

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 23-
	:	
KAMIL WAKULIK	:	18 U.S.C. § 641
	:	18 U.S.C. § 875(c)

**I N F O R M A T I O N**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

**Count 1**  
**(Theft of Government Funds)**

1. At all times relevant to this Information:
  - a. The Department of Veterans Affairs (“VA”), an agency of the United States, provided disability compensation benefits to United States military veterans through the Veterans Benefits Administration due to injuries or diseases sustained while on active military service, or for injuries or diseases that were worsened by active military service.
  - b. To accomplish this, the VA employed a screening process whereby a service member was assessed by the VA and a disability rating was assigned to the service member based on the severity of the service member’s injuries. The disability rating was then used by the VA to determine the amount of monthly disability benefits paid to the service member.

c. Defendant KAMIL WAKULIK, a resident of Morris County, New Jersey, was an active service member in the U.S. Marine Corps from in or about 2003 through in or about 2007.

d. In or about 2018, during an assessment by the VA for disability benefits, defendant KAMIL WAKULIK made false representations to the VA that he suffered from post-traumatic stress disorder (“PTSD”) based on his active-duty service. Defendant KAMIL WAKULIK supported this, in part, by falsely claiming that he was assigned to and participated in active-duty missions that required him to recover human remains following certain natural disasters that occurred in the Philippines and Thailand, when in fact, he had no involvement in recovering human remains in any of his active-duty missions.

e. Based on these false statements, the VA increased defendant KAMIL WAKULIK’s disability rating and provided additional monthly disability benefit payments to him totaling approximately \$118,979.16.

2. From on or about July 30, 2018 through on or about September 2, 2022, in the District of New Jersey and elsewhere, defendant

**KAMIL WAKULIK**

did embezzle, steal, purloin, and knowingly convert to his own use money of the United States in excess of \$1,000, that is, approximately \$118,979.16 in Veterans Affairs benefits to which he knew he was not entitled.

In violation of Title 18, United States Code, Section 641.

**Count 2**  
**(Interstate Transmission of Threat of Injury)**

3. Paragraph 1 of this Information is reincorporated here.

4. On or about August 23, 2022, defendant KAMIL WAKULIK sent an interstate text message to a VA Office of Inspector General agent, who was located in another state, threatening the agent and any other agent involved in investigating defendant KAMIL WAKULIK with physical violence.

5. On or about August 23, 2022, in the District of New Jersey and elsewhere, defendant

**KAMIL WAKULIK**

did transmit in interstate commerce a communication containing a threat to injure the person of another.

In violation of Title 18, United States Code, Section 875(c).

**FORFEITURE ALLEGATION**

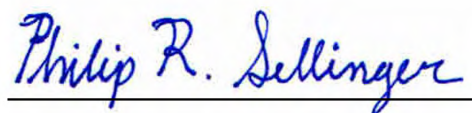
1. Upon conviction of theft of government funds, in violation of 18 U.S.C. § 641, as alleged in this Information, defendant KAMIL WAKULIK shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real or personal, obtained by defendant KAMIL WAKULIK that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of such offense, the value of which totaled \$118,979.16.

**Substitute Assets Provision**

2. 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 person;
- (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;

the United States shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b).



PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER: 22-

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**KAMIL WAKULIK**

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**INFORMATION FOR**

18 U.S.C. § 641  
18 U.S.C. § 875(c)

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**PHILIP R. SELLINGER**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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ADAM BAKER  
*ASSISTANT U.S. ATTORNEY  
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