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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : Hon. Jessica S. Allen  
: :  
v. : Mag. No. 23-8195  
: :  
JANIS MILLER : **CRIMINAL COMPLAINT**  
a/k/a "Janis Zaveri" :  
a/k/a "Janice Zaveri" :

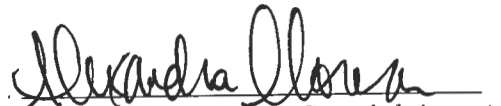
I, ALEXANDRA MORERA, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

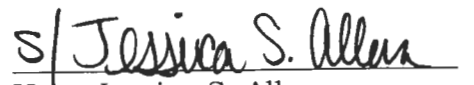
I further state that I am a Special Agent with the Social Security Administration, Office of the Inspector General, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
Alexandra Morera, Special Agent  
Social Security Administration  
Office of the Inspector General

Special Agent Alexandra Morera attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 19th day of December, 2023.

  
Hon. Jessica S. Allen  
United States Magistrate Judge

**ATTACHMENT A**

**Count One  
(Wire Fraud)**

From at least as early as on or about January 16, 1998 through at least as recently as on or about June 2, 2023, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**JANIS MILLER  
a/k/a “Janis Zaveri”  
a/k/a “Janice Zaveri,”**

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and to obtain money and property from victims by means of false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme and artifice to defraud, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, as set forth more fully below:

<b>Count</b>	<b>Approximate Date</b>	<b>Description</b>
One	October 3, 2022	A telephone conversation between JANIS MILLER, located in New Jersey, and a Social Security Administration employee, located in Ohio.

In violation of Title 18, United States Code, Section 1343.

## **ATTACHMENT B**

I, Alexandra Morera, am a Special Agent of the Social Security Administration, Office of the Inspector General (“SSA-OIG”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date or time, I am asserting that it took place on or about the date or time alleged.

1. As detailed below, evidence obtained through an investigation conducted by law enforcement, including SSA-OIG, demonstrates that the Defendant, JANIS MILLER, a/k/a “Janis Zaveri,” a/k/a “Janice Zaveri,” has defrauded multiple federal agencies out of more than approximately \$1 million over more than 25 years.

### **Background**

2. At various times relevant to this Complaint:

a. The United States Social Security Administration (“SSA”) was an agency of the executive branch of the United States government. The SSA, among other things, maintained the Retirement, Survivors, and Disability Insurance (“RSDI”) program under Title II of the Social Security Act, Title 42, United States Code, Section 401 et al., for eligible individuals. The RSDI program paid out benefits to certain eligible individuals (“SSA Benefits”).

b. The Office of Personnel Management (the “OPM”) was an agency of the United States government. OPM, among other duties, managed pension benefits for retired employees of the United States government. The Civil Service Retirement System (“CSRS”) was a retirement system covering federal employees who entered covered federal service before January 1, 1987. Upon retirement from civil service, the federal employees covered by CSRS became CSRS annuitants and were entitled to CSRS benefits throughout their lifetimes. In addition, a CSRS annuitant had the option to elect a survivor benefit for his/her spouse; if selected, a spousal benefit (“OPM Benefits”) allowed for the annuitant’s surviving spouse to continue to receive a reduced amount of benefits throughout the spouse’s lifetime.

c. OPM paid survivor annuity benefits to an annuitant's spouse only during his/her lifetime; payments ceased upon the spouse's death.

d. The defendant, MILLER, was a resident of New Jersey. At various times, MILLER also used the names "Janis Zaveri" and "Janice Zaveri." MILLER controlled an entity, "Company-1," that maintained its registered principal place of business at MILLER's home address.

e. "Individual-1" was born in or around 1913 and was a resident of Arizona. Individual-1 worked for the federal government in the Veterans Administration and was therefore entitled to OPM Benefits.

f. "Individual-2" was born in or around either 1919 or 1922 and was a resident of Arizona. Individual-1 married Individual-2 in or around 1949. Individual-2 was MILLER's aunt.

3. Individual-1 died on or about December 22, 1982. After Individual-1's death, Individual-2, as Individual-1's surviving spouse, began lawfully receiving OPM Benefits accruing to Individual-1.

4. Also in or around 1982, Individual-2 reached retirement age and began lawfully receiving SSA Benefits in her own right.

