## COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** VS. (NAME and ADDRESS): Magisterial District Court 12-2-03 **BONILLA-SANCHEZ REYNA** Magisterial District Judge David H. Judy, Esquire Middle Name Last Name First Name 50 Canal Street 1221 Continental Road, York, PA 17404 Royalton, Pa 17057 Telephone: **NCIC Extradition Code Type** ☐ C-Misdemeanor Surrounding States 1-Felony Full 5-Felony Pending Extradition ☐ Distance: \_ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition A-Misdemeanor Full ☐ 3-Felony Surrounding States B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Incident Number **Date Filed** OTN/LiveScan Number Complaint Number Docket Number ☐ YES 🖾 NO -306-22 09/30/2022 IFS200116 Co-Defendant(s) **GENDER** ров 09/06/1988 Add'l DOB Gen. Middle Name Last Name First Name ☐ Male **MARIELOS DURAN-ESCOBAR** KARLA AKA White Hispanic Unknown RACE Asian Black Native American ■ Non-Hispanic Unknown **ETHNICITY** BRO (Brown) ☐ PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) ☐ BLU (Blue) Hair PNK (Pink) GRN (Green) WHI (White) XXX (Unk./Bald) BLK (Black) ONG (Orange) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLK (Black) BLU (Blue) BRO (Brown) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA ☐ YES ☐ NO **DNA Location FBI Number MNU Number** OLN 33094505 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO **Fingerprint Classification:** 10 **DEFENDANT VEHICLE INFORMATION** Oth. NCIC Veh. Code School Veh. Reg. State Registration Comm'l Veh. Haz same as Ind. mat Plate # Sticker (MM/YY) Def. Style Color VIN Make Model Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). 09/30/2022 SDAG JOHN T. DICKINSON (Name of the attorney for the Commonwealth) attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. ☑ I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[22]

therefore designated as John Doe or Jane Doe

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

Page 1 of  $\underline{4}$ 

Harrisburg City

on or about OCTOBER 2017 THROUGH APRIL 18, 2022

in DAUPHIN County



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Docket N	lumber	:	Date	Filed:			V/LiveSca		er		Comp	laint/Incident	Numb	er
CR-3	106-2	22	191	X) 22		4 369	4324-	-2			IFS2	00116		
	U*		First:				Viiddle:			Last:				
Defenda	nt Nam	e:	REYN	Α			[.		ļ	BON]	LLA-S	SANCHEZ		
The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a <i>brief</i> summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)														
Inchoate				_	icitation 002 A		nspiracy 903			Num	ber of \	/ictims Age 60	or Olde	er
	1	911		(b)	(3)	of the	18		1	F1				
Lead?	Offense #	;	Section		section	Servit Month Strangers	PA Statut	e (Title)	Counts	Gr	ade	NCIC Offense Code	ι	JCR/NIBRS Code
	DOT D	,	Accident	Number					Interstate			Safety Zone		☐ Work Zone
(if ap	p <b>licabl</b> Descri	e)   ation (in			of state	te or ordir	nance). s	911 CO	RRUPT ORG	SANIZ	ATION			
Sidiule	DG901	וו) ווטוול	ioiuu <del>c</del> III	o name	, טי טומונ	ACC OF ORALI	.aoo). <b>s</b>	J 4V						
Acts of the accused associated with this Offense: the defendant, while employed by or associated with an enterprise, did unlawfully conduct and/or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity; to wit: from on/about October 2017 through April 18, 2022, the defendant, while employed by Salazar Auto Sales and Multiservices, LLC, and/or while subsequently an owner/employee of Beltin Auto Sales, LLC, did knowingly and intentionally conduct and / or participate in a continuing course of the conduct of the aforementioned dealerships' affairs through a pattern of racketeering activity which included vehicle title washing, tampering with public records or information, and unsworn falsification.														
Inchoat Offense		Attempt 18 901 A		. —	icitation 902 A		onspiracy 903			Nun	ber of	Victims Age 60	or Old	er
	2	911	· · · · ·	(b)	(4)	of the	18	: .	1	F1				
Lead? (	Offense#	_1	Section	Su	bsection		PA Statu	te (Title)	Counts Grade		rade	NCIC Offense Code		UCR/NIBRS Code
PennDOT Data Accident			Number	r Inte			Interstate	terstate Safety Zone Work Zone						
Statute Description (include the name of statute or ordinance): § 911 CORRUPT ORGANIZATION														
Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant did conspire with other persons to commit the crime of Corrupt Organizations, 18 PA.C.S.A §911(b)(3), to wit: the defendant, while employed by Salazar Auto Sales and Multiservices, LLC, did knowingly and intentionally conspire with owner Luis Salazar-Manon, and/or with employee(s) Cynthia Salazar and/or Jose Rivera-Rivera; and while an owner/employee of Beltin Auto Sales, LLC, the defendant did knowingly and intentionally conspire with owner Jose Rivera-Rivera, to conduct or participate directly or indirectly in the conduct of one or both of the aforementioned dealerships' affairs through a pattern of racketeering activity which included vehicle title washing, dealing in proceeds of unlawful activity, tampering with public records or information, and unsworn falsification. In so doing, one or more of them did engage in an an overt act in pursuance of the conspiracy.    Inchate														
Inchoa Offen		☐ Atter 18 90			olicitation 1902 A		onspiracy 3 903		Numb	per of \	/ictims	Age 60 or Olde		
	3	71				of the	75		1	M		NOIO Off	<u> </u>	HCD/MIDDS Code
Lead? Offense# Section PennDOT Data Acc			dent	Subsection			_		Grade			UCR/NIBRS Code		
PennDOT Data (if applicable)  Statute Description (include the name of statute or ordinance): § 903 CRIMINAL CONSPIRACY TO COMMIT FALSE APPLCIATON FOR CERTIFICATE OR REGISTRATION														
Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant, did engage in a continuing course of criminal conduct, wherein she, with intent of promoting or facilitating the comission of the crime of False Application for Certificate of Title or Registration, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; to wit: the defendant did agree with one or more of the following: Luis Salazar-Manon, Cynthia Salazar, Jose Rivera-Rivera, Salazar Auto Sales and Multiservices, LLC, and/or Beltin Auto Sales, LLC, that one of more of them would engage in conduct that constitutes the aforementioned crime, or an attempt or solicitation to commit such crime. One or more of them engaged in an overt act in pursuance thereof, but submitting application(s) for yearlies title(s) to PA. Dept. of Transportation (PennDOT) which contained a material false statement.														

