

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 14-
SEAN ROBERSON, : 18 U.S.C. §§ 1349 and 1028(f)
a/k/a "GoldCard," :
a/k/a "slacker," :
a/k/a "slackerplastics," :
a/k/a "slackerX," and :
a/k/a "slackerxxx" :

INFORMATION

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

COUNT ONE:
CONSPIRACY TO COMMIT WIRE FRAUD
(18 U.S.C. § 1349)

Background

The Defendant and Others

1. At all times relevant to this Information:
 - a. Defendant SEAN ROBERSON, a/k/a "GoldCard," a/k/a "slacker," a/k/a "slackerplastics," a/k/a "slackerX," and a/k/a "slackerxxx," was a resident of Palm Bay, Florida. Defendant ROBERSON was convicted in 2006, in the District of New Jersey, for fraud and related activity in connection with means of identification, in violation of Title 18, United States Code, Section 1028, for attempting to sell counterfeit driver's licenses and health

insurance cards over the Internet. Beginning in or around April 2011, defendant ROBERSON began selling counterfeit credit and debit cards (collectively, “payment cards”) and related contraband over the Internet. By June 2012, defendant ROBERSON launched the website fakeplastic.net (the “Fakeplastic Website” or the “Website”), which defendant ROBERSON and others used as a vehicle to sell counterfeit payment cards and holographic overlays used to create fake driver’s licenses.

b. Vinicio Gonzalez was a resident of Palm Bay, Florida. Gonzalez and assisted defendant ROBERSON in, *inter alia*, printing the counterfeit payment cards ordered by the Website’s customers, as well as mailing the cards and any other contraband ordered through the Website.

c. Hugo Rebaza was a resident of Palm Bay, Florida. Rebaza assisted ROBERSON by, *inter alia*, using fake driver’s licenses to open “mail drops” – post office boxes that were used to receive supplies needed to fulfill orders placed on the Website and, in some cases, to receive cash payments from defendant ROBERSON’s customers.

d. Both Vinicio Gonzalez and Hugo Rebaza have pled guilty to charges in the Western District of North Carolina relating to their activity in connection with the Website.

Relevant Terms

e. “Track data” referred to data that was encoded on the magnetic stripe on the back of a payment card. Track data contained certain information relating to a particular credit or debit account, including the credit

or debit account number and the name on the account. Criminals often referred to stolen track data as “dumps.”

f. “Embossing” was the act of printing certain information on payment cards. Embossed print was the raised print that appeared on the face of legitimate payment cards that displayed information associated with a particular card, such as the name of the accountholder, the account number for the account, and expiration date for the card.

g. “CVV” referred to “Card Verification Value” and “CID” referred to “Card Identifier” or “Card Identification Number.” Both were 3- to 4-digit codes printed on the front or back of legitimate payment cards. Online merchants often required customers to enter a card’s CVV or CID code along with other payment card information prior to entering into online transactions. The purpose of requiring the entry of these codes was to provide some proof that the user of the payment card account information had physical possession of the card.

h. “Authentication features” referred to any hologram, watermark, certification, symbol, code, image, sequence of numbers or letters, or other feature that either individually or in combination with another feature was used by the issuing authority on an identification document, document-making implement, or means of identification to determine if the document was counterfeit, altered, or otherwise falsified.

i. “Skimming operations” referred to schemes involving the installation of specialized equipment at either ATM locations or point-of-sale

terminals designed to steal the track data of payment cards used at such locations or terminals.

j. “Carding” or “cash out” operations referred to criminal operations in which individuals, among other things: (1) obtained stolen track data through various online “vendors” that typically obtained the data through a number schemes, including skimming operations and computer hacking; (2) encoded the stolen data onto custom-made counterfeit payment cards, which were embossed with the same names and account numbers that were encoded on the magnetic stripe on the back of the card in order to evade detection by law enforcement; (3) acquired fake driver’s licenses in the names associated with the stolen track data in order to increase the likelihood of successfully using the counterfeit payment cards; and (4) entered into unauthorized transactions using the foregoing methods to commoditize the stolen track data.

