

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MAJA NIKOLIC,
MARKO NIKOLIC,
NEBOJSA SIMEUNOVIC,
MIJAJLO STANISIC,
BRANKO ALEKSIC,
MILICA SUMAKOVIC, and
DORDE TODOROVIC, a/k/a "Djole"

No. 20 CR 750

Violations: Title 18, United States
Code, Sections 1343, 1956(a)(1)(B)(i),
and 1956(a)(2)(B)(i)

Superseding Indictment

COUNT ONE

The SPECIAL APRIL 2021 GRAND JURY charges:

1. At times material to this Indictment:

The Economic Injury Disaster Loan Program

a. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in March 2020 and designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic.

b. One source of relief provided by the CARES Act was the expansion of the Economic Injury Disaster Loan ("EIDL") program, which provided loan assistance (including advances of up to \$10,000) for businesses with, among other things, 500 or fewer employees and other eligible entities. The EIDL program was designed to provide economic relief to small businesses that were experiencing a temporary loss of revenue.

c. To gain access to funds through the EIDL Program, small businesses applied through the U.S. Small Business Administration (“SBA”) via an online portal and application. As part of the EIDL application process, the SBA required applicants to submit truthful information about the applying entity, its owner, and its condition prior to the COVID-19 pandemic. This information included the entity’s number of employees as of January 31, 2020; the entity’s gross revenues and cost of goods sold for the 12-month period prior to January 31, 2020; the entity’s type of business (*i.e.*, a business, an agricultural business, a sole proprietorship, a cooperative, among others); and the date on which the current owner assumed ownership of the entity. The applicant also was required to provide the business owner’s name, address, date of birth, Social Security number, and U.S. citizenship status. Applicants were required to electronically certify that the information provided in the application was true and correct and were warned that any false statement or misrepresentation to the SBA may result in sanctions, including criminal penalties.

d. EIDL Advance was a grant program offered as part of the EIDL Program. EIDL Advance was designed to provide emergency economic relief to businesses that were experiencing a temporary loss of revenue as a result of the COVID-19 pandemic. The applicant could request consideration for an EIDL advance in an application for an EIDL loan. The amount of the advance issued to the small business applicant was determined by the number of employees indicated

on the EIDL application, \$1,000 per employee, up to \$10,000. If an EIDL advance was issued, the advance did not need to be repaid.

e. If the application was approved by the SBA, the amount of the EIDL loan was determined in part based on the statements in the EIDL application about the entity's revenues and cost of goods sold for the 12 months prior to January 31, 2020.

f. EIDL funds were issued to the small business applicants directly from the United States Treasury.

g. EIDL loan proceeds were permitted to be used to pay an array of working capital and normal operating expenses, such as continuation of health care benefits, rent, utilities, and fixed debt payments.

Defendants

h. Defendant MAJA NIKOLIC was a resident of Brookfield, Illinois, a Serbian national, and not a United States citizen.

i. Defendant MARKO NIKOLIC was a resident of Opa Locka, Florida and La Grange, Illinois, a Serbian national, and not a United States citizen.

j. Defendant NEBOJSA SIMEUNOVIC was a resident of Lyons, Illinois, a Serbian national, and not a United States citizen. SIMEUNOVIC was the owner and operator of a business named SIM Express, Inc., located in Oakbrook, Illinois.

k. Defendant MILICA SUMAKOVIC was a resident of Chicago and La Grange, Illinois, a Serbian national, and not a United States citizen.

l. Defendant DORDE TODOROVIC, a/k/a “Djole,” was a resident of Chicago, Illinois, a Serbian national, and not a United States citizen.

m. Defendant MIJAJLO STANISIC was a resident of Willowbrook, Illinois, a Montenegrin national, and not a United States citizen.

n. Defendant BRANKO ALEKSIC was a resident of Chicago, Illinois, a Montenegrin national, and not a United States citizen.

