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

UNITED STATES OF AMERICA : Hon. Steven C. Mannion
 :
 v. : Mag. No. 14-6004
 :
 RICARDO ROSARIO, : CRIMINAL COMPLAINT
 ABRAHAM CORCINO, and :
 ALEXIS SCOTT CARTHENS :
 :
 :

I, Eric Malecki, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



Eric Malecki, Postal Inspector
United States Postal Inspection Service

Sworn to before me, and
subscribed in my presence

September 9, 2014 at
Newark, New Jersey

HONORABLE STEVEN C. MANNION
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One
**(Conspiracy to Commit Fraud and Related Activity in
Connection with Authentication Features)**

From in or about October 2012 through in or about August 2014, in Hudson County, in the District of New Jersey, and elsewhere, defendants

**RICARDO ROSARIO,
ABRAHAM CORCINO, and
ALEXIS SCOTT CARTHENS,**

did knowingly and intentionally conspire and agree with each other, and with others known and unknown, to traffic in false and actual authentication features for use in false identification documents, document-making implements, and means of identification, contrary to Title 18, United States Code, Section 1028(a)(8).

In violation of Title 18, United States Code, Section 1028(f).

ATTACHMENT B

I, Eric Malecki, a Postal Inspector with the United States Postal Inspection Service (“USPIS”), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

Relevant Entities and Individuals

At all times relevant to this Complaint, unless otherwise indicated:

1. “Fakeidstore.co” and “fakedlstore.com” were two domain names that were associated with the same website (the “FakeDLStore Website” or “Website”), which sold fake driver’s licenses for the states of New Jersey, Florida, Illinois, Pennsylvania, Rhode Island, and Wisconsin, each of which purportedly had “scannable barcodes” and “real” holographic overlays. The price for each fake driver’s license was approximately \$150, but the Website offered bulk pricing for orders of “10+” cards. The Website allowed its users to pay by bitcoin, a cryptographic-based digital currency, or MoneyPak, a type of prepaid payment card that could be purchased at retail stores. The “FAQ” section of the Website indicated that orders would be received approximately one to two days after payment was received and described the Website’s policy with respect to returns: “No Refunds. No snitching.” Screenshots of the Website are attached as **Exhibit A**, **Exhibit B**, and **Exhibit C**.

2. Defendant RICARDO ROSARIO was a resident of Jersey City, New Jersey, and the creator and administrator of the FakeDLStore Website.

3. Defendant ABRAHAM CORCINO was a resident of Jersey City, New Jersey, and assisted defendant ROSARIO in operating the FakeDLStore Website by, among other things, printing fake driver’s licenses and fulfilling customers’ orders.

4. Defendant ALEXIS SCOTT CARTHENS was a resident of Newark, New Jersey, and assisted defendant ROSARIO in operating the FakeDLStore Website by, among other things, printing fake driver’s licenses and fulfilling customers’ orders.

Overview

5. From at least as early as in or about October 2012 through as late as in or about August 2014, defendants ROSARIO, CORCINO and CARTHENS

sold fake driver's licenses over the Internet. In connection with their illegal business, defendant ROSARIO created the FakeDLStore Website and, with the assistance of defendants CORCINO and CARTHENS, operated the FakeDLStore Website in the following manner.

6. Visitors to the Website were first required to create a customer account by providing an email account, first and last name, telephone number, and password for the account. Upon creating the account, the customer was sent a welcome email from the Website with a link to its login page. Thereafter, the customer could order a fake driver's license from the Website by logging in and selecting a state driver's license template, entering the information that he/she wished to appear on the license, and uploading a headshot and an image of the user's signature.

7. After designing the fake driver's license, the customer was directed to a checkout page, where the user entered payment information (bitcoin or MoneyPak) and his/her shipping address. Orders to the Website were forwarded to an email address controlled by defendant ROSARIO, who then forwarded the order information to his co-conspirators, who then fulfilled them by printing the fake driver's licenses at locations within the District of New Jersey and shipping them to customers throughout the United States.

