SSC/2003R01260

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
		Hon.
v.	:	
ANDREW MANTOVANI,	:	Crim. No.
a/k/a "Deck,"		
a/k/a "d3ck,"	:	
a/k/a "BlahBlahBlhSTFU,"		18 U.S.C. §§ 371 & 2 ;
a/k/a "DeckerdIsMissin,"	:	18 U.S.C. § 1028(a)(2);
a/k/a "ThnkYouPleaseDie,"		18 U.S.C. § 1028(a)(7);
DAVID APPLEYARD,	:	18 U.S.C. § 1029(a)(1);
a/k/a "Black Ops,"		18 U.S.C. § 1029(a)(2); and
a/k/a "BlackBagTricks,"	:	18 U.S.C. § 1029(a)(6)(A)
ANATOLY TYUKANOV,		
a/k/a “vox,”	:	
a/k/a “thevoxa,”		
a/k/a “mengele,”	:	
KENNETH J. FLURRY,		
a/k/a “On The Fringe,”	:	I N D I C T M E N T
a/k/a “OTF,”		
a/k/a “SC-OTF,”	:	
KIM TAYLOR,		
a/k/a “macgyver,”	:	
JEREMY STEPHENS,		
a/k/a "Greywolf,"	:	
a/k/a "qwest4eternal,"		
a/k/a "timingbelt2000,"	:	
MATTHEW JOHNSON,		
a/k/a "Carsen,"	:	
a/k/a "Knight Rider,"		
a/k/a "GuinnessHawk,"	:	
BRANDON L. MONCHAMP,		
a/k/a "PVTHC,"	:	
a/k/a "Kingpin,"		
a/k/a "sk33l0,"	:	
WESLEY A. LANNING,		
a/k/a “Sigep1234,"	:	
a/k/a “Sigep,"		
a/k/a “Dirty Harry,"	:	
ALEXANDER PALACIO,		
a/k/a “Scrilla,”	:	
a/k/a “DNDSilencer,"		
a/k/a "Troublesome714,"	:	

a/k/a "NotoriousCarder,"
OMAR DHANANI, :
a/k/a “Voleur,"
a/k/a "Jaeden,” :
MARCELO DEL MAZO,
a/k/a “MALpadre,” :
PAUL A. MENDEL, JR.,
a/k/a "Mintfloss,” :
a/k/a "mojo2000x,"
BEAU ANTHONY FRANKS, :
a/k/a “Scarface,”
JEREMY ZIELINSKI, :
a/k/a “FraMd323,”
a/k/a “BunkerBusterBill," :
ALEKSI KOLAROV,
a/k/a “APK,” :
KASPAR KIVI,
a/k/a “liquid-technique” :
a/k/a “LiqDust,”
ROGERIO RODRIGUES, :
a/k/a "Kerberos,”
a/k/a “Empire_kerberos," and :
KARIN ANDERSSON,
a/k/a “Kafka” :

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT 1
(Conspiracy)

The Shadowcrew Criminal Organization

1. At various times relevant to this Indictment:

a. Shadowcrew was an international organization of approximately 4,000 members which promoted and facilitated a wide variety of criminal activities including, among others, electronic theft of personal identifying information, credit card and debit card fraud, and the production and sale of false identification documents.

b. Shadowcrew operated and maintained the Internet web site

www.shadowcrew.com (the "Shadowcrew web site") in Secaucus and Jersey City, New Jersey, as a communications medium to facilitate the commission of their criminal activities. Shadowcrew members gained access to the Shadowcrew web site by typing in their chosen username or nickname ("nic") and password at the login screen for the web site. Once they had logged in to the web site, Shadowcrew members were able to send and receive secure private messages to each other via the Shadowcrew web site in furtherance of their criminal conduct. Shadowcrew members also were able to access, initiate, and respond to messages posted to a variety of informational and discussion forums on the Shadowcrew web site, most of which were open only to Shadowcrew members. These forums provided guidance to Shadowcrew members on, among other things, producing, selling and using stolen credit card and debit card information and false identification documents. The Shadowcrew web site was designed and utilized to promote and facilitate the commission of criminal activity.

c. Shadowcrew members collectively trafficked in and made unauthorized use of at least 1.5 million stolen credit card numbers, resulting in actual losses in excess of $4 million to credit card companies, financial institutions, and credit card account holders.

The Structure of the Shadowcrew Criminal Organization

2. Shadowcrew members operated the Shadowcrew web site and oversaw the activities of the membership through the following hierarchical framework:

a. Defendants ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie;" DAVID APPLEYARD, a/k/a "Black Ops," a/k/a "BlackBagTricks;" ANATOLY TYUKANOV,

a/k/a “vox,” a/k/a “thevoxa,” a/k/a “mengele;” and others served as Shadowcrew administrators/forum techs (hereinafter “administrators”). Administrators collectively controlled the direction of the organization, handling day-to-day management decisions as well as long-term strategic planning for its continued viability. Administrators determined which individuals were permitted to become and remain members of Shadowcrew; the functions, responsibilities and levels of access to information for all members of the organization; and the rewards accorded members for their loyalty to Shadowcrew (e.g., elevated status within the organization) as well as the punishments meted out to members disloyal to the organization. The administrators had full access to the computer servers hosting the Shadowcrew web site and, correspondingly, had ultimate responsibility for the physical administration, maintenance and security of these computer servers as well as for the content of the web site. Defendants MANTOVANI and APPLEYARD also served as moderators and reviewers, as described below.

b. Defendants KENNETH J. FLURRY, a/k/a “On The Fringe,” a/k/a “OTF,” a/k/a “SC-OTF;” KIM TAYLOR, a/k/a “macgyver;” JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000;" MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk;” BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0;" WESLEY A. LANNING, a/k/a “Sigep1234,” a/k/a “Sigep,” a/k/a “Dirty Harry;” ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a “DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder;" OMAR DHANANI, a/k/a “Voleur," a/k/a "Jaeden;” MARCELO DEL MAZO, a/k/a“ MALpadre;” and others served as Shadowcrew moderators. Moderators oversaw and administered one or more of the informational and discussion forums on the Shadowcrew web site that either fell within an area of their expertise or

covered their geographic location. In this capacity, they established and enforced rules for participating in the various forums as well editing and deleting posts by Shadowcrew members on these forums.

c. Defendants FLURRY, TAYLOR, STEPHENS, JOHNSON, MONCHAMP, LANNING, PALACIO, DHANANI, PAUL A. MENDEL, JR., a/k/a "Mintfloss," a/k/a "mojo2000x;" and ROGERIO RODRIGUES, a/k/a "Kerberos," a/k/a "Empire_kerberos;" and others also frequently served as reviewers for particular products or services with which they had an expertise. Reviewers examined and/or tested illicit merchandise and services that Shadowcrew members desired to advertise and sell via the Shadowcrew web site (e.g., stolen credit card, debit card, and bank account information, and other stolen personal identifying information; counterfeit passports, drivers' licenses, Social Security cards, credit cards, debit cards, birth certificates, college student identification cards, health insurance cards and other false identification documents, and related services), and posted a written summary of that examination or testing on the web site. A favorable written review was a prerequisite to offering such illicit merchandise and services for sale on the Shadowcrew web site.

d. Defendants STEPHENS, JOHNSON, MONCHAMP, LANNING, PALACIO, DHANANI, MENDEL, BEAU ANTHONY FRANKS, a/k/a "Scarface;" JEREMY ZIELINSKI, a/k/a "FraMd323," a/k/a "BunkerBusterBill;" ALEKSI KOLAROV, a/k/a "APK;" KASPAR KIVI, a/k/a "liquid-technique" a/k/a "LiqDust;" and others were Shadowcrew vendors. Vendors advertised and sold the above-referenced illicit merchandise and services to Shadowcrew members via the Shadowcrew web site after such merchandise or service had received a favorable written review from a reviewer. Once a reviewer was designated, a

prospective vendor was required to ship multiple samples of the illicit merchandise or provide access to the illicit service to facilitate completion of the review.

e. General members of Shadowcrew, including defendant KARIN ANDERSSON, a/k/a “Kafka,” typically used the Shadowcrew web site to gather and share information about perpetrating criminal conduct, as more fully described in paragraph 5, through postings on the various informational and discussion forums and through secure private messaging to other Shadowcrew members.

The Conspiracy

3. From in or about August 2002 through on or about October 26, 2004, at Jersey City, in the District of New Jersey and elsewhere, defendants

ANDREW MANTOVANI,
a/k/a "Deck,"
a/k/a "d3ck,"
a/k/a "BlahBlahBlhSTFU,"
a/k/a "DeckerdIsMissin,"
a/k/a "ThnkYouPleaseDie,"
DAVID APPLEYARD,
a/k/a "Black Ops,"
a/k/a "BlackBagTricks,"
ANATOLY TYUKANOV,
a/k/a “vox,”
a/k/a “thevoxa,”
a/k/a “mengele,”
KENNETH J. FLURRY,
a/k/a “On The Fringe,”
a/k/a “OTF,”
a/k/a “SC-OTF,”
KIM TAYLOR,
a/k/a “macgyver,”
JEREMY STEPHENS,
a/k/a "Greywolf,"