Entities

o. Farm and Village Market, LLC was a business incorporated in Florida in or around June 2016 and dissolved on or about September 27, 2019.

p. Food by Orange, LLC was a business incorporated in Florida in or around August 2018 and dissolved on or about September 27, 2019.

q. Agrovet Solutions, LLC was a business incorporated in Florida in or around August 2018 and dissolved on or about September 27, 2019.

r. Farmer’s First Choice, Inc. was a business incorporated in Illinois in or around April 2018 and dissolved on or about September 13, 2019.

s. Corn Turkey Lemonade Inc. was a business incorporated in Illinois in or around March 2017 and dissolved on or about August 10, 2018.

t. Field & Fire, Inc. was a business incorporated in Illinois in or around October 2016 and dissolved on or about March 9, 2018.

u. MMSUS, Inc. was a business incorporated in Illinois in or around June 2017 and dissolved on or about November 8, 2019.

v. Slingshot Transport, Inc. was a business incorporated by MIJAJLO STANISIC in Illinois in or around October 2018.

w. Crop Solutions, LLC was a business incorporated in Florida in or around September 2018 and dissolved on or about September 27, 2019.

x. CS Freight, LLC was a business incorporated by MILICA SUMAKOVIC in Illinois in or around March 2019.

y. Gratz Logistics, LLC was a business incorporated in Florida in or around June 2018 and dissolved on or about September 27, 2019.

z. Flowering Consulting, LLC was a business incorporated in Florida in or around February 2018 and dissolved on or about September 27, 2019.

aa. Corner Giros, Inc. was a business incorporated in Illinois in or around June 2017 and dissolved on or about November 9, 2018.

2. Beginning in or around March 2020, and continuing through in or around September 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

MAJA NIKOLIC,
MARKO NIKOLIC,
NEBOJSA SIMEUNOVIC,
MIJAJLO STANISIC,
BRANKO ALEKSIC,
MILICA SUMAKOVIC, and
DORDE TODOROVIC, a/k/a "Djole,"

defendants herein, and others known and unknown to the grand jury, knowingly devised, intended to devise, and participated in a scheme to defraud and to obtain

money from the EIDL Program by means of materially false and fraudulent pretenses, representations, and promises, as further described below.

3. It was part of the scheme that MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC (together, the “defendants”), for the purpose of fraudulently obtaining EIDL funds, submitted and caused to be submitted over 300 applications for loans and advances under the EIDL Program, on behalf of businesses and entities purportedly owned by the defendants and others, including SIM Express, Farm and Village Market, Food by Orange, Agrovvet Solutions, Farmer’s First Choice, Corn Turkey Lemonade, Field & Fire, MMSUS, Slingshot Transport, Crop Solutions, CS Freight, Gratz Logistics, Flowering Consulting, and Corner Giros (together, the “Shell Companies”), which applications contained materially false statements and misrepresentations concerning, among other things, the applicant’s citizenship status and the purported entities’ number of employees, revenues, expenses, type of business, and owners.

4. It was further part of the scheme that MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC paid for, and caused others to pay for, the reincorporation of previously dissolved companies, including Farm and Village Market, Food by Orange, Agrovvet Solutions, Farmer’s First Choice, Corn Turkey Lemonade, Field & Fire, MMSUS, Crop Solutions, Gratz Logistics, Flowering Consulting, and Corner Giros, identifying themselves and others (including

Individual A, Individual B, and Individual C) in filings with various Secretaries of State as officers and agents of those companies. The defendants knew that these companies were not in operation at the time they paid to reincorporate them, that the former owners of the companies had not authorized them to reincorporate or assume responsibility for those companies, and that the defendants had no intention to initiate or resume any business operations under those companies' names.

5. It was further part of the scheme that, in EIDL applications submitted to the SBA, MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC falsely and fraudulently represented, and caused others to falsely and fraudulently represent, that the applicants were the owners of the previously dissolved entities, including the Shell Companies, and that they had assumed ownership of those companies more than one year before the dates on which they paid to reincorporate the companies. The defendants knew that these companies were not in operation at the time they submitted these EIDL applications, that they did not own or have any relationship to these companies prior to the date they paid to reincorporate them, and that the former owners of the companies had not authorized them to assume ownership or responsibility for those companies at any time.

