

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 14-
 :
 MIGUEL GONZALEZ : 18 U.S.C. § 1349

INFORMATION

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

The Conspiracy

1. From at least as early as January 2010 through in or about July 2013, in the District of New Jersey and elsewhere, defendant

MIGUEL GONZALEZ

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice would affect financial institutions, and, for the purpose of executing such scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communications in interstate and

foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

2. It was the object of the conspiracy for MIGUEL GONZALEZ and others to profit by trafficking and using stolen credit card numbers and related personal identifying information (“Stolen Card Data”).

Manner and Means of the Conspiracy

3. It was part of the conspiracy that from at least as early as January 2010 through in or about July 2013, MIGUEL GONZALEZ purchased Stolen Card Data, including Stolen Card Data relating to accounts held by New Jersey residents, from a number of sources, including various online vendors that sold Stolen Card Data obtained from network intrusions into major retailers and companies.

4. It was further part of the conspiracy that after purchasing Stolen Card Data from online vendors, MIGUEL GONZALEZ typically re-sold the Stolen Card Data to other individuals who then used it to create counterfeit credit cards (“Cloned Cards”), which they used to make unauthorized purchases.

5. It was further part of the conspiracy that MIGUEL GONZALEZ typically arranged for the purchase, sale, receipt, and delivery of Stolen Card Data over the Internet through instant chat software communications or electronic mail messages utilizing interstate wires.

6. It was further part of the conspiracy that, in some instances, MIGUEL GONZALEZ obtained Cloned Cards which he used to make unauthorized purchases.

7. It was further part of the conspiracy that, in total, MIGUEL GONZALEZ possessed and/or trafficked in Stolen Card Data relating to over 114,000 credit card accounts, the illegal use of which resulted in approximately \$23,000,000 in losses to, among others, the various financial institutions that issued the credit cards associated with the Stolen Card Data ("Card Issuers"). Certain Card Issuers who suffered losses as part of the conspiracy described herein were "financial institutions" as that term is defined in Title 18, United States Code, Section 20.

8. It was further part of the conspiracy that MIGUEL GONZALEZ used the proceeds of his illegal activity to purchase, *inter alia*, multiple homes, expensive jewelry, and a high-end speedboat.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby incorporated and realleged by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

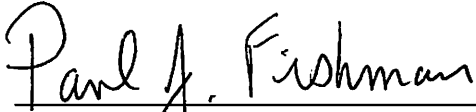
2. The United States hereby gives notice to defendant that, upon conviction of the offense charged in this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

3. If by any act or omission of defendant any of the property subject to forfeiture described above:

- 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 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section

2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

18 U.S.C. § 1349

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