

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 16-
ABRAHAM CORCINO : 18 U.S.C. § 1028(f)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Background

1. At all times relevant to this Information:
 - 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 ABRAHAM CORCINO 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.

c. Co-Conspirator 1 was a resident of Newark, 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, printing fake driver’s licenses and fulfilling customers’ orders.

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, defendant

ABRAHAM CORCINO

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 CORCINO, 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 CORCINO, 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 CORCINO 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.

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

FORFEITURE ALLEGATION

1. As a result of committing the offense alleged in this Information, defendant ABRAHAM CORCINO 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 this Information, defendant ABRAHAM CORCINO 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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INFORMATION FOR

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