8. The investigation has revealed that, among other things, many of the fake driver's licenses sold by defendants ROSARIO, CORCINO and CARTHENS were subsequently used by criminal actors in connection with "cash out" schemes where stolen credit and debit card information, usually obtained through hacking or ATM skimming operations, was encoded on to counterfeit credit cards, which were then used to steal cash from victims' accounts.

DEFENDANT RICARDO ROSARIO

9. The investigation has revealed that defendant ROSARIO used at least five different email accounts (collectively, the "Rosario Email Accounts") to administer the Website and to communicate with defendants CORCINO and CARTHENS concerning Website orders. A review of the contents of the Rosario Email Accounts obtained pursuant to court issued search warrants revealed that there is probable cause to believe that defendant ROSARIO was in fact the user of the Rosario Email Accounts because they either contained emails with identifying information, such as photographs attributable to the user of the account that match the photograph associated with defendant ROSARIO's New Jersey Department of Motor Vehicles photograph, and because each of the

Rosario Email Accounts was accessed from IP addresses¹ associated with either defendant ROSARIO's home or his office.

10. A review of the Rosario Email Accounts revealed thousands of emails related to the administration of the FakeDLStore Website, including :

- a. correspondence, from in or around October 2012 through June 2014, with email accounts associated with defendant CORCINO and defendant CARTHENS, and others, regarding the creation and sale of fake driver's licenses, the administration of the Website, and the trafficking of stolen credit and debit card data;
- b. correspondence with FakeDLStore Website members regarding the status of their orders of fake driver's licenses, including pictures of completed fake driver's licenses that defendant ROSARIO sent to his customers as proof of work;
- c. emails regarding the purchase of expensive printers and supplies used to create fake driver's licenses; and
- d. detailed order information, from on or about December 30, 2013 through on or about June 23, 2014, indicating that during that relatively short time frame, the FakeDLStore fulfilled orders for approximately 1,514 fake driver's licenses for approximately \$232,660.

The FakeDLStore Email Account

11. For example, one of the Rosario Email Accounts, was email account fakedlstore@[REDACTED].com (the "FakeDLStore Email Account"), which was listed on the FakeDLStore Website as a contact email address. An analysis of the IP addresses used to access the FakeDLStore Email Account revealed that the account was accessed multiple times from ROSARIO's home. Review of the FakeDLStore Email Account revealed thousands of emails regarding orders of fake driver's licenses, including pictures of completed fake driver's licenses that defendant ROSARIO sent to his customers as proof of work.

¹ Every connection to the Internet is identified by a unique number called an Internet Protocol, or "IP" address. This number is used to route information between devices. Two computers must know each other's IP addresses to exchange even the smallest amount of information. Accordingly, when one computer requests information from a second computer, the requesting computer specifies its own IP address so that the responding computer knows where to send its response.

The FakeDLStoreMKT Email Account

12. At various times between in or around April 2014 and in or around August 2014, a law enforcement officer acting in an undercover capacity (the "UC") purchased fake driver's licenses from the Website (the "UC Purchases"). After each of the UC Purchases, the UC received order confirmations from the email account fakedlstoremkt@[REDACTED].com (the "FakeDLStoreMKT Email Account"). Also, the UC received several additional emails from the FakeDLStoreMKT Email Account, including emails regarding shipping information and emails attaching photographs of the completed fake driver's licenses. An analysis of the IP addresses used to access the FakeDLStoreMKT Email Account revealed that the account was accessed multiple times from ROSARIO's home.

13. Law enforcement's review of the FakeDLStoreMKT Email Account revealed numerous emails between ROSARIO and customers of the FakeDLStore Website and over 15,000 emails, from in or around February 2012 through in or around June 2014, relating to the ordering and production of fake driver's licenses.

The RicardoRosario Email Account

14. The Rosario Email Accounts also included the ricardorosario@[REDACTED].com email account (the "RicardoRosario Email Account"). A review of the RicardoRosario Email Account revealed, among other things, that defendant ROSARIO used the account to communicate with defendants CORCINO and CARTHENS concerning criminal activity related to the Website. For example:

- a. On or about December 4, 2013, and again on December 6, 2013, ROSARIO, using the RicardoRosario Email Account, asked CORCINO to receive payment, through MoneyPak, for various orders for fake driver's licenses purchased through the Website.
- b. On or about February 5, 2014, ROSARIO, using the RicardoRosario Email Account, sent an email to the sales account for a printer supply company called "AmerID" inquiring about purchasing "another" HDP5000 printer. On or about April 30, 2014, a representative of AmerID emailed ROSARIO a purchase order for a refurbished Fargo HDP5000 printer. Based on my training and experience, I know that the Fargo HDP5000 printer is a high-end printer capable of printing fake driver's licenses.