a/k/a "qwest4eternal,"
a/k/a "timingbelt2000,"
MATTHEW JOHNSON,
a/k/a "Carsen,"
a/k/a "Knight Rider,"
a/k/a "GuinnessHawk,"
BRANDON L. MONCHAMP,
a/k/a "PVTHC,"
a/k/a "Kingpin,"
a/k/a "sk33l0,"
WESLEY A. LANNING,
a/k/a “Sigep1234,"
a/k/a “Sigep,"
a/k/a “Dirty Harry,"
ALEXANDER PALACIO,
a/k/a “Scrilla,”
a/k/a “DNDSilencer,"
a/k/a "Troublesome714,"
a/k/a "NotoriousCarder,"
OMAR DHANANI,
a/k/a “Voleur,"
a/k/a "Jaeden,”
MARCELO DEL MAZO,
a/k/a “MALpadre,”
PAUL A. MENDEL, JR.,
a/k/a "Mintfloss,”
a/k/a "mojo2000x,"
BEAU ANTHONY FRANKS,
a/k/a “Scarface,”
JEREMY ZIELINSKI,
a/k/a “FraMd323,”
a/k/a “BunkerBusterBill,"
ALEKSI KOLAROV,
a/k/a “APK,”
KASPAR KIVI,
a/k/a “liquid-technique”
a/k/a “LiqDust,”
ROGERIO RODRIGUES,
a/k/a "Kerberos,”
a/k/a “Empire_kerberos," and
KARIN ANDERSSON,
a/k/a “Kafka,”

did knowingly and willfully conspire and agree with each other and with others to commit offenses against the United States, that is:

a. the knowing transfer of an identification document, authentication feature, or a false identification document knowing that such document or feature was stolen or produced without lawful authority, contrary to Title 18, United States Code, Section 1028(a)(2);

b. the knowing transfer or use, without lawful authority, of a means of identification of another person with the intent to commit, or to aid and abet, unlawful activity that constitutes a violation of Federal law, contrary to Title 18, United States Code, Section 1028(a)(7); and

c. the knowing and fraudulent production, use, or trafficking in one or more counterfeit access devices, contrary to Title 18, United States Code, Section 1029(a)(1).

The Principal Goal of the Conspiracy

4. The principal goal of the conspiracy was to commit and assist Shadowcrew members in the commission of a wide variety of criminal activities including electronic theft of personal identifying information, credit card and debit card fraud, and the production and sale of false identification documents.

The Means and Methods of the Conspiracy

5. Among the means and methods employed by the defendants and their co-conspirators to carry out the conspiracy and effect its unlawful objects were those set forth below.

a. It was part of the conspiracy that the defendants and their coconspirators permitted, moderated, contributed to, and accessed posts by Shadowcrew members to informational and discussion forums on the Shadowcrew web site that provided instructions, guidance and tutorials on committing offenses involving a wide variety of criminal conduct including electronic theft of personal identifying information, credit card and debit card fraud, and the production and sale of false identification documents.

b. It was a further part of the conspiracy that the defendants and their coconspirators permitted advertisement of and advertised via the Shadowcrew web site and, correspondingly, sold to Shadowcrew members in response to interest generated by such advertisements, stolen credit card and bank account information, and other stolen individual identifying information; counterfeit passports, drivers' licenses, Social Security cards, credit cards, debit cards, birth certificates, college student identification cards, health insurance cards and other false identification documents; and other illicit services.

c. It was a further part of the conspiracy that prior to allowing the advertisement of such illicit merchandise and services on the Shadowcrew web site, the defendants and their coconspirators reviewed these items and services and caused these items and services to be reviewed in an effort to ensure that only the highest quality illicit merchandise and services was being sold to Shadowcrew members.

d. It was a further part of the conspiracy that the defendants and their coconspirators permitted the auctioning of and auctioned via the Shadowcrew web site to Shadowcrew members counterfeit passports, drivers' licenses, Social Security cards, credit cards, debit cards, birth certificates, college student identification cards, health insurance cards

and other false identification documents; equipment and materials used to commit credit card and debit card fraud and produce false identification documents; and merchandise acquired through such illicit activities.

e. It was a further part of the conspiracy that the defendants and their coconspirators verified and advertised services for verifying whether stolen credit card numbers would be accepted by vendors prior to using them to actually purchase goods and services. The most common manner by which this service was offered was through access to the electronic credit card authorization device of a legitimate retailer obtained by hacking into that retailer's computer network. In essence, such services permitted the defendants and their coconspirators to make unauthorized use of an electronic credit card authorization device to electronically "swipe" stolen credit card numbers to determine their continued viability.

f. It was a further part of the conspiracy that the defendants and their coconspirators commonly sent and received payment for illicit merchandise and services via Western Union money transfers or through transfers of digital currencies such as E-Gold or Web Money.

