

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **DATE FILED:** _____
v. : **CRIMINAL NO.** _____
CARNELL RAGAN : **VIOLATIONS:**
: **18 U.S.C. § 1029 (a)(1) and (b)(2)**
: **(conspiracy to commit access device**
: **fraud- 1 count)**
: **18 U.S.C. § 1028A(a)(1) (aggravated**
: **identity theft – 1 count)**
: **Notice of forfeiture**

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. From on or about December 12, 2009, to on or about October 21, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

CARNELL RAGAN

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and with intent to defraud, produce, use and traffic in counterfeit access devices, in violation of Title 18, United States Code, Section 1029(a)(1).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant CARNELL RAGAN obtained personal employee information from hospitals and other businesses to gain access to confidential credit card account numbers and other personal information about account holders and, without authority, produced counterfeit credit cards which he transferred to co-conspirators, who used those cards to fraudulently

obtained goods and services.

3. It was further part of the conspiracy that CARNELL RAGAN would also use skimmers to obtain credit card numbers used in his counterfeit credit card scheme.

4. In his scheme, the defendant CARNELL RAGAN counterfeited the cards of American Express, Visa, Chase Bank, among others. All of which do business in interstate commerce.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendant CARNELL RAGAN committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or before December 12, 2009, defendant CARNELL RAGAN manufactured counterfeit credit cards which he sold to others for them to make fraudulent purchases.

2. On or about December 12, 2009, defendant CARNELL RAGAN provided another person with a counterfeit American Express credit card, # 1095 (account number last four digits) which was used at Limerick Premium Outlets to make fraudulent purchases.

3. On or about October 21, 2010, defendant CARNELL RAGAN possessed in his house, personal information on patients and employees taken from hospitals as well as equipment for counterfeiting credit cards and creating bogus drivers licenses.

All in violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CARNELL RAGAN

knowingly and without lawful authority transferred, possessed, and used a means of identification of another person, that is, the name, date of birth, and social security number of M.T., a person known to the grand jury, during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1029(a)(1), (b)(2), as set forth in this indictment, defendant

CARNELL RAGAN

shall forfeit to the United States of America any personal property used or intended to be used to commit the offense. This includes, but is not limited to:

1. Dell Laptop computer, model Inspiron 1545, serial number 42430848805;
2. Toshiba hard drive, model HDD2H24, serial number 59RETBO3T, 250 GB;
3. Western Digital external hard drive, serial number WXE406071821, 60 GB;
4. Dane Electric thumb drive, serial number 067FF795C1448545, 4 GB;
5. Datacard 295 identification making machine;
6. HP Scanner copier;
7. Zebra P110i identification card printer;
8. TOHO heat embosser;
9. Currency counting machine;
10. MSR206 ID scanner;
11. Bulk blank magnetic strip identification cards;
12. Bulk rolls of sticker labels of holographic seal symbols and overlays; and
13. Pennsylvania State identification/Drivers license holographic seals and logos.

Pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney