

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
DAMIR PEJCINOVIC, :  
a/k/a "Damian," :  
a/k/a "Coco," :  
GZIMI BOJKOVIC, :  
a/k/a "Jimmy," :  
ADRIAN FISEKU, and :  
ELVIS CIRIKOVIC, :  
a/k/a "Gorilla," :  
:  
Defendants. :  
----- X

**SEALED**  
**INDICTMENT**

18 Cr.

**18 CRIM 767**

COUNT ONE

The Grand Jury charges:

THE PEJCINOVIC ENTERPRISE

1. At all times relevant to this Indictment, DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, were members and associates of the Pejcinovic Enterprise (the "Pejcinovic Enterprise" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, the commission of burglaries and interstate transportation and sale of stolen goods. The Pejcinovic Enterprise operated principally

in New York City, California, New Jersey, Pennsylvania, Florida, Massachusetts, Maine, and Europe.

2. The Pejcinovic Enterprise, including its leadership, membership, and associates, constitutes an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity, that is engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constitutes an ongoing organization whose members function as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise engaged in, and its activities affected, interstate and foreign commerce. DAMIR PEJGINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, participated in the operation of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

3. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, the commission of

burglaries and the interstate transport and sale of stolen property.

b. Promoting and enhancing the Enterprise and the activities of its members and associates.

MEANS AND METHODS OF THE ENTERPRISE

4. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise are the following:

a. To further the goal of generating income for the Enterprise, members and associates of the Enterprise committed, conspired to commit, and attempted to commit, numerous burglaries of jewelry stores and banks, as well as the interstate transportation and sale of stolen property from the burglaries.

b. Members and associates of the Enterprise conducted surveillance of potential targets for burglaries, in order to observe the patterns of employees working at these locations and determine possible points of entry.

c. Members and associates of the Enterprise identified potential targets for burglaries and made plans to enter the locations, steal money, jewelry, or other valuables, and flee the locations with the stolen property.

d. Members and associates of the Enterprise traveled and transported the stolen jewelry, cash, and other

goods across state lines and made phone calls in interstate commerce to further the goals of the enterprise.

e. Members and associates of the Enterprise sold the stolen goods to individuals who buy and sell stolen goods ("fences") in New York, California, and elsewhere and then split the proceeds of their unlawful activities.

#### THE RACKETEERING CONSPIRACY

5. From at least in or around 2006, up to and including in or around April 2017, in the Southern District of New York and elsewhere, DAMIR PEJGINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described above, namely the Pejcinovic Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly in the conduct of the affairs of the Pejcinovic Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of

multiple acts indictable under the following provisions of federal law:

a. Title 18, United States Code, Section 2314 (interstate transportation of stolen property); and

b. Title 18, United States Code, Section 2315 (interstate receipt and possession of stolen property).

6. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Enterprise.

#### OVERT ACTS

7. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between in or around February 2006 and in or around March 2006, DAMIR PEJCINOVIC, the defendant, and two co-conspirators not named herein ("CC-1" and "CC-2") participated in a burglary of a restaurant and an attempted burglary of a jewelry store in Portland, Oregon.

b. On or about March 29, 2008, PEJCINOVIC, GZIMI BOJKOVIC, a/k/a "Jimmy," and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and a co-conspirator not named herein ("CC-3") participated in a burglary of a jewelry store in New

York, New York, which resulted in the theft of jewelry valued at over \$2.5 million.

c. On or about October 11, 2008, PEJCINOVIC and CIRIKOVIC participated in an attempted burglary of a jewelry store in Germany, attempting to steal gold valued at more than €10 million.

d. On or about July 26, 2009, PEJCINOVIC, BOJKOVIC, and two co-conspirators not named herein ("CC-4" and "CC-5") participated in a burglary of a jewelry store in New York, New York, which resulted in the theft of jewelry valued at over \$850,000.

e. On or about August 25, 2010, PEJCINOVIC and CC-4 participated in an attempted burglary of a jewelry store in New York, New York.

f. On or about August 28, 2010, PEJCINOVIC, BOJKOVIC, CC-4, and a co-conspirator not named herein ("CC-6") participated in a burglary of a jewelry store in Beverly Hills, California, which resulted in the theft of jewelry valued at over \$70,000.

g. On or about September 5, 2010, PEJCINOVIC, CC-4, and CC-5 participated in a burglary of a jewelry store in Kansas City, Missouri, which resulted in the interstate transportation and sale of stolen jewelry valued at over \$1 million in New York, NY.

h. On or about February 19, 2011, PEJGINOVIC, CIRIKOVIC, and ADRIAN FISEKU, the defendants, CC-4, and CC-6 participated in a burglary of a jewelry store in Los Angeles, CA, which resulted in the interstate transportation and sale of stolen jewelry valued at over \$3 million in New York, NY.

i. In or around the Summer of 2011, PEJGINOVIC and CC-6 participated in an attempted burglary of a jewelry store in Brooklyn.

j. On or about September 16, 2011, PEJGINOVIC, CIRIKOVIC, CC-2, and two co-conspirators not named herein ("CC-7" and "CC-8") participated in a burglary of a jewelry store in Los Angeles, California which resulted in the theft of jewelry valued at over \$150,000.

k. In or around the Fall of 2012, PEJGINOVIC, BOJKOVIC, CC-4, and CC-6 participated in an attempted burglary of a bank in Philadelphia, Pennsylvania.

l. On or about June 30, 2012, PEJGINOVIC, CIRIKOVIC, CC-5, and CC-6 participated in an attempted burglary of a bank in Scarsdale, New York.

m. On or about July 22, 2012, PEJGINOVIC, CC-6, and a co-conspirator not named herein ("CC-9") participated in an attempted burglary of a jewelry store in New York, New York.

n. In or around the Fall of 2013, PEJGINOVIC, BOJKOVIC, CIRIKOVIC, and CC-6 participated in the burglary of a jewelry store in New Jersey.

o. On or about December 31, 2016, PEJGINOVIC, BOJKOVIC, FISEKU, and CC-6 participated in a burglary of a jewelry store in New York, New York, which resulted in the interstate transportation and sale of stolen jewelry valued at over \$3 million in Los Angeles, California.

p. On or about March 20, 2017, PEJGINOVIC, BOJKOVIC, FISEKU, and CC-6 participated in a burglary of a jewelry store in Los Angeles, California, which resulted in the theft of jewelry valued at over \$2 million.

