

2018R00575/EJJ

**FILED**

APR 25 2025

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

AT 8:30 - 4:10 P M  
CLERK, U.S. DISTRICT COURT - DNJ

*jm*

UNITED STATES OF AMERICA	:	Hon. Zahid N. Quraishi
	:	
v.	:	Crim. No. 25-268
	:	
STEVEN D. STANKOVITS	:	18 U.S.C. § 1343
	:	18 U.S.C. § 2
	:	18 U.S.C. § 1001(a)(2)

**INDICTMENT**

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

**COUNTS ONE THROUGH FOUR**  
(Wire Fraud)

**Introduction**

At all times relevant to the charges in this Indictment, unless otherwise stated:

1. Defendant Steven D. Stankovits (“STANKOVITS”) was a resident of East Brunswick, New Jersey, Milltown, New Jersey, or Matawan, New Jersey.

2. The Social Security Administration (“SSA”) was an agency of the United States within the executive branch of the United States government that administered programs under the Social Security Act, Title 42, United States Code, Section 301, *et seq.* (the “Act”).

3. The SSA, among other things, maintained the Disability Insurance Benefits (“DIB”) program under Title II of the Act. The DIB program paid benefits to those unable to work because of a medical condition expected to last at least one year or result in death. DIBs were intended to replace part of the earnings lost because of a physical or mental impairment. Monthly DIBs were paid to an eligible

disabled person and his or her eligible auxiliary beneficiaries, such as children, throughout the period of disability. Monthly benefits could be paid to, among others, disabled workers below the age of full retirement and their families.

4. The child of a DIB recipient could receive Child Insurance Benefits (“CIB”) if that child was the beneficiary’s biological or adopted child or dependent stepchild, or if the child had a parent who was disabled and entitled to Social Security benefits.

5. Medical evidence of the disabling condition was required, and medical recovery and/or work activity were events that affected entitlement or continued entitlement to disability benefits. An individual did not qualify as disabled for the purpose of these programs if he or she performed work considered significant gainful activity (“SGA”). If an individual engaged in several successive months of SGA, SSA could suspend disability payments.

**The Scheme to Defraud**

6. Between at least in or around November 2007 through at least in or around January 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

**STEVEN D. STANKOVITS,**

did knowingly devise and intend to devise a scheme and artifice to defraud the SSA, and to obtain money or property by means of false and fraudulent pretenses, representations, and promises, as set forth more fully below.

**Goal of the Scheme to Defraud**

7. The goal of the scheme was for STANKOVITS to obtain money and other benefits from the SSA to which he was not entitled by lying to the SSA about his physical disability and employment history.

**Manner and Means of the Scheme**

8. It was part of the scheme that:

a. On or about November 19, 2007, STANKOVITS completed an application for DIBs claiming that he had not worked since August 2006 because of a spinal cord injury and other disabilities. By completing the application, STANKOVITS agreed to notify the SSA if he worked as an employee or self-employed person.

b. On or about April 17, 2008, the SSA denied STANKOVITS's application for DIBs. On or about May 6, 2010, STANKOVITS appeared before an SSA Administrative Law Judge ("ALJ") in connection with his reconsideration application for DIBs and testified under oath that he had not worked since June 2006.

c. On or about November 23, 2015, STANKOVITS reported to the SSA that he had had no self-employment income since at least January 2013, stating that his reported income was investment income and that he "did not work."

d. On or about July 7, 2020, STANKOVITS reported to the SSA, in a submission signed under penalty of perjury, that he had not worked for someone or been self-employed since at least June 2018.

e. Notwithstanding STANKOVITS's representations to the SSA about his physical condition and purported inability to work, STANKOVITS worked

in the funeral industry from in or around February 2007 until in or around 2019, initially as an intern, and then as an owner and funeral director of at least two funeral homes located in New Jersey.

f. Had STANKOVITS truthfully reported his employment and physical ability to work, STANKOVITS would not have been eligible for DIBs or CIBs for the period between in or around November 2007 until in or around January 2022.

g. From in or around July 2010 until in or around January 2022, STANKOVITS received approximately \$585,629.80 in DIBs and CIBs from the SSA to which he was not entitled.

**Execution of the Scheme to Defraud**

9. On or about the dates set forth below, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

**STEVEN D. STANKOVITS,**

for the purposes of executing and attempting to execute the scheme described above, did knowingly transmit and cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, specifically those referenced below, each constituting a separate count of this Indictment:

<b>Count</b>	<b>Approximate Date</b>	<b>Description</b>
One	October 1, 2021	Wire of approximately \$2,270 from the Kansas City Regional Financial Center, Bureau of the Fiscal Service (the "KSFC"), in Missouri, on behalf of the Social Security Administration (the "SSA"), to a Wells Fargo account ending in 1802 (the "1802 Account") in New Jersey.

Two	November 3, 2021	Wire of approximately \$2,270 from the KSFC in Missouri on behalf of the SSA to the 1802 Account in New Jersey.
Three	December 3, 2021	Wire of approximately \$2,270 from the KSFC in Missouri on behalf of the SSA to the 1802 Account in New Jersey.
Four	January 3, 2022	Wire of approximately \$2,391 from the KSFC in Missouri on behalf of the SSA to the 1802 Account in New Jersey.

In violation of Title 18, United States Code, Section 1343 and Section 2.

**COUNT FIVE**  
(False Statements)

10. The allegations set forth in paragraphs 1 through 8 of this Indictment are realleged here.

11. On or about July 7, 2020, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

**STEVEN D. STANKOVITS,**

did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, namely a Social Security Administration Disability Update Report, knowing that such statements and representations were materially false, fictitious, and fraudulent.

In violation of Title 18, United States Code, Section 1001(a)(2).

**FORFEITURE ALLEGATION**

Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343 as charged in Counts One through Four of this Indictment, the defendant,

**STEVEN D. STANKOVITS,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real or personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of the said offenses, the value of which totaled approximately \$585,629.80.

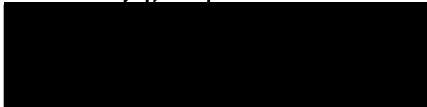
**SUBSTITUTE ASSETS PROVISION**

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

- 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,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL



FOREPERSON

Alina Habba  
ALINA HABBA  
United States Attorney

CASE NUMBER: 25-CR-268 (ZNQ)

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.**

**STEVEN D. STANKOVITS**

**INDICTMENT FOR**

18 U.S.C. § 1343  
18 U.S.C. § 2  
18 U.S.C. § 1001(a)(2)

**A True Bill,**

**Foreperson**

**ALINA HABBA**  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

**ELI JACOBS**  
ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY  
973-645-3976