

1 DANIEL G. BOGDEN
United States Attorney
2 KIMBERLY M. FRAYN
ANDREW W. DUNCAN
3 Assistant United States Attorneys
333 Las Vegas Blvd. South, Suite 5000
4 Las Vegas, Nevada 89101
Phone: (702) 388-6336 / Fax: (702) 388-5087

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 -oOo-

9 UNITED STATES OF AMERICA,
10 PLAINTIFF,
11 vs.

CRIMINAL INDICTMENT

2:12-CR- 083

VIOLATIONS:

12 **OMAR BUTT,**
13 a.k.a. FEAR,
14 **BILLY STEFFEY,**
a.k.a. OINK OINK,
15 a.k.a. FREDFLINTSTONE,
16 **JASON MACLASKEY,**
a.k.a. SHINNERBOCK,
17 a.k.a. THAT GUY,
18 **DEREK CARDER,**
ROBERT KEPHART,
HEATHER DALE, and
HERBERT MORRELL,

18 U.S.C. § 371 - Conspiracy;
18 U.S.C. § 1028(a)(1) - Trafficking in and
Production of False Identification
Documents; 18 U.S.C. § 1029(a)(1) -
Trafficking In, Production of, and Use of
Counterfeit Access Devices
18 U.S.C. § 2 - Aiding and Abetting

19 DEFENDANTS.
20

21
22 **THE GRAND JURY CHARGES THAT:**

23 **GENERAL ALLEGATIONS**

24 The following General Allegations are re-alleged and incorporated *in toto* by
25 reference herein.

26

The Carder.su organization

1
2 1. At all times relevant to this indictment, defendants **OMAR BUTT**, a.k.a.
3 **FEAR** (hereafter "**BUTT**"), **BILLY STEFFEY**, a.k.a. OINK OINK, a.k.a **FREDFLINTSTONE**,
4 (hereafter "**STEFFEY**"), **JASON MACLASKEY**, a.k.a. SHINNERBOCK, a.k.a. THAT GUY,
5 (hereafter "**MACLASKEY**"), were members of, employed by, and associated with a criminal
6 organization, hereafter referred to as "the Carder.su organization," whose members engage
7 in acts of identity theft and financial fraud, including, but not limited to, acts involving
8 trafficking in stolen means of identification; trafficking in, production and use of counterfeit
9 identification documents; identity theft; trafficking in, production and use of unauthorized and
10 counterfeit access devices; and bank fraud; and whose members interfere with interstate
11 and foreign commerce through acts of identity theft and financial fraud. Members and
12 associates of the Carder.su organization operate principally in Las Vegas, Nevada, and
13 elsewhere.

14 2. The Carder.su organization, including its leadership, members, and
15 associates, constitute an ongoing organization whose members function as a continuing unit
16 for a common purpose of achieving the objectives of the organization. The Carder.su
17 organization is engaged in, and its activities affect, interstate and foreign commerce.

18 3. The purposes of the Carder.su organization include, but are not limited
19 to, the following:

- 20 A. to enrich the members and associates of the organization
21 through the unlawful trafficking in: means of identification,
22 document-making implements, counterfeit identification
23 documents, device-making equipment, and, unauthorized and
24 counterfeit access devices;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

- B. to create, maintain, and control a marketplace for the distribution of stolen property, such as victims' personal and financial means of identification; and
- C. to protect the organization and its members from detection, apprehension and prosecution by law enforcement.

4. Among the means and methods by which the members and their associates conduct and participate in the conduct of the affairs of the Carder.su organization include, but are not limited to, the following:

- A. Members of the organization and their associates did traffic in and produce, did attempt to traffic in and produce, and did conspire to traffic in and produce, counterfeit identification documents, which affects interstate and foreign commerce.
- B. Members of the organization and their associates did unlawfully transfer, did attempt to unlawfully transfer, and did conspire to unlawfully transfer counterfeit identification documents, which affects interstate and foreign commerce.
- C. Members of the organization and their associates did unlawfully transfer, possess and use, did attempt to unlawfully transfer, possess and use, and did conspire to unlawfully transfer, possess and use a means of identification of another person in the commission of and in connection with the crime of Bank Fraud, which affects interstate and foreign commerce.
- D. Members of the organization and their associates did traffic in and use, did attempt to traffic in and use, and did conspire to

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

traffic in an use counterfeit and unauthorized access devices, which affects interstate and foreign commerce.

