

1 DANIEL G. BOGDEN
 United States Attorney
 2 KIMBERLY M. FRAYN
 ANDREW W. DUNCAN
 3 Assistant United States Attorneys
 JONATHAN A. OPHARDT
 4 Trial Attorney
 United States Department of Justice
 5 Organized Crime and Gang Section
 Lloyd D. George Federal Courthouse
 6 333 Las Vegas Boulevard South, Suite 5000
 Las Vegas, NV 89101
 7 (702) 388-6336
 Attorneys for the United States
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,)
)
 13 Plaintiff,)
)
 14 v.) 2:12-CR-0004-APG-(GWF)
)
 15 CAMERON HARRISON,) **MEMORANDUM IN SUPPORT**
) **OF GUILTY PLEA WITHOUT**
 16 Defendant.) **PLEA AGREEMENT**

17
 18 There is no plea agreement in this case. Government counsel was informed by
 19 defense counsel that the defendant intends to change his plea of not guilty to guilty without the
 20 benefit of a plea agreement. This Memorandum is to aid the court in advising the defendant of the
 21 consequences of a guilty plea under Fed.R.Crim.Pro. 11(a)(2)(c).

22 The defendant is charged by Indictment with:

- 23 (a) Count One: Participation in a Racketeer Influenced Corrupt Organization, in violation
- 24 of 18 U.S.C. § 1962(c) and 1963;
- 25 (b) Count Two: Conspiracy to Engage in a Racketeer Influenced Corrupt Organization, in
- 26 violation of 18 U.S.C. § 1962(d); and

1 (c) Count Sixteen: Trafficking in and Production of False Identification Documents and
2 Aiding and Abetting, in violation of 18 U.S.C. § 1028(a)(1), (b)(1)(A)(ii), and (c)(3) and 18 U.S.C.
3 § 2.

4 The defendant must admit or the government must prove the forfeiture allegations in
5 the Amended Bill of Particulars.

6 **I.**

7 **PENALTY**

8 **Statutory Penalty.**

9 1. Count One. The maximum penalty for Participation in a Racketeer Influenced
10 Corrupt Organization under 18 U.S.C. § 1962(c) and 1963, is not more than twenty (20) years in
11 prison, a fine of not more than two hundred and fifty thousand dollars (\$250,000), or both a fine and
12 imprisonment.

13 2. Count Two. The maximum penalty for Conspiracy to Engage in a Racketeer
14 Influenced Corrupt Organization, in violation of 18 U.S.C. § 1962(d), is not more than twenty (20)
15 years in prison, a fine of not more than two hundred and fifty thousand dollars (\$250,000), or both a
16 fine and imprisonment.

17 3. Count Twelve. The maximum penalty for Trafficking in and Production of
18 False Identification Documents and Aiding and Abetting, in violation of 18 U.S.C. § 1028(a)(1),
19 (b)(1)(A)(ii), and (c)(3) and 18 U.S.C. § 2, is not more than fifteen (15) years in prison, a fine of not
20 more than two hundred and fifty thousand dollars (\$250,000), or both a fine and imprisonment.

21 Allegations relating to forfeiture of property are also set forth against the defendant in
22 the Amended Bill of Particulars, including but not limited to, various items of identification and
23 device making equipment, and an *in personam* criminal forfeiture money judgment of
24 \$50,893,166.35 in United States Currency.

25 **Advisory Sentencing Guidelines**

1 The sentence imposed will be under 18 U.S.C. § 3553(a) and the United States
 2 Sentencing Guidelines. The length and terms of that sentence depend upon the nature and extent of
 3 previous criminal convictions which are used to determine the offense level and criminal history
 4 category under the Sentencing Guidelines. The Court determines the offense level and criminal
 5 history category and then must impose a reasonable and sufficient sentence, but not greater than
 6 necessary to comply with purposes of 18 U.S.C. § 3553(a).

7 The government will seek the following guidelines calculation:

8	Base Offense Level: The base offense level is seven as the defendant was	
9	convicted of an offense referenced to this guideline and the offense of conviction	
10	has a statutory maximum term of imprisonment of 20 years or more. U.S.S.G.	
11	§ 2B1.1(a)(1).	7
12	Specific Offense Characteristic: A 24-level enhancement is added as the	
13	amount of loss was more than \$50,000,000, but was not more than \$100,000,000.	
14	Total amount of actual loss involved in the offense was \$50,893,166.35. U.S.S.G.	
15	§ 2B1.1(b)(1)(M).	+24
16	Specific Offense Characteristic: A six-level enhancement is added as the	
17	offense involved 250 or more victims. Application Note 4(E) notes that, “victim	
18	includes any individual whose means of identification was used unlawfully or	
19	without authority.” U.S.S.G. § 2B1.1(b)(2)(C).	+6
20	Specific Offense Characteristic: A two-level enhancement is added as the	
21	offense involved receiving stolen property and the defendant was a person in the	
22	business of receiving and selling stolen property. U.S.S.G. § 2B1.1(b)(4).	+2
23	Specific Offense Characteristic: A two-level enhancement is added as a	
24	substantial part of the fraudulent scheme was committed from outside the United	
25	States, and the offense otherwise involved sophisticated means. U.S.S.G.	
26	§ 2B1.1(b)(10)(B), and § 2B1.1(b)(10)(C).	+2
	Specific Offense Characteristic: A two-level enhancement is added as the	
	offense involved possession and use of device-making equipment, and the	
	production of and trafficking in unauthorized and counterfeit access devices.	
	U.S.S.G. § 2B1.1(b)(11)(A), and § 2B1.1(b)(11)(B).	+2

1 Victim Related Adjustment: None. 0

2 Role Adjustment: None. 0

3 Obstruction Adjustment: None. 0

4 Adjusted Offense Level: 43

5 Adjustment for Acceptance of Responsibility: -3

6 **Total Offense Level: 40**

7 A federal prison sentence can no longer be shortened by early release on parole,
 8 because parole has been abolished. However, under U.S.S.G. § 5D1.1, a term of Supervised Release
 9 following any period of imprisonment is required when the term of imprisonment is more than a
 10 year. The term of supervised release is not to exceed three years for each count of conviction.

11 Under the provisions of U.S.S.G. § 5E1.2, a fine must be imposed, depending upon
 12 the Court's finding of the appropriate Offense Level within a range to be determined by the
 13 Guidelines. However, U.S.S.G. § 5E1.2(e) allows the District Court to waive the fine, impose a
 14 lesser fine or an alternative sanction, such as community service, if the defendant establishes he does
 15 not have the ability to pay a fine and is not likely to become able to pay any fine.

16 Both 18 U.S.C. § 3663 and U.S.S.G. § 5E1.1 permit restitution as deemed
 17 appropriate by the Court.

18 The government is seeking an order that the defendant pay restitution, jointly and
 19 severally, as follows:

20 American Express \$3,299,210.90

21 World Financial Center
 22 200 Vesey Street
 New York, NY 10285

23 Discover Financial Service \$2,202,429.00

24 c/o Mr. Michael Cassell
 25 P.O. Box 370685
 Las Vegas, NV 89137

1 MasterCard \$15,496,221.00
2 2000 Purchase Street
3 Purchase, NY 10577

4 Visa Inc. \$29,895,305.45
5 900 Metro Center Blvd.
6 Foster City, CA 94404

7 Total: \$50,893,166.35

8 A mandatory special assessment under 18 U.S.C. § 3013 and U.S.S.G. §' 5E1.3 of
9 \$100.00 per count of conviction must be imposed for this offense.

10 **II.**

11 **ELEMENTS OF THE OFFENSES**

12 Before a verdict of guilty may be reached, the Government would have to prove the
13 following essential elements of the offenses:

14 **Count One:** The elements of Participation in a Racketeer Influenced Corrupt
15 Organization, in violation of 18 U.S.C. § 1962(c) are:

16 1. There was an on-going enterprise, to wit, the Carder.su organization, that had
17 an informal framework for carrying out its objectives consisting of a group of persons associated
18 together for a common purpose of engaging in a course of conduct;

19 2. Defendant HARRISON associated with the Carder.su organization;

20 3. Defendant HARRISON conducted and participated directly in the conduct of
21 the affairs of the Carder.su organization, through a pattern of racketeering activity; and

22 4. The Carder.su organization engaged in or its activities in some way affected
23 commerce between one state and other states, or between the United States and a foreign country.

