

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

UNITED STATES OF AMERICA	: CRIMINAL NO. <u>15-</u>
v.	: DATE FILED: <u>November 24, 2015</u>
AURA VOICU	: VIOLATIONS:
SILVIU SERBAN	: 18 U.S.C. § 371 (conspiracy to commit bank
	: fraud - 1 count)
	: 18 U.S.C. § 1344 (attempted bank fraud - 1
	: count)
	: 18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this indictment:

1. Automatic Teller Machine ("ATM") skimming "jobs" at a particular bank were typically conducted by groups of two to three individuals. For a particular job, two devices were generally required: 1) a skimming device; and 2) a Personal Identification Number ("PIN") capturing device. A skimming device is an electronic device that can read magnetic strips on the backs of bank cards. Individuals involved in unlawful skimming activities typically place a skimming device over the card insertion slot of the ATM, or at the ATM lobby doors that control access to the bank lobby with a customer swipe card. While the skimming device is in place it captures the magnetic strip information of any card that is swiped through the machine. The skimming device will remain on an ATM or lobby door until participants in the skimming job remove it.

2. Individuals participating in unlawful ATM skimming jobs used PIN capturing

devices in order to steal bank customers' access codes. The PIN capturing device is installed on or near the ATM and in close proximity to the legitimate, factory installed ATM PIN pad.

Participants in ATM skimming jobs typically secure the PIN capturing device to the ATM by using double sided tape and/or superglue. Many PIN capturing devices use pinhole cameras to capture a customer's PIN number as the customer enters the numbers into the factory installed PIN pad. The PIN capturing device will remain on or near an ATM machine until participants in the skimming job remove it.

3. Participants in skimming jobs typically used computers to download the bank account information from the skimming device, a re-encoder to re-encode that information onto other cards with magnetic strips, and to download the video files that captured customers entering PIN numbers. The newly encoded card will act as a "clone" of the customer's authentic card. Participants in skimming jobs used the cloned cards along with the captured PIN numbers at ATMs in order to make unauthorized cash withdrawals from customers' bank accounts.

4. Green Dot cards were debit cards with no cash value until they were activated and loaded with cash. Participants in skimming jobs inserted un-activated Green Dot cards into ATMs in order to facilitate skimming jobs.

5. First County Bank, was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

6. PNC Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

7. Bank of America was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

8. Defendant AURA VOICU was a foreign national who resided outside of

Pennsylvania.

9. Defendant SILVIU SERBAN was a foreign national who resided outside of Pennsylvania.

10. From in or about Spring 2015 through in or about mid-June, 2015, in the Eastern District of Pennsylvania, the District of Connecticut and elsewhere, defendants

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conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, a scheme to defraud First County Bank, PNC Bank and Bank of America, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain monies owned by and under the care, custody, and control of those banks by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS

It was part of the conspiracy that:

11. Defendant SILVIU SERBAN rented a car which he used to transport himself, defendant AURA VOICU and others unknown to the grand jury, to Philadelphia area banks for the purpose targeting those banks for skimming jobs or conducting skimming jobs at those banks.

12. Defendant SILVIU SERBAN, defendant AURA VOICU and other members of the conspiracy unknown to the grand jury, used un-activated Green Dot cards to target banks for skimming jobs or to facilitate skimming jobs at Philadelphia area banks including, but not limited to, the following PNC Bank branches and Bank of America branches. PNC Bank

branches located at: 900 Walnut St., Philadelphia; 801 Christian St., Philadelphia; 3244 N. Broad St., Philadelphia; 5900 N. Broad St., Philadelphia; 6705 Rising Sun Ave., Philadelphia; 401 W. Tabor Rd., Philadelphia and 1511 Walnut St., Philadelphia. Bank of America branches located at: 10th and Chestnut Sts., Philadelphia; South St., Philadelphia; and in University City, Philadelphia.

13. Members of the conspiracy surreptitiously installed a skimming device on the door leading to the ATMs at PNC Bank, 1511 Walnut St., Philadelphia.

14. Members of the conspiracy surreptitiously installed PIN capturing pinhole cameras in false front receipt dispensers which they placed over the authentic receipt dispensers, at the ATMs at PNC Bank, 1511 Walnut St., Philadelphia.