E. Members of the organization and their associates did possess, did attempt to possess, and did conspire to possess fifteen (15) or more counterfeit and unauthorized access devices, which affects interstate and foreign commerce.

F. Members of the organization and their associates did plan, attempt to plan, and conspire to plan, with the intent to defraud, schemes to unlawfully obtain money and property from banks and other financial institutions by way of fraud, and material misrepresentations and false promises.

G. Members of the organization and their associates did use various means of communication designed to protect the membership's anonymity and to provide security for the criminal organization from attack by other rival criminal organizations and from law enforcement detection, including but not limited to, the use of:

- (i) Various website forums and chat rooms, such as Carder.info, Carder.su, Crdsu.su, Carder.biz, and Carder.pro, which are controlled by the Carder.su organization for use as their online gathering places, that is, as "virtual clubhouses," which provide secure meeting locations for the members and associates of the criminal organization;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

- (ii) Private messaging ("PM") which is a non-forum wide message sent between individual members on the criminal organization's website forums;
- (iii) E-mail, some of which are encrypted and password protected, or use service providers located outside the United States;
- (iv) ICQ chat, which is a free instant messaging electronic communication services provided by ICQ, Inc., a subsidiary of AOL. ICQ user accounts are identified by a Universal Identification Number ("UIN");
- (v) Proxies, which are achieved by bouncing from one computer to another to hide a member's true originating IP address;
- (vi) Virtual Private Network, ("VPNs"), which are similar to a proxy, but with the addition of creating an encrypted tunnel that cannot be monitored; and
- (vii) protected drop sites in the District of Nevada, and elsewhere, in the event that there is a need to transport, transfer, and receive physical items of contraband.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

COUNT ONE
Conspiracy

1. Paragraphs 1 through 4 of the General Allegations Section are hereby re-alleged and incorporated by reference as if fully set forth herein.

2. Beginning on a date unknown but not later than on or about November 12, 2007, continuing to on or about March 30, 2011, in the state and federal district of Nevada and elsewhere,

**OMAR BUTT, a.k.a. FEAR;
BILLY STEFFEY,
a.k.a. OINK OINK,
a.k.a. FREDFLINTSTONE,
a.k.a. YOMAMMA;
JASON MACLASKEY,
a.k.a. SHINNERBOCK,
a.k.a. THAT GUY;
DEREK CARDER;
ROBERT KEPHART;
HEATHER DALE; and
HERBERT MORRELL;**

defendants herein, did conspire and agree together with one another and with others, known and unknown, to commit the following offenses against the United States:

- a. Trafficking In and Production of False Identification Documents, in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (c)(3);
- b. Trafficking In, Production, and Use of Counterfeit Access Devices, in violation of Title 18 United States Code, Section 1029(a)(1);
- c. Possession of Fifteen or More Counterfeit and Unauthorized Access Devices, in violation of Title 18 United States Code, Section 1029(a)(3); and

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

- d. Fraudulent Transactions with Access Devices Issued to Other Persons, in violation of Title 18, United States Code, Section 1029(a)(5),and (b)(1).
- e. Mail Fraud, in violation of Title 18, United States Code, Section 1341.
- f. Wire Fraud, in violation of Title 18, United States Code, Section 1343.

