

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

NEMANJA LOVRE

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.

In or about May 2015, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere, , the defendant(s) violated:

Code Section

Title 18, United States Code, Section 1030(a)(7)(A)

Offense Description

intentionally extorted from any person any money and other thing of value by transmitting in interstate and foreign commerce any communication containing any threat to cause damage to a protected computer

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

ANDREW MCKAY
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: September 29, 2015

Judge's signature

City and state: Chicago, Illinois

MARIA VALDEZ, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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AFFIDAVIT

I, ANDREW MCKAY, being duly sworn, state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation and am assigned to the Chicago Field Office. I have been employed as a Special Agent with the FBI since on or about January 2015. As a Special Agent, I am charged with investigating possible violations of federal criminal law, including computer crimes, in violation of 18 U.S.C. § 1030 (the Computer Fraud and Abuse Act). I have spent approximately five months assigned to a cyber crime squad at the FBI and have gained experience in the investigation of computer crimes during this time.

2. This affidavit is submitted in support of a criminal complaint alleging that NEMANJA LOVRE has violated Title 18, United States Code, Section 1030(a)(7)(A), as well as in support of warrants to seize the following bank accounts, pursuant to Title 18, United States Code, Section 981(a)(1)(C):

a. All funds contained in JPMorgan Chase Bank, N.A. account number 632655523, held in the name of Marko Stankovic (“**Subject Account 1**”); and

b. All funds contained in Bank of America, N.A. account number 000452330644, held in the name of Love Freightways, Inc. (“**Subject Account 2**”).

3. As set forth below, there is probable cause to believe that NEMANJA LOVRE violated 18 U.S.C. § 1030(a)(7)(A), and that **Subject Account 1** and **Subject Account 2** contain proceeds of a violation of 18 U.S.C. § 1030(a)(7)(A).

4. The statements in this affidavit are based on my personal knowledge and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and seizure warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are sufficient to establish probable cause that NEMANJA LOVRE violated 18 U.S.C. § 1030(a)(7)(A) and that **Subject Account 1** and **Subject Account 2** contain proceeds of a violation of 18 U.S.C. § 1030(a)(7)(A) and such proceeds are therefore subject to seizure and forfeiture by the United States.

FACTS SUPPORTING PROBABLE CAUSE

Background of the Investigation

5. The FBI is conducting an investigation into unauthorized access by one or more individuals to the protected computer systems of a computer

software company located in the Chicago area (“Company A”) in violation of 18 U.S.C. § 1030 (the Computer Fraud and Abuse Act).

6. As further described below, a series of communications were received by Company A between on or about May 12, 2015, and May 21, 2015, which indicated that an individual named Stefan Stojanovic had gained unauthorized access to the protected computer systems of Company A and demanded payment from Company A while threatening to harm Company A computer systems and to disclose confidential information obtained from Company A computer systems.

7. Specifically, on or about May 20, 2015, and on or about May 26, 2015, an FBI agent interviewed Individual A,¹ a Company A employee, regarding the unauthorized access and threatening communications. Individual A provided the following information:

a. Company A’s primary business is the provision of software utilized by companies in the transportation sector. Company A also provides services to host the servers of a portion of its clients. Company A’s computer servers are located in Lombard, Illinois. Company A also has authorized access to many of its clients’ servers that are not directly hosted by Company

¹ Individual A is voluntarily cooperating with law enforcement and has not been promised anything in exchange for Individual A’s cooperation nor has Individual A received any benefit for the information thus far. Individual A has an arrest for domestic violence in 2007 but it is not clear if that arrest resulted in a conviction.

A in order to maintain the Company A software. The collective servers to which Company A has access contain personal information for between 50,000 and 100,000 individuals.

b. On or about May 12, 2015, Individual A received an email message from the email account srbincar@gmail.com which indicated that it was from someone who identified himself as Stefan Stojanovic and in which Stojanovic claimed to have gained unauthorized access to Company A computers. Stojanovic included a list of usernames and passwords in the email as well as a screenshot of a computer screen. Individual A advised that the usernames and passwords belonged to employees of Company A and that the screenshot appeared to be of someone logged into a Company A computer server. In the email, Stojanovic also claimed to work for Love Freightways, Inc. (“Love Freightways”). Individual A advised that Love Freightways had just become a customer of Company A’s in the last several months.

c. That same day, Individual A sent a response email back to the email account srbincar@gmail.com indicating an interest in discussing the matter further. Individual A stated he did this to attempt to draw out

more information from Stojanovic. In a subsequent email exchange, Individual A and Stojanovic agreed to discuss matters further via Skype².

