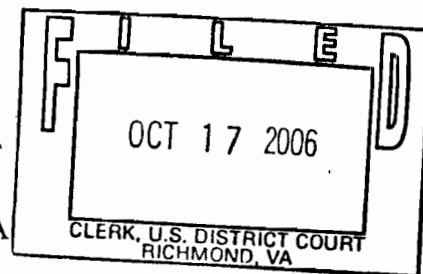


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA



Richmond Division

UNITED STATES OF AMERICA ) Criminal No. 3:06CR 372  
)  
v. ) 18 U.S.C. § 1349  
) (Conspiracy to Commit Bank Fraud)  
DANA CARLOTTA WARREN, ) Count 1  
a.k.a., "Sysco," )  
a.k.a., "Len Tillman," ) 18 U.S.C. § 1029(a)(2)  
a.k.a., "Candace McKinney," ) (Access Device Fraud)  
*Defendant.* ) Counts 2 and 4  
)  
) 18 U.S.C. § 1028A  
) (Aggravated Identity Theft)  
) Counts 3, 5 and 7  
)  
) 18 U.S.C. § 1028(a)(7)  
) (Identity Fraud)  
) Count 6  
)  
) 18 U.S.C. § 981(a)(2),  
) 18 U.S.C. § 1028(b)(5), and  
) 18 U.S.C. § 1029(c)(1)(C)  
) Forfeiture Notice

**INDICTMENT**

OCTOBER 2006 TERM — at Richmond, Virginia

THE GRAND JURY CHARGES THAT:

**COUNT ONE**  
(Conspiracy to Commit Bank Fraud)

Beginning sometime in 2005, the exact date being unknown to the Grand Jury, and continuing up to and including October 12, 2006, in the Eastern District of Virginia and elsewhere, the defendant DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," did conspire, and attempt to conspire, with other individuals both

known and unknown to the Grand Jury, to knowingly execute, and attempt to execute, a scheme and artifice to defraud a financial institution, and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of a financial institution by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

## INTRODUCTION

1. Over the time period described in this Indictment, the defendant, DANA CARLOTTA WARREN, a.k.a., “Sysco,” conspired to engage and engaged in a pattern of activity generally referred to as “carding.” “Carding” describes an assortment of activities revolving around the theft and fraudulent use of credit and debit card account numbers, often through Internet-based activities. Related activities include but are not limited to “phishing,” computer and network “hacking,” “cashing-out” stolen account numbers, Internet auction fraud, and re-shipping schemes.

2. Below is a sample of carding terminology as those terms relate to the allegations in this Indictment:

**BOA** – Carder jargon for Bank of America, a financial institution that provides, among other customer services, credit and debit accounts.

**Cap One/Cap1** – Carder jargon for Capital One, a financial institution that provides, among other customer services, credit and debit accounts.

**Carder** – Slang term used to describe an individual engaged in criminal carding activity.

**Cashing** – The act of obtaining money by committing fraud. This act can be committed in a variety of ways, including: 1) cashing-out Western Union wires,

postal money orders, and/or other financial instruments that were funded using transfers from stolen accounts; 2) using credit and debit card track data with PINs to obtain cash at ATMs; 3) withdrawals from PayPal accounts that received funds via stolen credit and debit accounts; 4) or setting up a bank account with a fake ID to withdraw cash on a credit card account.

**CC** – Slang for credit card. **CCs** is slang for multiple credit cards.

**COB or COBs (Change of Billing)** – Term used to describe the act of changing the billing address on a credit account to match that of a mail drop. This act allows the carder complete takeover capability of the compromised credit card account and increases the probability that the account will not be rejected when being used for Internet transactions.

**Drop** – An intermediary location used to disguise the source or recipient of a transaction (physical address, email address, bank account, *etc.*).

**Dumps** – Information electronically copied from the magnetic stripe on the back of credit or debit cards, including at least Track 2 data, but often Track 1 and Track 2 data. The magnetic stripe on the back of credit and debit cards has three separate tracks, referred to as “Track 1,” “Track 2,” and “Track 3.” Tracks 1 and 2 collectively will always contain information relating to account numbers and PINs, and will often contain such additional information, often in encoded form, as customer name, BIN and CCV (see above). Digital information contained in dumps may be encoded on to plastic cards for use in financial transactions such as ATM withdrawals.

