

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
JUAN S. CORDERO, :
DANIEL A. TORRES, :
ALEKSEY SERYY, :
RARNIERY MOLINA, :
a/k/a "Eddy," :
ADAEL ARIEL FIGARO, :
SALAH SAL ALTAWHEEL, :
JOSE F. CORDERO, and :
JEANCARLOS URENA, :
:
Defendants. :
:
----- X

SEALED INDICTMENT

21 Cr.

21 CRIM 132

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

OVERVIEW OF THE SCHEME

1. From at least in or around February 2016 up to and including in or around June 2020, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, and others known and unknown, participated in a criminal fraud ring (the "Fraud Ring") based in the United States and the Dominican Republic. The Fraud Ring committed account takeover fraud and identity theft in the Southern District of New York and elsewhere across the United States. The

primary objective of the Fraud Ring was to obtain iPhones and other electronic devices that were billed to the wireless service accounts of victim accountholders without the accountholders' knowledge or consent.

AT&T BACKGROUND

2. AT&T Wireless ("AT&T") is a provider of, among other things, mobile telephone services. AT&T sells cellphones, as well as wireless telephone and data plans through, among other means, its own physical storefronts and through retailers of electronic devices registered to the AT&T network. AT&T customers may purchase electronic devices, such as iPhones, at such retail locations and may bill the purchase price of the devices to the customers' existing accounts.

3. AT&T customer accounts are accessed using usernames and passwords.

4. An AT&T customer may have up to 10 authorized users on any particular account. Before an authorized user may be added to a particular account, however, AT&T sends a text message to the customer containing a PIN code that must be verified with AT&T.

5. An AT&T customer may reset the username and/or password on the customer's account using only the AT&T wireless telephone number assigned to a particular account. When a customer resets the password in this way, AT&T sends a PIN code

to the AT&T accountholder via text message. The accountholder would then use that PIN code to reset the login credentials on a particular account.

6. An authorized user may, among other things, purchase electronic devices and bill such purchases to the customer account for which the user is authorized.

MEANS AND METHODS OF THE CONSPIRACY

7. In order to effectuate the scheme, the Fraud Ring obtained personally identifying information ("PII") belonging to customers of AT&T in one of two ways:

a. First, the Fraud Ring purchased account information, such as usernames and passwords, belonging to AT&T customers from the dark web, that is, via extensive, sophisticated, and widely used criminal marketplaces operating on the internet for the purpose of selling illegal products and which permit purchasers greater anonymity than is possible on the traditional internet by using a variety of encryption technologies to ensure that communications and transactions are shielded from interception and monitoring. Having purchased the username and password belonging to a particular AT&T customer, a member of the Fraud Ring was able to log into the account of that customer and add a co-conspirator as an authorized user. In order to complete the addition of an authorized user, a member of the Fraud Ring also had to obtain the resulting

confirmatory PIN code sent by AT&T to the true customer. To do so, a member of the Fraud Ring purporting to be an AT&T representative called the customer. When placing these calls, the Fraud Ring used Voice Over Internet Protocol ("VOIP") Technology, which enables a caller to insert a chosen telephone number into the originating caller field. Often the Fraud Ring input numbers affiliated with, or closely related to, AT&T customer service telephone numbers, leading unsuspecting customers to provide their PIN codes based on their belief that they were communicating with representatives of AT&T.

b. Alternatively, the Fraud Ring obtained PII of customer accounts through password reset requests. Using this method, a member of the Fraud Ring, purporting to be an AT&T representative, typically placed a VOIP call to a particular wireless customer and alerted the customer to a forthcoming PIN code. At that point, while still on the line with the AT&T customer, a member of the Fraud Ring reset the password on that customer's account and asked the customer to recite the PIN code just sent via text message. Having obtained the PIN code, the Fraud Ring then changed the password of the customer's account and added a co-conspirator as an authorized user.

8. Next, the member of the Fraud Ring whose name had been added to a particular customer account entered either an AT&T retail location or a retailer of iPhones and electronic devices

registered to the AT&T network. Once at the retail location, the member of the Fraud Ring recently added as an authorized user on the customer's account purchased one or more electronic devices, typically iPhones costing at least \$1000 each. The cost of the devices would be charged to the customer account, while the member of the Fraud Ring making the purchase paid only the taxes and processing fees.