d. Between approximately on or about May 13, 2015, and on or about May 21, 2015, Individual A and Stojanovic engaged in a series of Skype instant message communications in which Stojanovic discussed gaining unauthorized access to Company A's computer systems and in which Stojanovic requested payment to prevent Stojanovic from disclosing Company A customer information and to allegedly fix the problem.

e. Individual A and Stojanovic agreed to two payments of \$10,000 each totaling \$20,000, but Stojanovic changed his mind claiming Stojanovic's partners had not agreed to that total and indicating that the price would be \$50,000 instead. Individual A then negotiated the price down to \$40,000. Individual A advised that he/she felt compelled to pay the money to Stojanovic to protect the data and computer servers of Company A's customers from being released or harmed by Stojanovic.

f. On or about May 20, 2015, Individual A received an email from the email account srbincar@gmail.com in which Stojanovic requested payment be made via a cashier's check and specified the name of Marko Stankovic as the name to which the check was to be payable. Stojanovic also

² I am aware from my experience that Skype is an Internet-based communication service which offers a variety of communication options including telephone voice calls, video chat, and instant messaging.

stated that he would provide the bank account number to which the cashier's check was to be deposited when a photo of the cashier's check was sent to him.

g. On or about May 20, 2015, Individual A obtained a \$40,000 cashier's check payable to the name of Marko Stankovic, and Individual A sent a photo of the cashier's check to the email account srbincar@gmail.com.

h. On or about May 20, 2015, Individual A and Stojanovic engaged in a Skype instant message conversation in which Individual A and Stojanovic agreed that the funds would be deposited the following morning as the bank was now closed. Stojanovic advised via instant message that Stojanovic would provide the bank account number to which the funds were deposited once Individual A was at the bank.

i. On or about May 21, 2015, Individual A sent a Skype instant message to Stojanovic and notified him that Individual A was at the bank. Stojanovic responded via Skype instant message with the bank account number to which the cashier's check was to be deposited. Stojanovic also requested that a copy of the receipt of the deposit be sent to him. Individual A followed the instructions and deposited the cashier's check to the specified bank account number. Individual A then sent a photograph of the receipt of the deposit to the email account srbincar@gmail.com.

8. Individual A provided an FBI agent a copy of an email message received on or about May 12, 2015 at 3:13 PM CDT from srbincar@gmail.com to Individual A's email account which listed the name "Stefan Stojanovic" next to srbincar@gmail.com with a subject "Security vulnerable on [Company A] server." The email stated in part:

"My name is Stefan and i'm³ working as IT Director of Love Freightways Inc. Love Freightways Inc. is using [Company A Software] and when I dont work for them I'm serching for vulnerability on websites, servers, softwares etc. as a freelancer. This email is not realted to my company, and they dont want to have anything with this. I find a security vulnerable on ur servers, and I'm looking to report this to you guys so you can fix this and keep ur servers safe from malicious hackers. This is proof of hacking, and i hope you will contact me so I can give you more informations how to fix this."

Immediately following this sentence were thirteen pairs of usernames and passwords and a screenshot of a computer screen which had an icon on the desktop that showed Company A software to be installed on it. As previously described in this affidavit, Individual A identified these usernames and passwords as being of Company A employees and the screenshot to be reflective of someone apparently logged onto a Company A server.

9. Individual A has provided an FBI agent with a copy of an email message dated May 20, 2015 at 3:40 PM CDT from srbincar@gmail.com to Individual A's email account with the name "Stefan Stojanovic" listed with

³ All typographical errors in the quoted language from emails or Skype chats are in the original text of the communication. Due to the number of typographical errors, a [sic] is it be considered in place after each error.

the email address srbincar@gmail.com which stated ‘Ok so then put name “Marko Stankovic,” when you send picture of check i will send you bank account.’

10. Individual A has provided an FBI agent with a copy of Individual A’s Skype instant message conversations between Individual A and the Skype user ID e.katarina.velika, which Individual A identified as being the Skype user ID which Stojanovic used to contact Individual A. The Skype display name⁴ which appeared with these instant messages from e.katarina.velika began with non-english characters and ended with “Stefan.”

a. A Skype instant message conversation from on or about May 13, 2015, stated in part the following:

e.katarina.velika: “Hi [Individual A]”

[Individual A]: “Hi”, “How you doing”

e.katarina.velika: “so far so good”, “how about you?”