24 *See Ninth Cir. Manual of Model Jury Instr., Criminal 8.161 (2010 ed.) (MODIFIED).*

25 **Count Two:** The elements of Conspiracy to Engage in a Racketeer Influenced
26 Corrupt Organization, in violation of 18 U.S.C. § 1962(d) are:

1. The Carder.su enterprise existed or would exist;

1 2. The Carder.su enterprise was engaged in, or would be engaged in, or its
2 activities affected or would affect, interstate or foreign commerce; and

3 3. Defendant HARRISON knowingly agreed that either defendant HARRISON
4 or a co-conspirator would violate Title 18, United States Code Section 1962(c), that is, to conduct
5 and participate, directly and indirectly, in the conduct of the affairs of the Carder.su enterprise
6 through a pattern of racketeering activity.

7 *See* Seventh Cir. Pattern Criminal Jury Instr. at 527 (2012 ed.) (MODIFIED).

8 **Count Sixteen:** The elements of Trafficking in and Production of False Identification
9 Documents, in violation of Title 18, United States Code, Section 1028(a)(1), (b)(1)(A)(ii), and (c)(3)
10 are:

- 11 1. Defendant HARRISON knowingly produced a false identification document;
12 2. Defendant HARRISON produced the false identification document without
13 lawful authority;
14 3. In the course of production, the false identification document was transported
15 in the mail.

16 *See* Ninth Cir. Manual of Model Jury Instr., Criminal 8.75 (2010 ed.) (MODIFIED).

17 The elements of Aiding and Abetting in violation of Title 18, United States Code
18 Section 2, are:

- 19 1. That the crime of Trafficking in and Production of False Identification
20 Documents was committed by someone;
21 2. Defendant HARRISON knowingly and intentionally aided, counseled,
22 commanded, induced, or procured that person to commit each element of the crime of Trafficking in
23 and Production of False Identification Documents;
24 3. Defendant HARRISON acted before the crime was completed, and acted with
25 the knowledge and intention of helping that person commit the crime of Trafficking in and
26 Production of False Identification Documents.

1 *See* Ninth Cir. Manual of Model Jury Instr., Criminal 5.1 (2010 ed.) (MODIFIED).

2
3 **III.**

4 **FACTS TO SUPPORT A PLEA OF GUILTY**

5 Defendant will need to admit the following facts to support his guilty plea:

6 **Count One**

7 1. From on or about November 22, 2005, through on or about June 2011, in the
8 state and federal District of Nevada, and elsewhere, defendant HARRISON and his codefendants,
9 including others known and unknown, were members of, employed by, and associated with the
10 Carder.su organization described below, an enterprise engaging in, and the activities of which affects
11 interstate and foreign commerce, who unlawfully, and knowingly did conduct and participate,
12 directly and indirectly, in the conduct of the affairs of Carder.su through a pattern of racketeering
13 activity described below:

14 a. The Carder.su organization was a criminal enterprise that
15 existed to enrich its members and associates through acts of identity theft and financial fraud,
16 including, but not limited to, acts involving trafficking in stolen means of identification; trafficking
17 in, production, and use of counterfeit identification documents; identity theft; trafficking in,
18 production, and use of unauthorized and counterfeit access devices; and bank fraud; and whose
19 members interfere with interstate and foreign commerce through acts of identity theft and financial
20 fraud. The Carder.su organization facilitated the sale of contraband by its members, including
21 counterfeit documents, stolen bank account and credit account information, and stolen personal
22 identifying information. Members and associates of the Carder.su organization operated in Las
23 Vegas, Nevada, and elsewhere.

