

**FILED**

SEP 09 2025

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Georgette Castner	AT 9:30 <del>AM</del> <b>AB 1:39 PM</b>
	:		CLERK, U.S. DISTRICT COURT - DNJ
	:		
v.	:	Crim. No. 25-539	
	:		
DANIEL T. SIGNORE and	:	18 U.S.C. § 371 26	
CATHERINE M. TOMASOVIC	:	U.S.C. § 7203	

INDICTMENT

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

COUNT 1  
(Conspiracy to Defraud the United States)

**Defendants and Other Individuals and Entities**

1. At all times relevant to Count 1 of this Indictment, unless otherwise indicated:

a. Defendant DANIEL T. SIGNORE ("SIGNORE") was a resident of Mercer County, New Jersey, and was the sole owner and operator of Signore Landscaping LLC, also known as Signore's Lawn and Landscaping, DBA Signore Lawn and Landscaping ("Signore Landscaping"), which provided landscaping services to the company's clients.

b. Defendant CATHERINE M. TOMASOVIC ("TOMASOVIC") was a resident of Mercer County, New Jersey and the Secretary of Signore Landscaping. TOMASOVIC was responsible for the bookkeeping for the company. TOMASOVIC and SIGNORE were co-signatories on almost all Signore Landscaping business checking accounts, including the checking account mainly used during the pertinent

time period (the “Signore Account”).

c. SIGNORE and TOMASOVIC, individually and through Signore Landscaping, obtained payments from clients for services provided. As a result of the payments from clients to TOMASOVIC and SIGNORE and Signore Landscaping for services rendered, TOMASOVIC and SIGNORE obtained hundreds of thousands of dollars in gross receipts for calendar years 2018 to 2021, and SIGNORE was required by law to make and file income tax returns for each of those calendar years.

d. The Internal Revenue Service (“IRS”) was an agency of the United States Department of the Treasury, responsible for administering and enforcing the tax laws of the United States and collecting the taxes that were due and owing to the Treasury of the United States by its citizens and residents.

e. Pursuant to the Internal Revenue Code and attendant regulations, citizens and residents of the United States who received gross income in excess of the minimum filing amount established by law for a particular year, as set forth in the table below, were required to make and file annually a United States Income Tax Return, Form 1040 (“Form 1040”) for that calendar year with the IRS and pay any tax due, typically by on or about April 15 of the following year.

<b>Year</b>	<b>Statutory Minimum Filing Amount</b>
2018	\$12,000.00
2019	\$12,200.00
2020	\$12,400.00
2021	\$12,550.00

f. Signore Landscaping operated from the joint residence of TOMASOVIC and SIGNORE, and was organized as a single-member LLC, owned solely by Signore. As such, Signore was treated as an entity disregarded as separate from its owner and was not required to file its own federal income tax return. Instead, its financial activity needed to be reported on Schedule C of SIGNORE's Form 1040.

### **The Conspiracy**

2. From in or about January 2018 to in or about February 2023, in the District of New Jersey and elsewhere, defendants

#### **DANIEL T. SIGNORE and CATHERINE M. TOMASOVIC**

did knowingly and intentionally conspire with each other and others to defraud the United States by impeding, impairing, obstructing, and defeating the lawful governmental functions of the IRS, a constituent agency of the United States Department of Treasury, to ascertain, compute, assess, and collect income taxes.

### **Object of the Conspiracy**

3. The object of the conspiracy was to impede, impair, obstruct, and defeat the lawful functions of the IRS to ascertain, compute, assess, and collect federal income.

### **Manner and Means of the Conspiracy**

4. It was part of the conspiracy that SIGNORE and TOMASOVIC concealed and attempted to conceal from the IRS income and assets held by Signore Landscaping through various means, including, among others, (i) cashing at check

cashers checks that Signore Landscaping's clients issued to SIGNORE and TOMASOVIC to pay for the company's services, and (ii) using the Signore Landscaping business bank account for personal expenditures.

5. It was further part of the conspiracy that defendant SIGNORE did not file a federal income tax return Form 1040 for calendar years 2018 through 2021.

