COMMONWEALTH OF	P.	OLICE CRIMINAL CO	OMPLAINT
PENNSYLVANIA		OMMONWEALTH OF PEN	
COUNTY OF: DAUPHIN		VS.	
Magisterial District Number: 12-02-03			
MDJ: Hon. DAVID H. JUDY, ESQ.	DEFENDANT:	(NAME and ADDRESS	S):
Address: 50 Canal Street	NEWROAD	MOTO	ORS LLC
Royalton, PA 17057	First Name	Middle Name Last Na	me Gen
	32 NORTH 16 TH STREE	T	
Telephone: (717) 944-4463	LEVANON, PA 17042		
	NCIC Extradition Code Ty		
☐ 1-Felony Full ☐ 5-Felony Pend.		neanor Surrounding States	Distance:
☐ 2-Felony Ltd. ☐ 6-Felony Pend. ☐ 3-Felony Surrounding States ☐ A-Misdemeano		neanor No Extradition neanor Pending	
☐ 4-Felony No Ext. ☐ B-Misdemeano	= .	neanor Pending neanor Pending Extradition Determ.	
	DEFENDANT IDENTIFICATION INF	ORMATION	
Docket Number Date Filed	OTN/LiveScan Number	Complaint/Incident Number	Request Lab Services?
CK-333-2 09BO/22		20AT022 /PA21420227	YES NO
GENDER DOB Y / POB		Add'I DOB / /	Co-Defendant(s)
☐ Male First Name	Middle Name	Last Name	Gen.
☐ Female AKA			
RACE White Asian	☐ Black ☐ Non-Hispanic	Native American Unknown	Unknown
	ED (Red/Aubn.) SDY (Sandy)	☐ BLU (Blue) ☐ PLE (Purpl	e) BRO (Brown)
☐ BLK (Black) ☐ O	NG (Orange)	☐ XXX (Unk./Bald) ☐ GRN (Gree	
☐ BLN (Blonde / Strawbe	эггу)		
EYE COLOR BLK (Black)	☐ BLU (Blue) ☐ BRO (Brow	n) GRN (Green)	GRY (Gray)
☐ HAZ (Hazel)	☐ MAR (Maroon) ☐ PNK (Pink)	MUL (Multicolored)	XXX (Unknown)
DNA PES NO DNA Location	on		WEIGHT (lbs.)
FBI Number	MNU Numb	er	
Defendant Fingerprinted YES NO	·		Ft. HEIGHT In.
Fingerprint Classification:	DEFENDANT VEHICLE INFORM		d est in en succió del resolució de accontracte a tractal a tractal a
State Hazmat Regist		Sahaal Oth. NO	CIC Veh. Code Reg.
Plate #		Veh.	same
VIN Year Mak	e Model	Style	Color as Def.
	h Managarad Disamana		
Office of the attorney for the Commonwealt	.n ⊠ Approved □ Disapprov	ed because:	· · · · · · · · · · · · · · · · · · ·
(The attorney for the Commonwealth may require that to filing. See Pa.R.Crim.P. 507).	the complaint, arrest warrant affidavi	, or both be approved by the attorney	for the Commonwealth prior
to ming. Goo'r an tormin 1 Gory.	0.11110	<i>"</i>	
DAG RICHARD H. BRADBURY JR.	Richard H. Brad (Signature of the attorney for the Com	doury, Jr.	09/29/2022
(Name of the attorney for the Commonwealth)	(Signature of the attorney for the Com	monwealthy	(Date)
Det. Mark H. MURRAY / TFC. Ramo		3-19 / 00610536, 12077	
(Name of the Affiant)	•	ETC -Assigned Affiant ID Number & B	auge #
of Lackawanna County Detectives / PA S		00 / PAPSP1A00	
(Identify Department or Agency Represented and Poli do hereby state: (check appropriate box)	tical Subdivision) (Police Age	ncy ORI Number)	
I accuse the above named defendar	nt who lives at the address act	forth above	
☐ I accuse the defendant whose name	s io univinomii to ine but milo is	นธอบาทธุก ฐอ	

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

on or about 12/02/19 - 03/11/21

(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)