**e-gold** – e-gold is an electronic currency system enabling individuals to create accounts online and transfer money, measured in units of gold or another precious metal, to other e-gold account holders worldwide without the need of exchanging different types of national currencies. Founded in 1996, e-gold is operated by Gold & Silver Reserve, Inc., under e-gold Ltd., which has several corporate offices in the United States. e-gold Ltd. purports to have several tons of precious metal reserves sufficient to back-up its system of electronic currency. e-gold is widely used by carders and others engaged in Internet-based criminal activity because the only valid information necessary to create an account is the user's email address.

**“Fulls,” “Fullz” (Full Info(s))** – Term used to describe a package of data containing multiple types of information about a victim, including many if not all of the following: addresses, phone numbers, social security account numbers, credit or debit account PIN numbers, credit history reports and other personal identifying information. Fulls are used by carders who wish to take over the identity of a person or to sell the identity of a person.

**ICQ** – An abbreviation for “I Seek You.” ICQ is an instant message system owned and operated by America On Line, which uses servers located in the Eastern District of Virginia to process ICQ message traffic. ICQ is the most widely used instant messaging system by carders. ICQ uses a numeric addressing system, *e.g.*, “267906160,” rather than nicknames (*e.g.*, “Sysco”) or email addresses to identify users during online conversations.

**IDs** – Slang for identification documents. Carders market a variety of IDs, including bills, diplomas, driver's licenses, passports, or anything that can be used as an identity document.

**Keylogger** – This is the name for a program often used by cyber criminals for the purpose of recording a victim's keystroke activity, thereby enabling the perpetrator to steal sensitive personal or financial information.

**Magstripe** – The stripe on the back of a credit card is a magnetic stripe, often called a “magstripe.” There are three tracks on the magstripe. Most credit cards use only tracks one and two. Collectively, tracks one and two contain name, account number and banking information. A magstripe reader can understand the information on the three-track stripe. Information obtained by a magstripe reader is often referred to as “swiped” or “dumped” tracks.

**MG** – MoneyGram International, a large money transfer network with over 100,000 locations worldwide.

**Phishing** – Also called “**spamming**” by carders, phishing attacks use both social engineering and technical subterfuge to steal consumers' personal identity data and financial account credentials. Social-engineering schemes use ‘spoofed’ e-mails to lead consumers to counterfeit websites designed to trick recipients into divulging financial data such as credit card numbers, account usernames, passwords and social security numbers. Hijacking brand names of banks, e-retailers and credit card companies, phishers often convince recipients to respond. Technical subterfuge schemes plant crimeware onto PCs to steal credentials directly, often using Trojan keylogger spyware.

**PIN(S) (also “pin(s)”)** – A carding term of the art indicating a credit card or debit card for which the personal identification number has also been obtained. This allows direct cash withdrawals, usually from an ATM, from the account.

**POS (Point of Sale)** – Acronym for a cash register transaction involving the purchase of merchandise with the use of a credit card. Carders also refer to this activity as “**in storing.**”

**Proxies** – Proxies is a term for proxy servers. A proxy server is a computer providing a network service allowing client computers to make indirect network connections to other network services. In the area of Internet-based crime, a proxy server effectively provides a launch pad (with its own accompanying IP address) through which a perpetrator can electronically navigate in an effort to hide his actual IP address. Obscuring a user’s actual IP address significantly complicates investigators’ ability to determine the identity of the user.

**WU** – Western Union, a large money transfer network with over 200,000 locations worldwide.

3. Within the carding community, multiple Internet websites have sprung-up to provide forums and online meeting places for individuals engaged in carding to negotiate deals and business relationships. Such sites include [www.CCpowerForums.com](http://www.CCpowerForums.com) (a.k.a., “CCpower,” or “CCP”), [www.theftservices.com](http://www.theftservices.com) (a.k.a., “Theft Services,” or “TTS”), [www1.mazafaka.ru](http://www1.mazafaka.ru) (a.k.a., “maza”), and [www.darkmarket.org](http://www.darkmarket.org) (a.k.a., “darkmarket,” or “DM”), among others. Most of these sites require members to register before using, and are generally monitored by site administrators linked to carding activity. While there are differences between these websites, as a general rule they provide some or all of the following services:

- Private and public message posting enabling members to offer and exchange services;
- Tutorials regarding various aspects of carding;
- Downloadable exploits such as source code for phishing webpages, and hyperlinks to hacking tools;
- Lists of proxies;
- Areas designated “Hall of Shame,” “Scumbags and Rippers,” or some similar designation used to name and ban individuals who rip-off other site members.

