

# CALL TO ACTION: THE GROWING EPIDEMIC OF COUNTERFEIT IDENTITY DOCUMENTS AND PRACTICAL STEPS TO COMBAT IT

The commercial, academic and government members of the Document Security Alliance have teamed together to provide an informative summary of the growing epidemic of counterfeit identity documents and the practical steps to combat it. We stand prepared to provide assistance and answer questions to help government organizations improve the security of their identity documents.

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## THE PROBLEM – HIGH QUALITY COUNTERFEITS ARE FLOODING AMERICA

*Off-shore counterfeiting rings in particular, and counterfeit rings resident in the United States are using scanning and image manipulation technology along with advanced software and printers to produce counterfeit driver's licenses which are very difficult to discern from valid driver's licenses. These counterfeits are being successfully passed in a variety of critical day-to-day situations.*

***Because of REAL ID Act compliance and increased use by states of identity verification systems such as SSOLV and SAVE, those living or operating under assumed names are increasingly finding themselves blocked at driver's license issuing agencies when attempting to get "valid" identification. Consequently, they seek high quality driver's license counterfeits and counterfeit "breeder documents" such as birth certificates.***

There is a growing sophistication in high quality counterfeit driver's licenses and state issued IDs, some of which are produced overseas and others in major metropolitan areas by professional criminals. In particular, there is a virtual flood of low cost, high quality counterfeits being shipped by the tens of thousands from China via the website *IDChief.ph*. Although this site is the most prominent, it is not unique.

Enforcement of important U.S. laws, as well as our safety and security is threatened, as purchasers of counterfeit IDs use them for purposes beyond underage drinking. The federal program for verifying eligible employees (E-Verify) and the National Instant Criminal Background Check System (NICS) used by gun stores to comply with the Brady Handgun Violence Protection Act both depend on the reliability of IDs (usually driver's licenses) presented by those subject to the check.

Federal and state laws recognize three types of "false" identity documents:

1. Counterfeit identity documents that emulate the features and characteristics of valid IDs issued by state and federal governments. For decades, the preferred counterfeit ID is a counterfeit driver's license with an unexpired date.
2. Valid identity documents, usually issued in the name of a fictitious or stolen identity, obtained through fraudulent means.
3. Valid identity documents that have been altered after issuance to change a name, photo image, age, or other biographic descriptor.





## ***Driver's Licenses are a Favorite Target for ID Counterfeiters***

Driver's licenses are the document of choice for identity purposes in the United States.

- A valid driver's license will get someone onto any domestic airline flight within the United States.
- Visual authentication of any secure document, such as a driver's license, normally requires the inspector to make a quick determination that features from the document, like the photograph, demographic information, security features, and substrate are genuine.
- Driver's licenses or passports are required for Brady Gun Checks and by employers using E-Verify. They are also required as proof of identification for boarding airplanes and for listed (controlled) pharmaceutical products like Oxycontin and Methamphetamine.

## **Counterfeit IDs impact National Security, Homeland Security, Public Safety and the Economy!**

**Public Safety:** (1) Underage drinking and habitual DUI offenders on the highways; (2) Increased levels of fraudulent retail and internet purchases of controlled substances such as amphetamines, barbiturates, and narcotics such as hydrocodone and oxycodone.

According to the Department of Justice, in 2007, American society suffered an estimated \$193 billion in losses from illicit drug use through crime, health and productivity costs. A 2011 report indicated that 16% of inmates in federal prisons convicted on

forgery and fraud charges have their offenses classified as "drug-induced". Additionally, 39% of those in jail and 42% of those in state and local prisons on convictions of forgery and fraud have their crimes classified as "drug-induced".<sup>1</sup> In nearly all cases, the link occurs because drug addicts can purchase controlled drugs using counterfeit IDs, especially when combined with counterfeit doctors' prescriptions.

**Homeland Security:** Increased levels of illegal gun purchases as brought to light by recent Mexican cartel activities and drug distribution rings in major U.S. cities. Using a counterfeit driver's license is a common method used by felons and straw purchasers to avoid detection by NICS checks.

Over the last five years, Mexican authorities have confiscated over 94,000 firearms, 64,000 of which originated in the US. Weapons from "Fast & Furious", are also coming back into the US.<sup>2</sup> It has been known for many years felons and straw buyers of guns rely on fake IDs to disguise their true identities, so many arrested are convicted of forgery and fraud as well as for illegal gun purchases.<sup>3</sup>

**National Security:** Jihadist terrorists and homegrown extremists have used counterfeit driver's licenses to rent cars and trucks, and to buy chemicals or certain fertilizers to derive high potency explosive components. Examples include Oklahoma City bomber Timothy McVeigh.

The 9/11 Commission Report states unequivocally that "Travel documents are as important as weapons" (p. 384) Recently, the indictment of terrorist suspect Ali Saleh Kahlal al-Marri, who has been linked to alleged Sept. 11 paymaster Mustafa Ahmed al-Hawsawi, stated that al-Marri was arrested with a laptop computer that had 1,000 stolen credit cards account numbers on it, along with a host of Internet bookmarks pointing to fraud and fake ID-related sites.

**Crime:** The "DC Sniper" John Muhammad was a proficient dealer in counterfeit driver's licenses, both to assist his illegal alien smuggling activities in Antigua, and for domestic criminal purposes.

Criminals often use counterfeits to conceal their fictitious or stolen identities to commit crimes, and/or hide from law enforcement.

The Ben Bernanke check fraud case was part of a multi-state gang operation that successfully used counterfeit driver's licenses to drain bank accounts.

## ***State and Federal Law Enforcement Are On the Job but Overwhelmed***

***Enforcing federal laws is critical to stopping the flood of counterfeit driver's licenses. To constrain lawbreakers using counterfeit IDs, an ounce of prevention, through an aggressive defense, will enhance public safety and significantly reduce financial losses to federal agencies and institutions. The resources expended to prosecute the providers and users of counterfeit ID's are a fraction of the benefit returned in reducing economic losses experienced by both the federal government and commercial businesses.***

<sup>1</sup> Department of Justice: National Intelligence Center. "Economic Impact of Illicit Drug Use on American Society." April 2011. Pp ix, 56-62.

<sup>2</sup> "[O]f the nearly 94,000 [weapons] that have been recovered that have been traced in Mexico in recent years, over 64,000 of those guns were sourced to the United States of America; 64,000 of 94,000 guns sourced to this country."— Attorney General Holder, 11/8/11, Senate Judiciary Committee Hearing.

<sup>3</sup> Pierre Thomas, "In the Line of Fire: The 'Straw Purchase' Scam," *The Washington Post* (August 18, 1991); and Thomas, "Va. Driver's License is Loophole for Guns: Fake Addresses Used in No-Wait Sales," *The Washington Post* (January 20, 1992).



This summer (2011), U.S. Custom and Border Protection spokesman Brian Bell described the surge of counterfeit IDs coming in from overseas. "Since January we have caught about 15,000 IDs," Bell said. "In the past we would see maybe 10 to 15 per year." In July 2011, officers in a Chicago suburb arrested 40 students between the ages of 17-20 for licenses that were hidden inside a game shipped from China. The shipment contained 1,700 fake IDs, according to the Cook County Sheriff's office.<sup>4</sup>

In February, a high-tech fake identification mill in Layton, Utah was dismantled by the Utah Attorney General's SECURE Strike Force when special agents arrested three illegal aliens and seized equipment used to make a wide assortment of identity cards from different states and countries. Agents seized computers, printers, laminating machine, cutters and high quality blank printing stock. They also confiscated Mexican consular identification cards, driver licenses from Utah and other states, Social Security cards and electrician licenses. SECURE Strike Force Commander Rhett McQuiston said, "We found incredibly realistic-looking identification documents. We have also never seen anyone creating false identification cards from so many states and federal government agencies."<sup>5</sup>

Also in February, investigators from the North Carolina Motor Vehicle Department responded to a tip from a temporary agency that people were using what appeared to be fake identification documents when applying for jobs. Investigators found fake driver's licenses from several states including North Carolina, Texas and California. They also found fake Social Security Cards and

Permanent Resident cards. "They had the capability of making fake ID's from any state," lead investigator Jessica Walker said. Although the suspects in this case are illegal Mexican immigrants, that's not always the case, said District Supervisor Rena Rikard of the Department of Motor Vehicles. "There are a lot of people out there doing this," she said. "It's not just Mexicans who are doing it either – it's everybody."

The recent wave of foreign produced high quality Fake IDs are difficult to discern without the use of technology or people well trained in forensic document analysis, using the special tools of the trade. Those states working to comply with REAL ID rules are training DMV personnel and local law enforcement to recognize counterfeit Driver's Licenses, notably Ohio, New Jersey, New York, Connecticut and Florida. Many other states, however, provide little or no comparable forensic document training to local law enforcement. There is also very limited use of card scanning technology by state and federal law enforcement or security personnel at ID checkpoints at airports and elsewhere.

## There are Solutions

Law enforcement actions by federal officials, led by the FBI and ICE, are notable, but are only capable of arresting a small proportion of the criminal gangs who produce and sell the counterfeits. To be more effective, the following solutions should be considered:

**Train our gatekeepers:** Frontline personnel in vulnerable areas of commerce, federal building security personnel and local police should become trained in basic methods of identity document authentication, and have tools available to assist in distinguishing

counterfeit IDs from valid IDs. Reference guides to state licenses are essential tools for authentication, as counterfeit driver's licenses are most often used in states other than the state from which the document is counterfeited.

**Stronger card security** for state and federal issued IDs and Driver's Licenses:

- Incorporation of levels 1, 2, and 3 security features into documents.
- Better understanding and usage of advanced authentication technologies. There are a variety of effective, easy to verify optical technologies which cannot be easily copied. These can be combined with other level 2 and 3 security features to form a layered approach to security that has proven effective.

**Specialized and secure card production materials** designed to prevent counterfeiting and that are limited in access and costly to obtain.

**Use of ID card scanning technology** for routine inspections of IDs to detect counterfeits

- Use of technology that does more than verify a bar code. Because sophisticated ID counterfeits produce bar codes that are impossible to differentiate from valid IDs, ID readers MUST be able to verify security features as well as bar codes.

<sup>4</sup> Staver, Anna. [Kent Patch](#). "Kent State Students Reach Deal on Fake ID Charges". 10/6/11.

<sup>5</sup> [http://attorneygeneral.utah.gov/PR\\_030311a.html](http://attorneygeneral.utah.gov/PR_030311a.html)



**Congress Needs to Affirm our National Commitment to Reduce Financial and Social Losses from Counterfeiting**

*We recommend Congress emphasize strong support for enforcement of federal anti-counterfeit, law enforcement task forces. Congressional oversight should challenge the Office of U.S. Attorneys to actively prosecute alleged criminal offenders.*

- Previously, ICE put more resources into counterfeit and fraudulent document task forces. This has been de-emphasized over the past two years. Congressional interest in DHS' efforts to investigate and prosecute criminal rings would increase ICE's resource allocation. The FBI has begun to more actively investigate and prosecute international criminals using counterfeit identity documents. Congressional support for these activities would lead to a greater resource allocation by the Department of Justice.

*We recommend the continuation of Department of Homeland Security grants supporting forensic document training for local law enforcement.*

- These grants expand the capability of state and local police to identify those presenting counterfeit documents. This is of great importance as those representing local governments are the first lines of defense against counterfeit identity documents.

*We recommend Congressional committees of jurisdiction request a GAO review of the federal agencies involved in fraud and counterfeit defense to assess and measure their improvements. They should consider adding this requirement to the respective Offices of*

*Inspector General of the federal agencies most at risk of financial loss through crimes enabled by counterfeit identity documents.*

- Existing federal laws to penalize the use of counterfeit IDs are tangential to other fraud statutes – hence these crimes are rarely prosecuted. Additional Congressional Oversight would increase attention to requiring use of federal agencies to identify counterfeit IDs used to access federal buildings.

**Law enforcement agencies can use existing federal laws to prosecute and penalize criminals who counterfeit IDs and driver's licenses!**

1. 18 U.S.C. Section 1028(a)(5) B Possession of Document-Making Implements;
2. 18 U.S.C. Section 1028(a)(8) B Trafficking in False Authentication Features;
3. 18 U.S.C. Section 1342 B Using a Fictitious Name or Address;
4. 18 U.S.C. Section 1546 B Fraud & Misuse of Visas, Permits, & Other Documents;
5. 18 U.S.C. Section 371 B Conspiracy;
6. 18 U.S.C. Section 1326(a), (b)(2) B Illegal Alien Found in the U.S. Following Deportation

A 2011 Los Angeles criminal case illustrates how federal statutes were used to prosecute more than two dozen individuals in a massive fraudulent document operation. The ID ring was producing counterfeit driver's licenses for 40 of 50 U.S. states. These counterfeit IDs were used in the "commission of credit and bank fraud, tax fraud, identity theft, and pharmaceutical diversion schemes... the false document manufacturing ring produced raw materials for the manufacture of thousands of documents per month that were distributed in California and across the United States."<sup>6</sup>

**The DSA recommends our Congressional leadership support counterfeit ID prevention in a manner that prioritizes public safety, fraud reduction, and the optimization of collected revenues.**

ID counterfeiting facilitates a wide range of illegal activities. The cost to society far exceeds the naïve popular perception that "Fake IDs" are only for underage kids trying to get into a tavern. Counterfeit IDs are a primary means to fraudulently obtain access, benefits, and prescription drugs for illegal use. Transnational criminal gangs operate across the United States counterfeiting driver's licenses, birth certificates, and other identity documents costing consumers, businesses and government benefits agencies hundreds of \$millions annually. ID Counterfeiting has become a major gateway for criminals to steal, injure and, in some cases, terrorize the public.

Federal laws sufficient to criminalize ID counterfeiting already exist, as do the agencies authorized to enforce them. As Congress considers how best to reduce the current deficit, it's important to consider that the fraud prevention savings to commerce and society well exceeds enforcement costs. Our nation's commitment to continue to fund identity document protection should not be in question.

<sup>6</sup> FBI Press Release, 11/3/11: [http://www.fbi.gov/losangeles/press-releases/2011/more-than-two-dozen-identified-in-massive-fraudulent-document-manufacturing-operation-in-los-angeles?utm\\_campaign=email-lmmediate&utm\\_medium=email&utm\\_source=los-angeles-press-releases&utm\\_content=43810](http://www.fbi.gov/losangeles/press-releases/2011/more-than-two-dozen-identified-in-massive-fraudulent-document-manufacturing-operation-in-los-angeles?utm_campaign=email-lmmediate&utm_medium=email&utm_source=los-angeles-press-releases&utm_content=43810)



APPENDIX

Important Federal Definitions to Prosecution of ID Counterfeiting Crimes:

TERM	DEFINITION	US CODE
<b>Authentication Feature</b>	the term "authentication feature" means any hologram, watermark, certification, symbol, code, image, sequence of numbers or letters, or other feature that either individually or in combination with another feature is used by the issuing authority on an identification document, document-making implement, or means of identification to determine if the document is counterfeit, altered, or otherwise falsified;	18 USC 1028 (d)(1)
<b>Identification Document</b>	the term "identification document" means a document made or issued by or under the authority of the United States Government, a State, political subdivision of a State, a sponsoring entity of an event designated as a special event of national significance, a foreign government, political subdivision of a foreign government, an international governmental or an international quasi-governmental organization which, when completed with information concerning a particular individual, is of a type intended or commonly accepted for the purpose of identification of individuals;	18 USC 1028 (d)(3)
<b>False Identification Document</b>	the term "false identification document" means a document of a type intended or commonly accepted for the purposes of identification of individuals that--  (A) is not issued by or under the authority of a governmental entity or was issued under the authority of a governmental entity but was subsequently altered for purposes of deceit; and  (B) appears to be issued by or under the authority of the United States Government, a State, a political subdivision of a State, a sponsoring entity of an event designated by the President as a special event of national significance, a foreign government, a political subdivision of a foreign government, or an international governmental or quasi-governmental organization	18 USC 1028 (d)(4)





<p><b>False Authentication Feature</b></p>	<p>the term "false authentication feature" means an authentication feature that--</p> <p>(A) is genuine in origin, but, without the authorization of the issuing authority, has been tampered with or altered for purposes of deceit;</p> <p>(B) is genuine, but has been distributed, or is intended for distribution, without the authorization of the issuing authority and not in connection with a lawfully made identification document, document-making implement, or means of identification to which such authentication feature is intended to be affixed or embedded by the respective issuing authority; or</p> <p>(C) appears to be genuine, but is not</p>	<p>18 USC 1028 (d)(5)</p>
<p><b>Issuing Authority</b></p>	<p>the term "issuing authority"--</p> <p>(A) means any governmental entity or agency that is authorized to issue identification documents, means of identification, or authentication features; and</p> <p>(B) includes the United States Government, a State, a political subdivision of a State, a sponsoring entity of an event designated by the President as a special event of national significance, a foreign government, a political subdivision of a foreign government, or an international government or quasi-governmental organization</p>	<p>18 USC 1028 (d)(6)</p>

The Document Security Alliance (DSA) is a not-for-profit organization created by government agencies, private industry and academia in the months after September 11, 2001. Since that time DSA has worked to improve document security at all levels of government and enhance our nation's economic, personal, and homeland security for the 21st century. DSA's goal is to identify methods of improving security documents and related procedures to combat fraud, terrorism, illegal immigration, identity theft, and other criminal acts. The DSA members – in both government and private industry – draw upon a wide range of knowledge and detailed technical disciplines to accomplish this goal. The group is committed to developing recommendations for appropriate federal and state government agencies, private industry, and policymakers



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# ATTACHMENT 1: FRAUDULENT DOCUMENT ENTERPRISE

## THIRTY INDICTED IN US COURT FOR INVOLVEMENT IN VIOLENT IDENTITY DOCUMENT COUNTERFEIT RING

### *A Flourishing Fraudulent Document Enterprise (FDE):*

This particular Fraudulent Document Enterprise (FDE)<sup>1</sup> was a massive, complex, and transnational counterfeit identification document manufacturing ring, operating in 19 different U.S. cities across 11 states, with a base of operations in Mexico. The criminal organization's members and associates engaged in the illegal acts

<sup>1</sup> A Fraudulent Document Enterprise is defined by Title 18, USC, Section 1961(4) that is a group of individuals associated in fact although not a legal entity. An FDE is a form of organized crime. In this particular case, the gang was also part of a transnational organized criminal gang, where the owners and managers are located outside the United States.

of false document trafficking, money laundering, kidnapping and murder. FDE is a highly organized gang with a cell based structure, a multi-level chain of command, and supervision from within Mexico. Federal prosecutors say the organization functioned like a "multinational corporation". The group was identified and "dismantled" by Immigrations and Customs Enforcement (ICE) agents, charging thirty for their involvement within the enterprise. Twenty seven of the defendants have pleaded guilty. However, the management team remains at large in Mexico, and it is likely that new FDEs will be established to meet the demand.

ICE reports that this gang was unique only for its high level of violence, but similar counterfeit document rings are operating all over the country. The gang's leader went by the name "El Muerto," Spanish for the "dead one." The gang did not hesitate to attack

competing gangs with physical force or murder.

### *Counterfeit IDs Manufactured and Sold:*

This gang produced and sold driver's licenses, state ID cards, foreign driver's licenses, Permanent Resident Alien cards, Social Security cards, foreign identification cards. Nearly 2,000 fraudulent documents were seized by authorities, along with computers, printers, packages of card-making stock, and other miscellaneous document making tools.

### *Where:*

Virginia Beach, VA  
Chelsea, MA,  
Richmond, VA,  
Norfolk, VA ,  
Manassas, VA  
Fayetteville, AR  
Little Rock, AR  
New Haven, CT  
Mishawaka, IN  
Lexington, KY  
Louisville, KY  
St. Louis, MO  
Chapel Hill, NC  
Greensboro, NC  
Raleigh, NC  
Wilmington, NC  
Cincinnati, OH  
Providence, RI  
Nashville, TN





**Murder:**

Gang cells used strong violence to drive out competition within each city of operations, including kidnappings, beatings, and murder. In July 2010, Edy Oliveres-Jiminez, the leader of the gang's Little Rock cell, kidnapped a competitor, bound, gagged, and blindfolded him and then beat him to death.

**Money:**

The documents were sold at \$150 - \$250 per set of two. Usually, this was a Permanent Resident Alien (Green) card along with a Social Security card, for example. A tracking of Western Union wire transfers from cell leaders to upper management in Mexico showed a total of more than \$1,000,000 in illicit funds moved from January 2008 to November 2010.

**Can the Widespread ID Counterfeiting Enterprises Be Stymied by Prevention?**

Too many state drivers' licenses are too easily counterfeited. Because driver's licenses will only become more valuable to felons and others as a way

to evade federal and state laws in the future, it's critical that state DMVs incorporate new technologies in identity documents issued, including driver's licenses. Many of these new technologies have proven to be nearly counterfeit proof. Had the targeted states' driver's license issuing agencies incorporated more security features into their documents, the driver's licenses and ID cards would not have "passed" scrutiny and been so widely accepted. States can also do much more to provide training to merchants, banks, and employers so they are alert to counterfeit IDs.

**Quotes:**

*The gang is "devoted to the production and sale of false identification documents".*

- Federal Indictment

*They really ran this like a business and used a business model where people would be promoted based on the amount of money they brought in.*

- John Torres, ICE

*Based on the guilty plea today, the hope and expectation is that it will*

*have a chilling effect ... on this type of activity.*

- Neil MacBride,  
Federal Prosecutor  
overseeing the case

**Far-reaching fake document ring**

Israel Cruz Millan is charged with managing a fraud business with cells in 19 cities and 11 states that the U.S. government says funneled at least \$1 million to its top leaders in Mexico.

Source: U.S. Attorney's Office for the Eastern District of Virginia

By Julie Snider, USA TODAY



**Sources:**

United States District Court for the Eastern District of Virginia v. Israel Cruz Milan, et al. Criminal No. 3:10cr308. 2/23/11.

O'Dell, Larry. "U.S. fake ID case nets guilty plea". Associated Press. 11/16/11.

Johnson, Kevin. "Prosecutors pursue fraud ring, cite 'unprecedented' violence". USA Today. 3/7/11

"Guilty plea for man in violent fake ID case". Associated Press. 11/15/11.

**December 2011**

## IDENTITY DOCUMENTS

# ATTACHMENT 2: WHERE DRIVER'S LICENSES AND ID CARDS ARE REQUIRED PROOFS OF IDENTITY

### WHERE ARE DRIVER'S LICENSES REQUIRED AS PROOFS OF IDENTITY?

A driver's license is the preferred identification document for law enforcement, employment and commercial businesses. It is only when a patrolman stops a speeding driver, or a traffic accident occurs, that a driver's license is used to prove lawful eligibility to operate a motor vehicle. When we stop at a bank

teller line, or the bank's drive through teller, we are accustomed to provide our driver's license as proof of identity to cash checks or withdraw funds. A driver's license is used to prove identity to apply for a job, purchase a gun, or board an airplane. Every adult needs a driver's license or a state issued identification card as a fact of everyday life.

As security measures have tightened throughout the past decade, so has the need for accurate identification verification. Along with airports and federal facilities,

businesses have also been increasingly reliant on the driver's license as an accurate proof of identity.

***The listed locations require driver's licenses and state issued ID cards or passports. That is, everyone must offer proof that you are who you say you are.***

The locations are categorized as National Security, Homeland Security, and Public Safety, as well as all three combined.

#### **National Security**

Maritime workers  
Ports

#### **Homeland Security**

Federal facilities  
Cruise ships  
Truck rental office

#### **Public Safety**

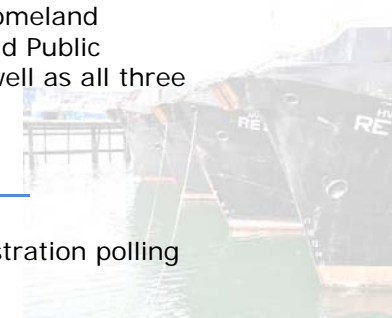
Teachers  
Home health care workers  
Elder care workers  
Child care providers  
Indian gaming  
Nursing homes  
Loan originators

SSA offices  
Public assistance offices  
Tavern  
Restaurant  
Check cashing offices  
Banks  
Credit unions  
Office of vital records  
Post office  
Courthouses  
Hotels  
Sporting goods stores  
Retail alcohol / tobacco sales locations  
Public schools  
Colleges  
Casinos  
Pharmacies

Voting/registration polling places  
Jury duty  
Town clerk  
Marriage license

#### **All of the Above**

Private security guards  
Airport workers  
Hazmat drivers  
TSA  
DMV  
Firearms dealers  
Employers  
Highway patrol  
Trains  
Office building security



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