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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
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UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

THOMAS LAMB,
a.k.a. **TLAMB2,**
JONATHAN VERGNETTI,
ROGER GRODESKY, and
JOHN HOLSHEIMER,

DEFENDANTS.

) CRIMINAL INDICTMENT
)
) 2:12-CR- 084
)
) VIOLATIONS:
) 18 U.S.C. § 371 - Conspiracy;
) 18 U.S.C. § 1028(a)(1) - Trafficking in and
) Production of False Identification
) Documents;
) 18 U.S.C. § 1029(a)(1) - Trafficking In,
) Production of, and Use of
) Counterfeit Access Devices
) 18 U.S.C. § 2 - Aiding and Abetting

18 **THE GRAND JURY CHARGES THAT:**

19 **GENERAL ALLEGATIONS**

20 The following General Allegations are re-alleged and incorporated *in toto* by
21 reference herein.

22 **The Carder.su organization**

23 1. At all times relevant to this indictment, defendant **THOMAS LAMB** a.k.a.
24 **TLAMB2** (hereafter "Lamb"), was a member of, employed by, and associated with a criminal
25 organization, hereafter referred to as "the Carder.su organization," whose members engage
26 in acts of identity theft and financial fraud, including, but not limited to, acts involving

1 trafficking in stolen means of identification; trafficking in, production and use of counterfeit
2 identification documents; identity theft; trafficking in, production and use of unauthorized and
3 counterfeit access devices; and bank fraud; and whose members interfere with interstate
4 and foreign commerce through acts of identity theft and financial fraud. Members and
5 associates of the Carder.su organization operate principally in Las Vegas, Nevada, and
6 elsewhere.

7 2. The Carder.su organization, including its leadership, members, and
8 associates, constitute an ongoing organization whose members function as a continuing unit
9 for a common purpose of achieving the objectives of the organization. The Carder.su
10 organization is engaged in, and its activities affect, interstate and foreign commerce.

11 3. The purposes of the Carder.su organization include, but are not limited
12 to, the following:

- 13 A. to enrich the members and associates of the organization
14 through the unlawful trafficking in: means of identification,
15 document-making implements, counterfeit identification
16 documents, device-making equipment, and, unauthorized and
17 counterfeit access devices;
- 18 B. to create, maintain, and control a marketplace for the distribution
19 of stolen property, such as victims' personal and financial
20 means of identification; and
- 21 C. to protect the organization and its members from detection,
22 apprehension and prosecution by law enforcement.

23 4. Among the means and methods by which the members and their
24 associates conduct and participate in the conduct of the affairs of the Carder.su organization
25 include, but are not limited to, the following:

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- A. Members of the organization and their associates did traffic in and produce, did attempt to traffic in and produce, and did conspire to traffic in and produce, counterfeit identification documents, which affects interstate and foreign commerce.
- B. Members of the organization and their associates did unlawfully transfer, did attempt to unlawfully transfer, and did conspire to unlawfully transfer counterfeit identification documents, which affects interstate and foreign commerce.
- C. Members of the organization and their associates did unlawfully transfer, possess and use, did attempt to unlawfully transfer, possess and use, and did conspire to unlawfully transfer, possess and use a means of identification of another person in the commission of and in connection with the crime of Bank Fraud, which affects interstate and foreign commerce.
- D. Members of the organization and their associates did traffic in and use, did attempt to traffic in and use, and did conspire to traffic in an use counterfeit and unauthorized access devices, which affects interstate and foreign commerce.
- E. Members of the organization and their associates did possess, did attempt to possess, and did conspire to possess fifteen (15) or more counterfeit and unauthorized access devices, which affects interstate and foreign commerce.
- F. Members of the organization and their associates did plan, attempt to plan, and conspire to plan, with the intent to defraud, schemes to unlawfully obtain money and property from banks

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and other financial institutions by way of fraud, and material misrepresentations and false promises.