g. It was a further part of the conspiracy that the defendants and their coconspirators established, contributed to, and encouraged others to contribute to the Shadowcrew donation fund to help defray the ongoing operational expenses of the Shadowcrew web site in return for the assistance that the Shadowcrew web site provided them in successfully committing their criminal activity.

h. It was a further part of the conspiracy that the defendants and their coconspirators permitted Shadowcrew members to send and receive, and sent and received,

secure private messages through the Shadowcrew web site to facilitate and promote the commission of criminal conduct including electronic theft of personal identifying information, credit card and debit card fraud, and the production and sale of false identification documents.

i. It was a further part of the conspiracy that Shadowcrew members were able to anonymously conduct their criminal activity and communicate with other Shadowcrew members through their chosen nic's. Shadowcrew members often were known by and conducted Shadowcrew business under more than one nic.

Overt Acts

6. In furtherance of the conspiracy and to effect its unlawful objects, the defendants and their coconspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or about August 2002, defendant ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie," co-founded the Shadowcrew criminal organization and established the Shadowcrew web site.

b. On or about August 23, 2002, defendant KENNETH J. FLURRY, a/k/a "On The Fringe," a/k/a "OTF," a/k/a "SC-OTF," in his role as a Shadowcrew moderator, posted a tutorial to the "Tutorials and How-To's" forum of the Shadowcrew web site describing the use of cryptography in magnetic strips on credit cards, debit cards and ATM cards.

c. On or about November 29, 2002, defendant JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000," in his role as a Shadowcrew vendor, posted a message on the Shadowcrew web site offering to auction off a stolen bank credit card account with a $5,000 credit limit.

d. On or about November 30, 2002, defendant JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000," in his role as a Shadowcrew vendor, posted a message on the Shadowcrew web site offering to auction off a stolen bank credit card account with a $12,000 credit limit.

e. On or about February 11, 2003, defendant DAVID APPLEYARD, a/k/a "Black Ops," a/k/a "BlackBagTricks," in his role as a Shadowcrew administrator, punished

Shadowcrew member “CCSupplier” for failing to refund money to multiple Shadowcrew members from business transactions by posting on the Shadowcrew web site his true name, address, home telephone number, and cellular telephone number.

f. On or about January 5, 2004, defendant MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk," transferred to another Shadowcrew member one counterfeit Arizona driver’s license, one counterfeit Tufts health insurance card, and one counterfeit Arizona State University student identification card.

g. On or about January 23, 2004, defendant ALEKSI KOLAROV, a/k/a “APK,” in his role as a Shadowcrew vendor, posted a message on the Shadowcrew web site offering to sell counterfeit Thomas Cook travelers’ checks.

h. On or about February 2, 2004, defendant JEREMY ZIELINSKI, a/k/a “FraMd323,” a/k/a “BunkerBusterBill," transferred to another Shadowcrew member nine counterfeit Visa credit cards.

i. On or about February 10, 2004, defendant DAVID APPLEYARD, a/k/a "Black Ops," a/k/a "BlackBagTricks," in his role as a Shadowcrew administrator, agreed to speak to the registered owner of the domain name **www.shadowcrew.cc** in an effort to secure the rights to that domain for Shadowcrew.

j. On or about March 5, 2004, defendant MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk," transferred to another Shadowcrew member one counterfeit Arizona driver’s license and one counterfeit Tennessee driver’s license.

k. On or about March 5, 2004, defendant PAUL A. MENDEL, JR., a/k/a "Mintfloss,” a/k/a "mojo2000x,” transferred to another Shadowcrew member one counterfeit

New York driver's license, one counterfeit Empire Blue Cross health insurance card, and one counterfeit University of Albany student identification card.

l. On or about March 13, 2004, defendant MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk," transferred to another Shadowcrew member one counterfeit Arizona driver's license and one counterfeit Tennessee driver's license.

m. On or about April 21, 2004, defendant ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a "DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder," electronically transferred to another Shadowcrew member six stolen credit card numbers.

n. On or about April 24, 2004, defendant ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a "DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder," electronically transferred to another Shadowcrew member three stolen credit card numbers.

o. On or about May 13, 2004, defendant ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a "DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder," electronically transferred to another Shadowcrew member two stolen credit card numbers.

p. On or about May 13, 2004, defendant BEAU ANTHONY FRANKS, a/k/a "Scarface," electronically transferred to another Shadowcrew member 100 stolen credit card numbers.

q. On or about May 19, 2004, defendant BEAU ANTHONY FRANKS, a/k/a "Scarface," electronically transferred to another Shadowcrew member 115,695 stolen credit cards.

r. On or about June 1, 2004, defendant JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000," in his role as a Shadowcrew vendor,

posted a message on the Shadowcrew web site offering to auction off two counterfeit gift cards for a retail store.

