 [8] MAHMOUD;
- 20 [9] SMITH;
- 21 [10] HAGGERTY;
- 22 [11] AJAYI;
- 23 [12] ION;
- 24 [13] GEORGIEVSKI;
- 25 [14] SELEZNEV;
- 26 [15] MUKHTAR;
- [16] AYAD;
- [17] MORRIS;
- [18] IDAALI;
- [19] MUSLIU;
- [20] LOFTON;
- [21] GOU;
- [22] CAMEZ;
- [23] HARRISON;
- [24] BESAROVIC;
- [25] BUTLER;
- [26] THOMAS;
- [27] SENNA071;
- [28] MORFIY;
- [29] GRUBER;
- [30]

- [31] MAXXTRO;
- [32] ELIT3;
- [33] FOZZY;
- [34] .VITRUM;
- [35] BOLOVAN;
- [36] TM;
- [37] ZOOMER;
- [38] CENTURION; and
- [39] CONSIGLIORI;

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

THE PATTERN OF RACKETEERING ACTIVITY

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

RACKETEERING ACTS INVOLVING STOLEN MEANS OF IDENTIFICATION AND COUNTERFEIT IDENTIFICATION DOCUMENTS

Racketeering Acts 1 through 15
Unlawful Trafficking in and Production of False Identification Documents

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

- [3] KOSTYUKOV;
- [4] BOOZER III;
- [5] WONG;
- [6] MONTECALVO;
- [21] LOFTON;
- [22] GOU;
- [23] CAMEZ;
- [24] HARRISON;
- [25] BESAROVIC;
- [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:

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

1 **Racketeering Act 16**
2 **Attempt to Unlawful Produce False Identification Documents**

3 5. From on or about April 16, 2011, until on or after May 18, 2011, in the State and
4 ~~Federal District of Nevada, and elsewhere, [30] GRUBER, defendant herein, together with other~~
5 members and associates of the Carder.su organization, including others known and unknown, did
6 knowingly and without lawful authority attempt to produce, and did attempt to cause others to
7 produce, false identification documents, in and affecting interstate and foreign commerce, and the
8 offense involved the production and transfer of false identification documents that are and appear
9 to be approximately two (2) Florida driver's licenses, in violation of Title 18, United States Code,
10 Sections 1028(a)(1), and (f).

11 **Racketeering Act 17**
12 **Attempt to Unlawfully Produce False Identification Documents**

13 6. Beginning on an unknown date, but not later than February 1, 2010, and continuing
14 to on or about February 5, 2010, in the States of Florida, New Hampshire, and elsewhere,
15 [28] SENNA071, defendant herein, together with other members and associates of the Carder.su
16 organization, including others known and unknown, did knowingly and without lawful authority
17 attempt to produce, and did attempt to cause others to produce, false identification documents, in and
18 affecting interstate and foreign commerce, and the offense involved the production and transfer of
19 false identification documents that are and appear to be a driver's license, bearing the name S.
20 Salman, all in violation of Title 18, United States Code, Sections 1028(a)(1), and (f).

21 **Racketeering Act 18**
22 **Conspiracy to Unlawfully Produce False Identification Documents**

23 7. Beginning on or about August 20, 2010, and continuing to on or about August 25,
24 2010, in the State of Nevada, and elsewhere, the defendants, [30] GRUBER and [21] LOFTON,
25 together with other members and associates of the Carder.su organization, including others unknown,
26 did unlawfully, knowingly and intentionally combine, conspire and agree among themselves, and

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] **BESAROVIC**, 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] ZOLOTAREV, 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).

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

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).

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

16 13. On or about March 15, 2009, in the in the State of Connecticut and elsewhere,
17 [5] **WONG**, 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] MAHMOUD;
 9 [12] ION;
 10 [16] AYAD;
 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				
23	[31] MAXXTRO	November 25, 2006	X-5696	K. Kehoe
24	[8] MAHMOUD	October 19, 2007	X-5598	B. Detrich
25	[31] MAXXTRO	February 28, 2008	X-1914	D. Stickler
26	[24] HARRISON	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] MAHMOUD	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] ION	August 3, 2010	X-3337	D. Bossman
10	36	[16] AYAD	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).

25 . . .
26 . . .