24 b. The purposes of the Carder.su organization include the
25 enrichment of its members and associates through: the unlawful trafficking in means of
26 identification, document-making implements, counterfeit identification documents, device-making

1 equipment, and unauthorized and counterfeit access devices; the creation, maintenance, and control
2 of a marketplace for the distribution of stolen property, such as victims' personal and financial
3 means of identification; the protection of the Carder.su organization and its members from detection,
4 apprehension, and prosecution by law enforcement; the preservation and protection of Carder.su's
5 operations and profits through the use of discipline, expulsion, and other acts of retribution; and the
6 promotion and enhancement of the reputation and standing of the enterprise and its members among
7 rivals.

8 c. Members of the Carder.su organization trafficked in,
9 produced, and transferred counterfeit identification documents; possessed document-making
10 implements; transferred, possessed, and used means of identification of another person in the
11 commission of and in connection with Bank Fraud affecting interstate and foreign commerce;
12 possessed fifteen (15) or more counterfeit and unauthorized access devices affecting interstate and
13 foreign commerce; trafficked in and possessed device-making equipment affecting interstate and
14 foreign commerce; planned schemes to unlawfully obtain money and property from banks and other
15 financial institutions by way of fraud and material misrepresentations and promises.

16 d. Members of Carder.su used various means of communication
17 designed to protect the membership's anonymity and to provide security for the criminal enterprise
18 from attack by other rival criminal organizations and from law enforcement detection, including the
19 use of: various website forums and chatrooms controlled by the Carder.su organization, such as
20 Carder.info, Carder.su, Crdsu.su, Carder.biz, and Carder.pro, as online gathering places which
21 provided secure meeting locations for the members and associates of the criminal enterprise; private
22 messaging, which is a non-forum wide message sent between individual members on the criminal
23 organizations website forums; e-mail, some of which are encrypted and password protected, or use
24 service providers located outside of the United States; ICQ chat, which is a free instant messaging
25 electronic communication service; proxies, which are achieved by bouncing from one computer to
26 another to hide a member's true originating IP address; Virtual Private Networks, which are similar

1 to a proxy, but with the addition of creating an encrypted tunnel that cannot be monitored; and
2 protected drop sites in the District of Nevada and elsewhere, in the event that there was a need to
3 transport, transfer, and receive physical contraband.

4 e. Members of the Carder.su organization have defined roles in
5 the enterprise, including Administrator, Moderator, Reviewers, Vendors, and Members.

6 i. The Administrator of the Carder.su organization served
7 as the head of the organization and controlled the destiny of the enterprise. The Administrator
8 handled day-to-day management decisions, as well as long-term strategic planning for the
9 organization's continued viability. As the leader of the enterprise, the Administrator determined
10 which individuals could become and remain members of Carder.su. He bestowed the rewards
11 accorded members for their loyalty to the organization, and set the punishment for members
12 evidencing disloyalty to the organization. The Administrator had ultimate responsibility for the
13 administration, maintenance, anonymity, and security of the Carder.su organization's computer
14 serves, as well as for the content of the Carder.su organization's Internet website forums.

15 ii. Moderators acted as leaders of the enterprise, directing
16 other members and associates in carrying out unlawful activities in furtherance of the enterprise's
17 affairs. Moderators were leaders of Carder.su, who oversaw and managed Carder.su by: monitoring
18 and policing the organization's websites; editing and deleting members' posts on the organization's
19 forums; by mediating disputes among the members; and reviewing particular products or services
20 provided through the enterprise with which they have an expertise.

21 iii. Reviewers examined and tested products and services
22 that members of the Carder.su organization wished to advertise and sell on the Carder.su
23 organization's websites. Once Reviewers completed their examination of the products and services,
24 they would post a written summary of that examination on the Carder.su organization's websites. A
25 favorable written review was a prerequisite to selling contraband on the websites. Although most
26

1 Reviewers primarily served as Administrators or Moderators of the enterprise, any qualified
2 individual could be appointed at any time by the Administrator to conduct a review.