- c. Review of the RicardoRosario Email Account also revealed numerous order confirmations from Amazon.com, from on or about February 20, 2014 through on or about June 20, 2014, for orders of large quantities of Fargo HDP5000 printing ribbon, plastic cards, and other supplies used to create fake driver's licenses.

DEFENDANT ABRAHAM CORCINO

15. The investigation has also revealed that defendant CORCINO used the email account abe031@[REDACTED].com (the "Corcino Email Account") to communicate with defendants ROSARIO and CARTHENS concerning criminal activity related to the Website. The investigation has further revealed that defendant CORCINO maintained an Instagram² social networking account (the "FakeDLStore Instagram Account") that promoted the Website.

16. There is probable cause to believe that defendant CORCINO was the user of the Corcino Email Account and the FakeDLStore Instagram Account. Among other things, an analysis of the IP addresses used to access each of these accounts revealed that they were accessed multiple times from IP addresses associated with defendant CORCINO's home.

17. Additionally, email correspondence with the Corcino Email Account found in the Rosario Email Accounts revealed that defendant CORCINO used the account to correspond with defendant ROSARIO regarding the Website. For example:

- a. On or about March 6, 2014, defendant CORCINO sent several screenshots of a text messaging conversation between defendant CORCINO and defendant CARTHENS to defendant ROSARIO. The screenshots appeared to be a text message correspondence between defendant CORCINO and the phone number ending in 1213 (the "1213 Number"), identified as belonging to defendant CARTHENS.
- b. The text message conversation in the screenshots referenced a "Big order (15pcs)" having to be shipped overnight for a "Francisco coka Garcia" in Homestead, Florida. A review of the Rosario Email Accounts revealed that "Louis F Garcia" ordered fifteen fake identification cards from defendant ROSARIO that day.

² Instagram is a social networking website that allows its users to, among other things, post photographs to their profile page.

- c. In the text message exchange, defendant CORCINO indicated that although CARTHENS was “ASSIGNED” the job, that CORCINO had “print[ed] them” and that, therefore, CARTHENS should come to CORCINO’s home to pick them up and deliver them. Based on my training and experience, as well as the investigation described herein, there is probable cause to believe that defendant CORCINO was telling defendant CARTHENS that he had already created the fake driver’s licenses that were ordered by “Louis F. Garcia,” and that, accordingly, defendant CARTHENS should pick up the contraband from defendant CORCINO’s home for mailing.

18. The investigation has also revealed that, in addition to the FakeDLStore Website, defendant CORCINO maintained the FakedDLStore Instagram Account to promote the Website. The profile page for the FakeDLStore Instagram account displayed various photographs of fake driver’s licenses, each bearing the domain name, fakeidstore.co, which associated with the Website.

DEFENDANT ALEXIS SCOTT CARTHENS

19. The investigation has also revealed that defendant CARTHENS used the therealbrianplumper@[REDACTED].com email account (the “Carthens Email Account”) to communicate with defendants ROSARIO and CORCINO concerning criminal activity related to the Website.

20. There is probable cause to believe that defendant CARTHENS was the user of the Carthens Email Account, and that he used the account to receive details of orders placed through the Website.

21. An analysis of the IP addresses used to access the Carthens Email Account revealed that the account was accessed multiple times from defendant CARTHEN’S home.