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

- (i) Various website forums and chat rooms, such as Carder.info, Carder.su, Crdsu.su, Carder.biz, and Carder.pro, which are controlled by the Carder.su organization for use as their online gathering places, that is, as "virtual clubhouses," which provide secure meeting locations for the members and associates of the criminal organization;
- (ii) Private messaging ("PM") which is a non-forum wide message sent between individual members on the criminal organization's website forums;
- (iii) E-mail, some of which are encrypted and password protected, or use service providers located outside the United States;
- (iv) ICQ chat, which is a free instant messaging electronic communication services provided by ICQ, Inc., a subsidiary of AOL. ICQ user accounts are identified by a Universal Identification Number ("UIN");

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- (v) Proxies, which are achieved by bouncing from one computer to another to hide a member's true originating IP address;
- (vi) Virtual Private Network, ("VPNs"), which are similar to a proxy, but with the addition of creating an encrypted tunnel that cannot be monitored; and
- (vii) protected drop sites in the District of Nevada, and elsewhere, in the event that there is a need to transport, transfer, and receive physical items of contraband.

COUNT ONE
Conspiracy

1. Paragraphs 1 through 4 of the General Allegations Section are hereby re-alleged and incorporated by reference as if fully set forth herein.

2. Beginning on a date unknown but not later than on or about July 14, 2009, continuing to on or about March 31, 2010, in the state and federal district of Nevada and elsewhere,

**THOMAS LAMB a.k.a. TLAMB2;
JONATHAN VERGNETTI;
ROGER GRODESKY; and
JOHN HOLSHEIMER;**

defendants herein, did conspire and agree together with one another and with others, known and unknown, to commit the following offenses against the United States:

- a) Trafficking In and Production of False Identification Documents, in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (c)(3);

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- b) Trafficking In, Production, and Use of Counterfeit Access Devices, in violation of Title 18 United States Code, Section 1029(a)(1);
- c) Possession of Fifteen or More Counterfeit and Unauthorized Access Devices, in violation of Title 18 United States Code, Section 1029(a)(3); and
- d) Fraudulent Transactions with Access Devices Issued to Other Persons, in violation of Title 18 United States Code, Section 1029(a)(5), (b)(1).

MANNER AND MEANS

3. The manner and means which the defendants and others used to achieve the objectives of the conspiracy are as follows:

a. **THOMAS LAMB** a.k.a. **TLAMB2** (hereafter "Lamb") **LAMB**, **JONATHAN VERGNETTI**, (hereafter "Vergnetti"), **ROGER GRODESKY**, (hereafter "Grodesky"), and **JOHN HOLSHEIMER**, (hereafter "Holsheimer"), by and through use of the wires, knowingly and with the intent to defraud, did unlawfully produce and cause others to produce, did transfer and cause other to transfer, by and through the United States mail, and did possess counterfeit identification documents, which they obtained from unindicted co-conspirators, some of whom are known members of the Carder.su organization.

b. Defendants **LAMB**, **VERGNETTI**, **GRODESKY**, and **HOLSHEIMER**, by and through use of the wires, knowingly and with the intent to defraud, did unlawfully transfer and cause others to transfer, and did possess stolen and otherwise unauthorized financial account information, which they obtained from unindicted co-conspirators, some of whom were known to be members of the Carder.su organization.

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c. Defendants **LAMB, VERGNETTI, GRODESKY, and HOLSHEIMER** knowingly and with the intent to defraud, did manufacture and produce and did cause others to manufacture and produce, did traffic in and cause others to traffic in, and did possess counterfeit access devices containing stolen and otherwise unauthorized magnetic credit card and bank card account information with the intent to fraudulently obtain money for their own personal gain and in furtherance of the criminal conspiracy.

d. Defendants **LAMB, VERGNETTI, GRODESKY, and HOLSHEIMER**, aiding and abetting one another and others, used and caused others to use, counterfeit access devices containing stolen and otherwise unauthorized magnetic credit card and bank card account information to fraudulently obtain money for their own personal gain and in furtherance of the criminal conspiracy.

OVERT ACTS

4. On or about July 14, 2009, defendant **THOMAS LAMB** a.k.a. **TLAMB2** (hereafter “Lamb”) became a member of the Carder.su Organization. Defendant **LAMB** participates in the criminal organization, acting under the direction of and in concert with other members in carrying out unlawful and other activities in furtherance of the conduct of the criminal organization’s affairs. Defendant **LAMB’s** criminal activities in furtherance of the criminal organization include, but are not limited to, production and trafficking in counterfeit identification documents, trafficking in production and use of counterfeit access devices, and possession of fifteen (15) or more counterfeit and unauthorized access devices.