3 iv. Vendors advertised and sold products, services, and
4 other contraband to members of the Carder.su organization by way of the Carder.su organization's
5 websites after having received a favorable written review from a Reviewer. To receive a favorable
6 review, a prospective Vendor had to ship multiple samples of product or provide access to services
7 to a Reviewer to facilitate completion of the review. Contact between a prospective Vendor and a
8 Reviewer was usually made through private email messaging or public posting in the appropriate
9 section of the Carder.su organization's websites.

10 v. Members were individuals who used the Carder.su
11 organization's vendors, by way of the organization's websites, to buy products and services, such as
12 credit card information, false identification documents, and other contraband. Members also shared
13 information through the organization's websites to teach other members how to engage in new
14 criminal activities, and how to best perpetrate existing criminal schemes. An individual seeking
15 membership in the Carder.su organization had to complete a number of security features designed to
16 protect the organization from infiltration by law enforcement or members of rival criminal
17 organizations. One such security feature required two current members in good standing to vouch
18 for a prospective member. Disputes between members were settled by the Administrator or
19 Moderators. If a member was found to be disloyal or have behaved in a manner that impeded
20 achieving the common objectives of the Carder.su organization, the Administrator would strip the
21 member's membership, and bar the member from accessing the Carder.su organization's websites.

22 f. On or about June 13, 2008, defendant HARRISON became
23 associated with the Carder.su organization. Defendant HARRISON operated as a member of the
24 Carder.su organization websites with the nickname of "Kilobit."

25 g. Through his membership in the Carder.su organization,
26 defendant HARRISON purchased from Carder.su vendors and members counterfeit identification

1 documents, and unauthorized access devices, that is, stolen or otherwise compromised credit card
2 and debit card account numbers, and counterfeit access devices, that is, counterfeit credit cards.

3 h. On February 23, 2010, defendant HARRISON e-mailed a
4 Carder.su vendor to order a counterfeit Georgia driver's license in the name of D.M., bearing the
5 photograph of defendant HARRISON. On February 25, 2010, defendant HARRISON sent three
6 hundred thirty dollars (\$330) to the vendor by way of Western Union as payment. On February 25,
7 2010, the vendor shipped the counterfeit license by UPS to the address provided by defendant
8 HARRISON. Such Unlawful Trafficking In and Production of False Identification Documents
9 constitutes a violation of Title 18, United States Code, Sections 1028(a)(1), which is a racketeering
10 activity as defined in Title 18, United States Code, Section 1961(1).

11 i. On June 26, 2008, defendant HARRISON possessed the means
12 of identification of D.O., a real person, including his name, address, telephone number, date of birth,
13 social security number, online banking credentials, and his credit account number ending in X-6433.
14 Defendant HARRISON transferred, in and affecting interstate and foreign commerce, and without
15 lawful authority, the means of identification of D.O. by transmitting the information by means of
16 wire communication in interstate commerce, specifically through an e-mail. Defendant HARRISON
17 provided the means of identification with the intent that they be used in a scheme or artifice to
18 defraud, and to obtain money and property by means of materially false and fraudulent pretenses,
19 and that such scheme would involve the transmission of signals and sounds by means of wire in
20 interstate commerce. Such Unlawful Transfer, Possession and Use of a Means of Identification
21 constitutes a violation of Title 18, United States Code, Sections 1028(a)(7), which is a racketeering
22 activity as defined in Title 18, United States Code, Section 1961(1).

23 j. On September 7, 2010, defendant HARRISON received an e-
24 mail from Carder.su member Defendant 35, a.k.a. Panther. The e-mail contained unauthorized
25 access devices, that is, twenty one (21) compromised debit card account numbers. An analysis of
26 defendant HARRISON's computer and e-mail accounts reveal he possessed a total of two hundred

1 and sixty five (265) different compromised credit and debit card account numbers. Such Possession
2 of Fifteen or More Unauthorized Access Devices constitutes a violation of Title 18, United States
3 Code, Sections 1029(a)(3) and (h), which is a racketeering activity as defined in Title 18, United
4 States Code, Section 1961(1).