9. Between in or about October 2018 and in or about January 2020, at least 636 AT&T customers received spoofed social engineering calls from approximately 14 VOIP numbers used by the Fraud Ring. All but one of these 636 accountholders had new users added to their accounts that preceded fraudulent cellphone purchases.

10. Members of the Fraud Ring made in-store purchases of iPhones and other electronic devices from retailers in the Southern District of New York and elsewhere in New York, and in 45 other states.

11. Once purchased, the iPhones were sold to buyers nationwide.

12. Following the re-sale of the fraudulently obtained iPhones, JUAN S. CORDERO, the defendant, and other co-conspirators located in the Southern District of New York, wired money to co-conspirators across the county and in the Dominican Republic.

13. Over the course of the conspiracy, the Fraud Ring billed over 4,800 iPhones and other electronic devices to AT&T customer accounts, resulting in over \$4 million in customer losses, which were ultimately absorbed by AT&T.

14. During the course of the conspiracy, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, were added as authorized users to hundreds of AT&T customer accounts. Thousands of iPhones and other electronic devices were then purchased on those compromised customer accounts. For example, during the course of the conspiracy:

a. The name "JUAN S CORDERO" or "JUAN CORDERO" was added as an authorized user to approximately 28 AT&T customer accounts. Approximately 49 iPhones, valued at over \$62,000 were purchased on those customer accounts.

b. The name "DANIEL TORRES," "DANIEL A TORRES" or "DANIELA TORRES" was added as an authorized user to approximately 57 AT&T customer accounts. Approximately 94 iPhones, valued at over \$120,000 were purchased on those customer accounts.

c. The name "ALEKSEY SERYY" or "ALERKSEY SERYY" was added as an authorized user to approximately 261 AT&T customer

accounts. Approximately 522 iPhones, valued at over \$535,000 were purchased on those customer accounts.

d. The name "RARNIERY MOLINA," "RANIERY MOLINA," "RARMIERY MOLINA," or "MOLINA RARNIERY" was added as an authorized user to approximately 342 AT&T customer accounts. Approximately 752 iPhones, valued at over \$760,000 were purchased on those customer accounts.

e. The name "ADAEL ARIEL FIGARO," "ADAEL ARIEL .FIGARÒ," "ADAEL A FIGA," "ADAEL A FIGARO," "ADAEL FIGARO," or "FIGARO ADAEL A" was added as an authorized user to approximately 121 AT&T customer accounts. Approximately 235 iPhones, valued at over \$325,000 were purchased on those customer accounts.

f. The name "SALAH SAH ALTAWHEEL," "ALTAWHEEL SALAH SAL," "SALAHSAL ALTAWHEEL," "SALAH ALTAWHEEL," "ATLAWHEEL SALAHH," "ALTAWHEEL SALAAH SAL," or "ATLAWHEEL SALAH SAL" was added as an authorized user to approximately 60 AT&T customer accounts. Approximately 109 iPhones, valued at over \$145,000 were purchased on those customer accounts.

g. The name "JOSE F. CORDERO" or "JOSE CORDERO" was added as an authorized user to approximately 82 AT&T customer accounts. Approximately 144 iPhones and other handsets, valued at over \$185,000 were purchased on those customer accounts.

h. The name "JEANCARLOS URENA," "JEAN CARLOS URENA," or "JEANCARLO URENA" was added as an authorized user to approximately 140 AT&T customer accounts. Approximately 250 iPhones and other handsets, valued at over \$283,000 were purchased on those customer accounts.

15. During the course of the conspiracy, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, often visited the same retail locations at the same time where they billed iPhones and other electronic devices to AT&T customer accounts to which they had been added as authorized users.

16. On or about June 6, 2016, ALEKSEY SERYY and RARNIERY MOLINA, the defendants, were present at an Apple store in Lone Tree, Colorado, at which each billed iPhones to customer accounts to which they had been added as authorized users.

17. On or about May 21, 2018, JOSE F. CORDERO and JEANCARLOS URENA, the defendants, were present at an Apple Store in Ardmore, Pennsylvania, at which each billed iPhones to customer accounts to which they had been added as authorized users.