5. Beginning on a date unknown, but not later than in or about September 2009, co-defendants **LAMB, JONATHAN VERGNETTI**, (hereafter “Vergnetti”), **ROGER GRODESKY**, (hereafter “Grodesky”), **JOHN HOLSHEIMER**, (hereafter “Holsheimer”), and others known and unknown, did knowingly traffic in and produce counterfeit identification documents, possess fifteen or more stolen and otherwise compromised unauthorized access

1 devices, that is credit and debit card account information belonging to persons other than the
2 co-conspirators, and traffic in, produce and use counterfeit access devices, all of which were
3 used for the personal benefit and financial gain of co-defendants **LAMB, VERGNETTI,**
4 **GRODESKY, HOLSHEIMER** and others, known and unknown.

5 6. From on or about September 11, 2009, continuing until on or about
6 September 13, 2009, defendants **LAMB** and **GRODESKY**, together with and aiding and
7 abetting one another, and others known and unknown, did knowingly and without lawful
8 authority traffic in and produce, and did cause others to traffic in and produce false
9 identification documents, which were transported in the mail in the course of the
10 unauthorized production, in and affecting interstate and foreign commerce, to wit:

11 a) One counterfeit New York driver's license in the name of T. Spring and
12 bearing the photograph of defendant **LAMB**, along with a counterfeit AT &T employee
13 identification card also in the name of T. Spring and bearing the photograph of defendant
14 **LAMB**; and

15 b) One counterfeit Nevada driver's license in the name of P. Brown and
16 bearing the photograph of defendant **GRODESKY**, along with a counterfeit AT &T employee
17 identification card also in the name of P. Brown and bearing the photograph of defendant
18 **GRODESKY**.

19 7. From on or about September 21, 2009, continuing until on or about
20 September 22, 2009, defendants **LAMB, GRODESKY, and HOLSHEIMER**, together with
21 and aiding and abetting one another, and others known and unknown, did knowingly and
22 without lawful authority traffic in and produce, and did cause others to traffic in and produce
23 false identification documents, which were transported in the mail in the course of the
24 unauthorized production, in and affecting interstate and foreign commerce, to wit: one
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1 counterfeit New York driver's license in the name of P. Brown and bearing the photograph
2 of defendant **GRODESKY**.

3 8. On a date unknown but not later than on or about September 27, 2009,
4 defendants **LAMB, GRODESKY, and HOLSHEIMER**, together with and aiding and abetting
5 one another, and others known and unknown, did traffic in, and produce counterfeit access
6 devices, to wit: 1) a counterfeit Visa card, in the name of T. Spring, embossed with account
7 number ending in X-4238; 2) a counterfeit Wal-Mart Visa debit card, in the name of T.
8 Spring, embossed with account number ending in X-8950; 3) a counterfeit Wal-Mart Visa
9 debit card embossed with account number ending in X-4238, 4) a counterfeit NASCAR Visa
10 debit card, in the name of T. Spring, embossed with account number ending in X-6087; 5)
11 a counterfeit NASCAR Visa debit card embossed, in the name of T. Spring, with account
12 number ending in X-4248; 6) a counterfeit "ONLY 1" Visa debit card, in the name of R.
13 Brown, embossed with account number ending in X-4974; 7) a counterfeit "ONLY 1" Visa
14 debit card, in the name of R. Brown, embossed with account number ending in X-8147; and
15 8) a counterfeit NASCAR Visa debit card, in the name of defendant **HOLSHEIMER**,
16 embossed with account number ending in X-0218.