6. It was further part of the scheme that, in EIDL applications submitted to the SBA, MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC made false and fraudulent representations, and caused others to make

false and fraudulent representations, regarding the Shell Companies and other previously dissolved entities, including the entities' gross revenues and costs of goods sold for the 12 months prior to January 31, 2020, as well as the entities' number of employees as of January 31, 2020. The defendants knew that, during the 12 months prior to January 31, 2020, the previously dissolved entities neither earned nor spent the revenues and costs of goods stated in the applications, and that the applying entities did not have any employees as of January 31, 2020.

7. It was further part of the scheme that, to substantiate the revenues, expenses, and continued existence of the Shell Companies and other previously dissolved entities, MAJA NIKOLIC submitted and caused to be submitted to the SBA copies of falsified federal corporate income tax documents, knowing that the documents had been falsified.

8. It was further part of the scheme that, in EIDL applications submitted to the SBA, MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC falsely and fraudulently represented, and caused others to falsely and fraudulently represent, that they were U.S. citizens. The defendants knew when they submitted the EIDL applications that they were not U.S. citizens and falsely misrepresented their citizenship to evade additional scrutiny, from the SBA, of their false and fraudulent applications.

9. It was further part of the scheme that NEBOJSA SIMEUNOVIC and MAJA NIKOLIC paid MARKO NIKOLIC, MIJAJLO STANISIC, and DORDE

TODOROVIC to solicit, and MAJA, MARKO, STANISIC, and TODOROVIC did solicit, personal identifying information, such as addresses, phone numbers, birthdates, and social security numbers, from numerous individuals, which information NEBOJSA and MAJA used to prepare and submit, and to cause others to prepare and submit, false and fraudulent EIDL applications in the names of previously dissolved entities.

10. It was further part of the scheme that MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC opened and caused others to open business bank accounts in the names of previously dissolved entities that they had paid to reincorporate, including the Shell Companies, and directed and caused others to direct the SBA to deposit the proceeds of fraudulently obtained EIDL loans into those bank accounts, which the defendants controlled. The defendants knew the Shell Companies and other previously dissolved entities had no true association with these bank accounts and opened these accounts in the names of those entities to induce the SBA, the banks, and others to falsely believe that the accounts belonged to the previously dissolved entities.

11. It was further part of the scheme that, as a result of the fraudulent EIDL applications, MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC caused the SBA to disburse at least approximately \$16,000,000 in EIDL loans and advances into bank accounts controlled by the defendants and others.

12. It was further part of the scheme that MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, DORDE TODOROVIC, and others used the funds that had been disbursed by the SBA based on the fraudulent EIDL applications to make cash withdrawals and transfers for their personal benefit, and not to pay for the ordinary operating expenses and debts of the applying entities.

13. It was further part of the scheme that MAJA NIKOLIC, MARKO NIKOLIC, NEBOJSA SIMEUNOVIC, MIJAJLO STANISIC, BRANKO ALEKSIC, MILICA SUMAKOVIC, and DORDE TODOROVIC misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

14. On or about May 14, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

NEBOJSA SIMEUNOVIC,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an internet transmission of a SIM Express EIDL loan application to SBA computer servers located outside of Illinois;

In violation of Title 18, United States Code, Section 1343.

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about May 21, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC and
NEBOJSA SIMEUNOVIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$36,500, from the Federal Reserve Bank to a SIM Express account maintained at Chase Bank, which funds represented the proceeds of an EIDL to SIM Express;

In violation of Title 18, United States Code, Section 1343.

COUNT THREE

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about June 1, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC, and
MIJAJLO STANISIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Slingshot Transport account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Slingshot Transport;

In violation of Title 18, United States Code, Section 1343.

COUNT FOUR

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about June 19, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

NEBOJSA SIMEUNOVIC and
BRANKO ALEKSIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Flowering Consulting account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Flowering Consulting;

In violation of Title 18, United States Code, Section 1343.

COUNT FIVE

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about June 23, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MILICA SUMAKOVIC,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a CS Freight account maintained at Fifth-Third Bank, which funds represented the proceeds of an EIDL to CS Freight;

In violation of Title 18, United States Code, Section 1343.