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] ZOLOTAREV;
- [2] LOPATIN;
- [4] BOOZER III;
- [6] MONTECALVO;
- [7] WANG;
- [8] MAHMOUD;
- [9] SMITH;
- [10] HAGGERTY;
- [11] AJAYI;
- [12] ION;
- [13] GEORGIEVSKI;
- [14] SELEZNEV;
- [15] MUKHTAR;
- [16] AYAD;
- [17] MORRIS;
- [18] IDAALI;
- [19] MUSLIU;
- [22] GOU;
- [23] CAMEZ;
- [24] HARRISON;
- [25] BESAROVIC;
- [26] BUTLER;
- [27] THOMAS;
- [30] GRUBER;
- [31] MAXXTRO;
- [33] FOZZY;
- [34] .VITRUM;
- [35] BOLOVAN;
- [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] ZOLOTAREV & [31] MAXXTRO	February 13, 2007	20
5	39	[1] ZOLOTAREV & [33] FOZZY;	February 15, 2007	17
6	40	[7] WANG	April 10, 2007	more than 490
7	41	[8] MAHMOUD	February 22, 2008	22
8	42	[30] GRUBER & [34] .VITRUM	February 23, 2008	25
9	43	[34] .VITRUM	May 7, 2008	40
10	44	[7] WANG	February 2, 2009	30
11	45	[8] MAHMOUD	March 9, 2009	25
12	46	[6] MONTECALVO	January 21, 2010	50
13	47	[6] MONTECALVO	April 5, 2010	220
14	48	[26] BUTLER & [9] SMITH	April 14, 2010	15
15	49	[25] BESAROVIC	May 16, 2010	17
16	50	[10] HAGGERTY	May 27, 2010	20
17	51	[10] HAGGERTY	June 2, 2010	40
18	52	[23] CAMEZ	June 7, 2010	30
19	53a.	[4] BOOZER III	June 9, 2010	200
20	53b.	[4] BOOZER III	June 10, 2010	50
21	54	[11] AJAYI	July 15, 2010	50
22	55	[11] AJAYI	July 21, 2010	146
23	56	[7] WANG	July 26, 2010	23
24	57	[11] AJAYI	July 27, 2010	99

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

1	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
2	82	[38] CENTURION	March 28, 2011	74
3	83	[33] FOZZY	March 28, 2011	22
4	84	[35] BOLOVAN	March 28, 2011	20
5	85	[2] LOPATIN	March 29, 2011	21
6	86	[35] BOLOVAN	April 6, 2011	38
7	87	[35] BOLOVAN	April 8, 2011	20
8	88	[2] LOPATIN	April 10, 2011	21
9	89	[18] IDAALI	April 11, 2011	20
10	90	[36] TM	April 11, 2011	20
11	91	[37] ZOOMER	April 11, 2011	19
12	92	[19] MUSLIU	April 12, 2011	49
13	93	[38] CENTURION	April 12, 2011	22
14	94	[19] MUSLIU	April 22, 2011	12,710
15	95	[17] MORRIS	April 29, 2011	22
16	96	[14] SELEZNEV	May 12, 2011	100
17	97	[17] MORRIS	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] GEORGIEVSKI;
[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] GEORGIEVSKI	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] WONG;
 18 [9] SMITH;
 19 [10] HAGGERTY;
 20 [11] AJAYI;
 21 [13] GEORGIEVSKI;
 22 [15] MUKHTAR;
 23 [23] CAMEZ;
 24 [26] BUTLER; and
 25 [29] MORFIY;

26 defendants herein, together with other members and associates of the Carder.su organization,
 including others known and unknown, did knowingly and intentionally combine, conspire 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

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] WONG	March 5, 2009 to March 9, 2009	50
8	105	[13] GEORGIEVSKI	March 19, 2009	27
9	106	[15] MUKHTAR & [23] CAMEZ	February 4, 2010	26
10	107	[29] MORFIY & [10] HAGGERTY	May 18, 2010	10
11	108	[9] SMITH & [26] BUTLER	August 31, 2010	10
12	109	[11] AJAYI & [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] ROMAN ZOLOTAREV a.k.a. Admin a.k.a. Support;
 24 [2] KONSTANTIN LOPATIN 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] TIN-YUEN WONG a.k.a. Ray Wong a.k.a. Ray;
 [6] EDWARD MONTECALVO a.k.a. Nightmare a.k.a. Tenure44;