[Individual A]: “pretty good”, “considering we had a server hacked into”, “albeit old one, still a big issue”

e.katarina.velika: “True, well i’m here to make developers and server administrator busy”

...⁵

⁴ I have been advised by FBI personnel experienced with Skype that a Skype display name is the name which appears when a call or instant message is sent to someone via Skype.

⁵ For brevity, the complete Skype conversation is not fully detailed here and “...” is utilized to denote where components of the conversation are not included.

[Individual A]: “ok, so let’s do this”, “you got into that one server and gained full access”, “did you get into any other ones?”

e.katarina.velika: “Not one, all of your servers”

[Individual A]: “which other one?”

e.katarina.velika: “I’m not sure, I’m not rly interested in server I got access”, “Just get one as proof”

...

e.katarina.velika: “So you figured that you are not 1st company I did this to.”

[Individual A]: “yeah”, “to be honest with you”, “I’m not surprised, I’m not happy with our current set up at all”

e.katarina.velika: “I ask for money for fix i think you figured that.” “Yeha you guys can do better”

...

e.katarina.velika: File sent - keys.xlsx⁶

e.katarina.velika: “If you like you can search for password. :’D”

...

[Individual A]: “so”, “what are you interested in, are you looking for full-time job or just security testing”

e.katarina.velika: “No I dont want job i can get job in Google if I want to.” But i’m happy with my position”, “i’m doing this for a few resons, fun, practice and some extra money”, So what do u think how much this

⁶ Individual A advised that keys.xlsx, which was transmitted via the Skype instant message was found to contain a list of usernames and passwords for accessing various Company A computer systems. An FBI agent has been provided a copy of this file which contains a list of over 800 username and password entries.

'bounty hunt' is worth?"

[Individual A]: "i'm more interested in something more long term"

e.katarina.velika: "Ok then", "Say price."

[Individual A]: "I don't know", "the price", "since I don't know how much something like this can be", "here's what I want to do", "i need to know how much would be it to pen-test it after we put all servers onto domain", "fully test it, inside and outside", "and not just that", "but entire network", "or actually, at least we can start with that and then move on"

e.katarina.velika: "Huh, that is 2 weeks job I think", "I hacked your servers in few hours"

[Individual A]: "so, how much is 2 weeks ?", "I know how much is my 2 weeks but not yours"

e.katarina.velika: "Ok so everything with this bug 150 000\$", "Price of new truck and price of new woth IT guy"

[Individual A]: "what is everything"

e.katarina.velika: "Pen-testing, few tips, fix, new website (this one sux – sorry), and this bug"

...

e.katarina.velika: "So do we have deal?", "And when we can start?"

[Individual A]: "ok, website on a side", "I need time", "to run it by my partners", "and need to think how to wrap it up for them", "before they call fbi heh", "they're Americans, hard for them to understand", "plus non-technical"

e.katarina.velika: "Just told them dat I had chance to delete everything", "They will end sued or things like that."

[Individual A]: “yeah, I understand”, “we’ll need some time, i’ll let you know in which direction we want to go”

e.katarina.velika: “Will just this bug is worth 50k \$”, “So with or without of job I expect money”

[Individual A]: “that’s a lot of money”

e.katarina.velika: “This is big bug”

[Individual A]: “even google doesn’t pay 50k”, “but I understand your point”

e.katarina.velika: “Yeha they pay 1m”, “Last company I did was 70k”

[Individual A]: “how would you expect your payment?”

e.katarina.velika: “However you guys want”, “I have bank accounts everywhere”, “off-shore, US, EU...”

...

e.katarina.velika: “So you cant make nothing before monday?”

[Individual A]: “not before i talk to them”⁷, “it really depends”, “whether they want to do long term”

...

[Individual A]: “but i do understand that this bug will be immediate payment”, “have another meeting in 30 minutes, gotta leave the office”, “send me that CV/resume.”⁸

⁷ From the context of the instant message conversation prior to this statement, I believe that “them” is a reference by Individual A to the business partners at Company A which Individual A had previously told Stojanovic about.