4. At all relevant times in this Indictment, the defendant, DANA CARLOTTA WARREN, lived at 5874 Clate Court, Ellenwood, Georgia. Further, at all relevant times the defendant received Internet broadband service provided by Comcast IP Services (hereafter “Internet service”) at that address through an account that had been subscribed in the name “Tina Turner.”

5. Capital One Bank/FSB, headquartered in Richmond, Virginia, is a federally insured financial institution in accordance with Title 18, United States Code, Section 20.

6. Bank of America, headquartered in Charlotte, North Carolina, is a federally insured financial institution in accordance with Title 18, United States Code, Section 20.

#### **OVERT ACTS**

In furtherance of the conspiracy and to attain the objects thereof, at least one of the following overt acts was committed in the Eastern District of Virginia and elsewhere:

1. On February 3, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to an individual who was a distributor of compromised credit and debit account numbers, (hereafter “Individual No. 1”), stating:

*Hi,*

*El need to know what account # to send the money to bro. And I can do pick ups now. Do u want me to e-gold it to your account or just wire it to you via WU or MG? I need an account # so I can send u your share. I'm not sure if you're getting my messages. I've been asking you all day what your account number is. LOL.*

*But I'm ready for the next pick up, And also what percentage did we agree upon? I couldn't remember if it was 40% or 50%.. And also, did you get the phone number I gave u too? Cuz I gave u a number where u can leave messages with my partner Kym when u need to transfer info of if u just need to get in touch with me. She handles all my calls and has been with me for 2 years now so she's cool.*

*Let me know about the account bro so I can send. Or are you letting me keep the first amount so I can see what it's gonna be like working with u? LOL No but seriously, I look forward to working with you for a long time to come. You don't have to worry about me ripping you. I'm from the ol skool way of doing things. Are you sure this is LEGIT? These people I'm picking up for aren't getting ripped off are they? Cuz it's my face on all these cameras I will be going in front of to pick up this money. LOL*

*Anyways, either leave me an offliner on Yahoo or ICQ or an email at either one of the e-mail addys.*

*Thanks, waiting to hear back from u.*

*Peace*

*Sysco*

2. On February 24, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to "Individual No. 1," stating:

*Hi,*

*No news because I never hear anything anymore from my ID guy. No one's heard from him on the boards. He even took his vendor status down from carders.*

*So, right now the only names that can be picked up on is Dana Warren. Possibly the name Carla Sheering but I don't know if my homegirl has the SS card for that one. They ask to see the SS Card itself at MG, not just the #.*

*If u know of any reliable people that can do IDs, let me know cuz it seems this Phoenix person has disappeared with orders that hasn't been fulfilled. I'm very pissed because I have lost out on a lot of money because of this.*

*Thanks,*

*Sysco*

3. On March 9, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$1048.00 to Individual No. 1's e-gold account using her e-gold account number 2837891, which she had previously set-up under the name "Dana Warren, 1400 McCoollum St., Starke, FL."
4. On March 11, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$332.00 to Individual No. 1's e-gold account using her e-gold account number 2053794, which she had previously set-up under the name "Len Tippin, 1397 Dell St., Jacksonville, FL."
5. On March 15, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebusiness@yahoo.com](mailto:primebusiness@yahoo.com), to "Individual No. 1," stating:

*waiting for fresh full infos and should have them tomorrow, thus bank accounts opened tomorrow... will keep you posted.*
6. On March 16, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebusiness@yahoo.com](mailto:primebusiness@yahoo.com), to "Individual No. 1," stating:

*I have a BOA bank drop ready to receive wires. Tell me info you need. How long will it be before wire is sent? How much? Percentage? And timeframes before the money will be available in the account?*

7. On March 16, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to “Individual No. 1,” stating:

*Bank account name: BOA - Bank Of America  
account name: SHANNON COOPER*

8. On March 22, 2006, “Individual No. 1” sent an email to the defendant, DANA CARLOTTA WARREN, via her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), stating:

*it would be a very good idea not to go to the same MG office each time.*

9. On March 23, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to “Individual No. 1,” stating:

*yeah, I will deposit your \$672 today (uBuyWeRush) and he will fund the e-gold account 2morrow.*

10. On March 24, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$631.68 to Individual No. 1’s e-gold account using her e-gold account number 2053794.

