

JURY COPY

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:09-CR-216-3-FL

FILED IN OPEN COURT
ON 11-24-10 *ELC*
Dennis P. Iavarone
US District Court
Eastern District of NC

UNITED STATES OF AMERICA)

v.)

I N D I C T M E N T
(Second Superseding)

ANES SUBASIC *a/k/a Mladen Subasic* ^{*BDK*})
SPC)

The grand jury charges that:

General Allegations

At all times relevant to this Indictment:

Defendant ANES SUBASIC is a naturalized citizen of the
United States, residing in the Eastern District of North
Carolina.

COUNT A

On or about December ^(1/2) 2, 2003, in the Eastern District of North Carolina, ^{per defendant, etc} the defendant, ANES SUBASIC, knowingly procured and attempted to procure, contrary to law, naturalization, to wit: in applying to become a naturalized American Citizen the defendant did respond, certify, and swear untruthfully on his formal application for naturalization, Form N-400, dated December 2, 2003, specifically in that he, in question 17, represented that he had not ever been charged with committing any crime or offense, whereas in truth and in fact as the defendant well knew, he had been charged with committing crimes and offenses on at least ten occasions prior to December 3, 2003, all in violation of Title 18, United States Code, Section 1425(a).

PKK
COUNT B

On or about ~~December 2, 2003~~ *and elsewhere*, 2003, in the Eastern District of North Carolina, *ENE* the defendant, ANES SUBASIC, knowingly procured and attempted to procure, contrary to law, naturalization, to wit: in applying to become a naturalized American Citizen the defendant did respond, certify, and swear untruthfully on his formal application for naturalization, Form N-400, dated December 2, 2003, in answer to question 23, represented that he had not given false or misleading information to any US government official while applying for any immigration benefit or to prevent deportation, exclusion or removal, whereas in truth and in fact as the defendant well knew, he had made false statements in regard to his criminal history on an I-590, Registration for Classification as a Refugee, which he filed on December 8, 1997, wherein he responded to Question 15, "Have you ever been charged with a violation of law," with the answer, "I have not," and on an I-485, Application to Register Permanent Residence or Adjust Status, which he filed on August 24, 1999, wherein he responded "No," to Question 1, part #3, which asked if he had ever been arrested, cited, charged, indicted, fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations, all prior to December 2, 2003, in


violation of Title 18, United States Code, Section 1425(a).

A TRUE BILL:

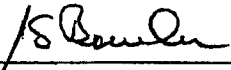
~~FOREPERSON OF THE GRAND JURY~~

DATE


11/23/2010



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