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	•		•	who lives at the	address set fo	orth aho	ive			
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☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

on or about 07/31/19 - 12/16/20

(Offense Date)

with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code)

In DAUPHIN County

therefore designated as John Doe or Jane Doe

[22]

(County Code)

CITY OF HARRISBURG (Place-Political Subdivision)



**Docket Number:** Date Filed: OTN/LiveScan Number Complaint/Incident Number CR. 322 - 2022 09/3V2 20AT022 /PA21420227 Last: First: Middle: **Defendant Name ARMANDO** DELAPAZ 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 brief 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. Inchoate ☐ Attempt Solicitation □ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the  $\boxtimes$ 01 911 PA CRIMES CODE (b)(2)01 F1 Offense# PA Statute (Title) NCIC Offense Code UCR/NIBRS Code Lead? Section Subsection Counts Grade PennDOT Data Accident Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise, to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a vehicle dealership. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense 02 911 (b)(3)of the PA CRIMES CODE 01 F1 Lead? Offense# Section Subsection PA Statute (Title) Counts NCIC Offense Code UCR/NIBRS Code Grade **PennDOT Data** Accident Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an owner, operator, and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity. ☐ Attempt Inchoate ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 03 911 (b)(4)PA CRIMES CODE 01 F1 Lead? Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code **PennDOT Data** Accident ☐ Interstate Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2) or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).



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	ì	veScan Number		Complaint/Incident Num	
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Statute Description (include	de the name of stat	ute or ordinance): Di	ALING IN PRO	CEEDS OF UNLAWFU	IL ACTIVITY
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Acts of the accused assoc	ciated with this Offe	ense: A person commits a	felony of the first dea	ree if the person conducts a	financial transaction with
knowledge that the property inv					
intent to promote the carrying of	n of the unlawful activity	y. To wit: the defendant re	peatedly engaged in fi	inancial transactions with kno	
involved represented the procee	eds of unlawful activity v	vith the intent to promote	the carrying on of said	d unlawful activity.	
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Dead? Offense# Section  PennDOT Data Accide (if applicable) Statute Description (included)  Acts of the accused associate is facilitating a fraud or injury purports to be the act of another fact the case, or to be a copy of that he/she is facilitating a fraud that they purported to have been acted	(a)(2) Subsection ent er de the name of state ciated with this Offer y to be perpetrated by a cer who did not authorize f an original when no sud or injury to be perpetrent executed at a time or executed at a time or subsection ent er de the name of state ciated with this Offer y to be perpetrated by a wit: on 37 occasions the	PA Statute (Tit state or ordinance): FC ense: A person is guilty of enyone, the actor makes, of that act, or to have been act original existed, to with ated by anyone, made, corplace other than was in faction A Conservation PA Statute (Tit state or ordinance): FC ense: A person is guilty of enyone, the actor utters are defendant, with intent to defendant, with intent to defendent actor ordinance or conservations.	CODE 37  e) Counts Coun	Safety Zone  Safety Zone  Safety Zone  Safety Zone  Safety Zone  It to defraud or injure anyonauthenticates, issues or transr place or in a numbered seintent to defraud or injure anythenticated, issued, and/or  Number of Victims Ag  Rade  NCIC Offense Code  Safety Zone  It to defraud or injure anyonows to be forged in a mannanyone, and/or with knowledgen.	UCR/NIBRS Code  Work Zone  e, or with knowledge that sfers any writing so that it quence other than was in nyone, or with knowledge transferred 37 writings so  e 60 or Older  UCR/NIBRS Code  Work Zone  e, or with knowledge that er specified in paragraphs ge that she was facilitating