#### Overt Acts

6. In furtherance of the conspiracy and in order to effect its object, SIGNORE and TOMASOVIC did commit the following overt acts, among others, in the District of New Jersey and elsewhere:

a. From in or around 2018 through in or about 2021, SIGNORE cashed numerous checks issued by his business clients made payable to SIGNORE or Signore Landscaping at a Mercer County, New Jersey check casher in order to conceal Signore Landscaping's income and assets from the IRS.

b. From in or about 2020 through in or about 2021, SIGNORE and TOMASOVIC also deposited payments for Signore Landscaping services into the Signore Account and then used the Signore Account to pay for tens of thousands worth of various personal expenses, including but not limited to lodging, streaming services such as Hulu and HBO, dining, liquor, and pet supplies, in order to conceal from the IRS the gross income received by Signore Landscaping such that these expenditures could be characterized as deductible business expenses. The business receipts deposited into the Signore Account and the business receipts cashed at the check casher are detailed below:

<b>Year</b>	<b>Business Receipts Cashed at Check Casher</b>	<b>Business Receipts Deposited in the Signore Account</b>	<b>Total Unreported Gross Receipts</b>
2018	\$67,776.92	\$23,423.16	\$91,200.08
2019	\$83,573.00	\$5,030.00	\$88,603.00
2020	\$26,535.00	\$334,108.94	\$370,643.94
2021	\$43,394.42	\$315,749.00	\$359,143.42

c. On or about January 9, 2023, TOMASOVIC falsely claimed to IRS agents, on behalf of Signore Landscaping, that during the time period of 2016 through 2023, she had used an online service to file two “tax returns.”

d. As of April 15, 2025, SIGNORE had not filed Forms 1040 for calendar years 2018 through 2021, despite receiving substantial gross receipts in each of those calendar years. As of that date, SIGNORE and TOMASOVIC had not paid any of the substantial tax due for each of those calendar years as a result of the gross income received by Signore Landscaping.

All in violation of Title 18, United States Code, Section 371.

**COUNTS 2 through 4**

**(Failure to File Tax Returns – Calendar Years 2019, 2020, and 2021)**

1. Paragraph 1 of Count 1 of this Indictment is realleged and incorporated herein.
2. During each of the calendar years 2019, 2020, and 2021, Signore Landscaping received substantial gross income exceeding hundreds of thousands of dollars.
3. By reason of that gross income, SIGNORE was required by law, following the close of each of those calendar years and on or before July 15, 2020, May 17, 2021, and April 18, 2022, respectively, to make and file an income tax return to the IRS, stating specifically the items of his gross income and any deductions and credits to which he was entitled.
4. On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

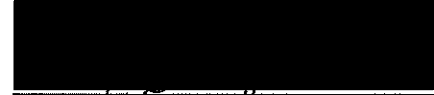
**DANIEL T. SIGNORE**

well knowing and believing all the foregoing, did willfully fail to make a federal income tax return to the IRS for each of the calendar years set forth below:

<b>Count</b>	<b>Date</b>	<b>Calendar Year</b>
2	July 15, 2020	2019
3	May 17, 2021	2020
4	April 18, 2022	2021

In violation of Title 26, United States Code, Section 7203.

A TRUE BILL



FOREPERSON

TODD BLANCHE  
United States Deputy Attorney General

*Alina Habba*

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ALINA HABBA  
Acting United States Attorney and  
Special Attorney

*Francesca Liguori*

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Francesca Liguori  
Assistant United States Attorney

CASE NUMBER: 25-539 (GC)

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

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UNITED STATES OF AMERICA

v.

DANIEL T. SIGNORE and  
CATHERINE M. TOMASOVIC

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**INDICTMENT FOR**

18 U.S.C. § 371  
26 U.S.C. § 7203

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A True Bill,



Foreperson

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TODD BLANCHE  
UNITED STATES DEPUTY ATTORNEY GENERAL

ALINA HABBA  
ACTING UNITED STATES ATTORNEY  
AND SPECIAL ATTORNEY

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FRANCESCA LIQUORI  
ASSISTANT U.S. ATTORNEY  
NEWARK, NEW JERSEY  
973-297-4373

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