MANNER AND MEANS

3. The manner and means which the defendants and others used to achieve the objectives of the conspiracy are as follows:

a. Defendants **OMAR BUTT**, a.k.a. FEAR, (hereafter "**BUTT**"), **BILLY STEFFEY**, a.k.a. OINK OINK, a.k.a FREDFLINTSTONE, a.k.a. YOMAMMA, (hereafter "**STEFFEY**"), **JASON MACLASKEY**, a.k.a. SHINNERBOCK, a.k.a. THAT GUY, (hereafter "**MACLASKEY**"), **DEREK CARDER** (hereafter "**CARDER**"), **ROBERT KEPHART**, (hereafter "**KEPHART**") **HEATHER DALE**, (hereafter "**DALE**"), and **HERBERT MORRELL**, (hereafter "**MORRELL**"), by and through use of the wires, knowingly and with the intent to defraud, did unlawfully produce and cause others to produce, did transfer and cause other to transfer, by and through the United States mail, and did possess counterfeit identification documents, which they obtained from unindicted co-conspirators, some of whom are known members of the Carder.su organization.

b. Defendants **STEFFEY** and **MACLASKEY**, by and through use of the wires, knowingly and with the intent to defraud, did unlawfully transfer and cause others to transfer, and did possess stolen and otherwise unauthorized financial account information, which they obtained from unindicted co-conspirators, some of whom are known to be members of the Carder.su organization.

1 c. Defendants **BUTT, STEFFEY, and MACLASKEY,**
2 knowingly and with the intent to defraud, did manufacture and produce and did cause others
3 to manufacture and produce, did traffic in and cause others to traffic in, and did possess
4 counterfeit access devices containing stolen and otherwise unauthorized magnetic credit
5 card and debit card account information with the intent to fraudulently obtain goods,
6 merchandise and money for their own personal gain and in furtherance of the criminal
7 conspiracy.

8 d. Defendants **BUTT, STEFFEY, MACLASKEY, CARDER,**
9 **KEPHART, DALE, and MORRELL,** aiding and abetting one another and others, used and
10 caused others to use, counterfeit access devices containing stolen and otherwise
11 unauthorized magnetic credit card and debit card account information to fraudulently obtain
12 goods, merchandise and money for their own personal gain and in furtherance of the
13 criminal conspiracy.

14 e. Defendants **BUTT, STEFFEY, MACLASKEY, CARDER,**
15 **KEPHART, DALE, and MORRELL,** aiding and abetting one another and others, did
16 transport, and did cause to be transported, in interstate and foreign commerce, goods, wares
17 and merchandise of the value of five thousand dollars (\$5000) or more, knowing the same
18 to have been stolen, converted and taken by fraud, for their own personal gain and in
19 furtherance of the criminal conspiracy.

20 OVERT ACTS

21 4. From on or about November 12, 2007, and continuing to on or about
22 November 29, 2007, an unindicted co-conspirator (hereafter "John Doe 1"), known to be a
23 member of Carder.su, together with and aiding and abetting the defendants and others, did
24 knowingly and without lawful authority traffic in and produce, and did cause others to traffic
25 in and produce a false identification document, which was transported in the mail in the
26

1 course of the unauthorized production, in and affecting interstate and foreign commerce, to
2 wit: one counterfeit Nevada driver's license in the name of D. Seda, and bearing the
3 photograph of John Doe 1.

4 5. On or about April 13, 2008, John Doe 1 and defendant **BUTT**, together
5 with and aiding and abetting one another, the co-defendants, and others, did knowingly and
6 with the intent to defraud, traffic in, through use of the interstate wires, one or more
7 unauthorized access devices, to wit: 1) an American Express account number ending in X-
8 2010; 2) an American Express account number ending in X-1005; 3) an American Express
9 account number ending in X-1000; and 4) a Discover account number ending in X-2257.

10 6. On or about April 13, 2008, John Doe 1 and defendant **BUTT**, together
11 with and aiding and abetting one another, the co-conspirators, and others, did agree that
12 defendant **BUTT** would manufacture and produce counterfeit access devices, to wit: 1) two
13 counterfeit access devices embossed in the name D. Seda; and 2) two counterfeit access
14 devices embossed in the name N. Mcaleer, which were to be transported in the mail in the
15 course of the unauthorized production, in and affecting interstate and foreign commerce.

