

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>CHRISTOPHER CASTILLO,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Primo"</b>	<b>:</b>	<b>18 U.S.C. § 1029(a)(1) (production and</b>
	<b>:</b>	<b>trafficking counterfeit access devices – 2</b>
	<b>:</b>	<b>counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1029(a)(4) (possession of</b>
	<b>:</b>	<b>device-making equipment – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated</b>
	<b>:</b>	<b>identity theft – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. Scotiabank is a Canadian-based bank providing a complete range of retail, commercial, corporate, investment and international banking services. Scotiabank is an issuer of access devices.

2. On or about June 2, 2015, in Philadelphia, in the Eastern District of Philadelphia, defendant

**CHRISTOPHER CASTILLO,  
a/k/a "Primo,"**

knowingly and with intent to defraud, produced, used and trafficked, and aided and abetted the production, use and trafficking of, one or more counterfeit access devices in a manner affecting interstate and foreign commerce, that is, defendant CASTILLO sold a counterfeit access device containing Scotiabank platinum Visa access device number ending in 2383 to J.P. for \$3,300.

In violation of Title 18, United States Code, Sections 1029(a)(1), (c)(1)(A)(i) and

2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1 of Count One is realleged and incorporated here.
2. On or about June 4, 2015, in Philadelphia, in the Eastern District of

Philadelphia, defendant

**CHRISTOPHER CASTILLO,  
a/k/a "Primo,"**

knowingly and with intent to defraud, produced, used and trafficked, and aided and abetted the production, use and trafficking of, one or more counterfeit access devices in a manner affecting interstate and foreign commerce, that is, defendant CASTILLO produced a counterfeit access device containing Scotiabank platinum Visa access device number ending in 2383 to J.P. in J.P.'s name.

In violation of Title 18, United States Code, Sections 1029(a)(1), (c)(1)(A)(i) and

2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 24, 2015, in Philadelphia, in the Eastern District of Philadelphia,  
defendant

**CHRISTOPHER CASTILLO,  
a/k/a “Primo,”**

knowingly and with intent to defraud, had custody and control of and possessed device-making equipment, including, but not limited to, over 150 white plastic credit card templates, five plastic credit card templates bearing the Capital One logo, six partially manufactured credit cards, multiple sheets of holographic stickers resembling the holograms found on Visa and MasterCard cards, documents containing personally identifiable information, a Datacard desktop card printer, and film for the printer, thereby affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(4), (c)(1)(A)(ii).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1 of Count One is realleged and incorporated here.
2. From on or about June 2, 2015 to June 4, 2015, in Philadelphia, in the Eastern District of Philadelphia, defendant

**CHRISTOPHER CASTILLO,  
a/k/a "Primo,"**

knowingly and without lawful authority, transferred, used and possessed, and aided and abetted the transfer, use and possession of, a means of identification of another person, that is, the identifying account number on a Scotiabank platinum Visa access device number ending in 2383 registered to G.T., during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4) and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1029 set forth in this indictment, defendant

**CHRISTOPHER CASTILLO,  
a/k/a "Primo,**

shall forfeit to the United States of America any property that constitutes, or is derived from, directly or indirectly, from gross proceeds traceable to the commission of the offenses, including, but not limited to, \$3,300 in currency, any property involved in such offenses, and any property traceable to such property.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (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 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

7