

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**NO. 14-60026-CR-COHN(s)**

18 U.S.C. § 371  
8 U.S.C. § 1325(c)  
18 U.S.C. § 1546(a)  
18 U.S.C. § 1001  
18 U.S.C. § 2

**UNITED STATES OF AMERICA**

**v.**

**GORAN BJELOVIC, aka Gadafi,  
SRDJAN JOVCIC,  
BRANKO LIKIC, aka Bane,  
HEATHER BENNETT,  
aka Heather Likic, and  
LJILJANA ALEKSIC,**

**Defendants.**

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**SUPERSEDING INDICTMENT**

The Grand Jury charges that:

**GENERAL ALLEGATIONS**

At times material to this Superseding Indictment:

1. A non-citizen of the United States (alien) was not permitted to reside and work permanently in the United States unless the alien was a lawful permanent resident, that is, a non-citizen of the United States who was residing in the United States under legally recognized and lawfully recorded permanent resident status as an immigrant. A permanent resident was also known as a "permanent resident alien," "lawful permanent resident," "resident alien permit holder," and "green card holder."

2. An alien could be granted permanent residency through several different ways,

including marriage to a United States citizen.

3. Aliens who were permanent residents of the United States were eligible to apply for naturalization, that is, to apply for United States citizenship, if they met certain criteria.

**The Process of Seeking Lawful Permanent Resident Status  
for Aliens Based Upon Marriage to a United States Citizen**

4. An alien seeking permanent resident status in the United States based upon marriage to a United States citizen had to use a process involving the filing of applications with the United States Department of Homeland Security, United States Citizenship and Immigration Services ("USCIS"), formerly known as the United States Immigration and Naturalization Service ("INS").

5. In order to initiate the process, the United States citizen was required to file a Form I-130, Petition for Alien Relative, with the USCIS.

6. The United States citizen may have been required to also file a Form I-864, Affidavit of Support, or Form I-864EZ, Affidavit of Support, with the USCIS to show that the alien had adequate means of financial support and was unlikely to become a public charge. The Form I-864EZ was a shorter version of the Form I-864.

7. The alien was required to file a Form I-485, Application to Register Permanent Residence or Adjust Status, with the USCIS, at the same time or subsequent to the filing by the United States citizen of the Form I-130, Petition for Alien Relative.

8. If the alien wanted to travel abroad during the pendency of the review of the Form I-130, Petition for Alien Relative, the alien could file a Form I-131, Application for Travel Document. Upon approval of the Form I-131, the USCIS would issue a Form I-512, Authorization for Parole of an Alien into the United States. The Form I-512 was an advance parole document that would allow the alien to return to the United States after foreign travel.

9. After receipt by the USCIS of the necessary documents relating to the Form I-130, Petition for Alien Relative, the alien and United States citizen spouse may have been required to attend an interview with the USCIS.

10. If the alien and United States citizen spouse were married for less than two years, and the Form I-130, Petition for Alien Relative, was granted, the alien would receive a Form I-551, conditional permanent resident card, commonly known as a "green card," which would be valid for two years.

11. During the ninety days prior to the expiration of the conditional permanent resident card, the alien and United States citizen were required to file a Form I-751, Application to Remove Conditions of Residence, to apply for a new Form I-551, permanent resident card, commonly known as a "green card," which would be valid for ten years without any special conditions.

#### **The Process of Applying for Naturalization**

12. In order to be eligible for naturalization based upon marriage to a United States citizen, the alien was required to: (i) be 18 years old or older; (ii) be a permanent resident of the United States for at least three years; (iii) be a person of good moral character; (iv) have a basic knowledge of the United States government; (v) have been in the United States continuously; and (vi) be able to read, write and speak basic English.

13. In order to apply for naturalization, the alien was required to file a Form N-400, Application for Naturalization, with the USCIS.

14. After the alien had been fingerprinted and the application reviewed, the alien was required to attend an interview with the USCIS. At the time of the interview, the alien was also required to take a civics test.

15. If the alien's application for naturalization was approved, the alien was required to attend a naturalization ceremony at which time the alien swore the Oath of Allegiance to the United States.

16. Upon completion of the naturalization ceremony the alien would become a United States citizen and would be provided with a Certificate of Naturalization.

**COUNT 1**

(Conspiracy, 18 U.S.C. § 371)

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

**The Conspiracy**

2. From in or about May 11, 2010, through on or about June 30, 2013, in Broward and Miami-Dade Counties in the Southern District of Florida, and elsewhere, the defendants,

**GORAN BJELOVIC, aka Gadafi,  
SRDJAN JOVCIC, and  
LJILJANA ALEKSIC,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit an offense against the United States, that is,

- a. marriage fraud in violation of Title 8, United States Code, Section 1325(c); and
- b. fraud and misuse of visas, permits, and other documents in violation of Title 18, United States Code, Section 1546(a).

**The Purpose and Object of the Conspiracy**

The principal purpose and object of the conspiracy was to deceive officials of the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, in order for **GORAN BJELOVIC** to unlawfully become a permanent resident of the United States.

**The Manner and Means of the Conspiracy**

The manner and means by which the defendants sought to achieve the purpose and object of the conspiracy included, among other things, the following:

1. **GORAN BJELOVIC**, a citizen of Serbia, and an alien and non-citizen of the United States, would seek to become a permanent resident of the United States so that he would be permitted to reside and work in the United States.

2. **GORAN BJELOVIC** would seek to enter into a marriage with a United States citizen for the purpose of evading immigration laws and becoming a permanent resident of the United States.

3. **GORAN BJELOVIC** would provide money and other assistance to **LJILJANA ALEKSIC**, a citizen of Bosnia and Herzegovina, and an alien and non-citizen of the United States, so that she could become a United States citizen.

4. **SRDJAN JOVCIC**, a Managing Member of B & J Apartments LLC, would assist **GORAN BJELOVIC**, a Manager of B & J Apartments LLC, in unlawfully seeking to become a permanent resident of the United States.

5. **SRDJAN JOVCIC** would assist **LJILJANA ALEKSIC** in her efforts to become a United States citizen, including assisting and coordinating her activities with an attorney representing **ALEKSIC** in her naturalization application to become a United States citizen.

6. After **LJILJANA ALEKSIC** had passed her naturalization test and had received her Certificate of Naturalization admitting her as a citizen of the United States, she would marry **GORAN BJELOVIC** in exchange for money.

7. **SRDJAN JOVCIC** and M.R., who was living in Orlando, Florida and who was promised remuneration for his efforts, would assist **LJILJANA ALEKSIC** and **GORAN BJELOVIC** in arranging for their marriage.

8. After their marriage, **GORAN BJELOVIC** and **LJILJANA ALEKSIC** would not live together or establish a life together assuming marital duties and obligations. Instead,

**BJELOVIC** would reside in Aventura, Florida with M.C., and then with N.M., who he later married, while **ALEKSIC** would reside in Orlando, Florida.

9. After their marriage, **GORAN BJELOVIC** and **LJILJANA ALEKSIC** would seek to deceive the United States Citizenship and Immigration Services by concealing material facts, making materially false statements, and submitting documents containing materially false statements and entries in their efforts to unlawfully obtain permanent resident status for **BJELOVIC**.

10. **SRDJAN JOVCIC** would agree to be a financial sponsor for **GORAN BJELOVIC** in order to assist **BJELOVIC** in becoming a permanent resident of the United States.

11. **GORAN BJELOVIC**, as a result of his marriage to **LJILJANA ALEKSIC**, would apply for and receive a Form I-766, Employment Authorization Card, permitting him to work in the United States.

12. **GORAN BJELOVIC**, as a result of his marriage to **LJILJANA ALEKSIC**, would apply for and receive a Form I-512, Authorization for Parole of Alien into the United States, permitting him to re-enter the United States after foreign travel.

13. **SRDJAN JOVCIC** would serve as interpreter for **GORAN BJELOVIC** during an interview by an officer of the United States Citizenship and Immigration Services and would translate from Serbo-Croatian into English **BJELOVIC's** false statements, well-knowing that those statements were false.

14. When the United States Citizenship and Immigration Services would not grant him permanent resident status without more information and documentation, **GORAN BJELOVIC** would fail to provide to USCIS the information and documentation that had been

requested and on June 30, 2013, would withdraw his request for permanent resident status in the United States.

**Overt Acts**

In furtherance of the conspiracy and to achieve the purpose and object thereof, at least one of the defendants committed and caused to be committed in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

1. On or about May 11, 2010, **GORAN BJELOVIC** signed check number 116, dated May 11, 2010, in the amount of \$680.00, drawn on his account, and payable to an attorney's trust account, with a notation of "Aleksic, Ljiljana N-400" written on the check.

2. On or about May 21, 2010, **LJILJANA ALEKSIC** caused her attorney to send a letter to the United States Citizenship and Immigration Services "re: N-400, Aleksic, Ljiljana" noting his representation of **ALEKSIC** and enclosing various documents including a Form N-400, Application for Naturalization, signed by **ALEKSIC**, and a check for \$675.00.

3. On August 30, 2010 at 9:48 a.m., **SRDJAN JOVCIC** and **LJILJANA ALEKSIC** spoke to each other in a telephone conversation in which they discussed **ALEKSIC's** upcoming nationality test. **ALEKSIC** asks **JOVCIC** to contact her attorney and ask the attorney to translate her birth certificate and send it to her by FedEx.

4. On August 30, 2010 at 4:23 p.m., **SRDJAN JOVCIC** and **LJILJANA ALEKSIC** spoke to each other in a telephone conversation. **JOVCIC** says he is in her attorney's office and that **ALEKSIC's** birth certificate will be translated, notarized, and sent back to her in Orlando, Florida.

5. On September 7, 2010, **SRDJAN JOVCIC** and **LJILJANA ALEKSIC** spoke to each other in a telephone conversation. **ALEKSIC** confirms that she had received the package



and that she will be taking the test tomorrow at 1:00 p.m. **JOVCIC** tells her to relax and study for the test and he will be waiting to hear from her.

6. On September 8, 2010, **LJILJANA ALEKSIC** took a nationality test at a USCIS office in Orlando, Florida.

7. On September 8, 2010, **SRDJAN JOVCIC** and **GORAN BJELOVIC** spoke to each other in a telephone conversation. **BJELOVIC** asks if **JOVCIC** had called the woman to see if she had passed. **JOVCIC** says he has not heard, but that she had been studying over the past month.

8. On September 8, 2010, **LJILJANA ALEKSIC** placed a telephone call to **SRDJAN JOVCIC**, interrupting his telephone conversation with **GORAN BJELOVIC**, who was placed on hold. **ALEKSIC** tells **JOVCIC** that she passed the test.

9. On September 8, 2010, **SRDJAN JOVCIC** resumed his telephone conversation with **GORAN BJELOVIC**. **JOVCIC** congratulates **BJELOVIC** saying he had just become an American because **LJILJANA ALEKSIC** had passed the test.

10. On September 10, 2010, **LJILJANA ALEKSIC** attended a naturalization ceremony at a USCIS office in Orlando, Florida, swore the Oath of Allegiance to the United States, become a United States citizen, and received a Certificate of Naturalization.

11. On September 11, 2010, **GORAN BJELOVIC** flew from Serbia to Miami, Florida, arriving prior to 6:00 p.m.

12. On September 11, 2010, at 8:19 p.m., **SRDJAN JOVCIC** placed a telephone call to **LJILJANA ALEKSIC**. **JOVCIC** informs **ALEKSIC** that **GORAN BJELOVIC** had arrived and that they would talk to an attorney to see what would be the next step.

13. On September 16, 2010, **SRDJAN JOVCIC** and M.R. in Orlando, Florida spoke

to each other in a telephone conversation in which they discussed scheduling the wedding of **GORAN BJELOVIC** and **LJILJANA ALEKSIC** so that the papers could be turned in right away. **JOVCIC** says he and **BJELOVIC** will travel to Orlando and stay in a hotel, **BJELOVIC** will marry **ALEKSIC**, she will get her share, M.R. will get one thousand, they will stay one more day and that's it. **JOVCIC** requests that M.R. get a notary to perform the marriage ceremony in **ALEKSIC's** apartment, and that it does not matter whether **ALEKSIC** likes it because she will be getting money.

14. On November 16, 2010, **GORAN BJELOVIC** and **LJILJANA ALEKSIC** were married in Orlando, Florida.

15. On or about December 12, 2010, **LJILJANA ALEKSIC** signed a Form I-130, Petition for Alien Relative, in which she falsely certified under penalty of perjury that she and **GORAN BJELOVIC** are residing together at 9902 Turf Way, Apt. 5, Orlando, Florida and had been residing there from September 2010 to the present.

16. On or about December 12, 2010, **GORAN BJELOVIC** signed a Form G-325A, Biographical Information, in which he falsely stated that he resides at 9902 Surf [sic] Way, Orlando, Florida, and had been residing there from September 2010 to the present.

17. On or about December 12, 2010, **GORAN BJELOVIC** signed a Form I-485, Application to Register Permanent Residence or Adjust Status, in which he falsely certified under penalty of perjury that his address is 9902 Turf Way, Apt. 5, Orlando, Florida and that he had not ever, in or outside the United States, been arrested, cited, charged, indicted, convicted, fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations.

18. On or about December 20, 2010, **GORAN BJELOVIC** and **LJILJANA ALEKSIC** caused their attorney to mail from Fort Lauderdale, Florida a package by Priority

Mail to the USCIS containing a letter with enclosures including the previously-described Forms I-130, G-325A, and I-485 that they had signed on or about December 12, 2010, and their State of Florida Marriage Record. These documents concealed the fact that **BJELOVIC** and **ALEKSIC** had entered into their marriage for the purpose of evading the immigration laws in order for **BJELOVIC** to unlawfully become a permanent resident of the United States.

19. On or about May 2, 2011, **GORAN BJELOVIC** signed a Form I-131, Application for Travel Document, in which he falsely certified under penalty of perjury that his address is 9902 Turf Way, Apt. 5, Orlando, Florida. Upon approval of the Application, he subsequently received a Form I-512, Authorization for Parole of Alien into the United States, which would permit him to re-enter the United States after foreign travel.

20. On or about October 5, 2011, **GORAN BJELOVIC** presented his Form I-512, Authorization for Parole of Alien into the United States, to an officer of the United States Customs and Border Protection at Miami International Airport, Miami, Florida and falsely stated that he lives at 9902 Turf Way, Apt. 5, Orlando, Florida, and thereupon the officer permitted him to re-enter the United States after foreign travel.

21. On or about April 10, 2013, **GORAN BJELOVIC**, during an interview by an officer of the USCIS in Orlando, Florida, falsely stated that he lives with his wife, **LJILJANA ALEKSIC**, and falsely stated that they reside at 9902 Turf Way, Apt. 5, Orlando, Florida.

22. On or about April 10, 2013, **SRDJAN JOVCIC**, during an interview of **GORAN BJELOVIC** by an officer of the USCIS in Orlando, Florida, translated from Serbo-Croatian into English **BJELOVIC's** false statements that he lives with his wife, **LJILJANA ALEKSIC**, and that they reside at 9902 Turf Way, Apt. 5, Orlando, Florida, **JOVCIC** well-knowing that those statements were false.

23. On or about April 10, 2013, **LJILJANA ALEKSIC**, during an interview by an officer of the USCIS in Orlando, Florida, falsely stated that she lives with her husband, **GORAN BJELOVIC**.

All in violation of Title 18, United States Code, Section 371.

**COUNT 2**

(Concealment of Material Fact, 18 U.S.C. § 1001(a)(1))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about December 12, 2010, in Broward County, in the Southern District of Florida, the defendants,

**GORAN BJELOVIC, aka Gadafi, and  
LJILJANA ALEKSIC,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully concealed and covered up by trick, scheme and device a material fact, that is, in a Form I-130, Petition for Alien Relative, signed by **LJILJANA ALEKSIC** and certified under penalty of perjury and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that **ALEKSIC** and **BJELOVIC** had entered into a marriage for the purpose of evading any provision of the immigration laws in order for **GORAN BJELOVIC** to become a permanent resident of the United States.

All in violation of Title 18, United States Code, Sections 1001(a)(1) and 2.

**COUNT 3**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about December 12, 2010, in Broward County, in the Southern District of Florida, the defendants,

**GORAN BJELOVIC, aka Gadafi, and  
LJILJANA ALEKSIC,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form I-130, Petition for Alien Relative, signed by **LJILJANA ALEKSIC** and certified under penalty of perjury and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

- (1) **GORAN BJELOVIC's** address is 9902 Turf Way, Apt. 5, Orlando, Florida;
- (2) **GORAN BJELOVIC** intends to live at 9902 Surf Way, Apt. 5, Orlando, Florida;
- (3) **GORAN BJELOVIC** and **LJILJANA ALEKSIC** last lived together at 9902 Surf Way, Apt. 5, Orlando, Florida; and
- (4) **GORAN BJELOVIC** and **LJILJANA ALEKSIC** last lived together at 9902 Surf Way, Apt. 5, Orlando, Florida from September 2010 to the present;

when in truth and fact and as the defendants then and there well knew, each statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Sections 1001(a)(3) and 2.

**COUNT 4**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about December 12, 2010, in Broward County, in the Southern District of Florida, the defendant,

**GORAN BJELOVIC, aka Gadafi,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form G-325A, Biographical Information, signed by **GORAN BJELOVIC** and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

(1) **GORAN BJELOVIC** resides at 9902 Surf Way, Orlando, Florida; and

(2) **GORAN BJELOVIC** resided at 9902 Surf Way, Orlando, Florida from September 2010 to the present;

when in truth and fact and as the defendant then and there well knew, each statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT 5**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about December 12, 2010, in Broward County, in the Southern District of Florida, the defendant,

**GORAN BJELOVIC, aka Gadafi,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form I-485, Application to Register Permanent Residence or Adjust Status, signed by **GORAN BJELOVIC** and certified under penalty of perjury and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

- (1) **GORAN BJELOVIC's** address is 9902 Turf Way, Apt. 5, Orlando, Florida; and
- (2) **GORAN BJELOVIC** had not ever, in or outside the United States, been arrested, cited, charged, indicted, convicted, fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations;

when in truth and fact and as the defendant then and there well knew, each statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).



**COUNT 6**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about May 2, 2011, in Broward County, in the Southern District of Florida, the defendant,

**GORAN BJELOVIC, aka Gadafi,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form I-131, Application for Travel Document, signed by **GORAN BJELOVIC** and certified under penalty of perjury and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

(1) **GORAN BJELOVIC's** address is 9902 Turf Way, Apt. 5, Orlando, Florida; when in truth and fact and as the defendant then and there well knew, that statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT 7**

(False Statement, 18 U.S.C. § 1001(a)(2))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about October 5, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

**GORAN BJELOVIC, aka Gadafi,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, that is, **GORAN BJELOVIC** stated and represented to an officer of the United States Customs and Border Protection, Department of Homeland Security, an agency of the United States, that:

(1) **GORAN BJELOVIC** lives at 9902 Turf Way, Apt. 5, Orlando, Florida; when in truth and fact and as the defendant then and there well knew, that statement and representation was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNTS 8 and 9**

(Fraud and Misuse of Documents, 18 U.S.C. § 1546(a))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about the dates set forth below in Broward and Miami-Dade Counties, in the Southern District of Florida, the defendant,

**GORAN BJELOVIC, aka Gadafi,**

knowingly used and possessed, as set forth below in each count, a document prescribed by statute or regulation for entry into or as evidence of authorized stay in the United States, that is, a Form I-512, Authorization for Parole of an Alien, bearing the name of **GORAN BJELOVIC**, knowing it to have been procured by means of false claim or statement, and to have been otherwise procured by fraud, that is, by marriage fraud and by denying and concealing **GORAN BJELOVIC's** prior criminal arrest and conviction history.

Count   Approximate Date   Details of Use and Possession of Document

8	October 5, 2011	Presented such Form I-512 to United States Customs and Border Protection at the Miami International Airport in Miami, Miami-Dade County, Florida for entry into the United States.
9	September 19, 2012	Presented such Form I-512 to the Florida Department of Highway Safety and Motor Vehicles in Lauderdale Lakes, Broward County, Florida to obtain a Florida driver license.

All in violation of Title 18, United States Code, Section 1546(a).

**COUNT 10**

(Conspiracy, 18 U.S.C. § 371)

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

**The Conspiracy**

2. From in or about August 15, 2010, through the date of the return of this Superseding Indictment, in Broward and Miami-Dade Counties in the Southern District of Florida, and elsewhere, the defendants,

**BRANKO LIKIC, aka Bane,  
SRDJAN JOVCIC,  
GORAN BJELOVIC, aka Gadafi, and  
HEATHER BENNETT, aka Heather Likic,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit an offense against the United States, that is,

- a. marriage fraud in violation of Title 8, United States Code, Section 1325(c); and
- b. fraud and misuse of visas, permits, and other documents in violation of Title 18, United States Code, Section 1546(a).

**The Purpose and Object of the Conspiracy**

The principal purpose and object of the conspiracy was to deceive officials of the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, in order for **BRANKO LIKIC** to unlawfully become a permanent resident of the United States.

**The Manner and Means of the Conspiracy**

The manner and means by which the defendants sought to achieve the purpose and object of the conspiracy included, among other things, the following:

1. **BRANKO LIKIC**, a citizen of Serbia, and an alien and non-citizen of the United States, would seek to become a permanent resident of the United States so that he would be permitted to reside and work in the United States.

2. **BRANKO LIKIC** would seek to enter into a marriage with a United States citizen for the purpose of evading immigration laws and becoming a permanent resident of the United States.

3. **BRANKO LIKIC** would seek to marry a United States citizen before his scheduled removal hearing on November 19, 2010.

4. **BRANKO LIKIC** would perform repair and maintenance work for **SRDJAN JOVCIC**, a Managing Member of B & J Apartments LLC, and **GORAN BJELOVIC**, a Manager of B & J Apartments LLC, and **JOVCIC** and **BJELOVIC** would assist **LIKIC** in marrying a United States citizen.

5. **BRANKO LIKIC** and **SRDJAN JOVCIC** would as early as August 15, 2010, make inquiries with various persons seeking a United States citizen who would agree to marry **LIKIC** in exchange for money.

6. **BRANKO LIKIC** would learn through his contacts that **HEATHER BENNETT** would consider marrying him in exchange for money.

7. **SRDJAN JOVCIC** and **GORAN BJELOVIC** would agree to issue a check from their B & J Apartments LLC bank account payable to **BRANKO LIKIC** so that **LIKIC** could send the money to **HEATHER BENNETT** to pay her airfare from South Carolina to Florida.

8. **HEATHER BENNETT** would fly from her residence in Myrtle Beach, South Carolina to Fort Lauderdale, Florida to meet with **BRANKO LIKIC** and **SRDJAN JOVCIC** to negotiate the terms of a possible marriage to **LIKIC** in exchange for money.

9. **HEATHER BENNETT** would agree to marry **BRANKO LIKIC** so that he could apply for permanent resident status in the United States, and in exchange **LIKIC** would agree to pay money to **BENNETT** and allow her to reside in his two-bedroom apartment while she was working at a restaurant in South Florida during the tourist season.

10. After their marriage, **HEATHER BENNETT** would seek additional money from **BRANKO LIKIC**, who would request a loan from **SRDJAN JOVCIC** and **GORAN BJELOVIC**.

11. **SRDJAN JOVCIC** and **GORAN BJELOVIC** would agree to issue a check from their B & J Apartments LLC bank account and payable to **BRANKO LIKIC**, who would send the money to **HEATHER BENNETT** in South Carolina.

12. After their marriage, **BRANKO LIKIC** and **HEATHER BENNETT** would seek to deceive the United States Citizenship and Immigration Services by concealing material facts, making materially false statements, and submitting documents containing materially false statements and entries in their efforts to unlawfully obtain permanent resident status for **LIKIC**.

#### **Overt Acts**

In furtherance of the conspiracy and to achieve the purpose and object thereof, at least one of the defendants committed and caused to be committed in the Southern District of Florida and elsewhere, at least one of the following overt acts, among others:

1. On August 15, 2010, **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation in which they discussed a possible meeting with D.S. to discuss

the possibility of D.S. marrying **LIKIC**.

2. On August 23, 2010, **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **JOVCIC** says "Arthur" told him that he had a woman who might be able to do it for the papers. **JOVCIC** says he told "Arthur" that it did not matter if she were white, black or Hispanic so long as she's normal and a citizen. **JOVCIC** also says he knows a girl who formerly worked with Z.J., who was willing to marry someone for \$10,000.00, and that Z.J. could ask the girl about marrying **LIKIC**. **JOVCIC** says he and **LIKIC** will figure it out.

3. On August 26, 2010, **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation in which **JOVCIC** says "Arthur" told him that he wanted to meet in person rather than speak over the telephone, and that he had found a wife.

4. On August 31, 2010, **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **JOVCIC** says "Arthur" told him that the woman had agreed to \$15,000.00, but that she had not been answering the telephone and had not yet confirmed meeting with **LIKIC**. When **LIKIC** asks her race and age, **JOVCIC** replies that she is a white American, but "Arthur" had not told him her age.

5. On September 3, 2010, at 6:45 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says he stopped by a café and learned that a woman is forty-eight years old, he has not yet met her and does not know what she looks like, but was advised that she looks like she's forty. **JOVCIC** says to marry her right away and do not second-guess or think about it.

6. On September 3, 2010, at 7:49 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says he saw a barman who told him

about a woman described as good. **LIKIC** says he told the barman to send the woman to him so he can see her or have the woman call him, but the woman had not yet called him.

7. On September 14, 2010, at 3:01 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says he just spoke to a woman who says her airfare would be about \$600.00, but she needs money to pay for the flight. **LIKIC** says he does not have the money.

8. On September 14, 2010, at 3:29:10 p.m., **SRDJAN JOVCIC** and **GORAN BJELOVIC** spoke to each other in a telephone conversation. **JOVCIC** says that **BRANKO LIKIC** had asked for a loan of money, but **JOVCIC** had replied that he would first have to ask **BJELOVIC**. The telephone call was then disconnected.

9. On September 14, 2010, at 3:29:51 p.m., **SRDJAN JOVCIC** and **GORAN BJELOVIC** spoke to each other in a telephone conversation. **JOVCIC** says that he had told **BRANKO LIKIC** that he could not lend him money without asking **BJELOVIC**. **JOVCIC** says an American girl from North Carolina who will marry **LIKIC** will come on Thursday. **BJELOVIC** says to give **LIKIC** a check and have **LIKIC** work it off for them. **BJELOVIC** says to put the check in **LIKIC's** name as if **LIKIC** had done some work.

10. On September 14, 2010, at 3:36 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **JOVCIC** says **LIKIC** should come to **JOVCIC's** place so that **JOVCIC** can give him some money. **LIKIC** says he just spoke to the woman and learned that her airfare was so high because she wants to bring her babysitter to watch her baby while she and **LIKIC** get married.

11. On or about September 14, 2010, **SRDJAN JOVCIC** caused to be delivered to **BRANKO LIKIC** check number 1049, dated September 14, 2010, in the amount of \$1,500.00,



drawn on the account of B & J Apartments LLC, signed by **JOVCIC** and payable to **LIKIC**.

12. On September 14, 2010, at 8:54 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says he sent the stuff to the woman and she will get the ticket to come here. **JOVCIC** says the woman should bring all the paperwork.

13. On September 15, 2010, **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says the woman had picked up the money. **JOVCIC** says when the woman gets here, he and **LIKIC** will have to sit down and talk to her and make an arrangement. **JOVCIC** says **GORAN BJELOVIC** had called wanting to know, and that he had told **BJELOVIC** that everything was okay.

14. On Thursday, September 16, 2010, **HEATHER BENNETT**, along with her baby and her babysitter, flew on a Spirit Airlines flight from Myrtle Beach, South Carolina to Fort Lauderdale, Florida.

15. On September 16, 2010, at 10:42 a.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. When **JOVCIC** asks about the situation, **LIKIC** says the bird flew into the cage. When **JOVCIC** asks if she is any good, **LIKIC** says she is good enough to marry. **LIKIC** describes **HEATHER BENNETT** and her son to **JOVCIC**.

16. On Friday, September 17, 2010, **BRANKO LIKIC** and **HEATHER BENNETT** signed the Application to Marry section of a State of Florida Marriage Record. The Marriage License section indicated that the license would become effective on September 20, 2010. The Certificate of Marriage section was subsequently executed by a notary public who alleged that the marriage of **LIKIC** and **BENNETT** took place on September 25, 2010.

17. On September 17, 2010, at 6:21 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC**

spoke to each other in a telephone conversation. **LIKIC** says he only has a license so **HEATHER BENNETT's** return flight has to be postponed from Sunday to Monday. **LIKIC** asks for a check for \$2,000.00 explaining he has to take \$1,000.00 to an attorney on Monday. **JOVCIC** says he (**JOVCIC**) will have to see **GORAN BJELOVIC** about the money. When **LIKIC** says he needs a sponsor, **JOVCIC** says he cannot be a sponsor for **LIKIC** because he has to be a sponsor for **BJELOVIC**.