5 **Count Two**

6 1. From on or about November 22, 2005, through on or about June 2011, in the
7 District of Nevada and elsewhere, defendant HARRISON and his codefendants, including others
8 known and unknown, were members of, employed by, and associated with the Carder.su
9 organization described below, an enterprise engaging in, and the activities of which affects interstate
10 and foreign commerce, and knowingly and intentionally conspired to violate Title 18, United States
11 Code Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of
12 the affairs of Carder.su through a pattern of racketeering activity described below:

13 a. The Carder.su organization was a criminal enterprise that existed to
14 enrich its members and associates through acts of identity theft and financial fraud, including, but
15 not limited to, acts involving trafficking in stolen means of identification; trafficking in, production,
16 and use of counterfeit identification documents; identity theft; trafficking in, production, and use of
17 unauthorized and counterfeit access devices; and bank fraud; and whose members interfere with
18 interstate and foreign commerce through acts of identity theft and financial fraud. The Carder.su
19 organization facilitated the sale of contraband by its members, including counterfeit documents,
20 stolen bank account and credit account information, and stolen personal identifying information.
21 Members and associates of the Carder.su organization operated in Las Vegas, Nevada, and
22 elsewhere.

23 b. The purposes of the Carder.su organization include the enrichment of
24 its members and associates through: the unlawful trafficking in means of identification, document-
25 making implements, counterfeit identification documents, device-making equipment, and
26 unauthorized and counterfeit access devices; the creation, maintenance, and control of a marketplace

1 for the distribution of stolen property, such as victims' personal and financial means of
2 identification; the protection of the Carder.su organization and its members from detection,
3 apprehension, and prosecution by law enforcement; the preservation and protection of Carder.su's
4 operations and profits through the use of discipline, expulsion, and other acts of retribution; and the
5 promotion and enhancement of the reputation and standing of the enterprise and its members among
6 rivals.

7 c. Members of the Carder.su organization trafficked in,
8 produced, and transferred counterfeit identification documents; possessed document-making
9 implements; transferred, possessed, and used means of identification of another person in the
10 commission of and in connection with Bank Fraud affecting interstate and foreign commerce;
11 possessed fifteen (15) or more counterfeit and unauthorized access devices affecting interstate and
12 foreign commerce; trafficked in and possessed device-making equipment affecting interstate and
13 foreign commerce; planned schemes to unlawfully obtain money and property from banks and other
14 financial institutions by way of fraud and material misrepresentations and promises.

15 d. Members of Carder.su used various means of communication
16 designed to protect the membership's anonymity and to provide security for the criminal enterprise
17 from attack by other rival criminal organizations and from law enforcement detection, including the
18 use of: various website forums and chatrooms controlled by the Carder.su organization, such as
19 Carder.info, Carder.su, Crdsu.su, Carder.biz, and Carder.pro, as online gathering places which
20 provided secure meeting locations for the members and associates of the criminal enterprise; private
21 messaging, which is a non-forum wide message sent between individual members on the criminal
22 organizations website forums; e-mail, some of which are encrypted and password protected, or use
23 service providers located outside of the United States; ICQ chat, which is a free instant messaging
24 electronic communication service; proxies, which are achieved by bouncing from one computer to
25 another to hide a member's true originating IP address; Virtual Private Networks, which are similar
26 to a proxy, but with the addition of creating an encrypted tunnel that cannot be monitored; and

1 protected drop sites in the District of Nevada and elsewhere, in the event that there was a need to
2 transport, transfer, and receive physical contraband.

3 e. Members of the Carder.su organization have defined roles in
4 the enterprise, including Administrator, Moderator, Reviewers, Vendors, and Members.

5 i. The Administrator of the Carder.su organization served
6 as the head of the organization and controlled the destiny of the enterprise. The Administrator
7 handled day-to-day management decisions, as well as long-term strategic planning for the
8 organization's continued viability. As the leader of the enterprise, the Administrator determined
9 which individuals could become and remain members of Carder.su. He bestowed the rewards
10 accorded members for their loyalty to the organization, and set the punishment for members
11 evidencing disloyalty to the organization. The Administrator had ultimate responsibility for the
12 administration, maintenance, anonymity, and security of the Carder.su organization's computer
13 serves, as well as for the content of the Carder.su organization's Internet website forums.