16 7. On or about May 6, 2008, John Doe 1 and defendant **BUTT**, together
17 with and aiding and abetting one another, the co-defendants, and others, did knowingly and
18 with the intent to defraud, traffic in and transfer, through use of the interstate wires, one or
19 more unauthorized access devices, to wit: 1) an American Express account number ending
20 in X-2017; 2) a Visa account number ending in X-1393; 3) a Visa account number ending
21 in X-3300; 4) a Visa account number ending in X-2393; 5) a Visa account number ending in
22 X-0297; 6) a Visa account number ending in X-2155; 7) a Visa account number ending in X-
23 1292; 8) a Visa account number ending in X-9298; 9) a Visa account number ending in X-
24 9272; and 10) a Visa account number ending in X-6931.

25

26

1 8. On or about May 6, 2008, John Doe 1 and defendant **BUTT**, together
2 with and aiding and abetting one another, the co-defendants and others, did agree that
3 defendant **BUTT** would manufacture, and produce counterfeit access devices, to wit: 1) one
4 (1) American Express counterfeit access device embossed in the name D. Seda; and 2) nine
5 (9) Visa counterfeit access devices embossed in the name N. Mcaleer, which were to be
6 transported in the mail in the course of the unauthorized production, in and affecting
7 interstate and foreign commerce.

8 9. On or about August 31, 2008, John Doe 1 and defendant **BUTT**,
9 together with and aiding and abetting one another, the co-defendants and others, did
10 knowingly and with the intent to defraud, traffic in and transfer, through use of interstate
11 wires, one or more unauthorized access devices, to wit: 1) an Visa account number ending
12 in X-8476; and 2) a Visa account number ending in X-4640.

13 10. On or about August 31, 2008, John Doe 1 and defendant **BUTT**,
14 together with and aiding and abetting one another, the co-defendants and others, did agree
15 that defendant **BUTT** would manufacture and produce counterfeit access devices, to wit:
16 two (2) counterfeit access device embossed in the name D. Seda, which were to be
17 transported in the mail in the course of the unauthorized production, in and affecting
18 interstate and foreign commerce.

19 11. From on or about June 25, 2009, and continuing to on or about July
20 2, 2009, defendant **MACLASKEY**, together with and aiding and abetting the co-defendants
21 and others, did knowingly and without lawful authority traffic in and produce, and did cause
22 others to traffic in and produce a false identification document, which was transported in the
23 mail in the course of the unauthorized production, in and affecting interstate and foreign
24 commerce, to wit: one counterfeit Nevada driver's license in the name of J. White, and
25 bearing the photograph of defendant **MACLASKEY**.

26

1 12. From on or about September 9, 2009, and continuing to on or about
2 September 11, 2009, defendant **STEFFEY**, together with and aiding and abetting the co-
3 defendants and others, did knowingly and without lawful authority traffic in and produce, and
4 did cause others to traffic in and produce a false identification document, which was
5 transported in the mail in the course of the unauthorized production, in and affecting
6 interstate commerce, to wit: one counterfeit Virginia driver's license in the name of J.
7 Stermer, and bearing the photograph of defendant **STEFFEY**.

8 13. On or about October 8, 2009, defendants **STEFFEY** and **BUTT**,
9 together with and aiding and abetting one another, the co-defendants and others, did
10 knowingly and with the intent to defraud, traffic in and transfer, by way of interstate wires,
11 one or more unauthorized access devices, to wit: approximately forty (40) MasterCard,
12 Discover and Visa account numbers and their corresponding expiration dates.

13 14. On or about October 8, 2009, defendants **STEFFEY** and **BUTT**,
14 together with and aiding and abetting one another, the co-defendants, and others, did agree
15 that defendant **BUTT** would manufacture and produce counterfeit access devices, to wit:
16 forty (40) counterfeit access device embossed in the name J. Stermer, which were to be
17 transported in the mail in the course of the unauthorized production, in and affecting
18 interstate commerce.

19 15. On or about October 8, 2009, defendants **MACLASKEY** and **BUTT**,
20 together with and aiding and abetting one another, the co-defendants, and others, did
21 knowingly and with the intent to defraud, traffic in, through use of interstate wires, one or
22 more unauthorized access devices, to wit: twelve (12) American Express account numbers,
23 and the corresponding account holders' names, dates of birth, addresses, and the account
24 holders' login credentials for AOL, including login names and passwords.

