

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 18-cr-566 (NLH)
v. :
DAURY CORDERO : 18 U.S.C. §§ 371, 1028(a)(7),
 : (b)(2)(B), and (c)(3)(A),
 : 18 U.S.C. § 2

2018 SEP 19 P 1:10
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Camden,
charges:

Count 1
[18 U.S.C. § 371 - Conspiracy]

The Defendant and Other Individuals, Entities or Organizations

1. At all times relevant to this Indictment:
 - a. Defendant DAURY CORDERO was a resident of Philadelphia, Pennsylvania and Camden, New Jersey.
 - b. Co-Conspirator 1 ("CC-1"), who was a co-conspirator but not named as a defendant herein, was a resident of Camden, New Jersey.
 - c. Cooperating Individual 1 ("CI-1") was an individual who was cooperating with law enforcement officers.
 - d. Undercover Agent 1 ("UC-1") was a federal law enforcement agent employed by the United States Department of Treasury, Internal Revenue Service, Criminal Investigation ("IRS-CI") and working in an undercover capacity.

e. The Internal Revenue Service (“IRS”) was a constituent agency of the Treasury Department and part of the Executive Branch of the United States Government, responsible for administering and enforcing the tax laws of the United States, and collecting taxes owed to the Treasury of the United States, and providing refunds of overpaid taxes.

2. From in or about January 2016 to in or about March 2016, in Camden County, in the District of New Jersey and elsewhere, defendant

DAURY CORDERO

did knowingly and intentionally conspire and agree with CC-1, and with others, known and unknown, to commit an offense against the United States, that is, to knowingly transfer, possess, and use, without lawful authority, a means of identification of another person with the intent to commit, to aid and abet, and in connection with, any unlawful activity that constitutes a violation of federal law, that is obtaining federal income tax refunds by false representation in violation of Title 18, United States Code, Section 287 and credit card fraud, in violation of Title 18, United States Code, Section 1029(a)(2), and such transfer, possession, and use was in and affecting interstate commerce, contrary to Title 18, United States Code, Section 1028(a)(7).

Object of the Conspiracy

3. The object of the conspiracy was for defendant DAURY CORDERO and CC-1 and others, both known and unknown, to obtain money from the sale of stolen means of identification.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that CC-1 unlawfully obtained the means of identification – including the name and Social Security Number – of certain individuals.

5. It was further part of the conspiracy that defendant DAURY CORDERO sold and transferred the stolen means of identification to an individual, knowing that the stolen means of identification were to be used to file with the IRS false and fraudulent Individual Income Tax Returns and to fraudulently apply for unauthorized credit card accounts.

Overt Acts

In furtherance of the conspiracy and to effect its object, defendant DAURY CORDERO and his co-conspirators, both known and unknown, committed the following overt acts, among others, in the District of New Jersey and elsewhere:

6. On several occasions in or about January 2016, defendant DAURY CORDERO met with CC-1 and told CC-1, in sum and substance, that if CC-1 saw any materials containing the personal identifying information of others that they could use the information to make some money.

7. On or about January 25, 2016, CC-1 started working at a cleaning service in southern New Jersey.

8. On or about January 29, 2016, while cleaning an office building in Cherry Hill, New Jersey, CC-1 found and took a list that included the names,

Social Security numbers, and date of births for 62 individuals. The top of the list read "Town of Uxbridge" ("Town of Uxbridge list").

9. On or about March 3, 2016, defendant DAURY CORDERO contacted CI-1 to see if that individual could help defendant CORDERO and CC-1 find someone who would help defendant CORDERO and CC-1 file tax returns using the stolen means of identification from the "Town of Uxbridge list."

10. On or about March 3, 2016, defendant DAURY CORDERO provided the "Town of Uxbridge list" to CI-1, with the express instruction that CI-1 return the "Town of Uxbridge list" to defendant CORDERO the next day if CI-1 could not find anyone who could file tax returns.

11. On or about March 4, 2016, after CI-1 contacted defendant DAURY CORDERO and told him that CI-1 had an associate who would purchase the "Town of Uxbridge list" from defendant CORDERO, defendant CORDERO contacted CI-1 and told CI-1 that CC-1 would sell the list for \$2,500.

12. On or about March 15, 2016, defendant DAURY CORDERO and CC-1 met CI-1 and UC-1 in Pennsauken, New Jersey. During the meeting UC-1 told defendant CORDERO that UC-1 would purchase the "Town of Uxbridge list" and would use the list to file tax returns and to apply for credit cards using the means of identification present on the "Town of Uxbridge list." Thereafter, defendant CORDERO received \$2,500 from UC-1 in exchange for the "Town of Uxbridge list."

In violation of Title 18, United States Code, Section 371.

COUNT 2
[18 U.S.C. § 1028 – Unlawful Transfer, Possession, or Use of a Means of Identification]

1. Paragraphs 1 and 3 through 12 of Count 1 of this Indictment are incorporated as if set forth in full herein.

2. Between on or about March 4, 2016 and on or about March 15, 2016, in Camden County, in the District of New Jersey and elsewhere, defendant

DAURY CORDERO

did knowingly transfer, possess and use, without lawful authority, means of identification of another person, to wit, the names, Social Security Numbers, and dates of birth, of 62 individuals, any one of which constitutes a violation, with the intent to commit, and to aid and abet, and in connection with unlawful activity that constitutes a violation of federal law, that is, obtaining a federal income tax refund by false representation in violation of Title 18, United States Code, Section 287 and credit card fraud in violation of Title 18, United States Code, Section 1029(a)(2), and such transfer, possession, and use was in and affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (b)(2)(B), (c)(3)(A), and Title 18, United States Code, Section 2.

A TRUE BILL,



FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

DAURY CORDERO

INDICTMENT FOR

18 U.S.C. § 371
18 U.S.C. § 1028
18 U.S.C. § 2

A True Bill,

~~For~~ person

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