

2. It was a part and an object of the conspiracy that GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," and ENIS MUSTAFA, the defendants, and others known and unknown, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, would and did produce, use, and traffic in one and more counterfeit access devices, in violation of Title 18, United States Code, Section 1029(a)(1).

3. It was further a part and an object of the conspiracy that GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," and ENIS MUSTAFA, the defendants, and others known and unknown, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, would and did possess fifteen and more devices which were counterfeit and unauthorized access devices, in violation of Title 18, United States Code, Section 1029(a)(3).

4. It was further a part and an object of the conspiracy that GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," and ENIS MUSTAFA, the defendants, and others known and unknown, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, would and did produce, traffic in, have control and custody of, and possess device-making equipment as that term is defined in Title 18, United States Code, Section

1029(e)(6), in violation of Title 18, United States Code, Section 1029(a)(4).

5. It was further a part and an object of the conspiracy that GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," and ENIS MUSTAFA, the defendants, and others known and unknown, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, would and did effect transactions with one and more access devices issued to another person and persons, to receive payment and other things of value during a one-year period the aggregate value of which was equal to and greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

6. In furtherance of the 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. On or about January 28, 2015, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," and ERBI KAU, a/k/a "Mafia," the defendants, sold a skimming device¹ in exchange for \$6,000 in Queens, New York.

b. On or about August 18, 2015, PRELAJ and KAU used forged or counterfeit debit cards at an ATM in New York, New York.

¹ A skimming device is an electronic device that can be inserted into the card reader of, or otherwise affixed to, certain automatic teller machines ("ATMs") in order to surreptitiously record the numbers of cards that are used in the ATM by reading the information contained on those cards' magnetic strips.

c. On or about September 2, 2015, NIKOLIN DEDUSHI, a/k/a "Niko," the defendant, drove KAU to a gas station in Las Vegas, Nevada, where KAU removed a skimming device that was installed on an ATM.

d. On or about September 10, 2015, ENIS MUSTAFA, the defendant, used at least one forged or counterfeit debit card to fraudulently withdraw at least \$900 in cash from an ATM at a gas station in Las Vegas, Nevada.

e. On or about the morning of September 12, 2015, BLENDAR BATSKA, a/k/a "Alex," the defendant, installed at least one skimming device on ATMs in the business center of a hotel in Las Vegas, Nevada (the "Hotel ATMs").

f. On or about the evening of September 12, 2015, KAU removed at least one skimming device that had been installed by BATSKA on the Hotel ATMs earlier in the day.

g. On or about October 24, 2015, DEDUSHI mailed a magnetic card reader/writer from Las Vegas, Nevada, to PRELAJ at an address in the Bronx, New York.

h. On or about November 3, 2015, PRELAJ mailed four forged or counterfeit debit cards from the Bronx, New York, to DEDUSHI at an address in Las Vegas, Nevada.

i. On or about November 27, 2015, PRELAJ and BATSKA used a credit card issued to another person, which had been stolen earlier in the day, at one or more department stores in New York,

New York, and fraudulently obtained merchandise with an aggregate value greater than \$3,000.

(Title 18, United States Code, Section 1029(b)(2).)

COUNT TWO

**(Access Device Fraud –
Producing, Using, and Trafficking in Counterfeit Access Devices)**

The Grand Jury further charges:

7. From at least in or about January 2015, up to and including at least December 2015, in the Southern District of New York and elsewhere, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," and ENIS MUSTAFA, the defendants, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, did produce, use, and traffic in one and more counterfeit access devices, to wit, PRELAJ, KAU, BATSKA, DEDUSHI, and MUSTAFA produced forged or counterfeit debit cards and used those cards to fraudulently withdraw money from bank accounts.

(Title 18, United States Code, Sections 1029(a)(1) and 2.)

COUNT THREE

**(Access Device Fraud –
Fifteen and More Counterfeit and Unauthorized Access Devices)**

The Grand Jury further charges:

8. From at least in or about January 2015, up to and including at least December 2015, in the Southern District of New York and elsewhere, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu,"

ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," and NIKOLIN DEDUSHI, a/k/a "Niko," the defendants, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, did possess fifteen and more devices which were counterfeit and unauthorized access devices, to wit, PRELAJ, KAU, BATSKA, and DEDUSHI possessed fifteen or more debit card numbers, which they had stolen through the use of skimming devices they installed on ATMs.

(Title 18, United States Code, Sections 1029(a)(3) and 2.)

COUNT FOUR

(Access Device Fraud – Device-Making Equipment)

The Grand Jury further charges:

9. In or about January 2015, in the Southern District of New York and elsewhere, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," and VICTOR TOMESCU, the defendants, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, did produce, traffic in, have control and custody of, and possess device-making equipment as that term is defined in Title 18, United States Code, Section 1029(e)(6), to wit, PRELAJ and KAU had control and custody of, and possessed, a skimming device, which PRELAJ and KAU sold in or around Queens, New York in exchange for \$6,000 in a transaction brokered by TOMESCU.

(Title 18, United States Code, Sections 1029(a)(4) and 2.)

COUNT FIVE

(Access Device Fraud – Device-Making Equipment)

The Grand Jury further charges:

10. From at least in or about August 2015, up to and including at least in or about October 2015, in the Southern District of New York and elsewhere, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," and NIKOLIN DEDUSHI, a/k/a "Niko," the defendants, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, did produce, traffic in, have control and custody of, and possess device-making equipment as that term is defined in Title 18, United States Code, Section 1029(e)(6), to wit, PRELAJ, KAU, BATSKA, and DEDUSHI had control and custody of, and possessed, skimming devices that they installed on ATMs in or around Las Vegas, Nevada.

(Title 18, United States Code, Sections 1029(a)(4) and 2.)

COUNT SIX

(Access Device Fraud – Access Devices Issued to Another Person)

The Grand Jury further charges:

11. From at least in or about November 2015, up to and including at least in or about December 2015, in the Southern District of New York and elsewhere, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," BLENDAR BATSKA, a/k/a "Alex," and MEHMET BOGIC, a/k/a "Bogi," the defendants, knowingly and with intent to defraud, in an offense affecting interstate and foreign commerce, did effect transactions

with one and more access devices issued to another person and persons, to receive payment and other things of value during a one-year period the aggregate value of which was equal to and greater than \$1,000, to wit, PRELAJ and BATSKA fraudulently obtained merchandise at one or more department stores in New York, New York with an aggregate value greater than \$3,000 using a credit card that had been stolen from a victim by BOGIC.

(Title 18, United States Code, Sections 1029(a)(5) and 2.)

COUNT SEVEN

(Aggravated Identity Theft)

The Grand Jury further charges:

12. From at least in or about January 2015, up to and including at least December 2015, in the Southern District of New York and elsewhere, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," ENIS MUSTAFA, and MEHMET BOGIC, a/k/a "Bogi," the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, PRELAJ, KAU, BATSKA, DEDUSHI, MUSTAFA, and BOGIC transferred, possessed, and used other persons' debit and credit card numbers and associated personal identification numbers

in connection with the offenses alleged in Counts One, Two, Three, Five, and Six of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1) & (b), and 2.)

FORFEITURE ALLEGATIONS

13. As the result of committing one or more of the offenses alleged in Counts One through Six of this Indictment, GJETO PRELAJ, a/k/a "Bibi," a/k/a "Juli Bregu," ERBI KAU, a/k/a "Mafia," BLENDAR BATSKA, a/k/a "Alex," NIKOLIN DEDUSHI, a/k/a "Niko," ENIS MUSTAFA, VICTOR TOMESCU, and MEHMET BOGIC, a/k/a "Bogi," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offenses alleged in Counts One through Six, and any property used or intended to be used to commit the offenses alleged in Counts One through Six.

SUBSTITUTE ASSET PROVISION

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

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;

- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 18, United States Code, Sections 982(b) and 1029(c)(2), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982(a)(2)(B) & (b), and 1029(c)(1)(C) & (c)(2); and Title 21, United States Code, Section 853(p).)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

GJETO PRELAJ,
a/k/a "Bibi,"
a/k/a "Juli Bregu,"
ERBI KAU,
a/k/a "Mafia,"
BLEDAR BATSKA,
a/k/a "Alex,"
NIKOLIN DEDUSHI,
a/k/a "Niko,"
ENIS MUSTAFA,
VICTOR TOMESCU, and
MEHMET BOGIC,
a/k/a "Bogi,"

Defendants.

SEALED INDICTMENT

S2 16 Cr.

(18 U.S.C. §§ 1028A, 1029(a)(1), 1029(a)(3),
1029(a)(4), 1029(a)(5), 1029(b)(2), and 2.)

PREET BHARARA

United States Attorney


Foreperson

1/26/16 FILED INDICTMENT many warrants issued
COTT, USM