11. On April 1, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$3,359.00 to Individual No. 1’s e-gold account using her e-gold account number 2053794.

12. On April 8, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to Individual No. 1, stating:

*TTS back up and maza, darkmarket is up  
Well, I hope everything will be resolved very soon. We need to get  
back to work ASAP.*

13. On April 11, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to "Individual No. 1," stating:

*\$5850 successfully arrived to shannon cooper yesterday*

*will cash out the \$1700 as well and make cash BOA deposit today and send confirmation e-mail w/ deposit slip to confirm*

*thank you,*

*sysco*

14. On April 12, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$3,354.00 to Individual No. 1's e-gold account using her e-gold account number 2053794.

15. On April 13, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$187.00 to Individual No. 1's e-gold account using her e-gold account number 2053794.

16. On April 14, 2006, the defendant, DANA CARLOTTA WARREN, sent an email from her email account, [primebizness@yahoo.com](mailto:primebizness@yahoo.com), to "Individual No. 1," stating:

*...ubuywerush was short \$1.80 that's it...*

*...let me know about the candice mckinney pick up and any other pending pickups...*

*Thanks,*

*Sysco*

17. On April 15, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$394.00 to Individual No. 1's e-gold account using her e-gold account number 2053794.

18. On April 17, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$1575.00 to Individual No. 1's e-gold account using her e-gold account number

3091750, which she had previously set-up under the name “Candice McKinney, 130 Rocky Point Way, Greenville, South Carolina.”

19. On April 20, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$4,264.78 to Individual No. 1’s e-gold account using her e-gold account number 3091750.
20. On April 21, 2006, the defendant, DANA CARLOTTA WARREN, transferred \$781.00 to Individual No. 1’s e-gold account using her e-gold account number 2053794.
21. On June 21, 2006, the defendant, DANA CARLOTTA WARREN, engaged in an ICQ chat session with a supplier of credit card account numbers (hereafter “Individual No. 2”) in response to a posting she made on [www.theftservices.com](http://www.theftservices.com) looking for new business. During the ICQ chat session, Individual No. 2 agreed to send plastic credit cards or electronic “dumps” and “pins” to the defendant via a drop address she provided. The defendant and Individual No. 2 further agreed that the defendant would cash-out the accounts at ATMs, and split the proceeds 50/50.
22. Sometime between June 21, 2006, and July 22, 2006, the exact date being unknown to the Grand Jury, the defendant, DANA CARLOTTA WARREN, picked-up a Capital One Bank/FSB Platinum Visa Card, Account Number XXXX-XXXX-XXXX-6569, issued in the name of “Todd Cahill,” that had been shipped to her by Individual No. 2 to the address of 5897 Clate Court, Ellenwood, Georgia, 30294.

23. On August 10, 2006, the defendant, DANA CARLOTTA WARREN, engaged in an ICQ chat session with Individual No. 2, and provided the drop address of 4268 Northridge Trail, Ellenwood, Georgia, 30294, for delivery of another credit card.
24. Sometime between August 10, 2006, and August 26, 2006, the exact date being unknown to the Grand Jury, the defendant, DANA CARLOTTA WARREN, picked-up a Capital One Bank/FSB Platinum Mastercard, Account Number XXXX-XXXX-XXXX-3339, issued in the name of "Stacy Herrell," that had been shipped to her by Individual No. 2 to the address of 4268 Northridge Trail, Ellenwood, Georgia, 30294.
25. Sometime between August 10, 2006, and October 12, 2006, the defendant, DANA CARLOTTA WARREN, obtained a fraudulent Georgia Identification Card depicting her photograph, and listing her identity as "Stacy Herrell, 4268 Northridge Trail, Ellenwood, Georgia, 30294."
26. From on or about July 27, 2006, to on or about August 7, 2006, the defendant, DANA CARLOTTA WARREN, made ATM withdrawals using the credit card issued in the name of Todd Cahill, account number ending in 6569, and obtained cash and services, including fees, totalling \$1,113.58.
27. From on or about August 31, 2006, to on or about September 19, 2006, the defendant, DANA CARLOTTA WARREN, made ATM withdrawals using the credit card issued in the name of Stacy Herrell, account number ending in 3339, and obtained cash and services, including fees, totalling \$2,503.01.