k. “Bitcoin” was a cryptographic-based digital currency, which could be used to pay for goods or services over the Internet, and could be exchanged into United States currency through, *inter alia*, the use of bitcoin exchangers.

l. “Liberty Reserve” was an online currency, which, until in or around May 2013, could be used to pay for goods or services over the Internet, and could be exchanged into United States currency. In or about May 2013, Liberty Reserve, its founders, and certain of its officers were indicted by the United States Attorney’s Office for the Southern District of New York, Crim. No. 13-368, for, among other things, money laundering.

The Fakeplastic Website

2. The Fakeplastic Website was a one-stop online shop operated by defendant ROBERSON and used by carding and cash out crews across the country to purchase customized counterfeit payment cards used to enter in unauthorized transactions with stolen track data, and holographic overlays used to make fake driver's licenses.

a. In order to access the Website's illegal offerings, an individual needed to be a member with a login and password provided by defendant ROBERSON, the Website administrator.

b. Members seeking to purchase holographic overlays for fake driver's licenses were able to browse through the Website's offerings of holographic overlays for various state identification cards that could be ordered and then used to create legitimate looking state identification cards. These members typically had the ability to create their own fake driver's licenses, but not the holographic overlays used to make the cards appear legitimate.

c. Members seeking to purchase counterfeit payment cards were able to browse through the Website's many fake cards designed to look like legitimate payment cards. Members had the ability to select the design and look of the fake payment card they wished to order from a selection of legitimate looking payment card templates, bearing the trademarks of various payment card issuers and processors. Indeed, members could even select and order various holographic stickers designed to look like the holograms appearing on legitimate payment cards.

d. Members input account numbers, name, expiration date, and CVV or CID number, associated with stolen track data, directly through the Website, which were all then embossed onto the counterfeit cards. Members with access to their own embossing equipment purchased counterfeit payment cards as “blanks,” i.e., cards designed to look legitimate and bearing one or more infringing mark, that had not been embossed with account numbers, names, and expiration dates.

e. Members made purchases using bitcoin. The Website also allowed its members to make purchases using Liberty Reserve currency until in or around May 2013 when the criminal charges relating to Liberty Reserve were made public.

f. The Website provided its members with bulk discounting in certain circumstances, and even provided some members with online “coupons.” The listed price for the contraband sold through the Website was as follows:

- i. \$1 for each holographic overlay;
- ii. \$1 for each holographic sticker;
- iii. \$12 for each unembossed counterfeit card; and
- iv. \$15 for each embossed counterfeit card.

The Conspiracy

3. From at least as early as in or around April 2011 through in or around December 2013, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SEAN ROBERSON,
a/k/a "GoldCard,"
a/k/a "slacker,"
a/k/a "slackerplastics,"
a/k/a "slackerX," and
a/k/a "slackerxxx,"

did knowingly and intentionally conspire and agree with Vinicio Gonzalez, Hugo Rebaza, and others, to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, in a manner affecting a financial institution, as that term is defined in Title 15, United States Code, Section 20, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

4. It was the object of the conspiracy for defendant ROBERSON and others to profit by selling customized counterfeit payment cards and holographic overlays used to create fake driver's licenses over the Internet.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that from at least as early as April 2011 through in or about December 2013, defendant ROBERSON and others sold authentication features for false identification documents, namely holographic overlays used on various state-issued driver's licenses, and customized counterfeit payment cards, over the Internet.

6. It was further part of the conspiracy that by in or around June 2012, defendant ROBERSON and others began selling counterfeit payment cards and holographic overlays through the Fakeplastic Website, which was a one-stop shop for various carding and cash out operations across the country.

7. It was further part of the conspiracy that defendant ROBERSON was the founder and administrator of the Website, created the templates used to create the counterfeit payment cards, oversaw the process for creating counterfeit payment cards, and set up the card manufacturing plant used to fulfill orders for counterfeit payment cards.