15. Members of the conspiracy surreptitiously removed a skimming device from the door leading to the ATMs at PNC Bank, 1511 Walnut St., Philadelphia, which skimming device was a short time later possessed by defendant AURA VOICU.

16. Members of the conspiracy surreptitiously removed the false front receipt dispensers containing the PIN capturing pinhole cameras from on top of the genuine receipt dispensers of the ATMs at PNC Bank, 1511 Walnut St., Philadelphia. These false front receipt dispensers were a short time later possessed by defendant AURA VOICU.

17. Defendant SILVIU SERBAN kept a laptop computer in his rented car for the purpose of storing skimmed account information and matching captured PIN numbers which had been unlawfully obtained from the PNC Bank located at 1511 Walnut Street, Philadelphia.

18. Defendant AURA VOICU stored instrumentalities used in skimming jobs in her New Jersey motel room. These instrumentalities included, but were not limited to, one ATM camera for skimming, three receipt stickers for ATMs, three modified battery chargers and

Krazy glue.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objectives, defendants AURA VOICU and SILVIU SERBAN, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about May 25, 2015, defendant AURA VOICU, for the purpose of facilitating skimming jobs, inserted Green Dot card # 4250 3100 2644 1743 in the ATM machine at First County Bank, Greenwich, Connecticut.

2. On or about June 4, 2015, defendant SILVIU SIRBAN rented a Volkswagen Passat from Hertz for the purpose of, among other things, transporting members of the conspiracy, including, but not limited to himself and defendant AURA VOICU, to Philadelphia area banks for the purpose of targeting those banks for skimming jobs and executing skimming jobs at those banks.

3. On or about June 11, 2015, defendant AURA VOICU rented a motel room at the Red Roof Inn, 217 S. Blackhorse Pike, Bellmawr, New Jersey, in order to be in close proximity to Philadelphia area banks for the purpose of facilitating skimming jobs at those banks.

4. On or about June 11, 2015, defendant SILVIU SERBAN rented a motel room at the Econo Lodge, 301 S. Blackhorse Pike, Bellmawr, New Jersey, in order to be in close proximity to Philadelphia area banks for the purposes of facilitating skimming jobs at those banks.

5. On or about June 12, 2015, defendant AURA VOICU rented a motel room at the Econo Lodge, 301 S. Blackhorse Pike, Bellmawr, New Jersey, in order to be in close proximity to Philadelphia area banks for the purpose of facilitating skimming jobs at those banks.

6. On or about June 2, 2015 at approximately 7:28 PM, a member of the conspiracy

inserted un-activated Green Dot card # 4250 3100 2656 6127 into an ATM located at PNC Bank, 801 Christian St., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

7. On or about June 2, 2015 at approximately 8:00 PM, a member of the conspiracy inserted un-activated Green Dot card #4250 3100 2656 6127 into an ATM located at PNC Bank, 900 Walnut St., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

8. On or about June 2, 2015 at approximately 8:23 PM, a member of the conspiracy inserted un-activated Green Dot card #4250 3100 2656 6127 into an ATM located at PNC Bank, 3244 N. Broad St., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

9. On or about June 2, 2015 at approximately 9:42 PM, a member of the conspiracy inserted un-activated Green Dot card #4250 3100 2656 6127 into an ATM located at PNC Bank, 5900 N. Broad St., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

10. On or about June 3, 2015 at approximately 9:45 PM, a member of the conspiracy inserted un-activated Green Dot card #4250 3100 2656 6127 into an ATM located at PNC Bank, 6705 Rising Sun Ave., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

11. On or about June 3, 2015 at approximately 9:59 PM, a member of the conspiracy inserted un-activated Green Dot card #4250 3100 2656 6127 into an ATM located at PNC Bank, 401 W. Tabor Rd., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

12. On or about June 3, 2015 at approximately 10:09 PM, a member of the conspiracy inserted un-activated Greene Dot card #4250 3100 2656 6127 into an ATM located at PNC Bank, 5900 N. Broad St., Philadelphia, which Green Dot card was possessed by defendant SILVIU SERBAN.