28. On September 17, 2006, the defendant, DANA CARLOTTA WARREN, using the name "Sysco," posted to a message to the Internet site [www.Darkmarket.ws](http://www.Darkmarket.ws) requesting the following:

*I need a VERY good carder who can card the following items to my drops:*

*PS3 (note I stated PS3 and NOT PS2!)  
Xbox  
LAPTOPS*

*You must not be greedy and accept a fixed flat rate of payment for the carding and NOT a percentage of the sale of my goods.*

*This will be on a regular basis as I have a lot of buyers lined up for these items. I prefer carders who know how to card shops that use DHL but we can work around this. Please, do NOT ask me to receive items other than the stuff I need, I have no time for that.*

*You will be paid after I receive the goods NOT after I sell the items.*

*SERIOUS inquiries from serious carders only please. I have no time for bullshitters, liars, game players, and rippers.*

*Contact me on ICQ: 329700470 so we can discuss terms and conditions.*

*Be safe all*

*-SYSCO*

---

*BOA Bank Drops  
Mail Drops  
WU & MG Drops*

29. On or about September 24, 2006, the defendant, DANA CARLOTTA WARREN, used her email account [syscoredd@yahoo.com](mailto:syscoredd@yahoo.com), and sent to Individual No. 2 a list

of full information about the following individuals so that Individual No. 2 could establish credit card accounts in their names:

<b>Name</b>	<b>City and State</b>	<b>Social Security Number</b>
Matthew Edwards,	Rex, Georgia	SSN XXX-XX-8869
Kenji Johnson,	Winter Garden, Florida	SSN XXX-XX-2885
Duane Pederson,	Cohasset, Minnesota	SSN XXX-XX-5785
Donald Plante,	Dorchester, Massachusetts	SSN XXX-XX-1867
Gregory Salter,	Dallas, Texas	SSN XXX-XX-8029
Gary Bryan Hart	Cabool, Missouri	SSN XXX-XX-1252
Justin Piot	Ladera Ranch, California	SSN XXX-XX-7223
Chiang Lin	Bellflower, California	SSN XXX-XX-5194
Ronnie Gillins	Hawthorne, Florida	SSN XXX-XX-5413
Robin Duncan	Middlefield, Ohio	SSN XXX-XX-7801
Kevin Schroeder	Tempe, Arizona	SSN XXX-XX-0511
Travi Rambali	Fayetteville, NC	SSN XXX-XX-7077

(All in violation of Title 18, United States Code, Section 1349).

**COUNT TWO**

(Fraud in Connection with Unauthorized Access Device)

From on or about July 27, 2006, to on or about August 7, 2006, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," knowingly and with intent to defraud used one or more unauthorized access devices, to wit, a Capital One Bank/FSB Platinum Visa Account Number XXXX-XXXX-XXXX-6569, issued in the name of "Todd Cahill," and by such conduct obtained \$1,113.58 worth of money, goods, services and anything of value, said use affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 1029(a)(2).)

**COUNT THREE**  
(Aggravated Identity Theft)

From on or about July 27, 2006, to on or about August 7, 2006, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," did knowingly possess and use, without lawful authority, a means of identification of another person, namely, the personal identification number associated with Capital One Bank/FSB Platinum Visa Account Number XXXX-XXXX-XXXX-6569, issued in the name of "Todd Cahill," during and in relation to an offense under 18 U.S.C. § 1029(a)(2), namely, fraud in connection with access devices, an offense enumerated under 18 U.S.C. § 1028A(c)(4).