25

26

1 16. On or about October 8, 2009, defendants **MACLASKEY** and **BUTT**
2 together with and aiding and abetting one another, the co-defendants, and others, did agree
3 that defendant **BUTT** would produce counterfeit access devices, to wit: ten (10) counterfeit
4 access devices, which were to be transported in the mail in the course of the unauthorized
5 production, in and affecting interstate commerce.

6 17. On or about October 9, 2009, defendants **BUTT**, **STEFFEY**, and
7 **KEPHARDT**, together with and aiding and abetting one another, the co-defendants, and
8 others agree that defendant **BUTT** would traffic in approximately forty (40) counterfeit access
9 devices, which were to be transported and delivered to defendant **KEPHARDT**, through use
10 of the mails, from in or around New York, to Portland, Oregon, in and affecting interstate
11 commerce.

12 18. On or about October 9, 2009, defendants **BUTT**, **MACLASKEY**, and
13 **DALE**, together with and aiding and abetting one another, the co-defendants, and others
14 agree that defendant **BUTT** would traffic in approximately two (2) counterfeit access devices,
15 which were to be transported and delivered to defendant **DALE**, through use of the mail,
16 from in or around New York to Mountain View, Missouri, in and affecting interstate
17 commerce.

18 19. On or about October 9, 2009, defendants **BUTT**, **MACLASKEY**, and
19 **MORRELL**, together with and aiding and abetting one another, the co-defendants, and
20 others did agree that defendant **BUTT** would traffic in approximately eight (8) counterfeit
21 access devices, which were to be transported and delivered to defendant **MORRELL**,
22 through use of the mail, from in or around New York to Davenport, Florida, in and affecting
23 interstate commerce.

24 20. From or about October 11, 2009, to on or about October 14, 2009,
25 defendants **BUTT**, **MACLASKEY**, and **MORRELL**, together with and aiding and abetting one
26

1 another, the co-defendants, and others did agree to unlawfully transport, transmit, and
2 transfer, and cause to be unlawfully transported, transmitted and transferred, from Florida
3 to New York, in and affecting interstate commerce, stolen goods and merchandise, that is,
4 laptop computers purchased with counterfeit access devices, of a value of more than five
5 thousand dollars (\$5,000), knowing the same to have been stolen.

6 21. On or about October 14, 2009, defendants **BUTT, MACLASKEY,**
7 **DALE,** and **MORRELL,** together with and aiding and abetting one another, the co-
8 defendants, and others did agree that defendant **BUTT** would conduct financial transactions,
9 in and affecting interstate commerce, involving the proceeds of specified unlawful activities,
10 to wit: fraud and related activity in connection with identification documents and access
11 devices, and the interstate transportation of stolen property; with the intent to promote the
12 carrying on of such specified unlawful activities, and knowing that the property involved in
13 the transactions represented the proceeds of some form of unlawful activity.

14 22. From on or about January 4, 2010, and continuing to on or about
15 January 7, 2010, defendants **STEFFEY** and **CARDER,** together with and aiding and abetting
16 the co-defendants and others, did knowingly and without lawful authority traffic in and
17 produce, and did cause others to traffic in and produce a false identification document, which
18 was transported in the mail in the course of the unauthorized production, in and affecting
19 interstate commerce, to wit: one counterfeit Nevada driver's license in the name of A.
20 Robins, and bearing the photograph of defendant **CARDER.**

21 23. From on or about January 21, 2010, and continuing to on or about
22 January 22, 2010, defendants **MACLASKEY** and **DALE,** together with and aiding and
23 abetting the co-defendants and others, did knowingly and without lawful authority traffic in
24 and produce, and did cause others to traffic in and produce a false identification document,
25 which was transported in the mail in the course of the unauthorized production, in and
26

1 affecting interstate commerce, to wit: one counterfeit Texas driver's license in the name of
2 defendant **MACLASKEY**, and bearing the photograph of defendant **MACLASKEY**.