#### **The Fraud**

5. Individual-2 died on or about January 16, 1998. At that time, Individual-2 had been receiving (1) her own SSA Benefits and (2) Individual-1's OPM Benefits. Individual-2 received these benefits in regular payments from SSA and OPM by check. After her death, however, no other individual, including MILLER, was lawfully entitled to these benefits.

6. MILLER served as the informant on Individual-2's Certificate of Death. MILLER, therefore, knew of Individual-2's death at or shortly after when it occurred.

7. Despite Individual-2's death, SSA and OPM continued to pay SSA Benefits and OPM Benefits to Individual-2's bank account.

8. In or about 2003, SSA and OPM began depositing SSA Benefits and OPM Benefits directly into a bank account ending in 5618 and in Individual-2's name (the "5618 Account"). I know from training, experience, and investigation that SSA and OPM change the manner of benefit payments only in response to a specific and direct request to do so. The purported beneficiary of these payments, Individual-2, had been deceased for around five years when this request was made.

9. On or about March 24, 2015, SSA received a request to change the contact telephone number for Individual-2 to a particular landline telephone number in a New Jersey area code (“Number-1”). I know from training, experience, and investigation that SSA changes a contact telephone number for benefits recipients only in response to a specific and direct request to do so. The purported beneficiary of these payments, Individual-2, had been deceased for around 17 years when this request was made.

10. Records received from the provider for Number-1 show that Number-1 began service in or around June 2, 2005, 7 years after Individual-2 passed away. Those records also show that the named subscriber for Number-1 was “Janice Zaveri,” a name known by law enforcement to have at times been used by MILLER.

11. On or about October 3, 2022, an SSA employee located in Ohio, seeking to confirm that Individual-2 (who at that time would have been over 100 years old) was still alive, called Number-1, the number listed as the contact telephone number for Individual-2. A person at that landline answered and spoke with the SSA employee, claiming to be Individual-2—who at that time had been deceased for around 24 years—and providing Individual-2’s approximate birthdate.

12. Based on evidence gathered in this investigation—including admissions later made by MILLER, as discussed below—I believe that the individual claiming to be Individual-2 during this call was, in fact, MILLER.

13. The deceased Individual-2 continued to receive OPM Benefits and SSA Benefits from her death in or around 1998 until 2023. In total, SSA paid approximately \$313,217.00 in SSA Benefits, and OPM paid approximately \$697,787.85 in OPM Benefits, for a total loss of approximately \$1,011,004.85.

14. On or about May 11, 2023, law enforcement agents met with MILLER for a voluntary interview. During that interview, MILLER confirmed that she had spoken with an SSA employee by telephone roughly within the previous year. SSA records show that its only telephonic communication within approximately one year of May 11, 2023 about Individual-2’s account occurred on or about October 3, 2022—that is, the date of the call discussed above. MILLER falsely claimed during that interview that she had not impersonated Individual-2 to the SSA employee during that October 3, 2022 call.

15. MILLER also admitted during the voluntary May 11, 2023 interview with law enforcement that she had withdrawn the SSA Benefits from the 5618 Account by using the account’s debit card and checks.

16. Consistent with MILLER’s admissions, records for the 5618 Account for the period from approximately January 1, 2013, to May 15, 2023,

which law enforcement obtained and reviewed, detail MILLER's disbursement of the fraudulently obtained benefits payments. Specifically, during that period:

- a. MILLER withdrew at least approximately \$70,000 in cash from the 5618 Account by debit card;
- b. MILLER wrote at least approximately \$130,000 worth of checks from the 5618 Account, signed the checks with Individual-2's name, and made the checks out to Company-1, the entity that she controlled; and
- c. MILLER withdrew thousands of dollars from the 5618 Account to buy gasoline and groceries.

17. Those bank records also show that virtually all of the benefits disbursed into the 5618 Account as a result of MILLER's fraud were later disbursed out of the account.

18. On or about June 1 and June 2, 2023, OPM and SSA discontinued the OPM Benefits and SSA Benefits, respectively, to the 5618 Account in light of MILLER's admissions during her May 11, 2023 interview with law enforcement.

19. On or about October 27, 2023, law enforcement met again with MILLER for a voluntary interview. MILLER admitted that when she was accessing Individual-2's bank account, she knew that she was not entitled to the SSA Benefits and OPM Benefits that were issued to Individual-2 after Individual-2's death. She also admitted that she had accessed the SSA Benefits and OPM Benefits after Individual-2's death and had transferred a portion of the deposits to Company-1.