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

**COUNT FOUR**  
(Fraud in Connection with Unauthorized Access Device)

From on or about August 31, 2006, to on or about September 19, 2006, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," knowingly and with intent to defraud used one or more unauthorized access devices, to wit, a Capital One Bank/FSB Platinum Mastercard Account Number XXXX-XXXX-XXXX-3339, issued in the name of "Stacy Herrell," and by such conduct obtained \$2,503.01 worth of money, goods, services and anything of value, said use affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 1029(a)(2).)

**COUNT FIVE**  
(Aggravated Identity Theft)

From on or about August 31, 2006, to on or about September 19, 2006, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," did knowingly possess and use, without lawful authority, a means of identification of another person, namely, the personal identification number associated with Capital One Bank/FSB Platinum Mastercard Account Number XXXX-XXXX-XXXX-3339, issued in the name of "Stacy Herrell," during and in relation to an offense under 18 U.S.C. § 1029(a)(2), namely, fraud in connection with access devices, an offense enumerated under 18 U.S.C. § 1028A(c)(4).  
(In violation of Title 18, United States Code, Section 1028A.)

**COUNT SIX**  
(Identification Fraud)

On or about September 24, 2006, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," did knowingly transfer in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit, the name, social security number, and date of birth of Matthew Edwards, with the intent to commit, or to aid or abet, any unlawful activity that constitutes a violation of Federal law, to wit, access device fraud in violation of 18 U.S.C. § 1029(a)(2).  
(In violation of Title 18, United States Code, Section 1028(a)(7).)

**COUNT SEVEN**  
(Aggravated Identity Theft)

On or about September 24, 2006, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, namely, the social security number of Matthew Edwards, during and in relation to an offense under 18 U.S.C. § 1029(a)(6)(A) and (B), namely, fraud in connection with access devices, an offense enumerated under 18 U.S.C. § 1028A(c)(4).

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

**Notice of Forfeiture**

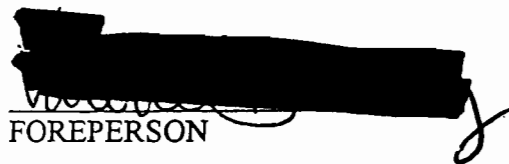
Pursuant to Rules 7(c)(2) and 32.2(a) FED. R. CRIM. P., and in accordance with Title 18, United States Code, the defendant, DANA CARLOTTA WARREN, a.k.a., "Sysco," a.k.a., "Len Tillman," a.k.a., "Candace McKinney," is hereby notified that, if convicted of any of the offenses charged in Counts One through Seven, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of the violations charged in Counts One through Seven, and as to Counts Two through Seven, the defendant shall also forfeit any personal property used or intended to be used to commit the offense, including the following evidence seized on October 12, 2006, from 5897 Clate Court, Ellenwood, Georgia:

**Assorted computers and associated peripheral devices;  
Removable media (CDs, DVDs, zip drives, diskettes, etc.);  
Counterfeit identification documents;  
Unauthorized access devices in any form, and  
Sums of cash.**

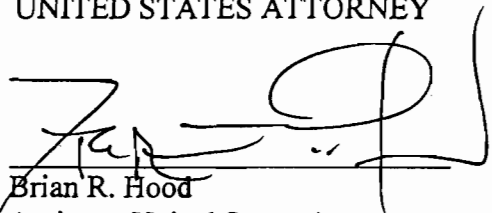
If property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

(In accordance with Title 18, United States Code, Sections 982(a)(2), 1028(b)(5) and 1029(c)(1)(C).)

A TRUE BILL:

  
FOREPERSON

CHUCK ROSENBERG  
UNITED STATES ATTORNEY

  
Brian R. Hood  
Assistant United States Attorney

No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

THE UNITED STATES OF AMERICA

vs.

**DANA CARLOTTA WARREN**  
a.k.a. "Sysco"  
a.k.a. "Len Tillman"  
a.k.a. "Candace McKinney"

**INDICTMENT**

In violation of 18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud  
In violation of 18 U.S.C. §§ 1029(a)(2) & 2 - Access Device Fraud  
In violation of 18 U.S.C. § 1028A - Aggravated Identity Theft  
In violation of 18 U.S.C. § 1028(a)(7) - Identity Fraud

A true bill.

Foreman

Filed in open court this \_\_\_\_\_ day, of \_\_\_\_\_ A. D. 20\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_