⁸ Previously in the chat session, Individual A had requested that Stojanovic send a resume outlining his skills and references.

e.katarina.velika: “Ok, that is fer, dont usually w8 few days for something like this”, “But i will make exception cuz my coworkers like you guys and ur software”

b. A Skype instant message conversation from on or about

May 18, 2015, stated in part the following:⁹

e.katarina.velika: “I am sorry, but the price for that breach is 50,000.”, “I understand that the number may be big.”, “But the technical and legal teams say that the price is 50,000 and that they cannot go below that”, “Simply put, the nature of a breach is such that it could lead to various misuses”

[Individual A]: “But it was 20k 10 minutes ago”

e.katarina.velika: “Yes it was okay for me, not for my team.”, “I am not familiar with legal things nor the American law”, “which says that the personal information of employees or entire companies must not be in the open”

[Individual A]: “Well it is not in the open”

e.katarina.velika: “With this breach it is”, “All the information of the entered [two specific job categories of Company A customers’ employees] is in the open”, “Likewise, someone else can also take it”, “and can publish it somewhere, unless this is done”

c. A Skype instant message conversation from on or about

May 20, 2015, stated in part the following:

⁹ In the May 18th conversation, both parties switched from writing in English to a language which Individual A identified as being Serbian. The translated instant messages listed here reflect the preliminary translation performed by an FBI linguist. All of the other instant message conversations detailed in this affidavit were written in English.

e.katarina.velika: “I sent you email.”¹⁰

[Individual A]: “In the bank”, “I’ll scan it shortly”

e.katarina.velika: “Ok let me know when ur done.”

[Individual A]: “Sent”

e.katarina.velika: “Ok go to Chase Bank”, “Message me when ur there”

[Individual A]: “Traffic is bad”, “Not sure I’ll make it”

e.katarina.velika: “Banks are working till 5”, “You have 25 min”

[Individual A]: “Exactly”, “Says 15 minutes for closest but im not moving”

e.katarina.velika: “Try to do it today”, “You still have 15 min.”

...

[Individual A]: “I wish you sent me that sooner”, “I wouldn’t be late”, “Name”

e.katarina.velika: “I had to talk to my team about this”, “This process is delicate to them.”

[Individual A]: “You’ll have your money tomorrow”

e.katarina.velika: “Try to go in bank, maybe they let you in.”

...

[Individual A]: “She closed, manager didn’t answer tl”, “Told me to

¹⁰ According to the Skype logs obtained from Individual A, this instant message was received on May 20, 2015 at approximately 4:17 PM CDT. As stated in paragraph nine, an email received by Individual A from srbincar@gmail.com on May 20, 2015 at 3:40 PM CDT specified the name of Marko Stankovic as the name to appear on the cashier’s check.

scan and deposit”, “Overnight”

e.katarina.velika: “Tomorrow morning be in bank.”

[Individual A]: “Yes”

e.katarina.velika: “Gove me phone number I will call you in 9AM by ur time”, “To give you information about account.”

d. A Skype instant message conversation from on or about May 21, 2015, stated in part the following:

[Individual A]: “Im here, let me know when ready”

e.katarina.velika: “I’m ready”, “Are you in bank?”

[Individual A]: “Walking in”, “Im here with deposit slip”

e.katarina.velika: “Ok I will send you account number”, “A moment”, **[Subject Account 1]**, “Marko Stankovic”, “CHASE Bank”, “When you make payment send me picture of recive”

[Individual A]: “Ok, going to deposit”

e.katarina.velika: “When money show up on account and everything move well you can pick time and date for bug fix.”

[Individual A]: “Deposit is done”

e.katarina.velika: “Ok take picture and send me to email so I can forward to team.”

[Individual A]: “I emailed it” ¹¹, “Also, no need for fix”, “Just please disconnect from our servers and any of our customers”, “And lets not talk to eqch other again”

¹¹ According to the Skype logs obtained from Individual A, this instant message was sent by Individual A on May 21, 2015 at approximately 9:11 AM CDT.

e.katarina.velika: “Alright”, “I send to my team to check”¹², “Ok they said everything is fine”¹³, “If you change ur mind about fix, email me anytime”

[Individual A]: “Just want this to end”

e.katarina.velika: “Yeha it’s bad.”, “Have any other company to recommend to us?” [A laughing face emoticon¹⁴ appeared at the end of this message.]

11. On or about June 8, 2015, a search warrant was issued in the Northern District of Illinois by the Honorable Magistrate Judge Jeffrey T. Gilbert for the email account `srbincar@gmail.com`. The FBI has received the search warrant results from Google for the email account `srbincar@gmail.com`, which an FBI agent has reviewed. The FBI agent found a significant amount of material relating to the Subject Offenses, including copies of the previously described email communications between Stefan Stojanovic and Individual A.