Docket Number:	Date Filed:	OTN/LiveScan Nu	mber	092.2		Complaint/Incident Number			
CR-322-2022	OF1 B0/22	OTN/LiveScan Number R 365 893-3 Middle:				20AT022 /PA21420227 Last:			
Defendant Name	First: ARMANDO	'	Midale:		I	Last: DELAF	PAZ		
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.									
Inchoate	i A	Solicitation 18 902 A		Conspiracy 18 903		N	umber of Victims Ag	ge 60 or Older	
Lead? Offense#	Section Subse	Culti-Preparation and Committee		ES CODE te (Title)	01 Counts	F1 Grade	NCIC Offense Code	100 UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	COLON	1 A Olaic	☐ Inte		"	☐ Safety Zone	☐ Work Zone	
Statute Description	(include the nan	ne of statute or ordi	nance	): <b>CONSPII</b>	RACY /	DODU	the		
Acts of the accused associated with this Offense: A person is guilty of conspiracy with another person or persons to commit a crime if with the intent of promoting or facilitating its commission he agrees with such other person or persons 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, with the intent of promoting or facilitating the commission of the offenses of Dealing in Proceeds of Unlawful Activities and/or Forgery and/or Washing Vehicle Titles and/or Deceptive Business Practices and/or Tampering with Public Records or Information and/or False Application for Certificate of Title and/or Altered, Forged or Counterfeit Documents and/or Obstructing Administration of Law or Other Governmental Function and/or Unsworn Falsification agreed with other person or persons to engage in conduct which constitutes such crime and/or attempt and/or solicitation to commit same.									
Inchoate	•	Solicitation		Conspiracy 18 903		N	umber of Victims Ag	ge 60 or Older	
Offerise 70 90		70 302 A	<u> </u>	70 000					
D 08	4118 Section Subse	1/4/2003/15/19/99/2004/03/03/03/03		ES CODE te (Title)	37 Counts	F3 Grade	NCIC Offense Code	110 UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	SCHOIL	r A Glatt	☐ Inte			☐ Safety Zone	☐ Work Zone	
Statute Description	(include the nan	ne of statute or ordi	nance	): WASHIN	G VEHI	CLE TI	TLES		
that the person is facilita	ting a deception to ficate of title for a	be perpetrated by anyon notor vehicle which incl	ne conc udes m	erning the true aterially false (	mileage of or fictitious	f a moto informat	vehicle, the person tion, to wit: with inte	anyone or with knowledge makes/causes to be made ent to deceive anyone, the ctitious information.	
Inchoate		☐ Solicitation 18 902 A		Conspiracy 18 903		N	umber of Victims A	ge 60 or Older	
D 09 Lead? Offense#	4107 (a) Section Subse	VCP1965-016-302-010-010-010-010-010-010-010-010-010-0		ES CODE	37 Counts	F3 Grade	NCIC Offense Code	110 UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	SCHOIL	1 A Giai	☐ Inte		Τ.	☐ Safety Zone	☐ Work Zone	
	(include the nar	ne of statute or ordi	nance	): DECEPTI	VE or F	RAUDI	JLENT BUSINES	SS PRACTICES	
for sale adulterated or n	Statute Description (include the name of statute or ordinance): <b>DECEPTIVE or FRAUDULENT BUSINESS PRACTICES</b> Acts of the accused associated with this Offense: A person commits an offense if, in the course of business, the person sells, offers or exposes for sale adulterated or mislabeled commodities, to wit: on 37 occasions the defendant, in the course of his/her business, sold, offered, or exposed for sale adulterated or mislabeled commodities within the definitions of this statute.								