18. On Monday, September 20, 2010, **HEATHER BENNETT**, along with her baby, flew on a Spirit Airlines flight from Fort Lauderdale, Florida to Myrtle Beach, South Carolina.

19. On September 30, 2010, at 12:47 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says **HEATHER BENNETT** asked him for \$1,000.00 to pay for some important expenses relating to a court matter tomorrow. **JOVCIC** says he had told **LIKIC** in the beginning to sit down with her and make arrangements, and that now she had caught **LIKIC** in the middle. **JOVCIC** says he has to finish something and will call **LIKIC** back.

20. On September 30, 2010, at 1:23 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **JOVCIC** says he and **GORAN BJELOVIC** are together and that they are returning after looking at some apartments. **LIKIC** asks to borrow \$1,000.00 for about ten days saying he will be able to repay it when a man sends him some money from Norway. **JOVCIC** says he does not know, suggests that **LIKIC** speak to **BJELOVIC**, and then says they will call **LIKIC** back.

21. On September 30, 2010, at 3:32 p.m., **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **JOVCIC** tells **LIKIC** to come to his place so he can give something to him.

22. On or about September 30, 2010, **SRDJAN JOVCIC** caused to be delivered to **BRANKO LIKIC** check number 1069, dated September 30, 2010, in the amount of \$1,000.00, drawn on the account of B & J Apartments LLC, payable to **LIKIC**, with a notation of "Loan" written on the check.

23. On October 1, 2010, **BRANKO LIKIC** and **SRDJAN JOVCIC** spoke to each other in a telephone conversation. **LIKIC** says **HEATHER BENNETT** got the money and finished everything. **LIKIC** says he just wants to finish that thing that he started.

24. On or about October 22, 2010, **BRANKO LIKIC** caused his attorney to file in the Immigration Court in Miami, Florida, a motion to continue his removal hearing scheduled for November 19, 2010 based upon **LIKIC's** marriage to **HEATHER BENNETT**, a United States citizen, which motion was granted on October 28, 2010.

25. On or about January 21, 2011, **HEATHER BENNETT** signed a Form G-325A, Biographical Information, in which she falsely stated that she resided at 5270 NE 6th Avenue, Fort Lauderdale, Florida from August 2010 to the present.

26. On or about May 2, 2011, **BRANKO LIKIC** and **HEATHER BENNETT** caused to be filed with the USCIS a Form I-130 and the previously-described Form G-325A that had been signed on or about January 21, 2011, and their State of Florida Marriage Record. These documents concealed the fact that **LIKIC** and **BENNETT** had entered into their marriage for the purpose of evading the immigration laws in order for **LIKIC** to unlawfully become a permanent resident of the United States.

27. On or about July 17, 2012, **HEATHER BENNETT**, during an interview by an officer of the USCIS in Oakland Park, Florida, made numerous false statements including that: she had met **BRANKO LIKIC** in July 2009; he had proposed marriage to her on September 1,

2010; and they had resided at 5270 NE 6th Avenue, Apartment 29E, Fort Lauderdale, Florida beginning a couple of weeks before their marriage in September 2010.

28. On or about July 17, 2012, **BRANKO LIKIC**, during an interview by an officer of the USCIS in Oakland Park, Florida, made numerous false statements including that: he met **HEATHER BENNETT** in July 2009; she had moved from South Carolina to Florida in July 2010; he had proposed marriage to her on September 1, 2010; and she had moved into his apartment in the beginning of September 2010.

29. On or about August 30, 2012, **HEATHER BENNETT** submitted to the USCIS in Oakland Park, Florida a hand-printed document dated August 24, 2012, in which she wrote false statements including that: she would never marry someone for them to get papers, referring to permanent residency in the United States; she had no intent to marry **BRANKO LIKIC** so he could get papers; and she had met **LIKIC** almost three years ago.

30. On or about August 30, 2012, **BRANKO LIKIC** submitted to the USCIS in Oakland Park, Florida a hand-printed document in which he falsely wrote that he had met **HEATHER BENNETT** in 2009.

31. On or about March 7, 2013, **HEATHER BENNETT** signed a Form G-325A, Biographical Information, in which she falsely stated that she resided at 5270 NE 6th Avenue, Fort Lauderdale, Florida from August 2010 to the present.

32. On or about March 7, 2013, **BRANKO LIKIC** signed a Form G-325A, Biographical Information, in which he falsely stated that he had no former wife before his marriage to **HEATHER BENNETT**.

33. On or about March 14, 2013, **BRANKO LIKIC** and **HEATHER BENNETT** caused to be filed with the USCIS a Form I-130 and the previously-described Forms G-325A

that they had signed on or about March 7, 2013, which documents concealed the fact that **LIKIC** and **BENNETT** had entered into their marriage for the purpose of evading the immigration laws in order for **LIKIC** to unlawfully become a permanent resident of the United States.

All in violation of Title 18, United States Code, Section 371.

**COUNT 11**

(Concealment of Material Fact, 18 U.S.C. § 1001(a)(1))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about May 2, 2011, in Broward County, in the Southern District of Florida, the defendants,

**BRANKO LIKIC, aka Bane, and  
HEATHER BENNETT, aka Heather Likic,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully concealed and covered up by trick, scheme and device a material fact, that is, in a Form I-130, Petition for Alien Relative, signed by **HEATHER BENNETT** and certified under penalty of perjury and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that **HEATHER BENNETT** and **BRANKO LIKIC** had entered into a marriage for the purpose of evading any provision of the immigration laws in order for **BRANKO LIKIC** to become a permanent resident of the United States.

All in violation of Title 18, United States Code, Sections 1001(a)(1) and 2.