17 9. On or about September 27, 2009, defendants **LAMB, GRODESKY, and**
18 **HOLSHEIMER**, together with and aiding and abetting one another, and others known and
19 unknown, did use and cause to be used a counterfeit Visa card, in the name of T. Spring,
20 embossed with account number ending in X-4238, along with a counterfeit New York driver's
21 license in the name of T. Spring and bearing the photograph of defendant **LAMB**, at the
22 South Point Casino, in Las Vegas, Nevada, to attempt to unlawfully obtain a cash advance
23 in the amount of approximately one thousand dollars (\$1,000) from a Global Cash ATM.

24 10. On or about September 27, 2009, defendant **LAMB**, together with and aiding
25 and abetting defendants **GRODESKY, and HOLSHEIMER**, and others known and unknown,
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1 unlawfully and with the intent to commit access device fraud, did possess a counterfeit New
2 York driver's license in the name of T. Spring and bearing the photograph of defendant
3 **LAMB**, along with a counterfeit AT &T employee identification card also in the name of T.
4 Spring and bearing the photograph of defendant **LAMB**.

5 11. On or about September 27, 2009, defendant **GRODESKY**, together with and
6 aiding and abetting, defendants **LAMB**, and **HOLSHEIMER**, and others known and
7 unknown, unlawfully and with the intent to commit access device fraud, did possess a
8 counterfeit Nevada driver's license in the name of P. Brown and bearing the photograph of
9 defendant **GRODESKY**, along with a counterfeit AT &T employee identification card also in
10 the name of P. Brown and bearing the photograph of defendant **GRODESKY**.

11 12. On or about September 27, 2009, defendant **GRODESKY**, together with and
12 aiding and abetting, defendants **LAMB**, and **HOLSHEIMER**, and others known and
13 unknown, unlawfully and with the intent to commit access device fraud, did possess a
14 counterfeit Nevada driver's license in the name of P. Brown and bearing the photograph of
15 defendant **GRODESKY**, along with a counterfeit AT &T employee identification card also in
16 the name of P. Brown and bearing the photograph of defendant **GRODESKY**.

17 13. From on or about September 22, 2009, continuing until on or about
18 September 29, 2009, defendant **VERGNETTI**, together with and aiding and abetting co-
19 defendants **LAMB**, **GRODESKY**, and **HOLSHEIMER**, and others known and unknown, did
20 knowingly and without lawful authority traffic in and produce, and did cause others to traffic
21 in and produce false identification documents, which were transported in the mail in the
22 course of the unauthorized production, in and affecting interstate and foreign commerce, to
23 wit: one counterfeit Arizona driver's license in the name of T. Johnson, bearing the
24 photograph of defendant **VERGNETTI**.

25 14. From on or about January 3, 2010, continuing until on or about January 5,
26 2010, defendants **LAMB**, and **HOLSHEIMER** together with and aiding and abetting co-

1 defendants **GRODESKY** and **VERGNETTI**, and others known and unknown, did knowingly
2 and without lawful authority traffic in and produce, and did cause others to traffic in and
3 produce false identification documents, which were transported in the mail in the course of
4 the unauthorized production, in and affecting interstate and foreign commerce, to wit:

5 a) One counterfeit Nevada driver's license in the name of T. Page,
6 bearing the photograph of defendant **LAMB**, along with a counterfeit AT &T employee
7 identification card also in the name of T. Page and bearing the photograph of defendant
8 **LAMB**; and

9 b) One counterfeit Nevada driver's license in the name of J. Hallaway,
10 bearing the photograph of defendant **HOLSHEIMER**, along with a counterfeit AT &T
11 employee identification card also in the name of J. Hallaway and bearing the photograph of
12 defendant **HOLSHEIMER**.

13 15. On or about March 31, 2010, defendant **VERGNETTI**, together with and
14 aiding and abetting co-defendants **LAMB**, **GRODESKY**, and **HOLSHEIMER**, and others
15 known and unknown, did use and cause to be used a counterfeit Visa card, in the name of
16 C. Borin, embossed with account number ending in X-3982, along with a counterfeit
17 California driver's license in the name of C. Borin and bearing the photograph of defendant
18 **VERGNETTI**, at the Fiesta Rancho Casino, in Las Vegas, Nevada, to unlawfully obtain a
19 cash advance in the amount of approximately two thousand dollars (\$2,000) from a Global
20 Cash ATM, and to attempt to unlawfully obtain a cash advance in the amount of
21 approximately one thousand five hundred dollars (\$1,500) from a Global Cash ATM.