Docket Number: Date Filed: CR 322 Alga を 1842	OTN/LiveScan Nu	imber 8 1 <i>3-3</i>	Complaint/Incident Num		
CK'382'1182 318422	Kows	Middle:	20AT022 /PA2142022 Last:	<u> </u>	
Defendant Name ARMANDO			DELAPAZ		
The acts committed by the accused	ara dagarihad hale	awwith agab Agt of Aggam	bly or statute allogadly vi	olated if	
appropriate. When there is more tha				olateu, ii	
(Set forth a brief summary of the facts suffici	ient to advise the defer	idant of the nature of the offense	(s) charged. A citation to the st		
violated, without more, is not sufficient. In a sallegedly violated.	summary case, you mu	ist cite the specific section(s) an	a subsection(s) of the statute(s	or ordinance(s)	
1 15.4 AGA 254 GLERRES DE 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	☐ Solicitation	☐ Conspiracy	Number of Victims Ag	o 60 or Oldor	
Offense 18 901 A	18 902 A	18 903	Number of Victims Ag	le oo or order	
□ 10 4911 (a)(	1) of the PA	CRIMES CODE 37	F3	260	
Lead? Offense# Section Subsection	(Stole substitution entrance)	PA Statute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data Accident (if applicable) Number		☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include the nam	ne of statute or ord	inance): TAMPERING W	TH PUBLIC RECORDS	or INFORMATION	
, ,		•			
Acts of the accused associated with	this Offense: A per	rson commits an offense if he kno	owingly makes a false entry in,	or false alteration of, any	
record, document or thing belonging to, or record the government to wit: on 37 occasions the					
and/or kept by, the government for information					
Inchoate	☐ Solicitation	☐ Conspiracy			
Offense 18 901 A	18 902 A	18 903	Number of Victims Ag	e 60 or Older	
		10 000			
	of the DA			110	
□ 11 7121  Lead? Offense# Section Subsection	- Lowingscontrollersorement	VEHCILE CODE 37 PA Statute (Title) Counts	M1 Grade NCIC Offense Co	110 ode UCR/NIBRS Code	
Lead? Offense# Section Subsection PennDOT Data Accident	ON THE PROPERTY OF THE PROPERT	VEHCILE CODE 37	M1		
Lead? Offense# Section Subsection PennDOT Data Accident (if applicable) Number	ction	VEHCILE CODE 37 PA Statute (Title) Counts  Interstate	M1 Grade NCIC Offense Co	ode UCR/NIBRS Code  ☐ Work Zone	
Lead? Offense# Section Subsection PennDOT Data Accident	ction	VEHCILE CODE 37 PA Statute (Title) Counts  Interstate	M1 Grade NCIC Offense Co	ode UCR/NIBRS Code  ☐ Work Zone	
Lead? Offense# Section Subsection PennDOT Data Accident (if applicable) Number	ne of statute or ord	VEHCILE CODE 37 PA Statute (Title) Counts Interstate inance): FALSE APPLICA	M1 Grade NCIC Offense Co Safety Zone TION FOR CERTIFICA	UCR/NIBRS Code  Work Zone  TE OF TITLE	
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The statute Description (include the name or address or makes a material false statute or for registration, to wit: on 37 occase.	ne of statute or ord this Offense: A pe	VEHCILE CODE 37 PA Statute (Title) Counts Interstate inance): FALSE APPLICA erson is guilty of a misdemeanor lose a security interest, or concea	M1 Grade NCIC Offense Co Safety Zone  TION FOR CERTIFICA  of the first degree if the person is any other material fact in an analysis.	UCR/NIBRS Code  Work Zone  TE OF TITLE  n uses a false or fictitious application for a certificate	
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□ 11 7121  Lead? Offense# Section Subsect  PennDOT Data Accident Number  Statute Description (include the name)  Acts of the accused associated with name or address or makes a material false state of title or for registration, to wit: on 37 occase for a certificate of title.	ne of statute or ord  this Offense: A peatement, or fails to disclusions the defendant material solicitation  18 902 A  ) of the PA	VEHCILE CODE 37 PA Statute (Title) Counts Interstate inance): FALSE APPLICA erson is guilty of a misdemeanor lose a security interest, or concea ade a material false statement at	M1 Grade NCIC Offense Co Safety Zone  TION FOR CERTIFICA  of the first degree if the person ls any other material fact in an and/or concealed any other material	Work Zone  TE OF TITLE  In uses a false or fictitious application for a certificate arial fact in an application  The off title arial fact in an application for a certificate arial fact in an application for a certificate arial fact in an application for a certificate arial fact in an application fact in a fact in	
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CR-392.	nber:	Date Filed:	OTN/LiveScan Nur	SS	93-3		1.7	laint/Incident Nu 022 /PA214202	
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Docket Number:	Date Filed:	OTN/LiveScan N	lumber	Complaint/Incident Number
CR-322-2022	09 Bdos	R 365	893-3	20AT022 /PA21420227
	First:		Middle:	Last:
Defendant Name	ARMANDO			DELAPAZ

- 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 <u>01</u> through <u>06</u>.
- 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.)

