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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Joseph A. Dickson  
 :  
 v. : Mag. No. 20-8150  
 :  
 MICHAEL FULCHER : **CRIMINAL COMPLAINT**

I, Raymond Berentes, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Secret Service, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

/s/ Raymond Berentes  
Special Agent Raymond Berentes  
United States Secret Service

Sworn and subscribed to me telephonically,  
May 6, 2020 in Essex County, New Jersey

HONORABLE JOSEPH A. DICKSON  
UNITED STATES MAGISTRATE JUDGE

/s/ JOSEPH A. DICKSON  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One**  
**(Possession of Fifteen or More Counterfeit Access Devices)**

On or about March 23, 2020, in Bergen County, in the District of New Jersey and elsewhere, the defendant

MICHAEL FULCHER

did knowingly and with intent to defraud, possess at least fifteen counterfeit and unauthorized access devices, as defined in Title 18, United States Code, Sections 1029(e)(1)-(3), namely counterfeit and unauthorized credit cards, in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(3) and (c)(1)(A)(i).

**Count Two**  
**(Possession of Access Device-Making Equipment)**

On or about March 23, 2020, in Bergen County, in the District of New Jersey and elsewhere, the defendant

MICHAEL FULCHER

did knowingly and with intent to defraud, produce, traffic in, have custody and control of, and possess access device-making equipment, as defined in Title 18, United States Code, Section 1029(e)(6), in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(4) and (c)(1)(A)(ii).

**Count Three**  
**(Aggravated Identity Theft)**

On or about March 23, 2020, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

MICHAEL FULCHER

did knowingly possess without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Title 18, United States Code, Section 1343, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

## **ATTACHMENT B**

I, Raymond Berentes, am a Special Agent with the United States Secret Service ("USSS"). I have knowledge about the facts set forth below from my involvement in the investigation, my review of reports, documents, pictures, videos, witness interviews, discussions with other law enforcement officials, and my training and experience. This affidavit is submitted for a limited purpose, and I have not set forth each and every fact that I know concerning this investigation. All statements described herein are relayed in substance and in part.

1. On or about March 23, 2020, law enforcement officers with the Teaneck Police Department responded to a 911 call, that was made by a male who was later identified as the defendant MICHAEL FULCHER (hereinafter, "FULCHER"), reporting a burglary in progress at FULCHER's residence. Upon searching two suspects found in FULCHER's residence and further investigation, the officers observed several counterfeit driver's licenses with FULCHER's photograph as well as a book bag which was filled with fraudulent credit cards, fraudulent identification cards, U.S. currency, and parts of a firearm that the two suspects took from FULCHER's residence.

2. The officers subsequently obtained a search warrant from a New Jersey State Judge and conducted a lawful search of FULCHER's residence in Teaneck, New Jersey. In the residence, law enforcement officers found, among other things, 4,920 counterfeit credit cards, several thousand blank plastic cards used to produce counterfeit credit cards, 206 counterfeit driver's licenses from 24 different states containing victims' personal identifiable information along with unknown suspect photographs, several state's holograms for driver's licenses, devices used to read the data that is encoded on the magnetic strip of a credit card, devices used to re-encode data onto the magnetic strip of a credit card, printers designed to print plastic cards, and several laptop computers, hard drives, memory devices, and other electronic devices.

3. After obtaining a search warrant from the Honorable Edward S. Kiel, United States Magistrate Judge for the District of New Jersey, Agents with the USSS conducted a forensic analysis of the electronic devices found in FULCHER's residence, including the laptop computers, hard drives, memory devices, and cellular phones. On these devices, law enforcement agents found, among other things, templates to create credit cards, currency, and identification documents, including driver's licenses, and spreadsheets containing thousands of unique credit card account numbers.

4. Based upon my training and experience, FULCHER was in possession of all of the necessary items to operate a large-scale access device-making plant. Not only was FULCHER in possession of thousands of unique active credit card

account numbers on his electronic storage devices, but FULCHER also possessed the access device-making equipment necessary to re-encode that data onto counterfeit credit cards, including re-encoding devices, thousands of plastic credit cards, and plastic card printers. Additionally, FULCHER possessed several counterfeit credit cards, counterfeit currency and counterfeit identification documents.