

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:24-mj-02896-Reid

FILED BY KAN D.C.

**May 3, 2024**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - Miami

IN RE: SEALED COMPLAINT  
\_\_\_\_\_ /

**CRIMINAL COMPLAINT COVER SHEET**

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: **Lacee Elizabeth Monk**  
Lacee Elizabeth Monk  
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the Southern District of Florida

United States of America )
V. )
David Knezevich, )
a/k/a Dusan Knezevic, )

Case No. 1:24-mj-02896-Reid

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 27, 2024, through February 5, 2024 in the county of Miami-Dade in the Southern District of Florida, the defendant(s) violated:

Code Section 18 U.S.C. § 1201(a)(1)
Offense Description Kidnapping

This criminal complaint is based on these facts: SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Andre Gilles (handwritten signature)

Complainant's signature

Andre Gilles, Task Force Officer, FBI

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by FaceTime

Date: 05/03/2024

Lisette Reid (handwritten signature)

Judge's signature

City and state: Miami, Florida

Lisette M. Reid, United States Magistrate Judge

Printed name and title



**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Andre Gilles, being first duly sworn, do hereby depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent for the United States Department of State, Diplomatic Security Service, currently assigned as a Task Force Officer with the Federal Bureau of Investigation (“FBI”) in the Miami Division. I have been employed as a Special Agent since January 2017, where I have received training in criminal investigations at the Federal Law Enforcement Training Center and the Diplomatic Security Training Center. In this capacity, I investigate violations of federal criminal law, specializing in criminal matters pertaining to U.S. extraterritorial jurisdiction. By virtue of my employment, I perform and have performed a variety of investigative tasks and have received training in the conduct of criminal investigations. I have also received training and gained experience in interviewing and interrogation techniques, the execution of federal search warrants and seizures, and the identification and collection of computer and cellphone-related evidence. I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code.

2. This Affidavit is made for the purpose of establishing probable cause in support of a criminal complaint and arrest warrant charging David Knezevich, a/k/a Dusan Knezevic (“Knezevich”), with kidnapping, in violation of Title 18, United States Code, Section 1201(a).

3. This Affidavit is based upon information known personally to me and information obtained from others who have investigated this matter and/or have personal knowledge of the facts herein. I have participated in this investigation, spoken with other law enforcement detectives, and has reviewed documents and police reports related to this investigation. I have set forth only those facts necessary to establish probable cause in support of this application, and thus,



not every detail known to your Affiant and other law enforcement officers concerning this investigation is stated herein. As such, I have not included all the known to me. Instead, I have set forth only those facts necessary to establish probable cause for the arrest of Knezevich.

**FACTUAL BACKGROUND**

4. On or about December 26, 2023, a 40-year-old female (the “Victim”) and United States citizen, traveled from Miami International Airport in the Southern District of Florida in the United States to Madrid, Spain.

5. Thereafter, on or about February 2, 2024, the Victim’s friends and family, who had previously communicated with her while she was in Spain, lost contact with her. For example, prior to her disappearance, the Victim and some friends had planned a trip that the Victim subsequently failed to show up for. Additionally, the last (non-automatic) activities on the Victim’s Bank of America account were for a flower purchase on or about February 2, 2024 (the last date she was seen alive), as well as a charge from a restaurant in Madrid on or about February 10, 2024, for failing to show up to a dinner reservation.

6. At the time of her disappearance, the Victim was married to Knezevich, a Yugoslavian-born naturalized citizen of the United States. According to the Victim’s friends and family, the Victim and Knezevich were separated and planned to divorce. The separation was contentious because Knezevich did not want to split the marital assets evenly with the Victim. The Victim was very fearful of Knezevich and believed that he was surreptitiously monitoring her whereabouts.

7. An investigation into the Victim’s disappearance by Spanish authorities revealed that on or about February 2, 2024, security cameras at the Victim’s apartment building in Madrid, Spain, captured her entering the building around 2:20 p.m. This is the last time the Victim is ever

seen alive. That same day at approximately 9:27 p.m., the building's surveillance camera captured a male wearing a helmet enter the building at the same time some individuals were exiting. Once inside the building, the male is captured descending the stairs while holding a can of spray paint, which he then uses to disable a surveillance camera by painting the lens. The lens was not completely obscured, and the male is then seen fastening a piece of duct tape to the lock of the building entrance to prevent the lock from engaging to allow subsequent entry. Notably, the male, who looks directly at the camera, has physical characteristics that resemble those of Knezevich. At approximately 10:30 p.m., the male is captured leaving the elevator with what appears to be a suitcase.

8. On or about February 4, 2024, Spanish firefighters entered the Victim's apartment for a welfare check and discovered that she was not in her apartment. Subsequently, Spanish law enforcement searched the Victim's apartment pursuant to a Judge's order and discovered that the Victim's cell phone, laptop computer, and respective chargers were missing.

9. Based on surveillance footage, Spanish law enforcement was able to identify the brand of spray paint used to disable the security camera. Law enforcement then determined that a retailer in Madrid had a recorded sale of that particular brand of spray paint on or about February 2, 2024. Surveillance footage from the retailer depicted an individual who appeared to be Knezevich purchasing the spray paint along with two rolls of duct tape on or about February 2, 2024, around noon.

10. Additionally, a Colombian woman who met Knezevich on a dating application in October 2023 ("Individual 1") advised law enforcement that on or about February 3, 2024 (the day



after the Victim is last seen alive), Knezevich contacted her via WhatsApp<sup>1</sup> and asked her for help in translating a message into “perfect Colombian” for a friend in Serbia who is writing a script about a Colombian character. Knezevich explains that he wants the writing to sound authentic.<sup>2</sup> Specifically, Knezevich and Individual 1 engage in the following dialogue, which Individual 1 provided to law enforcement:

Knezevich: Hey babe

Knezevich: I need your help

Individual 1: *Hello, babe*<sup>3</sup>

Individual 1: *Of course! Tell me*

Knezevich: I have a friend in Serbia who is a writer.

Knezevich: She has a small character who is Colombian!

Knezevich: She has few sentences

Knezevich: That have to be translated from Serbian/English to Colombian Spanish

Knezevich: Like how Colombian girl would speak

Knezevich: Rola

Knezevich: Haha

Knezevich: Are you able to translate what I give you in English into perfect Colombian?

Individual 1: *Ohh, babe, well, you know I don't speak English... I would have to rely on the translator*

Individual 1: *And I would create rolas sentences based on context*

Knezevich: Yes. You would see it translated and then fix it.

Knezevich: “I met someone wonderful. He has a summer house about 2h from Madrid. We are going there now and I will spend a few days there. There is barely any signal though. I'll call you when I come back. Kisses.”

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<sup>1</sup> WhatsApp is an encrypted messaging application that is typically utilized by its user through a mobile device.

<sup>2</sup> Notably, the Victim was born in Colombia and later became a U.S. citizen in 2009.

<sup>3</sup> Italicized text originally appeared in Spanish and has been translated for this Affidavit.

Knezevich: What do you think?

Individual 1: *Do I fix this paragraph?*

Knezevich: Yes

Individual 1: *"I met someone wonderful. He has a summer house about 2h from Madrid. We are going there now and I will spend a few days there. There is barely any signal though. I'll call you when I come back. Kisses."*

Knezevich: I can't verify that haha. Do you think it comes across normally?

Individual 1: *Yes ..that's how a rolo would speak*

Individual 1: *Is that all?*

Knezevich: Wait no

Knezevich: She is a girl!

Knezevich: Rola

Individual 1: *Haha, yesss.*

Knezevich: So did you write it as a boy or as a girl?

Individual 1: *Well the paragraph is general ... it's not written in the first person*

Knezevich: *One more!*

Knezevich: *Yesterday after therapy I needed a walk and he approached me on the street! Amazing connection. Like I never had before.*

Knezevich: *Yesterday after therapy I needed a walk and he approached me on the street! Amazing connection. Like I never had before.*

Individual 1: *That's incomplete ... because who approached her on the street?*

Individual 1: *If I do it literally like you are sending it to me, it would be like this*

Individual 1: *Yesterday I needed a walk after leaving therapy and xxxx approached me on street, there was an incredible connection that we hadn't had before*

Knezevich: A man approached a women from the previous paragraph

Knezevich: Approached her on the street

Knezevich: Like if you walk down the street and I see you and come to you and start hitting on you linda

Knezevich: [blank message]



Individual 1: *Yesterday I went for a walk after leaving therapy and a man approached me to flirt and we had an incredible connection.*

Knezevich: *Thanks gorgeous*

Individual 1: *Don't mention it handsome*

Individual 1: *I hope it helps*

Knezevich: *It helps my friend. : )*

11. Thereafter, Knezevich shared a photo with Individual 1 of a plane ticket he purchased on February 16, 2024, for a flight from Serbia to Bogota scheduled to arrive on February 19, 2024. However, Knezevich never boarded the flight. Knezevich and Individual 1 continued to communicate via WhatsApp until on or about February 26, 2024.