9/30	20 <i>a</i>	12	Tox AS		
(Date)	(Year)		(Signature of Affiant)		
AND NOW, on this date	Etoker 3,2027	I certify that the com	plaint has been properly completed	and verified.	
An affidavit of probable cause	must be completed before	a warrant can be issued.	WINDERNAM STATES	Wee.	
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(Magisterial District Court Number)

OF DAUPHIN



Docket Number: CR'332.2022	Date Filed:	OTN/LiveScan Number R365893-3	Complaint/Incident Number 20AT022 /PA21420227
	First:	Middle:	Last:
Defendant Name:	ARMANDO		DELAPAZ

#### AFFIDAVIT of PROBABLE CAUSE

Your Affiants, County Detective Mark MURRAY of The Lackawanna County District Attorney's Office and TFC Ramon TORRES of The Pennsylvania State Police are both members of The Pennsylvania State Police Auto Theft Task Force. Your affiants being duly sworn, depose and say:

Your affiants have 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 09/16/22, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 15. On 09/19/22, the Honorable Judge Lillian Harris RANSOM, Supervising Judge, entered an "Order Accepting Presentment No. 15" of the Forty-Seventh Statewide Investigating Grand Jury designating Dauphin County as the county for conducting the trial of all charges pursuant to Presentment No. 15. On 09/19/22, The Honorable Judge Lillian Harris RANSOM issued an "Order Unsealing Presentment No. 15." Said Order, states Presentment No. 15 and the order Accepting Presentment No. 15 are hereby unsealed so that the Commonwealth can utilize the presentment in connection with the institution of criminal charges. Presentment No. 15, Order Accepting Presentment No. 15, and the Order Unsealing Presentment No. 15, attached and herein incorporated by reference, recommend that The Attorney General of Pennsylvania or his designee institute criminal proceedings against the below listed individuals and charge them with offenses listed in Presentment No. 15:

01.	George FRIETTO	06. Sandra KLASSNER	<ol><li>Pawel BRYLA</li></ol>
02.	John MULEA	07. Alivia AURIEMMA	12. Alvara RODRIGUEZ
03.	Kara COSGROVE	08. Armando DeLaPAZ	13. Anibelkis GARCIA
04.	Angel RIOS	09. Jorge SANTOS-HERNANDEZ	14. Shefif HELMY
05.	Peter TAYOUN	10. Eva CONTRERAS	15. Luis LEYVA

I, <u>DET. MARK MURRAY / TFC. RAMON TORRES</u>, 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

| 3 | October | 3022 |
| 10/3/2022 | Date | Magisterial District Monday of January, | Magisterial District Monday of Monday of January, | Magisterial District Monday of Monda



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name:	First: ARMANDO	Middle:	Last: DELAPAZ

### AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Additionally, pursuant to 18 Pa. C.S.A. Sec. 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 by a high managerial agent acting in behalf of the corporation within the scope of his or her office of employment.

Presentment No. 15, Order Accepting Presentment No. 15, and the Order Unsealing Presentment No. 15, attached and herein incorporated by reference, recommend that The Attorney Gereral of Pennsylvania, or his designee, institute criminal proceedings against the below listed entities and charge them with offenses listed in Presentment No. 15:

01.	George's Garage	06.	PBJ Motors LLC
02.	Pennsylvania Tag and Title Inc.	07.	ALZ Auto Sales
03.	Luci's Auto Sales LLC	08.	Aquino Auto Mall LLC
04.	NewRoad Motors LLC	09.	EOS Auto Sales LLC
05.	Best Value Auto Outlet LLC	10.	Alliance Auto Sport Inc.

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

AFFIDAVIT OF PROBABLE CAUSE Page 02 of 02

Qet. Mas HMy TA. SSD (Signature of Affiant)