COUNT SIX

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about June 24, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC and
NEBOJSA SIMEUNOVIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$104,900, from the Federal Reserve Bank to a Corner Giros account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Corner Giros;

In violation of Title 18, United States Code, Section 1343.

COUNT SEVEN

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about June 29, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

BRANKO ALEKSIC,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Gratz Logistics account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Gratz Logistics;

In violation of Title 18, United States Code, Section 1343.

COUNT EIGHT

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about June 29, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC and
MARKO NIKOLIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Food by Orange account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Food by Orange;

In violation of Title 18, United States Code, Section 1343.

COUNT NINE

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about July 1, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC and
NEBOJSA SIMEUNOVIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Corn Turkey Lemonade account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Corn Turkey Lemonade;

In violation of Title 18, United States Code, Section 1343.

COUNT TEN

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about July 7, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC, and
MIJAJLO STANISIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Crop Solutions account maintained at BMO Harris Bank, which funds represented the proceeds of an EIDL to Crop Solutions;

In violation of Title 18, United States Code, Section 1343.

COUNT ELEVEN

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about July 21, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC, and
MIJAJLO STANISIC,

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$90,000, from the Federal Reserve Bank to a Farmers First Choice account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Farmers First Choice;

In violation of Title 18, United States Code, Section 1343.

COUNT TWELVE

The SPECIAL APRIL 2021 GRAND JURY further charges:

3. Paragraphs 1 through 13 of Count One are incorporated here.

4. On or about July 28, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

MARKO NIKOLIC,

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to an Agrovet Solutions account maintained at Citibank Bank, which funds represented the proceeds of an EIDL to Agrovet Solutions;

In violation of Title 18, United States Code, Section 1343.

COUNT THIRTEEN

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about August 6, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC, and
DORDE TODOROVIC, a/k/a "Djole,"

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to a Field and Fire account maintained at Chase Bank, which funds represented the proceeds of an EIDL to Field and Fire;

In violation of Title 18, United States Code, Section 1343.

COUNT FOURTEEN

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One are incorporated here.
2. On or about August 7, 2020, in the Northern District of Illinois, Eastern

Division, and elsewhere,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC, and
DORDE TODOROVIC, a/k/a “Djole,”

defendants herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, an interstate wire transmission of approximately \$149,900, from the Federal Reserve Bank to an MMSUS account maintained at Bank of America, which funds represented the proceeds of an EIDL to MMSUS;

In violation of Title 18, United States Code, Section 1343.

COUNTS FIFTEEN THROUGH TWENTY-NINE

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants, as set forth below, knowingly conducted and attempted to conduct the following financial transactions listed below, namely, the deposit of United States currency in bank accounts under each defendant's respective control, in or affecting interstate commerce, each such financial transaction constituting a separate count, which financial transactions involved the proceeds of a specified unlawful activity, namely, wire fraud, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transactions, the defendant knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

COUNT	DEFENDANT	DATE OF FINANCIAL TRANSACTION	FINANCIAL TRANSACTION
Fifteen	NEBOJSA SIMEUNOVIC	May 21, 2020	deposit of approximately \$48,500 from a SIM Express account maintained at Chase Bank into a Chase account ending in 8381
Sixteen	MIJAJLO STANISIC	June 1, 2020	deposit of approximately \$75,000 from a Slingshot Transport account maintained at Chase Bank into a Chase account ending in 8381