- 1 [7] YU FENG WANG a.k.a Ibatistuta;
 2 [8] MOHAMED AMR MAHMOUD a.k.a. AMR MAHMOUD a.k.a.
 CC- - Trader a.k.a. Kengza;
 3 [9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
 [10] MAKYL HAGGERTY a.k.a. Wave;
 4 [11] ALADELOLA TESLIM AJAYI a.k.a. Bank Manager a.k.a.
 Document Manager a.k.a. Corey;
 5 [12] ALEXANDRU ION a.k.a. Abagnalefrank;
 [13] JORDAN GEORGIEVSKI a.k.a. Devica;
 6 [14] ROMAN SELEZNEV a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
 [15] QASIR MUKHTAR a.k.a. Caliber;
 7 [16] ROY AYAD a.k.a. RABIE AYAD a.k.a. Patistota;
 [17] MINA MORRIS a.k.a. Source;
 8 [18] RACHID IDAALI a.k.a. C4rd3R;
 [19] LIRIDON MUSLIU a.k.a. Bowl;
 9 [20] SERGEI LITVINENKO a.k.a. Dorbik a.k.a. Matad0r;
 [21] MICHAEL LOFTON a.k.a. Killit a.k.a. Lofeazy;
 10 [22] SHIYANG GOU a.k.a. Cder;
 [23] DAVID RAY CAMEZ a.k.a. Bad Man a.k.a. Doctorsex;
 11 [24] CAMERON HARRISON a.k.a. Kilobit;
 [25] ALEKSANDAR BESAROVIC a.k.a. Qiller;
 12 [26] DUVAUGHN BUTLER a.k.a. Mackmann;
 [27] FREDRICK THOMAS a.k.a 1Stunna;
 13 [28] JOHN DOE 1 a.k.a Senna071;
 [29] JOHN DOE 2 a.k.a. Morfiy;
 14 [30] JOHN DOE 3 a.k.a. Gruber;
 [31] JOHN DOE 4 a.k.a. Maxxtro;
 15 [32] JOHN DOE 5 a.k.a. Elit3;
 [33] JOHN DOE 6 a.k.a. Fozzy;
 16 [34] JOHN DOE 7 a.k.a. Vitrum a.k.a. Lermentov;
 [35] ANDREI BOLOVAN a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
 17 [36] JOHN DOE 8 a.k.a. TM;
 [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;
 18 [38] JOHN DOE 10 a.k.a. Centurion; and
 [39] JOHN DOE 11 a.k.a. Consigliori;

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

25 A. Title 18, United States Code, Section 1028, identity theft and fraud related to
 26 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**
 6 **Trafficking in and Production of False Identification Documents**

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

- 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. mrdc87;
- 11 [5] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray;
- 12 [6] **EDWARD MONTECALVO** a.k.a. Nightmare a.k.a. Tenure44;
- 13 [21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy;
- 14 [22] **SHIYANG GOU** a.k.a. Cder;
- 15 [23] **DAVID RAY CAMEZ** a.k.a. Bad Man a.k.a. Doctorsex;
- 16 [24] **CAMERON HARRISON** a.k.a. Kilobit;
- 17 [25] **ALEKSANDAR BESAROVIC** a.k.a. Qiller;
- 18 [28] **JOHN DOE 1** a.k.a. Senna071; and
- 19 [29] **JOHN DOE 2** a.k.a. Morfiy;

20 defendants herein, together with and aiding and abetting one another, and others known and
 21 unknown, did knowingly and without lawful authority produce, and did cause others to produce,
 22 false identification documents, which were transported in the mail in the course of the unauthorized
 23 production, in and affecting interstate and foreign commerce, and the offense involved the
 24 production and transfer of false identification documents that are and appear to be driver's licenses,
 25 with each false identification document set forth below constituting a separate violation of Title 18,
 26 United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (c)(3); and Title 18, United States Code,
 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] WONG	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] BESAROVIC	April 12, 2011	GA DL	D. Vasic

COUNT EIGHTEEN

Attempt to Unlawful Produce False Identification Documents; Aiding and Abetting

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

COUNT NINETEEN

Conspiracy to Unlawfully Transfer False Identification Documents

24 Beginning on or about August 22, 2008, and continuing to on or about March 23, 2009, in
25 the State of Nevada, and elsewhere, [1] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a. Support,
26

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;**
10 **Aiding and Abetting**

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

23 **COUNT TWENTY ONE**
24 **Trafficking in and Use of Counterfeit and Unauthorized Access Devices;**
25 **Aiding and Abetting**

