

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
JANIS MILLER,	:	18 U.S.C. § 1343
a/k/a “Janis Zaveri,”	:	
a/k/a “Janice Zaveri”	:	

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges as follows:

**Background**

1. At various times relevant to this Indictment:
  - a. Defendant Janis Miller, a/k/a “Janis Zaveri,” a/k/a “Janice Zaveri” (“MILLER”), was a resident of South Orange, New Jersey.
  - b. The United States Social Security Administration (“SSA”) was an agency of the executive branch of the United States. The SSA, among other things, maintained retirement benefits under Title II of the Social Security Act, Title 42, United States Code, Section 402 *et. seq.*, for eligible individuals. When a person worked and paid Social Security taxes, that person earned “credits” toward Social Security benefits (“SSA Benefits”). SSA did not pay any SSA Benefits until a person had the required number of credits. Such SSA Benefits were not transferrable and could not be inherited.
  - c. 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 eligible 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.

d. In or around 1982, an individual entitled to SSA Benefits and OPM Benefits (the “Beneficiary”) filed for SSA Benefits and OPM Benefits and began to receive them lawfully.

e. On or about January 16, 1998, the Beneficiary passed away.

f. Despite the Beneficiary’s death, SSA and OPM continued to make monthly payments to the Beneficiary.

g. One way that the SSA and OPM administer SSA Benefits and OPM Benefits is via direct deposit to the recipient’s bank account at a commercial bank. In or around 2003, approximately five years after the Beneficiary’s death, a bank account in the Beneficiary’s name (“Bank Account-1”) was opened at a commercial bank (“Bank-1”). At or around that same time, SSA and OPM began sending SSA Benefits and OPM Benefits via direct deposit to Bank Account-1.

h. The Beneficiary was the only individual authorized to receive the SSA Benefits and OPM Benefits deposited into Bank-1 and to access Bank Account-

1.



i. 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.

### **The Scheme to Defraud**

2. From on or about January 16, 1998, through 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 by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, including a wire communication from outside of New Jersey to inside New Jersey, as set forth more fully below.

### **Object of the Scheme to Defraud**

3. The goal of the scheme was for MILLER to enrich herself by fraudulently obtaining funds from the Beneficiary’s bank account, Bank Account-1, that were intended exclusively for the Beneficiary’s benefit.

### **Manner and Means of the Scheme to Defraud**

4. It was part of the scheme to defraud that:



a. MILLER gained access to Bank Account-1 and caused to be issued a debit card (“Debit Card-1”) and a checkbook (“Checkbook-1”) for that account. Thereafter, on multiple occasions, MILLER accessed and withdrew funds from Bank Account-1 using Debit Card-1 and checks written from Checkbook-1. In total, from approximately on or about January 1, 2013, through on or about May 15, 2023, MILLER withdrew at least approximately \$200,000.00 from Bank Account-1.

b. On or about October 3, 2022, MILLER impersonated the Beneficiary to an employee of SSA, thereby causing SSA Benefits and OPM Benefits to continue to flow into Bank Account-1.

### **Execution of the Scheme**

5. On or about October 3, 2022, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, the defendant,

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

did knowingly transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, the following writings, signs, signals, pictures, and sounds, namely, an interstate communication by wire from MILLER in New Jersey to a SSA employee in Ohio.

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



## **FORFEITURE ALLEGATION**

Upon conviction of the offense in violation of 18 U.S.C. § 1343 charged in this Indictment, the defendant,

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

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real or personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of such offense, and all property traceable to such property, including, but not limited to, a sum of money equal to \$1,011,004.85, representing the proceeds of the offense charged in this Indictment, and all property traceable to such property.

## **SUBSTITUTE ASSET PROVISIONS**

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

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

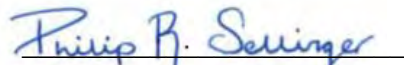


it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

---

FOREPERSON

  
PHILIP R. SELLINGER  
United States Attorney