22 16. On or about February 11, 2011, defendant **LAMB**, together with and aiding
23 and abetting other coconspirators, known and unknown, knowingly and with intent to
24 defraud, did possess fifteen or more unauthorized access devices, that is approximately sixty
25 nine (69) stolen credit and debit card account numbers issued to person other than the
26 defendant, and which are issued, owned, managed and controlled by a financial institution,

1 account issuer, credit card system member within the jurisdiction of the United States, in and
 2 affecting interstate and foreign commerce.

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

4 **COUNTS TWO THROUGH SEVEN**
 5 Trafficking in and Production of False Identification Documents

6 1. The factual allegations of Count One of this Indictment are incorporated by
 7 reference.

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

10 **THOMAS LAMB a.k.a. TLAMB2;**
 11 **JONATHAN VERGNETTI;**
 12 **ROGER GRODESKY; and**
 13 **JOHN HOLSHEIMER;**

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

21 <u>Counts</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
22 TWO	LAMB	9/15/2009	NY DL	T. Spring
23 THREE	GRODESKY	9/15/2009	NV DL	P. Brown
24 FOUR	GRODESKY	9/22/2009	NY DL	P. Brown
25 FIVE	VERGNETTI	9/22/2009	AZ DL	T. Johnson

<u>Counts</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
SIX	LAMB	1/05/2010	NV DL	T. Page
SEVEN	HOLSHEIMER	1/05/2010	NV DL	J. Hallaway

All in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (c)(3); and Title 18, United States Code, Section 2.

COUNT EIGHT

Trafficking In, Production of, and Use of Counterfeit Access Devices

1. The factual allegations of Count One of this Indictment are incorporated by reference.

2. On or about on September 27, 2009, in the State and Federal District of Nevada and elsewhere,

**THOMAS LAMB A.K.A. TLAMB2;
ROGER GRODESKY; and
JOHN HOLSHEIMER;**

the defendants herein, aiding and abetting one another, and others unknown, knowingly and with intent to defraud, did traffic in, produce and use, in and affecting interstate commerce, one or more counterfeit access devices issued to persons other than the defendants, to wit:

1) a counterfeit Visa card embossed with account number ending in X-4238; 2) a counterfeit Wal-Mart Visa debit card embossed with account number ending in X-8950; 3) a counterfeit Wal-Mart Visa debit card embossed with account number ending in X-4238, 4) a counterfeit NASCAR Visa debit card embossed with account number ending in X-6087; 5) a counterfeit NASCAR Visa debit card embossed with account number ending in X-4248; 6) a counterfeit "ONLY 1" Visa debit card embossed with account number ending in X-4974; 7) a counterfeit "ONLY 1" Visa debit card embossed with account number ending in X-8147; and 8) a counterfeit NASCAR Visa debit card embossed with account number ending in X-0218; in

1 violation of Title 18, United States Code, Section 1029(a)(1); and Title 18, United States
2 Code, Section 2.

3 **COUNT NINE**

4 **Trafficking In, Production of, and Use of Counterfeit Access Devices**

5 1. The factual allegations of Count One of this Indictment are incorporated by
6 reference.

7 2. On or about on March 31, 2010, in the State and Federal District of
8 Nevada and elsewhere,

9 **JONATHAN VERGNETTI**

10 the defendant herein, aiding and abetting others known and unknown, knowingly and with
11 intent to defraud, did traffic in, produce and use, in and affecting interstate commerce, one
12 or more counterfeit access devices issued to a person or persons other than the defendant,
13 that is, a counterfeit Visa card embossed with and contained in the card's magnetic stripe,
14 account number ending in X-3982; in violation of Title 18, United States Code, Section
15 1029(a)(1); and Title 18, United States Code, Section 2.

16 **DATED:** this 13 day of March 2012.

17 **A TRUE BILL:**

18 /s/
FOREPERSON OF THE GRAND JURY

19 **DANIEL G. BOGDEN**
United States Attorney

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22 **KIMBERLY M. FRAYN**
Assistant United States Attorney