22. Review of the Carthens Email Account revealed numerous emails from defendant ROSARIO forwarding the details of orders for fake driver’s licenses. For example:

- a. On or about June 19, 2014, defendant ROSARIO sent CARTHENS an email containing two .pdf files, one called “Orders 6-20.pdf” and another called “labels 6-20.pdf.” In the email, defendant ROSARIO stated: “Bro i know its a shitload of orders. None HAVE to got out today; do what you can and u can do the rest over the weekend no biggie.” The “Orders 6-20.pdf” file contained invoices for 10 orders of varying amounts of fake

driver's licenses, totaling 37 driver's licenses, for which the total price was listed as \$5,950. The invoices contained all of the information to be used in the fake driver's licenses, including name, address, date of birth, etc. The invoices each also noted the filename for the photo to be used to create the fake driver's license. The "labels 6-20.pdf" file contained 10 UPS shipping labels corresponding with the 10 orders.

23. Additionally, on or about June 17, 2014, law enforcement conducted physical surveillance of defendant CARTHENS and observed him leaving the his home carrying multiple white envelopes similar in shape and size to those received by law enforcement in connection with the UC Purchases. Subsequent review of the Carthens Email Account revealed that defendant CARTHENS received the details for 12 sets of orders for fake driver's licenses from one of the Rosario Email Accounts earlier that day. IP access logs also revealed that the Carthens Email Account was accessed earlier that same day from defendant CARTHENS' home.

EXHIBIT A

FAKEIDSTORE.CO
SCANNABLE BARCODES - UV - REAL HOLOS

View Cart: 0 Item(s) - \$0.00 Search

HOME • USA LICENSES

Welcome visitor you can sign or register account

My Account My Account My Account My Account My Account

Why FakeIDStore.co?

- High Definition Card Printing
- Custom, accurate templates
- Precise typeset and picture layouts
- Customized UV layers
- True Multi-Spec holograms
- Scannable Barcode and MagStripe
- Anonymous Ordering
- Secure Data Management
- Fast and Discreet shipping
- Quick order turnarounds

BUY NOW

DRIVER'S LICENSE
No 99 000 423 Exp. 00
DOB 08/28/1960 Sex M
Class: C Type BRN
Endorse
Concluded Rst B
Issued 08/28/2004
Expires 08/28/2008
John T. Sample
JOHN T SAMPLE
173 ANY STREET
HOMETOWN PA 00000
DL

bitcoin

MoneyPak

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EXTRAS

EXHIBIT B

View Cart: 0 Item(s) - \$0.00 Search

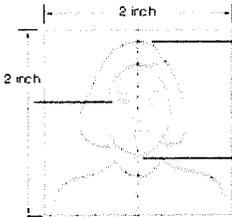
FAKEIDSTORE.CO
SCANNABLE BARCODES - UV - REAL HOLOS

HOME • USA LICENSES

Welcome visitor you can login or create an account.



Tips for a High Quality Fake ID



- High Quality (300dpi) digital passport photo 2"x2"
- Photo on a BLUE or WHITE background
- Ensure your clothes do NOT match background
- Neutral face expression
- No shadows on face or background
- Before uploading, be sure to rename your photo to name on ID
- Ideal name is: Firstname_Lastname_State.JPG
- Proofread all information on ID before submitting order!
- Upload a signature file with your order if necessary
- Ensure your email address is accurate to receive order information

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EXTRAS

EXHIBIT C

FAKEIDSTORE.CO
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View Cart: 0 Item(s) - \$0.00 - Search

HOME • USA LICENSES

My Account | Sign Up | Login | Checkout

Welcome visitor you can [login](#) or [register](#) an account.

ACCOUNT LOGIN

Home » Account » Login

<h4>NEW CUSTOMER</h4> <p>Register Account</p> <p>By creating an account you will be able to shop faster, be up to date on an order's status, and keep track of the orders you have previously made.</p> <p>Continue</p>	<h4>RETURNING CUSTOMER</h4> <p>I am a returning customer</p> <p>E-Mail Address:</p> <p>Password:</p> <p>Forgot my Password</p> <p>Login</p>	<h4>ACCOUNT</h4> <ul style="list-style-type: none">Login / RegisterForgot my PasswordMy AccountOrder HistoryDownloadsReturnsTrack OrdersNewsletter
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<h4>INFORMATION</h4> <ul style="list-style-type: none">FAQ	<h4>CUSTOMER SERVICE</h4> <ul style="list-style-type: none">Contact UsSite Map	<h4>EXTRAS</h4>
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