

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:15 CR 0049 CDP (DDN)
)	
RAMIZ ZIJAD HODZIC,)	
a/k/a Siki Ramiz Hodzic,)	
)	
SEDINA UNKIC HODZIC,)	
)	
NIHAD ROSIC,)	
a/k/a Yahya AbuAyesha Mudzahid,)	
)	
MEDIHA MEDY SALKICEVIC,)	
a/k/a Medy Ummuluna,)	
a/k/aBosna Mexico,)	
)	
ARMIN HARCEVIC, and)	
)	
JASMINKA RAMIC,)	
)	
Defendants.)	

**GOVERNMENT’S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Matthew T. Drake Assistant United States Attorneys for said District, and makes the following disclosures pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure:

At trial, the Government intends to use evidence seized from, and statements made by, various defendants during the events described below. This evidence and these statements are more fully set forth in investigative reports and discovery which will be made available to the

defendants. In presenting this list of events to the defendants, the Government does not concede that any respective defendant has standing to challenge each and every event listed.

The Government has not included in its listing of events every individual instance of physical surveillance that occurred or any photographs or videos taken during surveillance over the course of the investigation. Additionally, the government has not listed records and materials obtained by subpoena. It is the government's position that these events are not subject to suppression.

In prior filings with the Court, the Government provided notice to the defendants of the Government's intent to use evidence derived from the authorization under the Foreign Intelligence Surveillance Act.

<u>DATE</u>	<u>EVENT</u>	<u>CAUSE NO.</u>	<u>DEFENDANT</u>
10/28/2013	Receipt and seizure of receipts and US Customs declaration forms associated with packages mailed to Turkey	N/A	Sedina Hodzic
10/28/2013	Video surveillance United States Post Office – Lemay Ferry	N/A	Sedina Hodzic
11/14/2013	Order for Pen Register and Trap-and-Trace Devices to Pen Register Trap-and-Trace Device 314-494-1342	4:13 MC 00606 TCM	Ramiz Hodzic Sedina Hodzic
1/30/2014	Order for Pen Register and Trap-and-Trace Devices to Pen Register Trap-and-Trace Device 314-494-1342	4:14 MC 00052 SPM	Ramiz Hodzic Sedina Hodzic
3/10/2014	Consent search of cellular telephone	N/A	Ramiz Hodzic
3/10/2014	Interview of Ramiz Hodzic by U.S. Air Force personnel	N/A	Ramiz Hodzic

4/2/2014	Video Surveillance United States Post Office – Lemay Ferry	N/A	Sedina Hodzic
5/20/2014	Search warrant www.facebook.com/Mudzahidi.Sirijie Profile ID 100007206844803	4:14 MJ 00088 DDN	None
5/20/2014	Search warrant www.facebook.com/ramo.pazara.9 Profile ID number 100002647935197	4:14 MJ 00086 DDN	None
5/20/2014	Search warrant www.facebook.com/SikiRamiz.Hodzic Profile ID number 1304677927	4:14 MJ 00087 DDN	Ramiz Hodzic
5/11/2014 Through 8/5/2014	Consensual recordings	N/A	Nihad Rosic
7/20/2014	Consensual interview of Nihad Rosic	N/A	Nihad Rosic
2/5/2015	Search Warrant Precision location information on cell phone (Northern District of New York)	5:15 MJ 0038 TWD	Nihad Rosic
2/6/2015	Seizure and consent search of blue, plastic storage containers	N/A	Ramiz Hodzic Sedina Hodzic
2/6/2015	Seizure and inventory search of Ford Windstar	N/A	Ramiz Hodzic Sedina Hodzic
2/6/2015	Arrest of Ramiz Hodzic Seizure of cellular phone	N/A	Ramiz Hodzic
2/6/2015	Post arrest interview of Ramiz Hodzic	N/A	Ramiz Hodzic

2/6/2015	Consent for search of 4328 Chateau De Ville Dr., St. Louis, MO 63129 and storage shed	N/A	Ramiz Hodic
2/6/2015	Arrest of Sedina Hodzic Seizure of cellular phone	N/A	Sedina Hodzic
2/6/2015	Post arrest interview of Sedina Hodzic	N/A	Sedina Hodzic
2/6/2015	Arrest of Mediha Salkicevic Seizure and consent search of cellular phone	N/A	Mediha Salkicevic
2/6/2015	Post arrest interview of Mediha Salkicevic	N/A	Mediha Salkicevic
2/6/2015	Seizure and inventory of Toyota Camry	N/A	Mediha Salkicevic
2/6/2015	Arrest of Nihad Rosic Seizure of cellular phones	N/A	Nihad Rosic
2/6/2015	Post arrest interview of Nihad Rosic	N/A	Nihad Rosic
2/6/2015	Arrest of Armin Harcevic Seizure of cellular phone and laptop	N/A	Armin Harcevic
2/6/2015	Post arrest interview of Armin Harcevic	N/A	Armin Harcevic
2/6/2015	Seizure of computer at 2011 Lynnhaven Dr., San Jose, CA	N/A	Armin Harcevic

2/6/2015	Consent search of 2011 Lynnhaven Dr., San Jose, CA	N/A	Armin Harcevic
2/6/2015	Search and seizure warrant 9209 Sally Lane, Apartment 1E, Schiller Park, IL 60176	4:15 MJ 36 DDN	Mediha Salkicevic
2/6/2015	Search and Seizure warrant 4328 Chateau De Ville Dr., St. Louis, MO 63129, to include electronic media	4:15 MJ 39 DDN	Ramiz Hodzic Sedina Hodzic
2/13/2015	Search and seizure warrant Two blue Rubbermaid Roughneck plastic bins; one blue Sterilite plastic bin; two grey Sterilite plastic bins	4:15 MJ 43 DDN	Ramiz Hodzic Sedina Hodzic
2/24/2015	Search and seizure warrant One grey Samsung S5 cellular phone model SM-G870A, SN R38FB0DLJAZ; Black HP laptop model 2000-2C23DX, SN 5CG31017P0; Samsung Notebook II	4:15 MJ 44 DDN	Ramiz Hodzic Armin Harcevic
1/1/2014 Through 2/6/2015	Physical surveillance of all defendants	N/A	All defendants
5/15/2014 Through 2/11/2015	Electronic surveillance (pole camera)	N/A	Ramiz Hodzic Sedina Hodzic

As additional evidence is obtained, and as supplemental information comes to the Government's attention, the Government may choose to use evidence in addition to that previously listed. If the Government chooses to use additional evidence, a supplemental Rule 12(b)(4) notice will be filed.

Respectfully submitted,

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United States Attorney

s/ Matthew T. Drake

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon All defendants counsel of record.

s/Matthew T. Drake

MATTHEW T. DRAKE – 46499MO
Assistant United States Attorney