18. On or about September 19, 2018, ADAEL ARIEL FIGARO and JEANCARLOS URENA, the defendants, were present at an Apple store in Marlborough, Massachusetts, at which each billed iPhones to

customer accounts to which they had been added as authorized users.

19. On or about May 30, 2019, JUAN S. CORDERO and ALEKSEY SERYY, the defendants, were present at an Apple store in Germantown, Tennessee, at which each billed iPhones to customer accounts to which they had been added as authorized users.

20. On or about June 28, 2019, DANIEL A. TORRES and SALAH SAL ALTAWHEEL, the defendants, were present at an Apple store in Highland Park, Texas, at which each billed iPhones to customer accounts to which they had been added as authorized users.

21. During the course of the conspiracy, JUAN S. CORDERO, DANIEL A. TORRES, ADAEL A. FIGARO, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, conducted WhatsApp chats in which they transmitted PII and PIN codes belonging to AT&T customers, discussed security measures at retail locations and law enforcement lookout tactics, and shared iPhone price lists, as well as the names of secondary iPhone purchasers.

22. During the course of the conspiracy, JUAN S. CORDERO, RARNIERY MOLINA, JOSE F. CORDERO, and JEAN CARLOS URENA, the defendants, wired money to various co-conspirators. For example, during the course of the conspiracy:

a. JUAN S. CORDERO and JOSE F. CORDERO wired a total of over \$3,000 to a co-conspirator located in the Dominican Republic ("CC-1").

b. JUAN S. CORDERO, MOLINA, JOSE F. CORDERO, and URENA wired a total of over \$140,000 to a co-conspirator located in the Dominican Republic ("CC-2").

c. JUAN S. CORDERO, MOLINA, and URENA wired a total of over \$7,800 to a co-conspirator located in the Dominican Republic ("CC-3").

STATUTORY ALLEGATIONS

23. From at least in or around February 2016 up to and including in or around June 2020, in the Southern District of New York and elsewhere, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

24. It was a part and an object of the conspiracy that JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and

did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Wire Fraud)

The Grand Jury further charges:

25. The allegations contained in paragraphs 1 through 22 of this Indictment are repeated and realleged as if fully set forth herein.

26. From at least in or around February 2016 up to and including in or around June 2020, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, willfully and knowingly devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, and aided and abetted the

same, to wit JUAN CORDERO, TORRES, SERYY, MOLINA, FIGARO, ALTAWHEEL, JOSE F. CORDERO, and URENA, the defendants, used fraudulently obtained personally identifying information to add themselves via phone and internet to AT&T customer accounts and then fraudulently billed new iPhones and other devices to such accounts at retail locations.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury further charges:

27. The allegations contained in paragraphs 1 through 22 of this Indictment are repeated and realleged as if fully set forth herein.

28. From at least in or around February 2016 up to and including in or around June 2020, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWHEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, JUAN S. CORDERO, TORRES, SERYY, MOLINA, FIGARO, ALTAWHEEL, JOSE F. CORDERO, and URENA, possessed, used, and transferred the name, social security information, and

other personally identifying information of other individuals to commit the wire fraud offenses charged in Counts One and Two of this Indictment, and aided and abetted the same.

(Title 18, United States Code, Sections 1028A and 2.)

FORFEITURE ALLEGATIONS

29. As a result of committing the offenses alleged in Counts One and Two of this Indictment, JUAN S. CORDERO, DANIEL A. TORRES, ALEKSEY SERYY, RARNIERY MOLINA, a/k/a "Eddy," ADAEL ARIEL FIGARO, SALAH SAL ALTAWEEL, JOSE F. CORDERO, and JEANCARLOS URENA, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

30. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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 Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON

Audrey Strauss IPM
AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

Juan S. Cordero,
Daniel A. Torres,
Aleksey Seryy,
Rarniery Molina,
a/k/a "Eddy,"
Adael Ariel Figaro,
Salah Sal Altaweel,
Jose F. Cordero,
Jeancarlos Urena

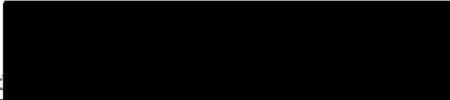
Defendants.

INDICTMENT

21 Cr.

(18 U.S.C. §§ 1349, 1343, 1028A, & 2)

AUDREY STRAUSS
United States Attorney


Foreperson