12. One of the emails received by the email account `srbincar@gmail.com` from Individual A was received on or about May 21, 2015 at 9:11 AM CDT. This email contained a digital picture with the filename

¹² According to the Skype logs obtained from Individual A, this instant message was sent by Stojanovic on May 21, 2015 at approximately 9:13 AM CDT.

¹³ According to the Skype logs obtained from Individual A, this instant message was sent by Stojanovic on May 21, 2015 at approximately 9:16 AM CDT.

¹⁴ I am aware from my experience that an “emoticon” is a graphic representation of a facial expression utilized in various forms of online communications designed to convey emotional expression such as happy, sad, angry, etc...

“20150521_090930.jpg” which is a photograph of a JPMorgan Chase Bank, N.A. receipt dated May 21, 2015 at 9:08 AM and that reflects \$40,000 deposited to an account number ending in 5523 with the availability of \$35,000 of the deposited amount delayed until June 2, 2015¹⁵.

13. The email account srbincar@gmail.com also was found to contain an email sent on or about May 21, 2015 at 9:13 AM CDT from Stefan Stojanovic using the email address it@lovefreightways.com¹⁶ to “nemo Lovre” at the email address nemo@lovefreightways.com. The email had attached the digital picture with the filename “20150521_090930.jpg” described in the prior paragraph.¹⁷

14. The email account srbincar@gmail.com was also found to contain an email sent on or about June 3, 2015 from Stefan Stojanovic using the

¹⁵ As stated previously, on May 21, 2015, Individual A received instructions via Skype to deposit the \$40,000 cashier’s check to Chase bank account #632655523, which is **Subject Account 1**.

¹⁶ I am aware that Google provides a service by which an individual can associate a non-gmail email address with his/her Google email account and send email messages using the Google email account that appear to come from the non-gmail associated email address. Further, the search of the email account srbincar@gmail.com also found an email received on or about December 26, 2014 from Google which indicated that “it@lovefreightways.com” has been added as an email address for the Google account srbincar@gmail.com.

¹⁷ As stated previously, the Skype logs obtained from Individual A reflect an instant message sent by Stojanovic on May 21, 2015 at approximately 9:13 AM CDT which stated “I send to my team to check.”

email address it@lovefreightways.com to “nemo Lovre” at the email address nemo@lovefreightways.com which stated:

“Dear Mr. [Individual A's first name]

As we agree I'm sending you information about your server security vulnerability. I want to let you know that I didn't make any actions till I have your full permission. Server is still vulnerable and as we agree when you give me permission I will fix it. If you don't want from me to make any action just let me know. Of course as we agreed I didn't touch any of your customers personal data or any server settings.

Regards,
Stefan.”

15. At the conclusion of the above content was additional text in a language which an FBI linguist identified as being Serbo-Croatian. A preliminary translation of this text by an FBI linguist was as follows:

“Is it okay to send him this? I will also later add the technical documentation, but this is the text”

16. The review of the srbincarc@gmail.com email contents found no indications that the above email message was subsequently sent to Individual A.

17. On or about July 24, 2015, an FBI agent interviewed Individual A regarding if Individual A had received any further communications from Stojanovic. Individual A advised he/she had not received any further communications from Stojanovic since on or about May 21, 2015. Individual A also advised that letters had been sent out to Company A's customers in late May 2015 to alert them to the fact that a potential data breach had occurred.

18. The email account srbincar@gmail.com was also found to contain an email sent on or about April 23, 2015 from nemo@lovefreightways.com to Stefan Stojanovic. The body of the email listed the name “Nemo Lovre,” the web site www.lovefreightways.com, and the telephone number 714-414-2207 which the email indicates is a mobile telephone number. This email also included a forwarded email received by nemo@lovefreightways.com in which the sender of the email is listed as Marko Stankovic. There was no content included in the forwarded email.

19. The email account srbincar@gmail.com was also found to contain an email sent on or about January 30, 2015 in which the sender of the email was listed as Marko Stankovic. The email reflected it was sent to both nemo@lovefreightways.com and srbincar@gmail.com. The email had a subject “business card & flayers” and contained approximately six attachments which appeared to be various logos, advertisement flyers, and business cards associated with Love Freightways.

20. During the investigation, bank account records were obtained from JP Morgan Chase Bank N.A. for **Subject Account 1**. The records reflected that the account was held in the name of Marko Stankovic, 3826 Broadlawn Dr, Los Angeles, CA 90068. Records for **Subject Account 1** reflect a deposit on or about May 21, 2015 of a \$40,000 cashier’s check payable to MARKO STANKOVIC with a remitter listed as COMPANY A.