8. It was further part of the conspiracy that Vinicio Gonzalez helped defendant ROBERSON fulfill orders for counterfeit payment cards and holographic overlays by printing the counterfeit payment cards ordered by the Website's customers, as well as by mailing the cards and other contraband ordered through the Website.

9. It was further part of the conspiracy that Hugo Rebaza helped defendant ROBERSON surreptitiously order and receive supplies, and in some instances cash payments for contraband, by opening and managing "mail drops" using fake driver's licenses.

10. It was further part of the conspiracy that in or around May 2013, after learning that he could no longer accept payment for contraband via Liberty Reserve, defendant ROBERSON began accepting bitcoin for payment by the Website's members, and posted the following message on the Website:

So for anyone that has not heard. Liberty Reserve was shutdown [indefinitely] for Money Laundering. What does that mean for fakeplastic??? It means we are going to accept Bitcoin as our primary payment system

I strongly urge everyone who is working in our line of work to start using Bitcoin. Bitcoin cannot be shutdown by any person or government, it cannot track your ass down, it is anonymous and safe! It is why Sil[k]Road (largest drug buying marketplace) has always used Bitcoin as a payment processor.

11. It was further part of the conspiracy that between in or around April 2011 and in or around December 2013, defendant ROBERSON and others received and fulfilled orders, either by email, instant messaging software, or through the Fakeplastic Website, for over 69,000 counterfeit payment cards (over 46,000 unembossed counterfeit payment cards and over 23,000 embossed cards), over 35,000 holographic stickers, and over 30,000 holographic overlays for fake driver's licenses, the use of which resulted in estimated losses of over \$30,000,000 to, among others, the various financial institutions, as that term is defined in Title 18, United States Code, Section 20, that issued the payment cards associated with stolen track data ultimately used on the counterfeit payment cards purchased from the Website.

12. It was further part of the conspiracy that defendant ROBERSON and his co-conspirators sent over 3,600 parcels of contraband through the United States mail since in or about April 2011 in order to fulfill orders of counterfeit payment cards, holographic stickers, and holographic overlays to

locations across the country, including in Hudson County, in the District of New Jersey.

13. It was further part of the conspiracy that during the course of its operation, the Fakeplastic Website generated over \$1,700,000 in gross receipts for defendant ROBERSON, who used the funds to pay his co-conspirators and invest in the illegal business itself through the acquisition and maintenance of expensive printing equipment.

In violation of Title 18, United States Code, Section 1349.

COUNT TWO:
CONSPIRACY TO COMMIT FRAUD AND RELATED ACTIVITY IN
CONNECTION WITH AUTHENTICATION FEATURES
(18 U.S.C. § 1028(f))

1. The allegations set forth in Paragraphs 1 through 2 and 4 through 13 of Count One above are hereby repeated, realleged and incorporated as if set forth in full herein.

2. From at least as early as in or around April 2011 through in or around December 2013, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SEAN ROBERSON
a/k/a "GoldCard,"
a/k/a "slacker,"
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a/k/a "slackerX," and
a/k/a "slackerxxx,"

did knowingly and intentionally conspire and agree with Vinicio Gonzalez, Hugo Rebaza, and others, 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).

FIRST FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby incorporated and realleged by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant that, upon conviction of Count One of this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

3. If by any act or omission of defendant any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section

2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

SECOND FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby incorporated and realleged by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(B).

2. The United States hereby gives notice to defendant that, upon conviction of Count Two of this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 982(a)(2)(B), of any and all property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation.

3. If by any act or omission of defendant any of the property subject to forfeiture described above:

f. cannot be located upon the exercise of due diligence;

g. has been transferred or sold to, or deposited with, a third party;

h. has been placed beyond the jurisdiction of the court;

i. has been substantially diminished in value; or

j. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section

982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

18 U.S.C. §§ 1349 and 1028(f)

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