3 24. From on or about January 29, 2010, and continuing to on or about
4 February 5, 2010, defendants **MACLASKEY**, **BUTT**, **DALE**, together with and aiding and
5 abetting the co-defendants and others, did knowingly and without lawful authority traffic in
6 and produce, and did cause others to traffic in and produce false identification documents,
7 which were transported in the mail in the course of the unauthorized production, in and
8 affecting interstate commerce, to wit: 1) one counterfeit Texas driver's license in the name
9 of H. League, and bearing the photograph of defendant **DALE**; 2) one counterfeit Tennessee
10 driver's license in the name of an unindicted co-conspirator and bearing that person's
11 photograph; and 3) one counterfeit Tennessee driver's licence in the name of C. Grey
12 bearing an unknown male's photograph.

13 25. From on or about February 4, 2010, and continuing to on or about
14 February 16, 2010, defendant **STEFFEY**, together with and aiding and abetting the co-
15 defendants and others, did knowingly and without lawful authority traffic in and produce, and
16 did cause others to traffic in and produce false identification documents, which were
17 transported in the mail in the course of the unauthorized production, in and affecting
18 interstate commerce, to wit: 1) one counterfeit Nevada driver's license in the name of R.
19 Miller, and bearing the photograph of defendant **STEFFEY**; and 2) one counterfeit Nevada
20 driver's license in the name of F. Graham, bearing the photograph of defendant **KEPHART**.

21 26. On or about February 18, 2010, defendants **STEFFEY**, **CARDER**, and
22 **BUTT**, together with and aiding and abetting one another, the co-defendants, and others,
23 did knowingly and with the intent to defraud, traffic in, through use of interstate wires, one
24 or more unauthorized access devices, to wit: three (3) American Express account numbers,
25 one (1) Discover account number, and twenty three (23) Visa account numbers.

26

1 27. From on or about March 6, 2010, and continuing to on or about March
2 19, 2010, defendants **MACLASKEY** and **MORRELL**, together with and aiding and abetting
3 the co-defendants and others, did knowingly and without lawful authority traffic in and
4 produce, and did cause others to traffic in and produce false identification documents, which
5 were transported in the mail in the course of the unauthorized production, in and affecting
6 interstate commerce, to wit: 1) one counterfeit Illinois driver's license in the name of S.
7 Ambraska, and bearing the photograph of an unknown male; 2) one counterfeit Georgia
8 driver's license in the name of H. Mullen, and bearing the photograph of defendant
9 **MORRELL**; 3) one counterfeit Georgia driver's license in the name of D. Chountov, bearing
10 the photograph of an unknown male; 4) one counterfeit Georgia driver's license in the name
11 of K. Ivanov, bearing the photograph of an unknown male; and 5) one counterfeit Georgia
12 driver's license in the name of S. Sauliunas, bearing the photograph of an unknown male.

13 28. On or about March 22, 2010, defendants **STEFFEY** and **BUTT**,
14 together with and aiding and abetting one another, the co-defendants, and others, did
15 knowingly and with the intent to defraud, traffic in, through use of interstate wires, one or
16 more unauthorized access devices, to wit: eight (8) American Express account numbers, and
17 the corresponding account holders' names, dates of birth, addresses, and the account
18 holders' login credentials for AOL, including login names and passwords.

19 29. On or about March 26, 2010, defendants **MACLASKEY**, **MORRELL**,
20 and **BUTT** together with and aiding and abetting one another, the co-defendants, and others,
21 did agree that defendant **BUTT** would produce counterfeit access devices, to wit: twenty
22 seven (27) counterfeit American Express access devices, embossed with the names of H.
23 Mullen, D. Chountov, and S. Sauliunas, which were to be transported in the mail in the
24 course of the unauthorized production, in and affecting interstate commerce.

25

26

1 30. From on or about May 6, 2010, and continuing to on or about May 28,
2 2010, defendants **STEFFEY**, **KEPHART**, together with and aiding and abetting the co-
3 defendants and others, did knowingly and without lawful authority traffic in and produce, and
4 did cause others to traffic in and produce false identification documents, which were
5 transported in the mail in the course of the unauthorized production, in and affecting
6 interstate commerce, to wit: 1) one counterfeit Nevada driver's license in the name of J.
7 Taylor, and bearing the photograph of defendant **STEFFEY**; 2) one counterfeit Nevada
8 driver's license in the name of J. Marks, and bearing the photograph of defendant
9 **KEPHART**; 3) one counterfeit New York driver's license in the name of M. Oakley, and
10 bearing the photograph of defendant **STEFFEY**; and 4) one counterfeit New York driver's
11 license in the name of D. Schultz, and bearing the photograph of defendant **KEPHART**.