**COUNT 12**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about May 2, 2011, in Broward County, in the Southern District of Florida, the defendant,

**HEATHER BENNETT, aka Heather Likic,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form G-325A, Biographical Information, signed by **HEATHER BENNETT** and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

(1) **HEATHER BENNETT** resided at 5270 NE 6th Avenue, Fort Lauderdale, Florida from August 2010 to the present;

when in truth and fact and as the defendant then and there well knew, that statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT 13**

(False Statement, 18 U.S.C. § 1001(a)(2))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about July 17, 2012, in Broward County, in the Southern District of Florida, the defendant,

**HEATHER BENNETT, aka Heather Likic,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, that is, **HEATHER BENNETT** stated and represented to an officer of the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

- (1) she met **BRANKO LIKIC** in July 2009;
- (2) she met **BRANKO LIKIC** in 2009 at a bar named Aruba;
- (3) she was living in Hollywood, Florida when she first met **BRANKO LIKIC**;
- (4) she started dating **BRANKO LIKIC** heavily in 2010 before their marriage;
- (5) she and **BRANKO LIKIC** decided to get married about a month after they started dating;
- (6) on September 1, 2010, **BRANKO LIKIC** proposed marriage to her;
- (7) it was the good sex that made her want to marry **BRANKO LIKIC**; and
- (8) she had resided at 5270 NE 6th Avenue, Apartment 29E, Fort Lauderdale, Florida beginning a couple of weeks before she got married in September 2010;

when in truth and fact and as the defendant then and there well knew, each statement and representation was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(2).



**COUNT 14**

(False Statement, 18 U.S.C. § 1001(a)(2))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about July 17, 2012, in Broward County, in the Southern District of Florida, the defendant,

**BRANKO LIKIC, aka Bane,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, that is, **BRANKO LIKIC** stated and represented to an officer of the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

- (1) he met **HEATHER BENNETT** in July 2009;
- (2) he met **HEATHER BENNETT** in 2009 at a bar named Aruba located on Commercial Boulevard;
- (3) **HEATHER BENNETT** moved from South Carolina back to Florida in July 2010;
- (4) he started dating **HEATHER BENNETT** heavily in 2010 before their marriage;
- (5) he proposed marriage to **HEATHER BENNETT** on September 1, 2010;
- (6) **HEATHER BENNETT** moved into his apartment and began living with him in the beginning of September 2010;
- (7) he wanted to marry **HEATHER BENNETT** because she reminded him of his mother a little bit and because of the amazing, amazing sex;

when in truth and fact and as the defendant then and there well knew, each statement and representation was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT 15**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about August 30, 2012, in Broward County, in the Southern District of Florida, the defendant,

**HEATHER BENNETT, aka Heather Likic,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a hand-printed document dated August 24, 2012, and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

- (1) she would never marry someone for them to get papers, referring to legal permanent residency;
- (2) she had no intent to marry **BRANKO LIKIC** so he could get papers, referring to legal permanent residency;
- (3) she had met **BRANKO LIKIC** almost 3 years ago; and
- (4) she had met **BRANKO LIKIC** at a bar named Aruba's;

when in truth and fact and as the defendant then and there well knew, each statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT 16**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about August 30, 2012, in Broward County, in the Southern District of Florida, the defendant,

**BRANKO LIKIC, aka Bane,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a hand-printed document signed by defendant **BRANKO LIKIC** and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

(1) he first met **HEATHER BENNETT** in 2009;

when in truth and fact and as the defendant then and there well knew, that statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT 17**

(Concealment of Material Fact, 18 U.S.C. § 1001(a)(1))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about March 14, 2013, in Broward County, in the Southern District of Florida, the defendants,

**BRANKO LIKIC, aka Bane, and  
HEATHER BENNETT, aka Heather Likic,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully concealed and covered up by trick, scheme and device a material fact, that is, in a Form I-130, Petition for Alien Relative, signed by **HEATHER BENNETT** and certified under penalty of perjury and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that **HEATHER BENNETT** and **BRANKO LIKIC** had entered into a marriage for the purpose of evading any provision of the immigration laws in order for **BRANKO LIKIC** to become a permanent resident of the United States.

All in violation of Title 18, United States Code, Sections 1001(a)(1) and 2.

**COUNT 18**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about March 14, 2013, in Broward County, in the Southern District of Florida, the defendant,

**HEATHER BENNETT, aka Heather Likic,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form G-325A, Biographical Information, signed by **HEATHER BENNETT** and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

(1) **HEATHER BENNETT** resided at 5270 NE 6th Avenue, Fort Lauderdale, Florida from August 2010 to the present;

when in truth and fact and as the defendant then and there well knew, that statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT 19**

(False Writing and Document, 18 U.S.C. § 1001(a)(3))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about March 14, 2013, in Broward County, in the Southern District of Florida, the defendant,

**BRANKO LIKIC, aka Bane,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made and used a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, that is, in a Form G-325A, Biographical Information, signed by **BRANKO LIKIC** and submitted to the United States Citizenship and Immigration Services, Department of Homeland Security, an agency of the United States, that:

(1) he had no former wife before his marriage to **HEATHER BENNETT**; when in truth and fact and as the defendant then and there well knew, that statement and entry was materially false, fictitious, and fraudulent.

All in violation of Title 18, United States Code, Section 1001(a)(3).

**COUNTS 20, 21, and 22**

(Fraud and Misuse of Documents, 18 U.S.C. § 1546(a))

1. The General Allegations in this Superseding Indictment are re-alleged and incorporated herein by reference.

2. On or about the dates set forth below in Broward and Miami-Dade Counties, in the Southern District of Florida, the defendant,

**SRDJAN JOVCIC,**

knowingly used and possessed, as set forth below in each count, a document prescribed by statute or regulation for entry into or as evidence of authorized stay in the United States, that is, a United States passport bearing Passport Number xxxxx2445 and the name of **SRDJAN JOVCIC**, knowing it to have been procured by means of false claim or statement, and to have been otherwise procured by fraud, that is, by marriage fraud and by denying and concealing **SRDJAN JOVCIC's** prior marital history, and prior criminal detention, arrest and conviction history, on the following documents:

- (1) Form I-485, Application to Register Permanent Resident or Adjust Status signed by **SRDJAN JOVCIC** on January 10, 2003;
- (2) Form G-325A, Biographical Information signed by **SRDJAN JOVCIC** on January 10, 2003;
- (3) Form I-130, Petition for Alien Relative signed by **SRDJAN JOVCIC's** wife on January 10, 2003;
- (4) Form I-751, Petition to Remove Conditions on Residence, and supporting affidavit, signed by **SRDJAN JOVCIC** on January 10, 2003;
- (5) Form N-400, Application for Naturalization, signed by **SRDJAN JOVCIC** on January 18, 2007; and

(6) Form N-445, Notice of Naturalization Oath Ceremony, signed by **SRDJAN JOVCIC** on November 2, 2007.

