

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 : Crim. No. 16-
 v. :
 : 18 U.S.C. § 1028(f)
ALEXIS SCOTT CARTHENS : 18 U.S.C. § 286

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 Create False Identification Documents)

1. At all times relevant to this Information:

Background

a. “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." Some of the fake driver's licenses sold through the Website 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, were encoded on to counterfeit credit cards, which were then used to steal cash from victims' accounts.

b. Defendant ALEXIS SCOTT CARTHENS was a resident of Newark, New Jersey, and assisted in the operation of the FakeDLStore Website by, among other things, printing fake driver's licenses and fulfilling customers' orders.

c. Co-Conspirator 1 was a resident of Jersey City, New Jersey, and the creator and administrator of the FakeDLStore Website.

d. Co-Conspirator 2 was a resident of Jersey City, New Jersey, and assisted in the operation of the FakeDLStore Website by, among other things, marketing the Website on social media websites.

The Conspiracy

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

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did knowingly and intentionally conspire and agree with others to produce an identification document, authentication feature, or a false identification document, to wit, fake driver's licenses, without lawful authority, contrary to Title 18, United States Code, Sections 1028(a)(1) and (b)(1)(A)(ii).

Object of the Conspiracy

3. It was the object of the conspiracy for CARTHENS, Co-Conspirator 1, and Co-Conspirator 2 to produce and sell fake driver's licenses that they marketed through the FakeDLStore Website, an illicit online retail shop.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that from in or about October 2012 through in or about August 2014, defendant CARTHENS, Co-Conspirator 1, and Co-Conspirator 2 sold fake driver's licenses over the Internet through the FakeDLStore Website.

5. It was further part of the conspiracy that the Website required visitors 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.

6. It was further part of the conspiracy that individuals with customer accounts at the Website 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. It was further part of the conspiracy that, 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.

8. It was further part of the conspiracy that orders for fake driver's licenses placed through the Website were forwarded to an email address controlled by Co-Conspirator 1, who then forwarded the order information to defendant CARTHENS and Co-Conspirator 2, who then fulfilled the orders by printing the fake driver's licenses at locations within the District of New Jersey and shipping them through the mail to customers throughout the United States.

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

COUNT TWO
(Conspiracy to Defraud the Government with Respect to Claims)

1. The allegations contained in paragraph 1 of Count One of this Information are fully alleged and incorporated as though fully set forth in this paragraph.

The Conspiracy

2. Between at least as early as in or about December 2012 and in or about November 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant

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did knowingly and intentionally agree, combine, and conspire with others to defraud the United States and a department and agency thereof, specifically the United States Department of the Treasury and the Internal Revenue Service, by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent material claims.

Object of the Conspiracy

3. It was the object of the conspiracy for defendant CARTHENS and others to use stolen personally identifiable information ("PII") to file false and fraudulent individual income tax returns with the Internal Revenue Service in order to steal tax refund money from the United States government.

Manner and Means of the Conspiracy

4. It was a part of the conspiracy that defendant CARTHENS obtained stolen PII from a number of sources, including stolen medical records, to

include information necessary to file false and fraudulent tax returns through online tax filing services.

5. It was further part of the conspiracy that defendant CARTHENS obtained email addresses from Co-Conspirator 1, which were used to register accounts for online tax filing and to register prepaid debit card accounts that were used to receive the fraudulently obtained refunds.

6. It was further part of the conspiracy that Co-Conspirator 1 provided defendant CARTHENS with access to mail delivered to a number of addresses, otherwise known as “drop addresses,” which were used to receive the fraudulently obtained tax refunds.

In violation of Title 18, United States Code, Section 286.

FORFEITURE ALLEGATION

1. As a result of committing the offense alleged in Count One of this Indictment, defendant ALEXIS SCOTT CARTHENS shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such violation, including but not limited to a sum of money equal to at least \$232,660 in United States currency.

2. As a result of committing the offense alleged in Count One of this Indictment, defendant ALEXIS SCOTT CARTHENS shall further forfeit to the United States, pursuant to 18 U.S.C. § 1028(h), any and all illicit authentication features, identification documents, document-making implements and means of identification.

Substitute Assets Provision

3. If any of the above-described forfeitable property, 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.



PAUL J. FISHMAN
United States Attorney

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