13. On or about June 11, 2015 at approximately 6:43 PM and 6:45 PM, defendant AURA VOICU inserted un-activated Green Dot card #4250 3100 2644 1743 into an ATM located at PNC Bank, 1511 Walnut St., Philadelphia.

14. On or about June 12, 2015 at approximately 9:45 PM, defendant AURA VOICU inserted un-activated Green Dot card #4250 3100 2644 1743 into at least one ATM located at PNC Bank, 1511 Walnut St., Philadelphia.

15. On or about June 12, 2015 after using un-activated Green Dot card #4250 3100 2644 1743 to access both ATMs located at PNC Bank, 1511 Walnut St., Philadelphia, defendant AURA VOICU left the area with defendant SILVIU SERBAN in defendant SILVIU SERBAN's Volkswagen Passat.

16. On or about June 13, 2015, defendant AURA VOICU inserted un-activated Green Dot card #4250 3100 2644 1743 into an ATM located at Bank of America, 10th and Chestnut Sts., Philadelphia.

17. On or about June 13, 2015, defendant AURA VOICU inserted un-activated Green Dot card #4250 3100 2644 1743 into an ATM located at Bank of America, University City, Philadelphia.

18. On or about June 13, 2015, defendant AURA VOICU inserted un-activated Green Dot card #4250 3100 2644 1743 into an ATM located at Bank of America on South St., Philadelphia.

19. On or about June 13, 2015, defendants AURA VOICU and SILVIU SERBAN traveled to the vicinity of the ATMs located at PNC Bank, 1511 Walnut St., Philadelphia.

20. On or about June 13, 2015, defendant AURA VOICU inserted un-activated Green Dot card #4250 3100 2644 1743 into an ATM located at PNC Bank, 1511 Walnut St., Philadelphia.

21. On or about June 13, 2015, defendant AURA VOICU removed the skimming device from the door accessing the ATMs located at PNC Bank, 1511 Walnut St., Philadelphia.

22. On or about June 13, 2015, defendant AURA VOICU removed the false fronts from the ATM receipt dispensers, which false fronts covered the genuine ATM receipt dispensers at PNC Bank, 1511 Walnut St., Philadelphia.

23. On or about June 13, 2015, defendants AURA VOICU and SILVIU SERBAN began to leave the vicinity of the PNC Bank, 1511 Walnut St., Philadelphia in SERBAN's rented Volkswagen Passat.

24. On or about June 13, 2015, defendant SILVIU SERBAN possessed un-activated Green Dot card #4250 3100 2656 6127.

25. On or about June 13, 2015, defendant AURA VOICU possessed un-activated Green Dot card #4250 3100 2644 1743.

26. On or about June 13, 2015, defendants SILVIU SERBAN and AURA VOICU possessed a laptop computer in SERBAN's rented Volkswagen Passat, which computer contained approximately 144 valid PNC Bank account numbers and a video containing corresponding PIN numbers, from debit/credit cards which had been used at the PNC Bank branch located at 1511 Walnut St., Philadelphia, from approximately June 2, 2015 through approximately June 12, 2015.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 9 of the introduction, paragraphs 11 through 18 of the manner and means and the overt acts in Count One of this Indictment are incorporated here.
2. From on or about Spring 2015 though in or about mid-June, 2015, in the Eastern District of Pennsylvania, the District of Connecticut and elsewhere, defendants

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and others known and unknown to the grand jury knowingly executed, and attempted to execute, a scheme to defraud PNC Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

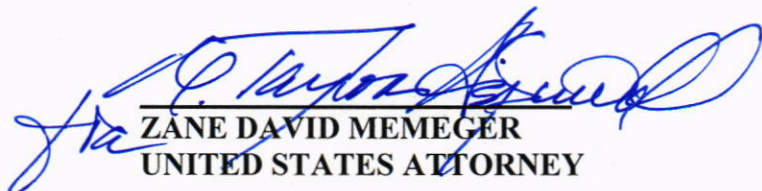
THE SCHEME

3. Paragraphs 1 through 9 of the introduction, paragraphs 11 through 18 of the manner and means and the overt acts in Count One of this indictment are incorporated here.

All in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY