

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRANKO BOGDANOV,  
also known as “Franko Kalath”;  
LELA BOGDANOV; and  
JULIA BOGDANOV

CASE NUMBER:  
**UNDER SEAL**

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about February 21, 2014, at Northbrook, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2314	transported in interstate commerce goods and merchandise of a value of \$5,000 or more, knowing the same to have been stolen

This criminal complaint is based upon these facts:

  X   Continued on the attached sheet.

\_\_\_\_\_  
SHANNON L. MCDOWELL  
Special Agent, United States Secret Service  
(USSS)

Sworn to before me and signed in my presence.

Date: March 4, 2014

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

\_\_\_\_\_  
MICHAEL T. MASON, U.S. Magistrate Judge  
*Printed name and Title*

**AFFIDAVIT**

I, SHANNON L. MCDOWELL, being duly sworn, state as follows:

1. I am a Special Agent with the United States Secret Service, and have been so employed since approximately August 2007. My current responsibilities include the investigation of white collar crime, including mail, wire, and bank fraud.

2. This affidavit is submitted in support of a criminal complaint alleging that Branko Bogdanov, also known as Franko Kalath,, Lela Bogdanov, and Julia Bogdanov have violated Title 18, United States Code, Section 2314. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging BOGDANOV with interstate transportation of stolen goods, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and from persons with knowledge regarding relevant facts,

**FACTS SUPPORTING PROBABLE CAUSE**

4. The USSS recently received information from the Director of Investigations for Barnes and Noble, Inc. and the Market Investigations Manager

for Toys R Us Inc. The loss prevention executives told the USSS that they had sustained a huge loss in merchandise, including American Girl dolls, Furby robotic toys, Lego blocks, baby monitors, and baby carriers. According to the executives, their investigation determined that a particular eBay account sold large quantities of these specific items, and that the amount of items sold by the account often matched the quantities of the same item stolen from a particular Barnes & Noble or Toys R Us store.

5. The executives also told the USSS that they obtained information from eBay regarding the name and address associated with that particular eBay account. I have reviewed the eBay records, which were provided to me by the executives, and the records show that an individual who is now cooperating with the government (“Cooperating Individual” or “CI”)<sup>1</sup> is the owner of the account. In addition, the records indicate that the CI sold \$3.4 million in merchandise with an estimated retail value of \$6 million, many of which is the type of merchandise stolen from Barnes and Noble and Toys R Us. The executives told me that the prices charged by the CI for the items were significantly below the retail price for the items.

6. According to the Barnes and Noble executive, on or about December 10, 2013, the executive traveled to the CI’s residence in the Chicago suburbs and interviewed the CI. According to the executive, the CI told him that over the past

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<sup>1</sup> The CI is over 70 years old, has no prior convictions, and has a 30-year-old arrest for theft. As discussed in more detail in this affidavit, information provided by the CI has been corroborated by eBay records, text messages that I have viewed that were sent to the CI from Subject Phone 1, emails that appear to have been sent to the CI from BRANKO BOGDANOV, and physical evidence. No promises have been made to the CI by the government regarding his/her cooperation.

ten years, the CI has purchased merchandise with a retail value of approximately \$6 million from a man that he/she knew as “Franko Kalath.”

7. The executive showed the CI a photograph of BOGDANOV’s residence, a particular address on Weller Lane in Northbrook, Illinois (the “Subject Premises”), which he/she positively identified as the primary location where he/she purchased merchandise from “Franko Kalath.” According to the executive, he searched a loss prevention database for “Franko Kalath,” which identified the name as an alias for BRANKO BOGDANOV.

8. Illinois Secretary of State records indicate that BOGDANOV’s residence is the Subject Premises. In addition, Palatine Police Department records indicate that when BOGDANOV was arrested on or about December 17, 2013, for Retail Theft, BOGDANOV’s booking address was the Subject Premises. In addition, an investigator at the United States Attorney’s Office searched a commercial database and determined that BRANKO BOGDANOV, LELA BOGDANOV, JULIA BOGDANOV, and “Franko Kalath” were all listed as residents of the Subject Premises. Cook County Recorder of Deeds records indicate that BRANKO BOGDANOV is the sole owner of the Subject Premises, with an estimated property value of \$1,342,710.

#### **January 16, 2014 Interview of the CI**

9. On or about January 16, 2014, I interviewed the CI, who confirmed that he/she purchased items worth millions of dollars from BRANKO BOGDANOV over the past ten years. The CI provided me with extensive hand-written notes and

receipts indicating a vast variety of items he/she has purchased from BRANKO BOGDANOV, including toys, electronic equipment, baby supplies, and kitchenware. I also viewed a cancelled check written by the CI to pay for purchases from BRANKO BOGDANOV, which contains the name BRANKO BOGDANOV in the payee line.

10. In addition, with the CI's consent, I seized numerous items from the CI's garage, which the CI said that he/she purchased from the individual he/she knew as "Franko Kalath." The items included numerous American Girl dolls, baby monitors, baby carriers, steak knives, and Nanoblock building blocks. All of the items appeared to be new and in their original packaging.

11. The CI showed me his/her cellular phone, which is Subject Phone 2. With the CI's permission, I viewed the contacts in Subject Phone 2, and one of the contacts was named "Franko" and listed the phone number for Subject Phone 1.

12. Subscriber information for Subject Phone 1 lists BRANKO BOGDANOV as the name associated with Subject Phone 1, and the Subject Premises—the address where the CI indicated he/she frequently met "Franko"—was listed as the address associated with Subject Phone 1.

13. In addition, AT&T records and data obtained from a pen register on Subject Phone 1 indicate that Subject Phone 1 is frequently in contact with another phone, Subject Phone 3. For example, pen register data indicates that from February 16, 2014 to February 20, 2014, there were 29 contacts between Subject Phone 1 and Subject Phone 3. Subscriber information for Subject Phone 3 lists

JULIA BOGDANOV as the name associated with Subject Phone 3, and the Subject Premises as the address associated with Subject Phone 3.

14. I viewed several text messages stored on Subject Phone 2 that were sent and received by the CI to “Franko” on Subject Phone 2. At least one of the texts contained photographs of Nanoblocks that “Franko” indicated that he wanted to sell to the CI. Texts stored on Subject Phone 2 indicated that the CI told “Franko” that he/she was not interested in purchasing the Nanoblocks.

15. In addition, with the CI’s permission, I viewed numerous emails in his/her email sent to and from “Franko” at franko56us@yahoo.com. The emails appear to have been sent between the CI and “Franko” on a monthly basis regarding quantities and prices of items to be purchased by the CI from “Franko.”

16. For example, on December 4, 2013, the CI emailed “Franko,” stating:

40 summer slim and secure  
10 summer touch  
40 Motorola monitors \$160  
40 Motorola monitors \$100  
40 babies r-u “ \$35  
100 Furby’s  
40 logitech 900 UE \$225  
500 american girl dolls (will pay \$10 each for the new style dresses  
or 25th anniversary edition)

17. The CI explained to me that he/she would receive texts from Subject Phone 1 when new items were available for sale, and the CI would email “Franko” to place his/her order.

18. The CI confirmed that the eBay account information that the Barnes and Noble executive provided to me was for his/her eBay account, and that he/she

was responsible for the items sold on that account. eBay records for that account indicate that the CI sold \$3.4 million in merchandise with an estimated retail value of \$6 million in items that correspond with theft from stores, including Toys R Us and Barnes & Noble.

### **eBay Records**

19. Barnes & Noble has also provided me with records obtained from eBay for an account in the name of MISO BOGDANOV. eBay records indicate that the listed address for MISO BOGDANOV's eBay account is the Subject Premises.<sup>2</sup> In addition, the shipping address is listed under the name of MISO BOGDANOV at the Subject Premises. According to a Barnes & Noble executive, records for MISO BOGDANOV's eBay account indicate that he has made \$110,665.84 in sales, and that many of the items sold were similar to the items sold by the CI.

20. Barnes & Noble has also provided me with records obtained from eBay for an account in the name of JULIA BOGDANOV. eBay records indicate that the listed address for JULIA BOGDANOV's eBay account is the Subject Premises. In addition, the shipping address is listed under the name of BRANKO BOGDANOV at the Subject Premises.

21. In addition, Barnes & Noble has provided me with records obtained from eBay for an account in the name of SYLVIA BOGDANOV.<sup>3</sup> eBay records indicate that the listed address for SYLVIA BOGDANOV's eBay account is the

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<sup>2</sup> Based upon a search of a commercial database, it appears that MISO BOGDANOV is the son of BRANKO and LELA BOGDANOV and resides at the Subject Premises.

<sup>3</sup> Based upon a search of a commercial database, it appears that SYLVIA BOGDANOV is the daughter of BRANKO and LELA BOGDANOV and resides at the Subject Premises.

Subject Premises. In addition, the shipping address is listed under the name of SYLVIA BOGDANOV at the Subject Premises.

22. In addition, Barnes & Noble has provided me with records obtained from eBay for an account in the name of BRANKO BOGDANOV. eBay records indicate that the listed address for BRANKO BOGDANOV's eBay account is the Subject Premises.

23. According to a Barnes & Noble investigator, the eBay accounts for JULIA BOGDANOV, SYLVIA BOGDANOV, and BRANKO BOGDANOV share a single PayPal payment account, into which money from the sale of items on eBay is deposited. The investigator provided me with eBay records indicating that the accounts for JULIA BOGDANOV, SYLVIA BOGDANOV, and BRANKO BOGDANOV made \$692,278.45 in sales, and that many of the items sold were similar to the items sold by the CI.

24. According to a Barnes & Noble investigator, the eBay accounts of the CI, JULIA BOGDANOV, SYLVIA BOGDANOV, BRANKO BOGDANOV, and MISO BOGDANOV have a combined \$4.2 million in sales, and the items have a retail value of \$7.1 million.

#### **November 22, 2013 Theft in Pikesville, Maryland**

25. I have also reviewed a case report provided to me by Barnes & Noble regarding a theft of mini American Girl dolls from the Barnes & Noble store located in Pikesville, Maryland. In the case report, a store detective wrote that she witnessed three individuals steal mini American Girl dolls from the store.



According to a Barnes & Noble loss prevention executive, the detective later viewed known photographs of BRANKO BOGDANOV, LELA BOGDANOV, and JULIA BOGDANOV and identified them as the individuals she witnessed on November 22, 2013.

26. According to the detective, she observed LELA BOGDANOV place two mini American Girl dolls under her skirt. The detective then observed JULIA BOGDANOV say something to BRANKO and LELA BOGDANOV and they all headed to the front exit. According to the detective, she and another Barnes & Nobles employee then attempted to apprehend LELA BOGDANOV before she left the store. The detective said that she approached LELA BOGDANOV, who concealed the dolls as BRANKO BOGDANOV opened the door and stood there watching.

27. According to the detective, LELA BOGDANOV then told her that she put the merchandise back. The detective then asked LELA BOGDANOV to come with her because she was a store detective and had seen LELA BOGDANOV place merchandise under her skirt. According to the detective, at this point, LELA BOGDANOV began to shove her and BRANKO BOGDANOV began to grab the hood of her jacket, choking her. The detective then observed BRANKO and LELA BOGDANOV run out the front entrance, enter a gray minivan, and drive away.<sup>4</sup> According to the detective, JULIA BOGDANOV was still inside the vestibule, and told her that LELA BOGDANOV was a cancer patient. The detective then asked

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<sup>4</sup> The Subject Vehicle is a gray minivan.

JULIA BOGDANOV to accompany her to the manager's office, and JULIA BOGDANOV declined, walked out of the store, and entered the gray minivan which BRANKO and LELA BOGDANOV entered a few minutes earlier.

28. The Barnes & Noble store in Pikesville, Maryland did not have surveillance cameras at the time of the theft. The store inventory taken shortly after the BOGDANOVs left the store indicated that 10 mini American Girl dolls worth a total of \$254.29 were missing.

29. Based upon my review of AT&T records obtained pursuant to court order, on November 22, 2013, at 4:29 p.m., Subject Phone 1 was located in the vicinity of Pikesville, Maryland. According to Barnes & Noble records, the theft in Pikesville, Maryland took place on November 22, 2013, at approximately 4:18 p.m.

#### **Surveillance Video**

30. In addition, I received surveillance video taken on December 12, 2013, from a Barnes & Noble store located in Pembroke Pines, Florida. I have viewed this video, and a man who resembles a known photograph of BRANKO BOGDANOV and a woman who resembles a known photograph of LELA BOGDANOV entered the store. Several seconds later, a woman who resembles a known photograph of JULIA BOGDANOV entered the store. The video also depicts BRANKO and LELA BOGDANOV lingering near a display of Lego building blocks. The woman who resembled LELA BOGDANOV wore a long black skirt, which appeared much fuller when she exited the store. According to Barnes & Noble, store personnel discovered that two boxes of Lego building blocks worth \$89.95 were missing shortly after the

individuals left the store. In addition, Barnes & Noble employees found two security wrappings lying on the floor nearby. Based upon my review of AT&T records obtained pursuant to court order, on December 12, 2013, at 12:34 p.m., Subject Phone 1 was located in the vicinity of Pembroke Pines, Florida. According to Barnes & Noble records, the theft in Pembroke Pines, Florida took place on December 12, 2013, between approximately 12:35 p.m. and 12:40 p.m.

31. I have also viewed surveillance video from a Barnes & Noble store located in Murfreesboro, Tennessee that was taken in October 23, 2013. In the footage, a man who resembles BRANKO BOGDANOV, a woman who resembles LELA BOGDANOV, and a woman who resembles JULIA BOGDANOV entered the store separately. The individuals who resembled BRANKO and LELA BOGDANOV then went to a section of the store where mini American Girl dolls were on display. The woman who resembled LELA BOGDANOV wore a long black skirt, which appeared larger and fuller when she exited the store. Shortly thereafter, Barnes & Noble employees determined that 45 mini American Girl dolls worth a total of \$1,079.55 were missing from the store. eBay records indicate that the same model of mini American Girl dolls were sold by the CI approximately one week after October 23, 2013. Based upon my review of AT&T records obtained pursuant to court order, on October 23, 2013, at approximately 9:17 p.m. and 9:25 p.m., Subject Phone 1 was located in the vicinity of Smyrna, Tennessee, which is approximately 9.4 miles north of Murfreesboro, Tennessee. According to Barnes & Noble records,

the theft in Murfreesboro, Tennessee took place on October 23, 2013, at approximately 8:16 p.m.

32. On February 17, 2014, information provided by AT&T pursuant to a court order indicated that Subject Phone 1 was in the vicinity of a particular location in Norman, Oklahoma. According to a Barnes & Noble investigator, surveillance video from a Barnes & Noble store located in Norman, Oklahoma contains images of BRANKO and LELA BOGDANOV entering and exiting the store. I have viewed still images taken from the surveillance video, which depict BRANKO BOGDANOV and LELA BOGDANOV—wearing a long black skirt—holding and examining items inside the store while JULIA BOGDANOV stood near them. According to a Barnes & Noble investigator, as the BOGDANOVs exited the store, the security alarm sounded and store employees attempted to stop LELA BOGDANOV and prevent her from exiting the store. According to the investigator, store employees reported that JULIA BOGDANOV<sup>5</sup> intervened and attempted to keep the employees from pursuing LELA BOGDANOV. The investigator told me that the BOGDANOVs entered a gray Honda Odyssey minivan (the “Subject Vehicle”) and left the area. According to the investigator, two Innotab 3S learning tablets valued at \$99.95 each and a Leapster pad valued at \$59.95 were missing from the store’s inventory that day.

### **February 19, 2014 Surveillance of the BOGDANOVs**

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<sup>5</sup> I have viewed images of the female taken at the Barnes & Noble store in Norman, Oklahoma, and compared them to known images of JULIA BOGDANOV, and the images from Norman, Oklahoma resemble JULIA BOGDANOV.

33. On February 19, 2014, information provided by AT&T pursuant to a court order indicated that Subject Phone 1 was in the vicinity of a hotel located in The Woodlands, Texas. Using this information, law enforcement conducted surveillance of BRANKO BOGDANOV, LELA BOGDANOV, and another individual later identified as JULIA BOGDANOV at the hotel, and also observed and photographed the Subject Vehicle at the hotel.<sup>6</sup> Law enforcement then observed the BOGDANOVs drive in the Subject Vehicle to a Toys R Us located in The Woodlands, Texas, enter the Toys R Us, and exit the store.<sup>7</sup> Law enforcement then observed the BOGDANOVs enter and exit a Starbucks in the same shopping center. Law enforcement then followed the BOGDANOVs to a FedEx shipping store, and observed them enter and exit the store. Law enforcement then followed the BOGDANOVs as they travelled to the Woodlands Mall in The Woodlands, Texas. Law enforcement saw the BOGDANOVs enter the Apple Store in the Woodlands Mall, and a USSS agent observed BRANKO and LELA BOGDANOV in the back corner of the Apple Store and JULIA BOGDANOV in the front section of the Apple Store. Law enforcement then saw the BOGDANOVs enter and exit a Dillard's department store in the same mall.

34. Law enforcement then followed the BOGDANOVs as they proceeded to The Baby Store, to Wal-Mart, and then to the Willowbrook Mall, all of which were

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<sup>6</sup> Photographs of the Subject Vehicle indicate that it bears Illinois license plate N124970. Illinois Secretary of State records indicate that BRANKO BOGDANOV is the registered owner of this vehicle, with the Subject Premises listed as the address of owner.

<sup>7</sup> I have viewed surveillance photos from the Toys R Us store, which contain images of individuals who resemble BRANKO BOGDANOV, LELA BOGDANOV, and JULIA BOGDANOV. In the photos, LELA BOGDANOV is wearing a long black skirt.

located in Houston, Texas. Law enforcement saw the BOGDANOVS enter an Apple Store and a Sephora in the mall, and then enter and leave a Starbucks in the vicinity of the mall. Law enforcement then followed the BOGDANOVS to a nearby Toys R Us. I have viewed still images taken from surveillance video at the Toys R Us, which depict BRANKO, LELA, and JULIA BOGDANOV inside the store. In some of the images, BRANKO BOGDANOV and LELA BOGDANOV are depicted handling Lego Mindstorms building blocks, and in one image, LELA BOGDANOV appears to hold a box of Lego Mindstorms building blocks near her long black skirt.

35. After the BOGDANOVS left Toys R Us, Houston Police Department officers stopped the BOGDANOVS for Failure to Use Turn Signal while the BOGDANOVS were driving in the Subject Vehicle. When officers approached the vehicle, they observed two boxes of Lego building blocks in plain view. Law enforcement had previously observed surveillance video from a nearby Toys R Us earlier that day, which contained images of LELA BOGDANOV placing a box of Lego building blocks into her skirt and BRANKO BOGDANOV removing security cords from Lego boxes. Based upon that information, the officers asked the BOGDANOVS if they had receipts for the Lego building blocks in their vehicle. According to the officers, the BOGDANOVS said that they didn't have receipts because they bought the items at a flea market, but that they didn't want the items any more. The BOGDANOVS gave officers numerous items from their vehicle, including Lego building blocks, cosmetics, cutlery, bags of coffee, and FedEx packing materials. Five of the boxes of Lego building blocks contained Mindstorms building

blocks that were identical to the boxes that BRANKO BOGDANOV and LELA BOGDANOV were seen handling on Toys R Us surveillance photos. The BOGDANOVs then left the area in their vehicle, after showing the officers Illinois driver's licenses and an Illinois identification card that confirmed their identity.

36. Law enforcement has made contact with stores that were visited by the BOGDANOVs on February 19, 2014. Thus far, Toys R Us has confirmed that the items from their stores—including five boxes of Lego Mindstorms building blocks—are worth \$3,858.96, the Apple Store has confirmed that the items from their store are worth \$3,399.55, Sephora has confirmed that the items from their store are worth over \$4,100, and Dillard's has confirmed that Sora brand cutlery stolen from their store was worth \$1,728.75. Starbucks confirmed that the eight bags of coffee were stolen from their stores.

#### **February 20, 2014 Surveillance of the BOGDANOVs**

37. A day later, on February 20, 2014, information provided by AT&T pursuant to a court order indicated that Subject Phone 1 was in the vicinity of a Residence Inn in Baton Rouge, Louisiana.<sup>8</sup> Law enforcement located the Subject Vehicle at the Residence Inn,<sup>9</sup> and saw BRANKO BOGDANOV open the rear cargo door of the Subject Vehicle. Law enforcement saw a FedEx cardboard box and at

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<sup>8</sup> Residence Inn records indicate that on February 19, 2014, BRANKO BOGDANOV rented a room at the Residence Inn in Baton Rouge, Louisiana. The records indicate that BRANKO BOGDANOV provided the Subject Premises as his home address and stated that the purpose of his trip was "leisure."

<sup>9</sup> Law enforcement took photographs of the Subject Vehicle, and the license plate of the Subject Vehicle is clearly visible in the photographs.

least two black suitcases inside the rear area of the Subject Vehicle, but did not observe any other items in the rear area.

38. Law enforcement then followed the Subject Vehicle to a Wal-Mart store in Baton Rouge, Louisiana. Law enforcement observed BRANKO, LELA, and JULIA BOGDANOV enter and exit the Wal-Mart, and then observed them travel to a nearby Toys R Us / Babies R Us store in Baton Rouge, Louisiana. Surveillance photos from the store depict BRANKO and LELA BOGDANOV entering the store separately and leaving together. In the photo depicting LELA BOGDANOV exit the store, her black skirt is noticeably larger than it was in a photo depicting her entrance to the store. After the BOGDANOVs left the area, law enforcement lost sight of the Subject Vehicle for some time.

39. Law enforcement continued surveillance in New Orleans, spotting the Subject Vehicle in a Toys R Us parking lot located in Metairie, Louisiana. Law enforcement observed BRANKO BOGDANOV and LELA BOGDANOV exit the Toys R Us store together, and took photographs of them. Surveillance observed that LELA BOGDANOV's stomach appeared more square or rectangular than usual, and it appeared that she was holding something against her stomach with her right arm. I have viewed multiple photographs of BRANKO and LELA BOGDANOV taken by law enforcement, which depict LELA BOGDANOV's right hand pressing against her blouse, which appears to have something rectangular underneath.

40. Law enforcement then saw LELA BOGDANOV enter the rear passenger side of the Subject Vehicle, and observed a gust of wind blow her dress,



revealing a box concealed in her dress, contained in what appears to be a blue lining. According to law enforcement officers conducting surveillance, the lining appeared to be some kind of carrying device, and contained several items that had the same shape and sharp corners of a cardboard box. Law enforcement also observed numerous bags in the Subject Vehicle, which were not present when surveillance of the Subject Vehicle was conducted earlier that day. I have viewed a photograph of LELA BOGDANOV's black dress, which was taken by law enforcement officers on surveillance that day. In the photograph, there is a gap in the material in the dress, and blue cloth is visible underneath the black dress. In addition, the photograph depicts the corner of a black cardboard box bearing printing and a logo underneath the dress, between the black outer material and the blue cloth inside the dress. I have viewed another photograph of LELA BOGDANOV's black dress taken by law enforcement on surveillance that day, in which she appears to be using her right hand to close or obscure the gap in her black dress. The photograph also depicts blue lining material underneath the black dress, and the outline of multiple rectangular objects is visible in the blue lining material. Law enforcement then observed JULIA BOGDANOV exit the store and enter the Subject Vehicle, which then departed the area.

41. Later that day, on February 20, 2004, information provided by AT&T pursuant to a court order indicated that Subject Phone 1 was in the vicinity of Canton, Mississippi. Based upon that information, law enforcement conducted surveillance of the BOGDANOVs as they drove in the Subject Vehicle.

42. At approximately 8:07 p.m. on February 20, 2014, a Mississippi Highway Safety Patrol officer conducted a traffic stop of the Subject Vehicle as the BOGDANOVs drove northbound on Interstate 55, in the vicinity of Canton, Mississippi, for following another car too closely. When the officer approached the vehicle, he noticed several large black trash bags in the rear of the vehicle. The driver of the vehicle produced an Illinois driver's license identifying himself as BRANKO BOGDANOV. The officer asked BRANKO BOGDANOV to unlock the sliding door, and he did so.

43. The officer observed two passengers, and asked them for identification. The front passenger produced an Illinois driver's license identifying herself as JULIA BOGDANOV and the rear passenger produced an Illinois identification card identifying herself as LELA BOGDANOV.<sup>10</sup> BRANKO BOGDANOV told the officer that LELA is his wife, and that JULIA is their daughter.

44. The officer issued BRANKO BOGDANOV a warning citation, and then asked him where he had been, where he was going, and why he had several large trash bags in the rear of the vehicle. BRANKO BOGDANOV told the officer that he was returning to Chicago, Illinois from New Orleans, Louisiana and that the trash bags were full of goods that he had obtained from flea markets "all over."

45. The officer told BRANKO BOGDANOV that the trash bags concerned him a bit, and he asked for consent to search the bags, which BRANKO

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<sup>10</sup> The officer did not record LELA BOGDANOV's first name, but he recorded her last name and the number of her identification card, which is the same number visible on LELA BOGDANOV's identification card, which was photographed by law enforcement in Houston a day earlier.

BOGDANOV verbally provided. The officer walked to the back of the Subject Vehicle to search the bags, but BRANKO BOGDANOV did not follow him or otherwise open the rear of the vehicle. BRANKO BOGDANOV then said that he is diabetic and needed to relieve himself, and asked the officer if he could do so on the side of the road, and the officer said he could not.

46. BRANKO BOGDANOV eventually followed the officer to the rear of the Subject Vehicle, and the officer inquired about the trash bags once again. BRANKO BOGDANOV became belligerent and began tearing the trash bags open, one at a time, pulling out an item from each bag to show the officer. The officer said that BRANKO BOGDANOV only showed him one item from each bag, but that he could see that there was several of the same item within each bag. He remembers that some of the brand names he saw were Mindstorms, Lego, and Baby Bjorn. The officer did not seize any of the items, and after further conversation with the officer, the BOGDANOVs left the area in the Subject Vehicle with the trash bags containing merchandise.

#### **BOGDANOVs Return to the Subject Premises**

47. On February 21, 2014, information provided by AT&T pursuant to a court order indicated that Subject Phone 1 was in the vicinity of the Subject Premises. On February 21, 2014, at approximately 11:00 p.m., I conducted surveillance of the Subject Premises and saw the Subject Vehicle parked outside.

48. Five days later, on February 26, 2014, the CI told me that he/she received photos on Subject Phone 2 that were texted to him/her from “Franko

Kalath,” who used Subject Phone 1. The CI forwarded the photos to me. One of the photos shows many boxes of merchandise that appear to be new and in their original packaging, including two Baby Bjorn baby carriers, 17 baby monitors, and two sets of Lego building blocks. The photos also show 18 boxes of Shun Sora cutlery and 11 boxes of Wusthof cutlery that appear to be new and in their original packaging. I have shown the photos to two loss prevention executives, who estimated the total retail value of the items as \$7,500. Data from a pen register on Subject Phone 1 confirms that text messages were sent to Subject Phone 2 at approximately 11:57 a.m. on February 26, 2014.

49. The CI also told me that about an hour later, he/she received a voicemail on Subject Phone 2 from “Franko Kalath,” who used Subject Phone 1. The CI played the voicemail for me, and I heard a male voice state, “Hey [CI], this is Franko, give me a call back when you get a chance.” Data from a pen register on Subject Phone 1 confirms that a phone call was received by Subject Phone 2 at approximately 1:05 p.m. on February 26, 2014.

50. At my direction, at approximately 4:08 p.m., the CI sent a text message to BRANKO BOGDANOV on Subject Phone 1, stating “Sorry I missed your call. I am driving to Mississippi for a poker tournament. I will be back next week. what day depends on how I do. Can I call you then?” According to the CI, “Franko Kalath” replied later that night, at 6:54 p.m., stating, “OK, that’s fine good luck.” Data from a pen register on Subject Phone 1 confirms that a text message was received from Subject Phone 2 at approximately 4:08 p.m. on February 26, 2014,

and a text message was sent to Subject Phone 2 at approximately 6:54 p.m. on February 26, 2014.

### CONCLUSION

51. Based on the foregoing, there is probable cause to believe that on or about February 21, 2014, at Northbrook, Illinois and elsewhere, BRANKO BOGDANOV, LELA BOGDANOV, and JULIA BOGDANOV transported in interstate commerce goods and merchandise of a value of \$5,000 or more, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2314.

FURTHER AFFIANT SAYETH NOT.

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SHANNON L. MCDOWELL  
Special Agent, United States Secret Service

SUBSCRIBED AND SWORN to before me on March 4, 2014.

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MICHAEL T. MASON  
United States Magistrate Judge