

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Criminal No. 14-  
 :  
 LAMAR TAYLOR : 18 U.S.C. § 371

**INFORMATION**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

**Relevant Entities and Individuals**

1. At all times relevant to this Information:
  - A. **Co-Conspirator OLEKSIY SHARAPKA and the “Sharapka Cash Out Organization”**
    - a. Co-conspirator OLEKSIY SHARAPKA was a resident of Kiev, Ukraine, and the leader of the “Sharapka Cash Out Organization,” a criminal enterprise that operated a large-scale computer hacking and identity theft scheme from at least as early as in or about March 2012 through in or about June 2013. Pursuant to the scheme, co-conspirator SHARAPKA and his co-conspirators opened up bank accounts and obtained pre-paid debit cards in the names of identity theft victims (the “Fraudulent Accounts”), which they funded by, among other means, fraudulently diverting funds from victims’ bank accounts through computer hacking, or with the proceeds of fraudulent tax returns they caused to be filed with the Internal Revenue Service (“IRS”) in the names of identity theft victims. Thereafter, co-conspirator SHARAPKA and his co-conspirators “cashed out” the Fraudulent Accounts and shared the illicit proceeds.

**B. The Massachusetts Cash Out Crew**

b. Co-conspirator R.D., not named as a defendant herein, was a resident of Malden, Massachusetts, who managed a “cash out crew” for the Sharapka Cash Out Organization that cashed out Fraudulent Accounts in and around Massachusetts (the “Massachusetts Cash Out Crew”).

c. Defendant LAMAR TAYLOR was a resident of Salem, Massachusetts, who cashed out fraudulently funded bank accounts and pre-paid debit cards for the Sharapka Cash Out Organization as part of the Massachusetts Cash Out Crew.

d. During the period of the conspiracy charged herein, the Massachusetts Cash Out Crew cashed out approximately \$390,000 in illicit proceeds from the Fraudulent Accounts.

**C. Selected Victim Company**

e. During the course of the conspiracy, co-conspirator SHARAPKA and others targeted the customers of over a dozen financial institutions, retail brokerage firms, financial services companies, accounting firms, and payroll processing companies (collectively, the “Victim Companies”), including, Fundtech Holdings LLC (“Fundtech”). Fundtech was headquartered in New Jersey that offered its clients, among other things, an online bill payment system called “Modern Payments.” Modern Payments enabled Fundtech’s clients to both collect bill payments and issue refunds to their customers online. Municipalities such as the city of Evans, Colorado (the “City of Evans”) used the Modern Payments platform to collect utilities payments and to issue refunds for utilities overpayments to its customers.

**The Conspiracy**

2. From at least as early as in or about March 2012 through in or about June 2013, in the District of New Jersey and elsewhere, defendant

**LAMAR TAYLOR**

did knowingly and intentionally conspire and agree with co-conspirator OLEKSIY SHARAPKA, and others known and unknown to commit offenses against the United States, namely, to:

(a) knowingly devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, and sounds, in violation of Title 18, United States Code, Section 1343;

(b) knowingly, and with intent to defraud, traffic in and use one or more unauthorized access devices during a one-year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period in violation of Title 18, United States Code, Section 1029(a)(2); and

(c) knowingly transfer, possess, and use without lawful authority, a means of identification of another person with the intent to commit, and aid and abet, access device fraud and wire fraud, in violation of Title 18, United States Code, Section 1028(a)(7).

**Object of the Conspiracy**

3. The object of the conspiracy was for co-conspirator SHARAPKA, co-conspirator R.D., defendant TAYLOR, and others to enrich themselves by: (1) compromising the account

account and personal identifying information of individuals through various means; (2) diverting money from victims' bank accounts to the Fraudulent Accounts, which they subsequently cashed out; and (3) filing fraudulent tax returns claiming refunds in the names of identity theft victims and directing those refunds to the Fraudulent Accounts, which they subsequently cashed out.

#### **Manner and Means of the Conspiracy**

4. It was part of the conspiracy that international computer hackers working for the Sharapka Cash Out Organization first compromised the log-in credentials (*e.g.*, usernames and passwords) of customers of the Victim Companies, using hacking methods directed primarily at the Victim Companies' customers.

5. It was further part of the conspiracy that the computer hackers used the compromised log-in credentials to gain unauthorized access to the customers' accounts at the Victim Companies.

6. It was further part of the conspiracy that the computer hackers diverted money from the compromised accounts to Fraudulent Accounts controlled by the Sharapka Cash Out Organization.

7. It was further part of the conspiracy that after the funds had been diverted, co-conspirator SHARAPKA directed individuals in the United States, including co-conspirator R.D., and defendant TAYLOR, to cash out the Fraudulent Accounts by, among other things, conducting Automated Teller Machine ("ATM") withdrawals and fraudulent purchases.

8. It was further part of the conspiracy that from at least as early as in or about October 2011 through in or about June 2013, co-conspirator SHARAPKA and others compromised the personal identifying information of individuals, and used the compromised

information to file fraudulent tax returns claiming refunds with the IRS. Those refunds were also directed to the Fraudulent Accounts and cashed out in the manner described above.

9. It was further part of the conspiracy that the majority of the illicit proceeds generated by the Sharapka Cash Out Organization's operations flowed up from the cashers to their managers, and then to the higher levels of the operation. The cashers often transferred funds from the United States to co-conspirator SHARAPKA and other co-conspirators overseas using international wire transfer services, among other methods.

#### Overt Acts

10. In furtherance of the conspiracy and to effect the unlawful objects thereof, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

a. From in or about October 2011 through in or about June 2013, co-conspirators unlawfully accessed computer servers located in New Jersey to access bank account information belonging to the customers of a Victim Company.

b. From on or about November 23, 2012 through on or about December 12, 2012, co-conspirators compromised the Fundtech Modern Payments platform.

c. On or about December 12, 2012, defendant TAYLOR made an ATM withdrawal at a bank located in or around Beverly, Massachusetts.

d. On or about December 13, 2012, defendant TAYLOR made an ATM withdrawal at a bank located in or around Malden, Massachusetts.

In violation of Title 18, United States Code, Section 371.

  
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PAUL J. FISHMAN  
United States Attorney