s. On or about June 7, 2004, defendant WESLEY A. LANNING, a/k/a "Sigep1234," a/k/a "Sigep," a/k/a "Dirty Harry," electronically transferred to another Shadowcrew member six stolen credit card numbers.

t. On or about June 29, 2004, defendant ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie," electronically transferred to another Shadowcrew member five stolen credit card numbers.

u. On or about June 29, 2004, defendant ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie," electronically transferred to another Shadowcrew member one stolen credit card number.

v. On or about July 8, 2004, defendant ALEKSI KOLAROV, a/k/a "APK," transferred to another Shadowcrew member one counterfeit United Kingdom passport.

w. On or about July 14, 2004, defendant ANATOLY TYUKANOV, a/k/a "vox," a/k/a "thevoxa," a/k/a "mengele," electronically transferred to another Shadowcrew member one stolen credit card number.

x. On or about July 14, 2004, defendant WESLEY A. LANNING, a/k/a "Sigep1234," a/k/a "Sigep," a/k/a "Dirty Harry," electronically transferred to another Shadowcrew member five stolen credit card numbers.

y. On or about August 11, 2004, defendant PAUL A. MENDEL, JR., a/k/a

"Mintfloss," a/k/a "mojo2000x," transferred to another Shadowcrew member one counterfeit New York driver's license, one counterfeit Empire Blue Cross health insurance card, and one counterfeit City University of New York student identification card.

z. On or about August 14, 2004, defendant BEAU ANTHONY FRANKS, a/k/a "Scarface," electronically transferred to another Shadowcrew member two stolen credit card numbers.

aa. On or about August 18, 2004, defendant KIM TAYLOR, a/k/a "macgyver," began acting as the moderator of the Qualifications forum on the Shadowcrew web site.

bb. On or about August 19, 2004, defendant MARCELO DEL MAZO, a/k/a "MALpadre," received from another Shadowcrew member an electronic transfer of nine stolen credit card numbers.

cc. On or about August 23, 2004, defendant KARIN ANDERSSON, a/k/a "Kafka," electronically transferred to another Shadowcrew member two stolen credit card numbers.

dd. On or about August 23, 2004, defendant MARCELO DEL MAZO, a/k/a "MALpadre," received from another Shadowcrew member an electronic transfer of six stolen credit card numbers.

ee. On or about August 24, 2004, defendant MARCELO DEL MAZO, a/k/a "MALpadre," received from another Shadowcrew member an electronic transfer of five stolen credit card numbers.

ff. On or about August 25, 2004, defendant JEREMY ZIELINSKI, a/k/a

“FraMd323,” a/k/a “BunkerBusterBill," received from another Shadowcrew member an electronic transfer of 11 stolen credit card numbers.

gg. On or about August 25, 2004, defendant KARIN ANDERSSON, a/k/a “Kafka,” electronically transferred to another Shadowcrew member five stolen credit card numbers.

hh. On or about August 26, 2004, defendant KARIN ANDERSSON, a/k/a “Kafka,” electronically transferred to another Shadowcrew member one stolen credit card number.

ii. On or about August 31, 2004, defendant BEAU ANTHONY FRANKS, a/k/a “Scarface,” electronically transferred to another Shadowcrew member 12 stolen credit card numbers.

jj. On or about September 1, 2004, defendant OMAR DHANANI, a/k/a “Voleur," a/k/a "Jaeden,” in his role as a Shadowcrew vendor**,** offered Shadowcrew members an anonymous electronic money laundering service in unlimited amounts for a minimum fee of 10% of a transaction.

kk. On or about September 9, 2004, defendant KIM TAYLOR, a/k/a “macgyver,” caused another Shadowcrew member to electronically transfer eight stolen credit card numbers to him.

ll. On or about September 27, 2004, defendant ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie," electronically transferred to another Shadowcrew member approximately 18 million e-mail accounts with associated usernames, passwords, dates of birth, and other

personally identifying information, approximately 60,000 of which included first and last name, gender, address, city, state, country and telephone number.

mm. On or about September 29, 2004, defendant WESLEY A. LANNING, a/k/a “Sigep1234," a/k/a “Sigep," a/k/a “Dirty Harry," checked the viability of five stolen credit card numbers.

nn. On or about October 5, 2004, defendant BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0," checked the viability of one stolen credit card number.

oo. On or about October 6, 2004, defendant BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0," checked the viability of one stolen credit card number.

pp. On or about October 7, 2004, defendant ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos," checked the viability of five stolen credit card numbers.

qq. On or about October 7, 2004, defendant PAUL A. MENDEL, JR., a/k/a "Mintfloss,” a/k/a "mojo2000x,” checked the viability of 18 stolen credit card numbers.

rr. On or about October 8, 2004, defendant ANATOLY TYUKANOV, a/k/a “vox,” a/k/a “thevoxa,” a/k/a “mengele,” in his role as a Shadowcrew administrator, changed the content of the main page of the Shadowcrew web site.

ss. On or about October 9, 2004, defendant ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos," checked the viability of two stolen credit card numbers.

tt. On or about October 11, 2004, defendant BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0," checked the viability of four stolen credit card

numbers.

uu. On or about October 11, 2004, defendant ROGERIO RODRIGUES, a/k/a "Kerberos," a/k/a "Empire_kerberos," checked the viability of stolen credit card numbers.

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

COUNT 2

(Unlawful Transfer of Means of Identification to Facilitate Criminal Conduct)

1. The allegations set forth in paragraphs 1 – 2 and 4 – 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. On or about September 27, 2004, at Secaucus, in the District of New Jersey and elsewhere, defendant

ANDREW MANTOVANI,
a/k/a "Deck,"
a/k/a "d3ck,"
a/k/a "BlahBlahBlhSTFU,"
a/k/a "DeckerdIsMissin,"
a/k/a "ThnkYouPleaseDie,"

did knowingly and willfully transfer and cause to be transferred in a manner affecting interstate commerce, without lawful authority, means of identification of other persons, that is approximately 18 million e-mail accounts with associated usernames, passwords, dates of birth, and other personally identifying information, approximately 60,000 of which included first and last name, gender, address, city, state, country and telephone number, each of which said e-mail accounts corresponded to a unique victim, with the intent to commit, and to aid and abet, unlawful activity that constitutes a violation of Federal law, namely criminal dissemination of unsolicited commercial e-mail, contrary to 18 U.S.C. § 1037.

In violation of Title 18, United States Code, Sections 1028(a)(7) & (b)(2)(B) and 2.

COUNT 3
(Trafficking in Unauthorized Access Devices)

1. The allegations set forth in paragraphs 1 – 2 and 4 – 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. On or about May 19, 2004, at Jersey City, in the District of New Jersey, and elsewhere, defendant

BEAU ANTHONY FRANKS,
a/k/a "Scarface,"

knowingly, willfully, and with intent to defraud did traffic in approximately 115,695 unauthorized access devices in a manner affecting interstate commerce, during a one-year period, and by such conduct did obtain more than $1,000 during that period, each of which said unauthorized access devices corresponded to a unique victim.

In violation of Title 18, United States Code, Sections 1029(a)(2) & (c)(1)(A)(i) and 2.

COUNT 4

(Unlawful Transfer of Means of Identification to Facilitate Criminal Conduct)

1. The allegations set forth in paragraphs 1 – 2 and 4 – 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. From at least as early as on or about August 13, 2004 through on or about August 26, 2004, at Secaucus, in the District of New Jersey and elsewhere, defendant

KARIN ANDERSSON,
a/k/a "Kafka,"

did knowingly and willfully transfer and cause to be transferred in a manner affecting interstate and foreign commerce, without lawful authority, means of identification of other persons, that is approximately 111 sets of debit card numbers, associated personal identification ("PIN") numbers, and bank account numbers, each of which corresponded to a unique victim, with the intent to commit, and to aid and abet, unlawful activity that constitutes a violation of Federal law, namely access device fraud, contrary to 18 U.S.C. §§1029(a)(1), (a)(2), (a)(3), (a)(5), (a)(6), (c)(1)(A)(i) and (ii).

In violation of Title 18, United States Code, Sections 1028(a)(7) & (b)(2)(B) and 2.

COUNTS 5 – 37

(Unlawful Transfer of Means of Identification to Facilitate Criminal Conduct)

1. The allegations set forth in paragraphs 1 - 2 and 4 - 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. On or about the dates set forth below, at Jersey City, in the District of New Jersey, and elsewhere, the identified defendants did knowingly and willfully transfer and cause to be transferred in a manner affecting interstate commerce, without lawful authority, means of identification of other persons, that is stolen credit card numbers, each of which corresponded to a unique victim, with the intent to commit, and to aid and abet, unlawful activity that constitutes a violation of Federal law, namely access device fraud, contrary to 18 U.S.C. §§ 1029(a)(1), (a)(2), (a)(3), (a)(5), (a)(6) and (c)(1)(A)(i) & (ii):

Count	**Date**	**Defendant**	**Approximate Number of Stolen Credit Card Numbers Transferred**
5	April 25, 2004	ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a “DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder"	20
6	May 12, 2004	ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a “DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder"	71
7	May 13, 2004	BEAU ANTHONY FRANKS, a/k/a “Scarface”	100
8	May 18, 2004	ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a “DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder"	62