14 ii. Moderators acted as leaders of the enterprise, directing
15 other members and associates in carrying out unlawful activities in furtherance of the enterprise's
16 affairs. Moderators were leaders of Carder.su, who oversaw and managed Carder.su by: monitoring
17 and policing the organization's websites; editing and deleting members' posts on the organization's
18 forums; by mediating disputes among the members; and reviewing particular products or services
19 provided through the enterprise with which they have an expertise.

20 iii. Reviewers examined and tested products and services
21 that members of the Carder.su organization wished to advertise and sell on the Carder.su
22 organization's websites. Once Reviewers completed their examination of the products and services,
23 they would post a written summary of that examination on the Carder.su organization's websites. A
24 favorable written review was a prerequisite to selling contraband on the websites. Although most
25 Reviewers primarily served as Administrators or Moderators of the enterprise, any qualified
26 individual could be appointed at any time by the Administrator to conduct a review.

1 iv. Vendors advertised and sold products, services, and
2 other contraband to members of the Carder.su organization by way of the Carder.su organization's
3 websites after having received a favorable written review from a Reviewer. To receive a favorable
4 review, a prospective Vendor had to ship multiple samples of product or provide access to services
5 to a Reviewer to facilitate completion of the review. Contact between a prospective Vendor and a
6 Reviewer was usually made through private email messaging or public posting in the appropriate
7 section of the Carder.su organization's websites.

8 v. Members were individuals who used the Carder.su
9 organization's vendors, by way of the organization's websites, to buy products and services, such as
10 credit card information, false identification documents, and other contraband. Members also shared
11 information through the organization's websites to teach other members how to engage in new
12 criminal activities, and how to best perpetrate existing criminal schemes. An individual seeking
13 membership in the Carder.su organization had to complete a number of security features designed to
14 protect the organization from infiltration by law enforcement or members of rival criminal
15 organizations. One such security feature required two current members in good standing to vouch
16 for a prospective member. Disputes between members were settled by the Administrator or
17 Moderators. If a member was found to be disloyal or have behaved in a manner that impeded
18 achieving the common objectives of the Carder.su organization, the Administrator would strip the
19 member's membership, and bar the member from accessing the Carder.su organization's websites.

20 f. On or about June 13, 2008, defendant HARRISON became associated with
21 the Carder.su organization. Defendant HARRISON operated as a member of the Carder.su
22 organization websites with the nickname of "Kilobit."

23 g. During the course of the conspiracy and through his membership in the
24 Carder.su organization, defendant HARRISON purchased from Carder.su vendors and members
25 counterfeit identification documents, and unauthorized access devices, that is, stolen or otherwise
26

1 compromised credit card and debit card account numbers, and counterfeit access devices, that is,
2 counterfeit credit cards.

3 h. During the course of the conspiracy, and on or about February 23, 2010,
4 defendant HARRISON e-mailed a Carder.su vendor to order a counterfeit Georgia driver's license in
5 the name of D.M., bearing the photograph of defendant HARRISON. On February 25, 2010,
6 defendant HARRISON sent three hundred thirty dollars (\$330) to the vendor by way of Western
7 Union as payment. On February 25, 2010, the vendor shipped the counterfeit license by UPS to the
8 address provided by defendant HARRISON. Such Unlawful Trafficking In and Production of False
9 Identification Documents constitutes a violation of Title 18, United States Code, Sections
10 1028(a)(1), which is a racketeering activity as defined in Title 18, United States Code, Section
11 1961(1).

12 i. During the course of the conspiracy, and on or about June 26, 2008, defendant
13 HARRISON possessed the means of identification of D.O., a real person, including his name,
14 address, telephone number, date of birth, social security number, online banking credentials, and his
15 credit account number ending in X-6433. Defendant HARRISON transferred, in and affecting
16 interstate and foreign commerce, and without lawful authority, the means of identification of D.O.
17 by transmitting the information by means of wire communication in interstate commerce,
18 specifically through an e-mail. Defendant HARRISON provided the means of identification with the
19 intent that they be used in a scheme or artifice to defraud, and to obtain money and property by
20 means of materially false and fraudulent pretenses, and that such scheme would involve the
21 transmission of signals and sounds by means of wire in interstate commerce. Such Unlawful
22 Transfer, Possession and Use of a Means of Identification constitutes a violation of Title 18, United
23 States Code, Sections 1028(a)(7), which is a racketeering activity as defined in Title 18, United
24 States Code, Section 1961(1).