12. At some point during Individual 1's communications with Knezevich, Individual 1 told her mother about having met a Serbian man online. Wanting to know more about the individual, Individual 1's mother "Googled" Knezevich and learned that his wife had been reported missing in Madrid. Individual 1 then discovered a news article that contained a message purportedly from Knezevich's wife that matched the exact wording of the text she and Knezevich had put together on or about February 3, 2024.<sup>4</sup>

13. A review of records from Customs and Border Protection revealed that on or about January 27, 2024, Knezevich traveled by airplane from Miami International Airport in the Southern District of Florida, to Istanbul, Turkey. Thereafter, Knezevich traveled out of Serbia by

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<sup>4</sup> For example, a Google search for Knezevich yielded the following articles, which all reference the sentences Knezevich purportedly needed translated for his Serbian friend. *See* Kinsey Crowley, *A Florida Woman is missing in Spain after bizarre occurrences. Her loved ones want answers.*, USA TODAY, Feb. 19, 2024, <https://www.usatoday.com/story/news/nation/2024/02/19/ana-maria-knezevic-missing-david-knezevic-unknown-location/72656841007/>; *see also* Fort Lauderdale businesswoman disappears in Spain after helmeted man disables cameras, CBS NEWS, February 19, 2024, <https://www.cbsnews.com/miami/news/american-woman-goes-missing-in-madrid-after-helmeted-man-disables-cameras-2/>



vehicle on or about January 30, 2024, and returned to Belgrade, Serbia, by vehicle on or about February 5, 2024. Per Google maps, by car, it takes approximately 26 hours to travel from Belgrade, Serbia, to Madrid, Spain at a distance of 2,592 kilometers.

14. Law enforcement's investigation revealed that Knezevich rented a Peugeot 308 in Serbia from approximately on or about January 29, 2024, through approximately on or about March 15, 2024. The owner of the rental car agency informed law enforcement that, when Knezevich returned the vehicle, the rental agency discovered that the windows had been tinted, the license plate frames had changed, and two stickers had been removed from the vehicle. The vehicle had traveled approximately 7,677 kilometers while rented by Knezevich.

15. Law enforcement's investigation revealed that, around the relevant time, an individual filed a complaint that both his license plates were stolen off his vehicle in Spain. Spanish authorities ran a search in their plate reader database for the stolen plate and learned that the stolen plate was present on Calle Francisco Sivela, the street where the Victim's apartment was located.

16. Additionally, the stolen plate also passed through two toll booths in the middle of the night on February 2, 2024, into February 3, 2024. Video from the toll booths revealed that the plates were attached to a Peugeot 308 with tinted windows, which is the type of vehicle Knezevich rented in Serbia. Because of the tint, the driver is not visible. One of the toll booths is in Ajalvir, Spain, which is just outside of Madrid.

17. Law enforcement has also learned that, on or about March 4, 2024, a woman purporting to be the Victim (the "Caller") contacted an insurance carrier for the purpose of cancelling three insurance policies held by the Victim for her and Knezevich's business. The insurance policies related to vehicles that were used by the business. During the call, children

could be heard in the background speaking to the Caller. The Victim does not have any children. Moreover, law enforcement learned, pursuant to a subpoena return, that the phone number utilized by the Caller was owned by Knezevich's company and Knezevich is listed as the contact for the phone number.

18. Moreover, on or about April 24, 2024, an employee of Knezevich ("Employee 1") advised law enforcement that Knezevich instructed Employee 1 to impersonate the Victim in order to open a new bank account and provided Employee 1 with the Victim's social security number to use as proof that she was the Victim. Thereafter, on or about April 25, 2024, Employee 1 advised Knezevich during a telephone call that she was uncomfortable impersonating the Victim because the Victim was missing. In response, Knezevich told Employee 1 that this was "not serious" and told Employee 1 it needed to be done in order for the employees to be paid. Knezevich further stated, "I cannot call with my voice because I sound like a guy."

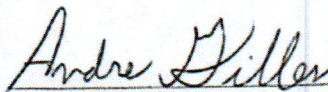
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**CONCLUSION**

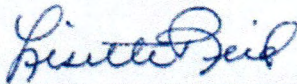
19. Based on the foregoing, your Affiant respectfully submits that there is probable cause to believe that Knezevich committed the offense of kidnapping, in violation of Title 18, United States Code, Section 1201(a)(1).

**FURTHER AFFIANT SAYETH NAUGHT**



ANDRE GILLES  
TASK FORCE OFFICER  
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 3rd day of May 2024.



HONORABLE LISETTE M. REID  
UNITED STATES MAGISTRATE JUDGE