COUNT	DEFENDANT	DATE OF FINANCIAL TRANSACTION	FINANCIAL TRANSACTION
Seventeen	NEBOJSA SIMEUNOVIC	June 1, 2020	deposit of approximately \$75,000 into a Chase account ending in 6157
Eighteen	MAJA NIKOLIC	June 22, 2020	deposit of approximately \$572,000 into a Bank of America account ending in 4808
Nineteen	NEBOJSA SIMEUNOVIC	June 22, 2020	deposit of approximately \$589,584 into a Chase account ending in 2522
Twenty	NEBOJSA SIMEUNOVIC	June 24, 2020	deposit of approximately \$114,800 from a Corner Giros account maintained at Chase Bank into a Chase account ending in 2522
Twenty-One	BRANKO ALEKSIC	June 29, 2020	deposit of approximately \$90,000 from a Gratz Logistics account maintained at Chase Bank into a Chase account ending in 7067
Twenty-Two	MILICA SUMAKOVIC	July 2, 2020	deposit of approximately \$147,247.89 from a CS Freight account maintained at Fifth-Third Bank into a Citibank account ending in 5078
Twenty-Three	MARKO NIKOLIC	July 3, 2020	deposit of approximately \$450,000 from a Food by Orange account maintained at Chase Bank into a Chase account ending in 8530
Twenty-Four	MIJAJLO STANISIC	July 14, 2020	purchased from a Crop Solutions account ending in 5791 maintained at BMO Harris Bank, a \$74,000 cashier's check made payable to "Slingshot"

COUNT	DEFENDANT	DATE OF FINANCIAL TRANSACTION	FINANCIAL TRANSACTION
Twenty-Five	NEBOJSA SIMEUNOVIC	July 20, 2020	deposit of approximately \$75,000 into a Chase account ending in 6157
Twenty-Six	NEBOJSA SIMEUNOVIC	July 23, 2020	deposit of approximately \$65,100 from a Farmers First Choice account maintained at Chase Bank into to a Chase account ending in 6157
Twenty-Seven	MAJA NIKOLIC	July 23, 2020	deposit of approximately \$65,100 into to a Citibank account ending in 6305
Twenty-Eight	DORDE TODOROVIC, a/k/a "Djole"	August 10, 2020	deposit of approximately \$149,900 from an MMSUS account maintained at Bank of America into a Bank of America account ending in 0893
Twenty-Nine	NEBOJSA SIMEUNOVIC	August 10, 2020	deposit of approximately \$75,000 into to a Chase account ending in 6157

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS THIRTY THROUGH THIRTY-THREE

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants, as set forth below, knowingly transmitted and transferred, and attempted to knowingly transmit and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States, namely, the wire transfer of United States currency from bank accounts in the United States to financial accounts outside the United States, each such transmission and transfer constituting a separate count, which transmissions and transfers involved the proceeds of a specified unlawful activity, namely, wire fraud, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transactions, the defendant knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

COUNT	DEFENDANT	DATE OF FINANCIAL TRANSACTION	TRANSMISSION AND TRANSFER
Thirty	NEBOJSA SIMEUNOVIC	June 23, 2020	wire transfer of approximately \$400,000 from a Chase account ending in 2522 to a bank outside the United States
Thirty-One	MILICA SUMAKOVIC	July 2, 2020	wire transfer of approximately \$235,000 from a Citibank account ending in 5078 to a bank outside the United States
Thirty-Two	MARKO NIKOLIC	July 14, 2020	wire transfer of approximately \$600,000 from a Citibank account ending in 0043 to a bank outside the United States
Thirty-Three	MAJA NIKOLIC	July 28, 2020	wire transfer of approximately \$710,000 from a Citibank account ending in 6305 to a bank outside the United States

All in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

FORFEITURE ALLEGATION ONE

The SPECIAL APRIL 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this Indictment,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC,
MARKO NIKOLIC,
MIJAJLO STANISIC,
BRANKO ALEKSIC,
MILICA SUMAKOVIC, and
DORDE TODOROVIC, a/k/a "Djole,"

defendants herein, shall forfeit to the United States of America, any property which constitutes and is derived from proceeds traceable to the offenses, as provided in Title 18, United States Code, Section 981(a)(1)(C).

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION TWO

The SPECIAL APRIL 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in this Indictment,

MAJA NIKOLIC,
NEBOJSA SIMEUNOVIC,
MARKO NIKOLIC,
MIJAJLO STANISIC,
BRANKO ALEKSIC,
MILICA SUMAKOVIC, and
DORDE TODOROVIC, a/k/a "Djole,"

defendants herein, shall forfeit to the United States of America, any property involved in a transaction or attempted transaction in violation of Section 1956, or any property traceable to such property, as provided in Title 18, United States Code, Section 981(a)(1)(A).

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON


UNITED STATES ATTORNEY