COUNT TWO

The Grand Jury further charges:

9. From at least in or around 2006, up to and including in or around April 2017, in the Southern District of New York and elsewhere, DAMIR PEJGINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, the interstate transport, receipt, and possession of stolen property, in violation of Title 18, United States Code, Sections 2113(a),



2113(b), 2314, and 2315.

10. It was a part and an object of the conspiracy that DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, would and did knowingly enter and attempt to enter a bank, and a building used in whole and in part as a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, with intent to commit in such bank and building, and part thereof so used, a felony affecting such bank, and in violation of a statute of the United States, and a larceny, in violation of Title 18, United States Code, Section 2113(a).

11. It was further a part and object of the conspiracy that DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, would and did knowingly take and carry away and attempt to take and carry away, with intent to steal and purloin, property and money and any other thing of value exceeding \$1,000 belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(b).

12. It was further a part and object of the

conspiracy that DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, would and did knowingly transport, transmit, and transfer in interstate and foreign commerce any goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, in violation of Title 18, United States Code, Section 2314.

13. It was further a part and object of the conspiracy that DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, and others known and unknown, would and did knowingly receive, possess, conceal, store, barter, sell, and dispose of goods, wares, and merchandise, securities, and money of the value of \$5,000 and more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted and taken, in violation of Title 18, United States Code, Section 2315.

OVERT ACTS

14. The allegations set forth in paragraph 7 of this Indictment are repeated and realleged as if set forth fully herein.

(Title 18, United States Code, Section 371.)

COUNT THREE

The Grand Jury further charges:

15. In or around February 2017, in the Southern District of New York and elsewhere, DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," and ADRIAN FISEKU, the defendants, willfully and knowingly transported, transmitted and transferred in interstate and foreign commerce goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, to wit, PEJCINOVIC, BOJKOVIC, and FISEKU transported, and aided and abetted the transportation of, stolen jewelry valued at over \$5,000 from New York to California for sale.

(Title 18, United States Code, Sections 2314 and 2.)

FORFEITURE ALLEGATIONS AND SUBSTITUTE ASSET PROVISION

FORFEITURE ALLEGATION AS TO COUNT ONE

16. As a result of committing the offense alleged in Count One of this Indictment, DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," ADRIAN FISEKU, and

ELVIS CIRIKOVIC, a/k/a "Gorilla," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the offense alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained.

FORFEITURE ALLEGATION AS TO COUNTS TWO and THREE

17. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, DAMIR PEJCINOVIC, a/k/a "Damian," a/k/a "Coco," GZIMI BOJKOVIC, a/k/a "Jimmy," and ADRIAN FISEKU, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is

derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

Substitute Assets Provision

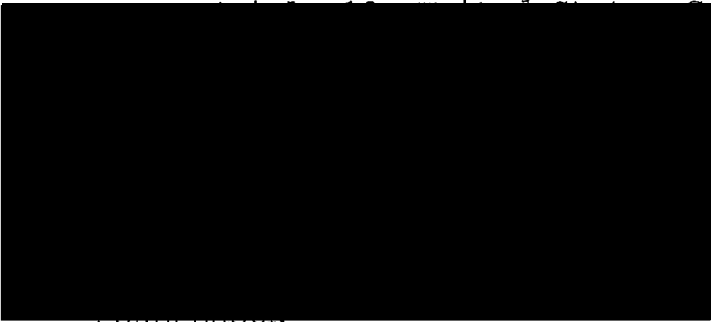
18. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section

2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

Code, Sections 981 and 1963;  
Code, Section 853; and  
s Code, Section 2461.)

  
Geoffrey S. Berman  
GEOFFREY S. BERMAN *GSB*  
United States Attorney

FORWARDED  
OCT 22 2018

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

DAMIR PEJGINOVIC, a/k/a "Damian," a/k/a  
"Coco,"  
GZIMI BOJKOVIC, a/k/a "Jimmy,"  
ADRIAN FISEKU, and  
ELVIS CIRIKOVIC, a/k/a "Gorilla,"

Defendants.

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SEALED INDICTMENT

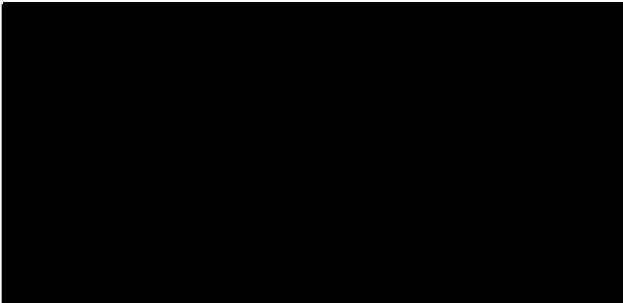
18 Cr.

(18 U.S.C. §§ 371, 1962(d), 2314, and  
2.)

GEOFFREY S. BERMAN  

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United States Attorney.

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Foreperson.