Records for **Subject Account 1** also reflect a June 9, 2015 debit of \$25,000. The records included a scanned copy of a check drawn on **Subject Account 1** associated with this debit. The check is dated June 4, 2015, and is made out for \$25,000 payable to the order of “CASH.”

21. During the investigation, bank account records were obtained from Bank of America N.A. for **Subject Account 2**. The records reflected that the account was held in the name of Love Freightways, Inc., 501 N. Brookhurst St, Ste 206, Anaheim, CA 92801. The signature card for the account, which is dated November 30, 2011, lists the signatory as Nemanja Lovre whose relationship to Love Freightways is listed as “owner.” The signature card lists Illinois driver's license number L16063383028 with an expiration date of January 28, 2014 as a form of identification for NEMANJA LOVRE. The telephone number associated with the account was 714-414-2207.¹⁸ Records for **Subject Account 2** reflect a deposit on or about June 8, 2015, of a \$25,000 check. The records included a scanned copy of the check which indicated it was from **Subject Account 1**.¹⁹ The check also lists the

¹⁸ As stated previously, telephone number 714-414-2207 was listed as the mobile telephone number associated with “Nemo Lovre” in the email sent on or about April 23, 2015 from nemo@lovefreightways.com to Stefan Stojanovic.

¹⁹ As stated previously, **Subject Account 1** was the bank account to which Individual A was instructed to deposit the \$40,000 cashier’s check.

account holder of **Subject Account 1** as Marko Stankovic. The check is dated June 4, 2015 and pays the \$25,000 to the order of “CASH.”²⁰

22. On or about September 15, 2015, an FBI agent reviewed the web site <http://lovefreightways.com>. The web site indicated that Love Freightways was a transportation logistics company with a listed business address of 501 N. Brookhurst St, Ste #206, Anaheim, CA 92801.

23. On or about September 18, 2015, an FBI agent reviewed a publicly accessible LinkedIn profile for “Nemo Lovre” which listed Lovre as the president at Love Freightways located in Anaheim, CA with a date range of June 2011 to the present listed. The profile also reflected that Lovre’s educational experience included attending the “College of DuPage” from 2003 to 2007 and “William Howard Taft High School Chicago” from 1999 to 2003.

24. State of Illinois driver’s license records reflect a current driver’s license issued to NEMANJA LOVRE, date of birth January 28, 1983, having the license number L16063383028 which was most recently issued on or about December 11, 2013.

25. On or about September 18, 2015, an FBI agent performed a search utilizing the Thomson Reuters CLEAR database²¹ for any individual

²⁰ As stated previously, the bank receipt dated May 21, 2015 which reflected \$40,000 being deposited to an account number ending in 5523 indicated that availability of \$35,000 of the deposited amount would be delayed until June 2, 2015.

named “Nemo Lovre” nationally. A single result was located for an individual with the name “Nemo Lovre.” This result reflected a possible former address located at 2817 12th Ave, Los Angeles, CA 90018 with an associated time frame of August 2011. A possible phone number associated with this individual was listed as 714-414-2207. The search did not locate any further identifying information, such as a date of birth, social security number, or other addresses for a “Nemo Lovre.”

26. A similar search utilizing the CLEAR database was performed for NEMANJA LOVRE which identified LOVRE as having a date of birth of January 28, 1983, and also indicated that NEMANJA LOVRE was associated with the telephone number 714-414-2207, and which listed approximately ten addresses located in either the greater Chicago, IL area or Los Angeles, CA area from 2006 to 2015 including the address 2817 12th Ave, Los Angeles, CA 90018 covering the period of August to October 2011.

27. An FBI translator familiar with the Serbian language has advised an FBI agent involved with the investigation that “Nemo” could be used as an abbreviated version of Nemanja.

²¹ The Thomson Reuters CLEAR database is service that provides search functionality of public records data. I have found the results of searches using this service to be reliable in the past.

CONCLUSION

28. Based on the above information, I respectfully submit that there is probable cause to believe that NEMANJA LOVRE violated 18 U.S.C. § 1030(a)(7)(A) and that **Subject Account 1** and **Subject Account 2** contain proceeds of a violation of 18 U.S.C. § 1030(a)(7)(A) and therefore may be seized for forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

29.

FURTHER AFFIANT SAYETH NOT.

ANDREW MCKAY
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on September 29, 2015.

MARIA VALDEZ
United States Magistrate Judge