POLICE CRIMINAL COMPLAINT Complaint/Incident Number OTN/LiveScan Number Docket Number: Date Filed: M-306-22 9 BAZZ IFS200116 Last: **Defendant Name: BONILLA-SANCHEZ REYNA** I. ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Inchoate ☐ Attempt 18 901 A 18 902 A 18 903 Offense of the 75 1 M1 7121 П 4 Grade NCIC Offense Code UCR/NIBRS Code PA Statute (Title) Counts Lead? Offense# Section Subsection **PennDOT Data** Accident ☐ Work Zone ☐ Interstate ☐ Safety Zone Number (if applicable) Statute Description (include the name of statute or ordinance): § 7121 FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION Acts of the accused associated with this Offense: The defendant did knowingly and intentionally make a material false statement, or conceal any other material fact in an application for a certificate of title or for registration; To wit: On or about October 2017 through April 18, 2022, the defendant engaged in a continuing course of criminal conduct wherein she knowingly and intentionally made material false statements or concealed other material facts on applications for certificates of salvage and/or on applications for reconstructed vehicle titles submitted to the PA Dept. of Transportation (PennDOT) on behalf of Salazar Auto Sales and Multiservices, LLC and/ or Beltin Auto Sales, LLC. ☐ Conspiracy Inchoate ☐ Attempt ☐ Solicitation Number of Victims Age 60 or Older 18 902 A 18 903 18 901 A Offense of the **NCIC Offense Code** UCR/NIBRS Code Grade Subsection PA Statute (Title) Counts Offense# Section Lead? PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate Number (if applicable) Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense: ☐ Solicitation ☐ Conspiracy Inchoate ☐ Attempt Number of Victims Age 60 or Older 18 903 Offense 18 901 A 18 902 A

PennDOT Data (if applicable)	Accident Number ———	☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (in	clude the name of statute or ordin	nance):		
Acts of the accused as	ssociated with this Offense:			

PA Statute (Title)

Counts

Grade

**NCIC Offense Code** 

of the

Subsection

UCR/NIBRS Code

Lead?

Offense#

PennDOT Data

Section

Accident

POLICE CRIMINAL COMPLAINT

Date Filed: 01	FN/LiveScan Number	Complaint/Incident Number IFS200116					
rst: EYNA		NILLA-SANCHEZ					
	9 130 22 R	9 13q 22   R 3C 432 4-6 rst:   Middle:   Last:					

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered  $\underline{1}$  through  $\underline{\hspace{1cm}}$ .
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

AND NOW, on this date

SEPTEMBER 30, 2000

I certify that the complaint has been properly completed and verified.

(Signature of Affiant)

An affidavit of probable cause must be completed before a warrant can be issued.

(Magisterial District Court Number)

(Issuing Authority)

## POLICE CRIMINAL COMPLAINT

Docket Number: CR-306-22	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS200116
	First:	Middle:	Last:
Defendant Name:	: REYNA	I.	BONILLA-SANCHEZ

## AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Jeremy Becker of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, depose and say;

Your Affiant has been conducting a criminal investigation into violations of the criminal laws of the Commonwealth of Pennsylvania. This investigation has used the resources of the Forty-Seventh Statewide Investigating Grand Jury. On September 16, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 17. On September 19, 2022 the Honorable Supervising Judge Lillian H. Ransom, First Judicial District, Philadelphia County, Pennsylvania, entered a court order accepting the Grand Jury's recommendation of charges and findings. The Presentment, attached and herein incorporated by reference, recommends that the Attorney General of Pennsylvania or his designee file the charges specified in this criminal complaint and Presentment No. 17 against the below listed individuals and corporations. Pursuant to 18 Pa.C.S.A. §307 (a)(3) – A corporation may be convicted of the commission of an offense if: (3) the commission of the offense was authorized, requested, commanded, performed or recklessly tolerated by the board of directors or a high managerial agent acting in behalf of the corporation within the scope of his office or employment.

- 1. Luis Fermin Salazar-Manon
- 2. Cynthia Salazar
- 3. Jose R. Rivera Rivera
- 4. Reyna Bonilla Sanchez
- 5. Salazar Auto Sales & Multiservices, LLC.
- 6. N&G Towing, Body Shop and Sales, LLC.
- 7. Beltin Auto Sales, LLC.

Your Affiant believes through participation in this investigation and as recommended by the Forty-Seventh Investigating Grand Jury that probable cause exists for the arrest of the above named parties and respectfully asks this Honorable Court to issue arrest warrants for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

I, JEREMY BECKER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this

My commission expires first Monday of January

day of

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POLICE CRIMINAL COMPLAIN

		4-14-4-	LOFICE CIVIMILIAVE COMI EVILLE
Docket Number: OK - 306-22	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS200116
Defendant Name:	First: REYNA	Middle:	Last: BONILLA-SANCHEZ