UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	No. 20 CR 750
v.	)	
	)	Judge Guzman
MAJA NIKOLIC, et al.	)	

MOTION TO ISSUE CORRECTED BENCH WARRANTS

The United States of America, by its attorney, John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, moves this court for issuance of corrected bench warrants as to four fugitive defendants: (1) Maja Nikolic, (2) Nebojsa Simeunovic, (3) Mijajlo Stanisic, and (4) Dorde Todorovic. In support of its motion, the government states:

1. Defendants Maja Nikolic and Marko Nikolic were first charged in this case, each with one count of wire fraud, on October 23, 2020.

2. Maja and Marko Nikolic were indicted on January 19, 2021. In the indictment, Marko Nikolic was charged with two counts of wire fraud, and Maja Nikolic was charged with one count of wire fraud.

3. A superseding indictment was returned on October 19, 2022. In addition to the Nikolics, five additional defendants were charged in the superseding indictment. Additional counts of wire fraud, as well as domestic and international concealment money laundering charges, were also added to the case.

4. Existing arrest and bench warrants issued in this case do not completely and accurately reflect the pending charges as to the fugitive defendants.

In the event that one or more of the fugitive defendants is apprehended abroad, discrepancies between the superseding indictment and the active arrest warrant may lead to difficulties in detaining and extraditing such individuals.

5. To correct these discrepancies, the government requests that the Court quash the existing arrest and/or bench warrants for defendants Maja Nikolic, Nebojsa Simeunovic, Mijajlo Stanisic, and Dorde Todorovic, and issue in their place corrected bench warrants (ILND 442). Each corrected bench warrant should identify the charging instrument as a Superseding Indictment by selecting the appropriate box on ILND 442. The offenses for each defendant should be briefly described as follows:

Defendant	**Brief offense description**
Maja Nikolic	Wire fraud Title: 18 U.S.C. 1343 (9 counts)
	Domestic money laundering Title: 18 U.S.C.: 1956(a)(1)(B)(i) (2 counts)
	International money laundering Title 18: U.S.C.: 1956(a)(2)(B)(i) (1 count)
Nebojsa Simeunovic	Wire fraud Title: 18 U.S.C.: 1343 (10 counts)
	Domestic money laundering Title: 18 U.S.C.: 1956(a)(1)(B)(i) (7 counts)
	International money laundering Title: 18 U.S.C.: 1956(a)(2)(B)(i) (1 count)
Mijajlo Stanisic	Wire fraud Title: 18 U.S.C.: 1343 (3 counts)
	Domestic money laundering Title: 18 U.S.C.: 1956(a)(1)(B)(i) (2 counts)
Dorde Todorovic	Wire fraud Title: 18 U.S.C.: 1343 (2 counts)
	Domestic money laundering Title: 18 U.S.C.: 1956(a)(1)(B)(i) (1 count)

WHEREFORE, the United States moves this court to issue corrected bench warrants as described herein.

Respectfully submitted,

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