Count   Approximate Date   Details of Use and Possession of Document

20	April 24, 2009	Presented such United States passport to the Florida Department of Highway Safety and Motor Vehicles in Lauderdale Lakes, Broward County, Florida to obtain a Florida driver license.
21	March 23, 2011	Presented such United States passport to United States Customs and Border Protection at the Miami International Airport in Miami, Miami-Dade County, Florida for entry into the United States.
22	August 10, 2011	Presented such United States passport to United States Customs and Border Protection at the Miami International Airport in Miami, Miami-Dade County, Florida for entry into the United States.

All in violation of Title 18, United States Code, Section 1546(a).

FOREPERSON

  
WILFREDO A. FERRER  
UNITED STATES ATTORNEY

  
WILLIAM T. SHOCKLEY  
ASSISTANT UNITED STATES ATTORNEY



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 14-60026-Cr-JIC(s)

vs.

## CERTIFICATE OF TRIAL ATTORNEY\*

GORAN BJELOVIC, a/k/a Gadafi,  
SRDJAN JOVCIC,  
BRANKO LIKIC, a/k/a Bane,  
HEATHER BENNETT, a/k/a Heather Likic, and  
LJILJANA ALEKSICDefendants./

Court Division: (Select One)

Miami     Key West      
FTL ✓ WPB     FTP    

## Superseding Case Information:

New Defendant(s)     Yes ✓ NoNumber of New Defendants    Total number of counts 22

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

- Interpreter: (Yes or No) Yes  
List language and/or dialect Serbo-Croatian

- This case will take 7 days for the parties to try.

- Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I 0 to 5 days      
 II 6 to 10 days ✓  
 III 11 to 20 days      
 IV 21 to 60 days      
 V 61 days and over    

Petty      
 Minor      
 Misdem.      
 Felony ✓

- Has this case been previously filed in this District Court? Yes (Yes or No)

If yes:

Judge: James I. CohnCase No. 14-60026-Cr-JIC

(Attach copy of dispositive order)

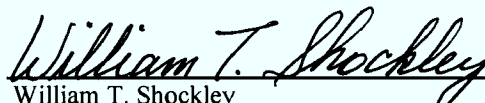
Has a complaint been filed in this matter?     (Yes or No) NO

If yes:

Magistrate Case No.    Related Miscellaneous numbers:    Defendant(s) in federal custody as of    Defendant(s) in state custody as of    Rule 20 from the District of    Is this a potential death penalty case? NO (Yes or No)

- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003?     Yes ✓ No

- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007?     Yes ✓ No

William T. Shockley  
ASSISTANT UNITED STATES ATTORNEY  
Court ID No. A5500088

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** GORAN BJELOVIC, a/k/a Gadafi

**Case No:** 14-60026-Cr-JIC(s)

**Counts #:** 1, 10

Conspiracy

18 U.S.C. § 371

**\* Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Count #:** 2

Concealment of Material Fact

18 U.S.C. § 1001(a)(1)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 3, 4, 5, 6

Making False Writing or Document

18 U.S.C. § 1001(a)(3)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Count #:** 7

Making Materially False Statement

18 U.S.C. § 1001(a)(2)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 8, 9

Fraud and Misuse of Visas, Permits, and Other Documents

18 U.S.C. § 1546(a)

**\*Max. Penalty:** 10 years' imprisonment, \$250,000 fine, 3 years' supervised release

\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** SRDJAN JOVCIC

**Case No:** 14-60026-Cr-JIC(s)

**Counts #:** 1, 10

Conspiracy

18 U.S.C. § 371

**\* Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 20, 21, 22

Fraud and Misuse of Visas, Permits, and Other Documents

18 U.S.C. § 1546(a)

**\*Max. Penalty:** 10 years' imprisonment, \$250,000 fine, 3 years' supervised release

\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** BRANKO LIKIC, a/k/a Bane

**Case No:** 14-60026-Cr-JIC(s)

**Count #:** 10

Conspiracy

18 U.S.C. § 371

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 11, 17

Concealment of Material Fact

18 U.S.C. § 1001(a)(1)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Count #:** 14

Making Materially False Statement

18 U.S.C. § 1001(a)(2)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 16, 19

Making False Writing or Document

18 U.S.C. § 1001(a)(3)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** HEATHER BENNETT, a/k/a Heather Likic

**Case No:** 14-60026-Cr-JIC(s)

**Count #:** 10

Conspiracy

18 U.S.C. § 371

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 11, 17

Concealment of Material Fact

18 U.S.C. § 1001(a)(1)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Counts #:** 12, 15, 18

Making False Writing or Document

18 U.S.C. § 1001(a)(3)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Count #:** 13

Making Materially False Statement

18 U.S.C. § 1001(a)(2)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** LJILJANA ALEKSIC

**Case No:** 14-60026-Cr-JIC(s)

**Count #:** 1

Conspiracy

18 U.S.C. § 371

**\* Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Count #:** 2

Concealment of Material Fact

18 U.S.C. § 1001(a)(1)

**\*Max. Penalty:** 5 years' imprisonment, \$250,000 fine, 3 years' supervised release

**Count #:** 3

Making False Writing or Document

18 U.S.C. § 1001(a)(3)

\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.