12 31. From on or about November 30, 2010, and continuing to on or about
13 December 1, 2010, defendant **STEFFEY**, together with and aiding and abetting the co-
14 defendants and others, did knowingly and without lawful authority traffic in and produce, and
15 did cause others to traffic in and produce a false identification document, which were
16 transported in the mail in the course of the unauthorized production, in and affecting
17 interstate commerce, to wit: one counterfeit Nevada driver's license in the name of J. Sellers,
18 and bearing the photograph of an unknown male.

19 32. From on or about January 11, 2011, and continuing to on or about
20 January 13, 2011, defendant **STEFFEY**, together with and aiding and abetting the co-
21 defendants and others, did knowingly and without lawful authority traffic in and produce, and
22 did cause others to traffic in and produce a false identification document, which were
23 transported in the mail in the course of the unauthorized production, in and affecting
24 interstate commerce, to wit: one counterfeit Nevada driver's license in the name of Jef.
25 Purcell, and bearing the photograph of defendant **STEFFEY**.

26

1 33. On or about January 12, 2011, defendants **STEFFEY** and **BUTT**,
2 together with and aiding and abetting one another, the co-defendants, and others did agree
3 that defendant **BUTT** would produce counterfeit access devices, to wit: ten (10) Visa
4 counterfeit access devices embossed with the name of Jer. Purcell; one (1) American
5 Express counterfeit access embossed with the name of Jer. Purcell; and seven (7) Visa
6 counterfeit access device embossed with the name J. Sellers, which were to be transported
7 in the mail in the course of the unauthorized production, in and affecting interstate
8 commerce.

9 34. On or about January 13, 2011, defendants **STEFFEY** and **BUTT**,
10 together with and aiding and abetting one another, the co-defendants, and others, did
11 knowingly and with the intent to defraud, traffic in, through use of interstate wires, one or
12 more unauthorized access devices, to wit: five (5) American Express account numbers
13 ending in X-02000; X-92000; X-6026; X-5002; and X-1055.

14 35. On or about March 4, 2011, defendants **STEFFEY** and **BUTT**, together
15 with and aiding and abetting one another, the co-defendants, and others, did knowingly and
16 with the intent to defraud, traffic in, through use of interstate wires, one or more unauthorized
17 access devices, to wit: twenty eight Visa account numbers and two (2) American Express
18 account numbers.

19 36. On or about March 4, 2011, defendants **STEFFEY** and **BUTT**, together
20 with and aiding and abetting one another, the co-defendants, and others did agree that
21 defendant **BUTT** would produce counterfeit access devices, to wit: fifteen (15) counterfeit
22 access devices embossed with the name of Jer. Purcell; and another fifteen access devices
23 embossed with the name of D. Schultz, which were to be transported in the mail in the
24 course of the unauthorized production, in and affecting interstate commerce.

25
26

1 37. On or about March 15, 2011, defendants **STEFFEY** and **BUTT**,
2 together with and aiding and abetting one another, the co-defendants, and others did agree
3 that defendant **BUTT** would produce counterfeit access devices, to wit: twenty eight (28)
4 Visa counterfeit access devices embossed with the name of Jef. Purcell, which were to be
5 transported in the mail in the course of the unauthorized production, in and affecting
6 interstate commerce.

7 38. On or about March 24, defendant **BUTT**, together with and aiding and
8 abetting, the co-defendants, and others did agree that he would produce counterfeit access
9 devices, to wit: five counterfeit Visa access devices, five counterfeit American Express
10 access devices, and five counterfeit Discover access devices; which were transported in the
11 mail, on or about March 28, 2011, in the course of the unauthorized production, in and
12 affecting interstate commerce.