9	June 18, 2004	ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie"	10
10	June 28, 2004	ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie"	101
11	July 19, 2004	ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a “DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder"	17
12	July 21, 2004	ALEXANDER PALACIO, a/k/a "Scrilla," a/k/a “DNDSilencer," a/k/a "Troublesome714," a/k/a "NotoriousCarder"	17
13	July 23, 2004	MARCELO DEL MAZO, a/k/a “MALpadre”	100
14	August 18, 2004	MARCELO DEL MAZO, a/k/a “MALpadre”	13
15	August 19, 2004	WESLEY A. LANNING, a/k/a “Sigep1234," a/k/a “Sigep," a/k/a “Dirty Harry"	12
16	August 22, 2004	WESLEY A. LANNING, a/k/a “Sigep1234," a/k/a “Sigep," a/k/a “Dirty Harry"	12
17	August 23, 2004	MARCELO DEL MAZO, a/k/a “MALpadre”	60
18	August 24, 2004	MARCELO DEL MAZO, a/k/a “MALpadre”	99

19	August 25, 2004	JEREMY ZIELINSKI, a/k/a “FraMd323,” a/k/a “BunkerBusterBill"	11
20	August 25, 2004	KARIN ANDERSSON, a/k/a “Kafka”	5
21	August 31, 2004	BEAU ANTHONY FRANKS, a/k/a “Scarface”	12
22	September 3, 2004	ANDREW MANTOVANI, a/k/a "Deck," a/k/a "d3ck," a/k/a "BlahBlahBlhSTFU," a/k/a "DeckerdIsMissin," a/k/a "ThnkYouPleaseDie,"	6
23	September 4, 2004	MARCELO DEL MAZO, a/k/a “MALpadre”	123
24	September 9, 2004	KIM TAYLOR, a/k/a “macgyver”	8
25	September 30, 2004	WESLEY A. LANNING, a/k/a “Sigep1234," a/k/a “Sigep," a/k/a “Dirty Harry"	9
26	September 30, 2004	PAUL A. MENDEL, JR., a/k/a "Mintfloss,” a/k/a "mojo2000x"	21
27	October 5, 2004	ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos,"	9
28	October 6, 2004	ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos,"	17
29	October 7, 2004	PAUL A. MENDEL, JR., a/k/a "Mintfloss,” a/k/a "mojo2000x"	18
30	October 8, 2004	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	7

31	October 10, 2004	WESLEY A. LANNING, a/k/a “Sigep1234," a/k/a “Sigep," a/k/a “Dirty Harry"	6
32	October 12, 2004	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	8
33	October 12, 2004	ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos,"	12
34	October 13, 2004	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	7
35	October 13, 2004	ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos,"	10
36	October 14, 2004	ROGERIO RODRIGUES, a/k/a "Kerberos,” a/k/a “Empire_kerberos,"	12

In violation of Title 18, United States Code, Sections 1028(a)(7) & (b)(2)(B) and 2.

COUNTS 37 – 38
(Trafficking in Counterfeit Access Devices)

1. The allegations set forth in paragraphs 1 – 2 and 4 – 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. On or about the dates set forth below, at Short Hills, in the District of New Jersey, and elsewhere, the identified defendants did knowingly, willfully, and with intent to defraud traffic in one or more counterfeit access devices in a manner affecting interstate commerce, each of which said counterfeit access devices corresponded to a unique victim:

Count	**Date**	**Defendant**	**Approximate Number and Type of Counterfeit Access Devices**
37	December 15, 2003	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	5 Counterfeit Visa Credit Cards
38	February 2, 2004	JEREMY ZIELINSKI, a/k/a “FraMd323,” a/k/a “BunkerBusterBill"	9 Counterfeit Visa Credit Cards

In violation of Title 18, United States Code, Sections 1029(a)(1) & (c)(1)(A)(i) and 2.

COUNTS 39 – 51
(Transferring False Identification Documents)

1. The allegations set forth in paragraphs 1 – 2 and 4 – 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. On or about the dates set forth below, at Short Hills, in the District of New Jersey, and elsewhere, the identified defendants did knowingly and willfully transfer false identification documents in a manner affecting interstate and foreign commerce knowing that such documents were produced without lawful authority:

Count	Approximate Date	Defendant	Approximate Number and Type of False Identification Documents
39	December 15, 2003	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	One Counterfeit Virginia Driver's License
40	January 5, 2004	MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk"	One Counterfeit Arizona Driver's License; One Counterfeit Tufts Health Insurance Card; One Counterfeit Arizona State University Student Identification Card
41	February 11, 2004	WESLEY A. LANNING, a/k/a "Sigep1234," a/k/a "Sigep," a/k/a "Dirty Harry"	One Counterfeit Michigan Driver's License
42	February 11, 2004	PAUL A. MENDEL, JR., a/k/a "Mintfloss," a/k/a "mojo2000x"	One Counterfeit New York Driver's License; One Counterfeit Empire Blue Cross Health Insurance Card
43	March 5, 2004	MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk"	One Counterfeit Arizona Driver's License; One Counterfeit Tennessee Driver's License;

