



Magisterial District Court 12-2-03
Magisterial District Judge David H. Judy, Esquire
50 Canal Street
Royalton, Pa 17057
Telephone: (717) 944-4463

DEFENDANT: (NAME and ADDRESS):
N&G TOWING, BODY SHOP & SALES LLC
First Name Middle Name Last Name Gen
1710-1710A Virginia Avenue, Dover, PA 17315

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-312-2022</u>	Date Filed <u>09/30/2022</u>	OTN/LiveScan Number	Complaint Number <u>IFS-20-0116</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	<input type="checkbox"/> Asian				
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)		
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number	ENTITY# 6813550			
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					Ft. HEIGHT In.
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

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).

SDAG JOHN DICKINSON
(Name of the attorney for the Commonwealth)

John Dickinson
(Signature of the attorney for the Commonwealth)

09/30/2022
(Date)

I, <u>JEREMY BECKER</u> (Name of the Affiant)	<u>737643/BADGE # 736</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of <u>Pennsylvania Office of Attorney General</u> (Identify Department or Agency Represented and Political Subdivision)	<u>PA0222400</u> (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] <u>Harrisburg City</u> (Subdivision Code) (Place-Political Subdivision)	
in DAUPHIN County [22] (County Code)	on or about <u>FEBRUARY 7, 2021 THROUGH APRIL 18, 2022</u>

RECEIVED

SEP 30 2022

DISTRICT COURT 12-2-03



POLICE CRIMINAL COMPLAINT

Docket Number: CR-312-2022	Date Filed: 9/30/2022	OTN/LiveScan Number	Complaint/Incident Number IFS-20-0116
Defendant Name:	First: N&G TOWING,	Middle: BODY	Last: SHOP & SALES LLC

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. 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): § 903 CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY, ETC.

Acts of the accused associated with this Offense: On/about February 7, 2021, through April 18, 2022, the defendant, by and through its agent, Luis Salazar-Manon, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and/or Unsworn Falsification to Authorities, did agree with such other person(s) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with Cynthia Salazar and/ or Jose Rivera-Rivera (enhanced inspector), that one or more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in overt act in pursuance of the conspiracy.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	4118		of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): § 4118 WASHING VEHICLE TITLES

Acts of the accused associated with this Offense: The defendant, by and through its agent Luis Salazar-Manon, with intent to deceive anyone or with knowledge that the defendant is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the defendant made or caused to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information, to wit: On or about February 7, 2021 through April 18, 2022, with intent to deceive the PA Dept. of Transportation (PennDOT), the defendant engaged in a continuing course of criminal conduct in which the defendant made or caused to be made applications for certificates of reconstructed motor vehicle titles which falsely asserted that the vehicles underwent enhanced inspections and were deemed to have been restored to roadworthiness.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	4911	(a) (1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): § 4911 TAMPERING WITH PUBLIC RECORDS OR INFORMATION

Acts of the accused associated with this Offense: The defendant, by and through its agent, Luis Salazar-Manon, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: On or about February 7, 2021, through April 18, 2022, the defendant, with intent to defraud the PA Dept. of Transportation (PennDOT), engaged in a continuing course of conduct, whereby the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT, including application forms for PA motor vehicle titles and/or supporting documentation submitted to PennDOT by the defendant; as well as inspection station records required by law to be kept by personnel at official inspection stations in PA for information of the government.



POLICE CRIMINAL COMPLAINT

Docket Number: CK-312-2022	Date Filed: 9/13/2022	OTN/LiveScan Number	Complaint/Incident Number IFS-20-0116
Defendant Name:	First: N&G TOWING,	Middle: BODY	Last: SHOP & SALES LLC

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, by and through its agent, Luis Salazar-Manon, 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 February 7, 2021 through April 18, 2022, the defendant engaged in a continuing course of criminal conduct, knowingly and intentionally making material false statements or concealing other material facts on applications for certificates of salvage and/or on applications for reconstructed vehicle titles that were submitted to the PA Dept. of Transportation (PennDOT) on behalf of the defendant used car dealership.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	4107	(a)(4)	of the	18	1	M2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): § 4107 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

Acts of the accused associated with this Offense: The defendant, by and through its agent, Luis Salazar-Manon, in the course of business did knowingly and with intent sell, offer or expose for sale adulterated or mislabeled commodities. To wit: On or about February 7, 2021 through April 18, 2022, in the course of business, the defendant engaged in a continuing course of criminal conduct in which the defendant knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT). The applications pertained to out of state vehicles which were not present at the defendant dealership and therefore the vehicle information was not verified and the "reconstructed" vehicles did not undergo enhanced safety inspections as required by law to ensure the vehicles' roadworthiness.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-312-2022</i>	Date Filed: <i>9/30/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS-20-0116
Defendant Name:	First: N&G TOWING,	Middle: BODY	Last: SHOP & SALES LLC

- 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.
- 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.
- This complaint consists of the preceding page(s) numbered 1 through .
- 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 than 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)

SAD Bilal

 (Signature of Affiant)

AND NOW, on this date September 30, 2022 I certify that the complaint has been properly completed and verified.

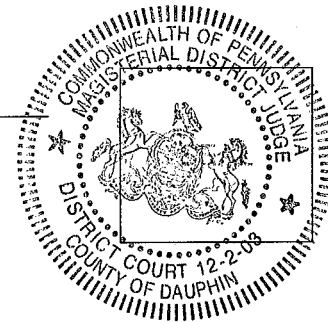
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

 (Magisterial District Court Number)

[Signature]

 (Issuing Authority)





Docket Number: CK-312-2022	Date Filed: 9/30/2022	OTN/LiveScan Number	Complaint/Incident Number IFS-20-0116
Defendant Name:	First: N&G TOWING,	Middle: BODY	Last: SHOP & SALES LLC

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.

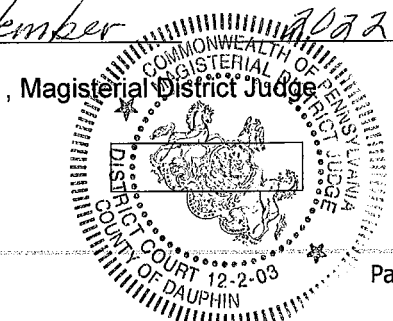


 (Signature of Affiant)

Sworn to me and subscribed before me this 30th day of September

9/30/2022 Date _____, Magisterial District Judge

My commission expires first Monday of January, 2023





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-312-2022</i>	Date Filed: <i>9/30/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS-20-0116
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