25 j. During the course of the conspiracy, and on or about September 7, 2010,
26 defendant HARRISON received an e-mail from Carder.su member Defendant 35, a.k.a. Panther.

1 The e-mail contained unauthorized access devices, that is, twenty one (21) compromised debit card
2 account numbers. An analysis of defendant HARRISON's computer and e-mail accounts reveal he
3 possessed a total of two hundred and sixty five (265) different compromised credit and debit card
4 account numbers. Such Possession of Fifteen or More Unauthorized Access Devices constitutes a
5 violation of Title 18, United States Code, Sections 1029(a)(3) and (h), which is a racketeering
6 activity as defined in Title 18, United States Code, Section 1961(1).

7 **Count Sixteen**

8 On or about February 25, 2010, defendant HARRISON, aiding and abetting others
9 known and unknown, knowingly produced a false identification document without lawful authority,
10 that is, a counterfeit Georgia driver's license in the name of D. Mock, which, in the course of
11 production, was shipped in the mail, a violation of Title 18, United States Code, Section 1028(a)(1),
12 (b)(1)(A)(ii), and (c)(3), as follows:

13 On or about February 23, 2010, defendant HARRISON e-mailed a Carder.su vendor
14 to order a counterfeit Georgia driver's license in the name of D.M., bearing the photograph of
15 defendant HARRISON. On February 25, 2010, defendant HARRISON sent three hundred thirty
16 dollars (\$330) to the vendor by way of Western Union as payment. On February 25, 2010, the
17 vendor shipped the counterfeit license by UPS to the address provided by defendant HARRISON.
18 Such Unlawful Trafficking In and Production of False Identification Documents constitutes a
19 violation of Title 18, United States Code, Sections 1028(a)(1).

20 **Asset Forfeiture Allegations AMENDED BILL OF PARTICULARS:**

21 The government is unaware of whether the defendant is agreeing to or contesting the
22 asset forfeiture provisions set forth against him in the Amended Bill of Particulars.

23 If the defendant is agreeing to the asset forfeiture provisions set forth in the Amended Bill of
24 Particulars, the defendant must admit that the government could prove that the various items set
25 forth in the Amended Bill of Particulars, including but not limited to, various items of identification
26 and device making equipment, and an *in personam* criminal forfeiture money judgment of

1 \$50,893,166.35 in United States Currency, is (a) any interest acquired or maintained from his
2 criminal violations, or is (b) any interest in; security of; claim against; or property or contractual
3 right of any kind affording a source of influence over; any enterprise which he established, operated,
4 controlled, conducted, or participated in the conduct of his criminal violations, or (c) any property
5 constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering
6 activity or unlawful debt collection in his criminal violations. The property and the criminal
7 forfeiture money judgment of \$50,893,166.35 are facilitating property and proceeds of the crime.

8
9 DANIEL G. BOGDEN,
United States Attorney

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11 DATE: April 9, 2014 /s/ Kimberly M. Frayn
12 KIMBERLY M. FRAYN
13 ANDREW W. DUNCAN
Assistant United States Attorneys
14 JONATHAN A. OPHARDT,
Trial Attorney
15 Department of Justice
Organized Crime and Gang Section
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1 CERTIFICATE OF SERVICE

2 I, Kimberly M. Frayn, certify that the defendant's counsel, BENJAMIN C.
3 DURHAM, ESQ., was served with a copy of the MEMORANDUM IN SUPPORT OF GUILTY
4 PLEA WITHOUT A PLEA AGREEMENT on this date by Electronic Case Filing and via e-mail.

5 DATED: April 9, 2014

6 /s/ Kimberly M. Frayn
7 KIMBERLY M. FRAYN
8 Assistant United States Attorney

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