44	March 5, 2004	PAUL A. MENDEL, JR., a/k/a "Mintfloss," a/k/a "mojo2000x"	One Counterfeit New York Driver's License; One Counterfeit Empire Blue Cross Health Insurance Card; One Counterfeit University of Albany Student Identification Card
45	March 13, 2004	PAUL A. MENDEL, JR., a/k/a "Mintfloss," a/k/a "mojo2000x"	One Counterfeit New York Driver's License; One Counterfeit Empire Blue Cross Health Insurance Card; One Counterfeit University of Albany Student Identification Card
46	March 13, 2004	MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk"	One Counterfeit Arizona Driver's License; One Counterfeit Tennessee Driver's License
47	March 13, 2004	MATTHEW JOHNSON, a/k/a "Carsen," a/k/a "Knight Rider," a/k/a "GuinnessHawk"	Three Counterfeit Arizona Drivers' Licenses; Two Counterfeit Tufts Health Insurance Cards; Two Counterfeit Arizona State University Student Identification Cards
48	April 6, 2004	WESLEY A. LANNING, a/k/a "Sigep1234," a/k/a "Sigep," a/k/a "Dirty Harry"	One Counterfeit Michigan Driver's License
49	July 8, 2004	ALEKSI KOLAROV, a/k/a "APK"	One Counterfeit United Kingdom Passport
50	August 2, 2004	WESLEY A. LANNING, a/k/a "Sigep1234," a/k/a "Sigep," a/k/a "Dirty Harry"	Two Counterfeit Michigan Drivers' Licenses
51	August 11, 2004	PAUL MENDEL, JR., a/k/a "Mintfloss," a/k/a "mojo2000x"	One Counterfeit New York Driver's License; One Counterfeit Empire Blue Cross Health Insurance Card; One Counterfeit City University of New York Student Identification Card

In violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A)(ii) & (b)(2)(A) and 2.

COUNTS 52 – 62
(Unauthorized Solicitation to Offer Access Devices)

1. The allegations set forth in paragraphs 1 – 2 and 4 – 5 of Count 1 of this Indictment are realleged as if set forth herein at length.

2. On or about the dates set forth below, at Secaucus, in the District of New Jersey, and elsewhere, the identified defendants, without the authorization of the issuers of the access devices, did knowingly, willfully, and with intent to defraud solicit other persons for the purpose of offering access devices, each of which said access devices corresponded to a unique victim:

Count	**Approximate Date**	**Defendant**	**Approximate Number and/or Type of Access Devices Offered**
52	November 19, 2002	JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000"	Stolen Mastercard and American Express Credit Card Numbers
53	December 6, 2002	JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000"	Stolen Bank Credit Card Accounts with $12,000, $14,000 and $24,000 Credit Limits
54	December 7, 2002	JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000"	Ten Stolen American Express Credit Card Numbers
55	December 12, 2002	JEREMY STEPHENS, a/k/a "Greywolf," a/k/a "qwest4eternal," a/k/a "timingbelt2000"	Stolen Online Credit Card Accounts with $7,000, $12,000 and $14,000 Credit Limits
56	November 19, 2003	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	Counterfeit Credit Cards
57	December 17, 2003	ROGERIO RODRIGUES, a/k/a "Kerberos," a/k/a “Empire_kerberos	9 Stolen Credit Card Numbers

58	January 23, 2004	ALEKSI KOLAROV, a/k/a “APK”	Counterfeit Thomas Cook Travelers’ Checks
59	January 30, 2004	BEAU ANTHONY FRANKS, a/k/a “Scarface”	1,000 Counterfeit Visa and Mastercard Credit Cards
60	February 13, 2004	BRANDON L. MONCHAMP, a/k/a "PVTHC," a/k/a "Kingpin," a/k/a "sk33l0"	Counterfeit Credit Cards
61	February 15, 2004	JEREMY ZIELINSKI, a/k/a “FraMd323,” a/k/a “BunkerBusterBill"	Counterfeit Credit Cards
62	May 13, 2004	BEAU ANTHONY FRANKS, a/k/a “Scarface”	110,000 Stolen Credit Card Numbers

In violation of Title 18, United States Code, Sections 1029(a)(6)(A) & (c)(1)(A)(i) and 2.

_____

CHRISTOPHER J. CHRISTIE
United States Attorney

A TRUE BILL

_____

FOREPERSON