				49				_ COMPLAIN I
Docket Number:	Date Filed:	OTN/LiveScan	Number			Compl	aint/Incident Num	ber
MR-353-W	O9 \$0/22					20AT(022 /PA2142022	27
	First:		Middle:			Last:		
Defendant Name	NEWROAD					МОТО	RS LLC	
The acts committed appropriate. When to use forth a brief summar	here is more th	an one offense,	each offei	nse should !	be numb	ered ch	ronologically.	
violated, without more, is	not sufficient. In a	a summary case, you	ı must cite tl	ne specific sec	ction(s) and	subsect	ion(s) of the statute(s	s) or ordinance(s)
allegedly violated.								
Inchoate		☐ Solicitation		Conspiracy		N	umber of Victims Ag	se 60 or Older
Offense 18 901	Α	18 902 A		18 903				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
⊠ 01	4118	of the	DA CDIM	ES CODE	109	F3		110
4 4 4 4		section	PA CRIM		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	Accident	, codion	777 Oldie					
(if applicable)	Number			☐ Inte	erstate	L	☐ Safety Zone	☐ Work Zone
Statute Description (include the na	me of statute or o	ordinance): WASHIN	IG VEHI	CLE TI	TLES	
•	`			•				
A ota of the acquired	accociated with	thic Offense: An	orcon comm	its a followy of	the third d	ograp if v	with intent to deceive	anyone or with knowledge
								makes/causes to be made
an application for a certif	ficate of title for a	motor vehicle which	includes m	aterially false	or fictitious	informat	ion, to wit: with inte	nt to deceive anyone, the
defendant made/caused	to be made 109 ap	plications for a certif	icate of title	for a motor ve	ehicle whic	h included	d materially false or fi	ictitious information.
•								
Inchoate	pt	☐ Solicitation		Conspiracy				00 Old
Offense 18 901	A	18 902 A		18 903		N	umber of Victims Ag	ge 60 or Older
					I		Participation of the State of t	ا مند
		Cesposit Account of South Control Control		ES CODE	109	F3		110
Lead? Offense#	Section Subs)(4) of the section	PA CRIM		109 Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
Lead? Offense# PennDOT Data		Cesposit Account of South Control Control			Counts	Grade	NCIC Offense Code	
Lead? Offense# PennDOT Data (if applicable)	Section Subs Accident Number	section	PA Statu	ite (Title)	Counts erstate	Grade [☐ Safety Zone	UCR/NIBRS Code
Lead? Offense# PennDOT Data	Section Subs Accident Number	section	PA Statu	ite (Title)	Counts erstate	Grade [☐ Safety Zone	UCR/NIBRS Code
PennDOT Data (if applicable) Statute Description (Section Subs Accident Number (include the na	me of statute or o	PA Statu ordinance	ite (Title) Inte	Counts erstate IVE or F	Grade [☐ Safety Zone JLENT BUSINES	UCR/NIBRS Code Work Zone SS PRACTICES
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Lead? Offense# PennDOT Data (if applicable) Statute Description (Acts of the accused for sale adulterated or mislabeled adulterated or mislabeled of the accused for sale adulterated or mislabeled or misl	Section Substance Substance	me of statute or on the control of the definitions of the definition of the definiti	PA Statu ordinance A person con occasions the	DECEPT: Inte DECEPT: Inmits an offen e defendant, i Conspiracy 18 903 ES CODE	Counts erstate IVE or F use if, in the n the course 109 Counts	RAUDU e course se of his/	☐ Safety Zone JLENT BUSINES of business, the persent business, sold, of the business, sold, of the business and the business are business.	UCR/NIBRS Code Work Zone SS PRACTICES on sells, offers or exposes fered, or exposed for sale ge 60 or Older 260
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POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan N	lumber				laint/Incident Num 022 /PA214202	
Un-5/5-2//	First:		Middle			Last:	022 /FAZITZUZ.	2.7
Defendant Name	NEWROAD					MOTO	RS 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 <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		Solicitation 18 902 A		Conspiracy 18 903		N	lumber of Victims A	ge 60 or Older
□ 04	7121	of the PA	VEHIC	LE CODE	109	M1		110
Lead? Offense#	Section Subse	SECREMENTAL ELECTRONICATION .	PA Statut		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			☐ Inte	erstate		☐ Safety Zone	☐ Work Zone
Statute Description (include the nan	ne of statute or or	dinance): FALSE A	PPLICA'	TION	FOR CERTIFICA	TE OF TITLE
name or address or make	s a material false st	atement, or fails to dis	close a se	curity interest	, or conceal	s any oth	ner material fact in an	on uses a false or fictitious application for a certificate terial fact in an application
Inchoate ☐ Attem Offense 18 901		Solicitation 18 902 A		Conspiracy 18 903		N	lumber of Victims A	ge 60 or Older
□ 05	7122 (2) of the PA	VEHIC	LE CODE	109	M1		110
Lead? Offense#	Section Subse	- PARCHICARISCOLOGIANINE	PA Statul		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	Accident Number			☐ Inte	erstate		☐ Safety Zone	☐ Work Zone
Statute Description (include the nar	ne of statute or or	dinance): ALTERE	D, FORG	ED, O	R COUNTERFEI	T DOCUMENTS
Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: on 109 occasions, the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.								
				-				
Inchoate		Solicitation 18 902 A	5 0	Conspiracy 18 903		N	lumber of Victims A	ge 60 or Older
□ 06 €	1110	of the P	A CRIM	ES CODE	1	F3		
Lead? Offense#	Section Subse	CONTRACTOR OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS		ite (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			☐ Inte	erstate		☐ Safety Zone	☐ Work Zone
Statute Description (include the name of statute or ordinance): CONSPIRACY/ LASHER (C.)								
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 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 agreed with other person or persons to engage in conduct which constitutes such crime and/or attempt and/or solicitation to commit same.								



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-333-22 C	79 BJ 30		20AT022 /PA21420227
	irst:	Middle:	Last:
Defendant Name	NEWROAD		MOTORS LLC

- 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 $\underline{01}$ through $\underline{03}$.
- 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.)

.		0
9/30	حددل	100
(Date)	(Year)	(Signature of Affiant)
AND NOW on this data	A ODORGO & LO	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.

(Magisterial District Court Number) (Issuing Auth



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-333-21	09 Bd 302		20AT022 /PA21420227
	First:	Middle:	Last:
Defendant Name:	NEWROAD		MOTORS LLC

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	11. Pawel BRYLA
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 day of Jung Date

My commission expires first Monday of January, 2014

(Signature of Affiant)

9022

Magisterial District Judge



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name:	First: NEWROAD	Middle:	Last: MOTORS LLC

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

(Signature of Affiant)