26 On or about March 1, 2011, in the State and Federal District of Nevada, and elsewhere, [26]
DUVAUGHN BUTLER a.k.a. Mackmann, defendant herein, together with and aiding and abetting
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] KONSTANTIN LOPATIN a.k.a. Graf;
- 14 [6] EDWARD MONTECALVO a.k.a Nightmare a.k.a. Tenure44;
- 15 [8] MOHAMED AMR MAHMOUD a.k.a. AMR MAHMOUD a.k.a.
16 CC- - Trader a.k.a. Kengza;
- 17 [14] ROMAN SELEZNEV a.k.a. Track2 a.k.a. Bulba a.k.a. Neux;
- 18 [16] ROY AYAD a.k.a. RABIE AYAD a.k.a. Patistota;
- 19 [17] MINA MORRIS a.k.a. Source;
- 20 [18] RACHID IDAALI a.k.a. C4rd3R;
- 21 [19] LIRIDON MUSLIU 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] ANDREI BOLOVAN 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>
1 TWENTY TWO	[8] MAHMOUD	February 22, 2008	22
2 TWENTY THREE	[8] MAHMOUD	March 9, 2009	25
3 TWENTY FOUR	[6] MONTECALVO	January 21, 2010	50
4 TWENTY FIVE	[6] MONTECALVO	April 5, 2010	220
5 TWENTY SIX	[14] SELEZNEV	January 20, 2011	29
6 TWENTY SEVEN	[11] AYAD	March 15, 2011	15
7 TWENTY EIGHT	[36] TM	March 16, 2011	20
8 TWENTY NINE	[14] SELEZNEV	March 18, 2011	20
9 THIRTY	[37] ZOOMER	March 18, 2011	20
10 THIRTY ONE	[17] MORRIS	March 18, 2011	17
11 THIRTY TWO	[18] IDAALI	March 23, 2011	20
12 THIRTY THREE	[2] LOPATIN	March 24, 2011	20
13 THIRTY FOUR	[11] AYAD	March 24, 2011	20
14 THIRTY FIVE	[33] FOZZY	March 24, 2011	20
15 THIRTY SIX	[36] TM	March 24, 2011	20
16 THIRTY SEVEN	[37] ZOOMER	March 24, 2011	23
17 THIRTY EIGHT	[38] CENTURION	March 24, 2011	18
18 THIRTY NINE	[18] IDAALI	March 26, 2011	60
19 FORTY	[34] .VITRUM	March 28, 2011	20
20 FORTY ONE	[38] CENTURION	March 28, 2011	74
21 FORTY TWO	[33] FOZZY	March 28, 2011	22
22 FORTY THREE	[35] BOLOVAN	March 28, 2011	20
23 FORTY FOUR	[2] LOPATIN	March 29, 2011	21
24 FORTY FIVE	[35] BOLOVAN	April 6, 2011	38
25 FORTY SIX	[35] BOLOVAN	April 8, 2011	20

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

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] ALADELOLA TESLIM AJAYI 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] AJAYI & [26] BUTLER	February 16, 2011	10

FORFEITURE ALLEGATION

1
2 1. The allegations contained in Counts One and Two of this Indictment are hereby
3 repeated, realleged, and incorporated by reference herein as though fully set forth at length for the
4 purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section
5 1963 and Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P.,
6 notice is hereby given to the defendants that the United States will seek forfeiture as part of any
7 sentence in accordance with Title 18, United States Code, Section 1963 in the event of any
8 defendant's conviction under Counts One and Two.

9 2. The defendants,

- 10 [1] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a. Support;
11 [2] **KONSTANTIN LOPATIN** 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] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray;
16 [6] **EDWARD MONTECALVO** a.k.a. Nightmare a.k.a. Tenure44;
17 [7] **YU FENG WANG** a.k.a. Ibatistuta;
18 [8] **MOHAMED AMR MAHMOUD** a.k.a. AMR MAHMOUD 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] **ALADELOLA TESLIM AJAYI** a.k.a. Bank Manager a.k.a. Document
23 Manager a.k.a. Corey;
24 [12] **ALEXANDRU ION** a.k.a. Abagnalefrank;
25 [13] **JORDAN GEORGIEVSKI** a.k.a. Devica;
26 [14] **ROMAN SELEZNEV** a.k.a. Track2 a.k.a. Bulba a.k.a. Neux;
 [15] **QASIR MUKHTAR** a.k.a. Caliber;
 [16] **ROY AYAD** a.k.a. RABIE AYAD a.k.a. Patistota;
 [17] **MINA MORRIS** a.k.a. Source;
 [18] **RACHID IDAALI** a.k.a. C4rd3R;
 [19] **LIRIDON MUSLIU** a.k.a. Bowl;
 [20] **SERGEI LITVINENKO** 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] **ALEKSANDAR BESAROVIC** 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] ANDREI BOLOVAN 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. Consiglieri;

1
2
3
4
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).