13 39. From on or about March 23, 2011, and continuing to on or about
14 March 30, 2011, defendant **BUTT**, together with and aiding and abetting the co-defendants
15 and others, did knowingly and without lawful authority traffic in and produce, and did cause
16 others to traffic in and produce a false identification document, which were transported in the
17 mail in the course of the unauthorized production, in and affecting interstate commerce, to
18 wit: 1) one counterfeit New York driver's license in the name of R. Frizzell, and bearing the
19 photograph of defendant **BUTT**; and 2) one counterfeit New York driver's license in the name
20 of Q. Luu, bearing the photograph of an unknown male.

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

22 **COUNTS TWO THROUGH FIFTEEN**
23 Trafficking in and Production of False Identification Documents

24 1. The factual allegations of Count One of this Indictment are
25 incorporated by reference.

26

1 2. On or about the dates set forth below, in the State and Federal District
2 of Nevada, and elsewhere,

3 **OMAR BUTT, a.k.a. FEAR;**
4 **BILLY STEFFEY,**
5 a.k.a. OINK OINK,
6 a.k.a. FREDFLINTSTONE,
7 a.k.a. YOMAMMA;
8 **JASON MACLASKEY,**
9 a.k.a. SHINNERBOCK,
10 a.k.a. THAT GUY;
11 **DEREK CARDER;**
12 **ROBERT KEPHART;**
13 **HEATHER DALE; and**
14 **HERBERT MORRELL;**

15 defendants herein, together with and aiding and abetting one another, and others known and
16 unknown, did knowingly and without lawful authority produce, and did cause others to
17 produce, false identification documents, which were transported in the mail in the course of
18 the unauthorized production, in and affecting interstate and foreign commerce, and the
19 offense involved the production and transfer of false identification documents that are and
20 appear to be driver's licenses, with each false identification document set forth below
21 constituting a separate violation of Title 18, United States Code, Sections 1028(a)(1),
22 (b)(1)(A)(ii), and (c)(3); and Title 18, United States Code, Section 2, as follows:

<u>Counts</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
23 TWO	MACLASKEY	7/02/2009	NV DL	J. White
24 THREE	STEFFEY	9/11/2009	VA DL	J. Stermer
25 FOUR	CARDER	1/07/2010	NV DL	A. Robins
26 FIVE	MACLASKEY	1/22/2010	TX DL	J. Maclaskey
SIX	DALE	2/05/2010	TX DL	H. League
SEVEN	STEFFEY	2/16/2010	NV DL	R. Miller

1	EIGHT	KEPHART	2/16/2010	NV DL	F. Graham
2	NINE	MORRELL	3/19/2010	GA DL	H. Mullen
3	TEN	STEFFEY	5/28/2010	NV DL	J. Taylor
4	ELEVEN	STEFFEY	5/28/2010	NY DL	M. Oakley
5	TWELVE	KEPHART	5/28/2010	NV DL	J. Marks
6	THIRTEEN	KEPHART	5/28/2010	NY DL	D. Schultz
7	FOURTEEN	STEFFEY	1/13/2011	NV DL	Jef. Purcell
8	FIFTEEN	BUTT	3/30/2011	NY DL	R. Frizzell

9 All in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and
10 (c)(3); and Title 18, United States Code, Section 2.

11 ///

12 ///

13

14

15

16

17

18

19

20

21

22

23

24

25

26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

COUNT SIXTEEN

Trafficking In, Production of, and Use of Counterfeit Access Devices

1. The factual allegations of Count One of this Indictment are incorporated by reference.

2. On or about on March 23, 2011, in the State and Federal District of Nevada and elsewhere,

OMAR BUTT a.k.a. FEAR,


the defendant herein, knowingly and with intent to defraud, did traffic in and produce, in and affecting interstate commerce, one or more counterfeit access devices, to wit: five counterfeit Visa access devices, five counterfeit American Express access devices, and five counterfeit Discover access devices, issued to a person or persons other than the defendant, in violation of Title 18, United States Code, Section 1029(a)(1); and Title 18, United States Code, Section 2.

DATED: this 13 day of March 2012.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney


KIMBERLY M. FRAYN
Assistant United States Attorney