

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 12-02-03
MDJ: Hon. DAVID H. JUDY, ESQ.
Address: 50 Canal Street
Royalton, PA 17057

DEFENDANT: (NAME and ADDRESS):
PENNSYLVANIA TAG & TITLE INC.
First Name Middle Name Last Name Gen
1907 PITTSTON AVE.
SCRANTON, PA 18505

Telephone: (717) 944-4463

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Ltd.
- 3-Felony Surrounding States
- 4-Felony No Ext.
- 5-Felony Pend.
- 6-Felony Pend. Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending
- F-Misdemeanor Pending Extradition Determ.
- Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-336-2022</u>		Date Filed <u>09/30/22</u>		OTN/LiveScan Number		Complaint/Incident Number <u>20AT022 / PA21420227</u>		Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO			
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female		DOB / /		POB		Add'l DOB / /		Co-Defendant(s) <input type="checkbox"/>			
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown		ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown		HAIR COLOR <input type="checkbox"/> GRY (Gray) <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"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)		EYE COLOR <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)		DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location	
FBI Number		MNU Number		WEIGHT (lbs.)		Ft. HEIGHT In.					
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Fingerprint Classification:									

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <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).

DAG RICHARD H. BRADBURY, JR. Richard H. Bradbury, Jr. 09/29/2022
(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, <u>Det. Mark H. MURRAY / TFC. Ramon TORRES</u> <small>(Name of the Affiant)</small>		<u>44428, 13-19 / 00610536, 12077</u> <small>(PSP/PMOETC -Assigned Affiant ID Number & Badge #)</small>	
of <u>Lackawanna County Detectives / PA State Police</u> <small>(Identify Department or Agency Represented and Political Subdivision)</small>		<u>PA0352800 / PAPSP1A00</u> <small>(Police Agency ORI Number)</small>	
do hereby state: (check appropriate box)		RECEIVED SEP 30 2022 DISTRICT COURT 12-2-03	
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 <u>[3011]</u> <u>CITY OF HARRISBURG</u> <small>(Subdivision Code) (Place-Political Subdivision)</small>			
In DAUPHIN County	<u>[22]</u> <small>(County Code)</small>	on or about <u>05/13/18 - 03/11/21</u> <small>(Offense Date)</small>	



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-336-2022</i>	Date Filed: <i>05/13/22</i>	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: PENNSYLVANIA	Middle:	Last: TAG & TITLE INC.

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.

<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 checked="" type="checkbox"/> Lead?	01	4118		of the	PA CRIMES CODE	259	F3		110
	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): **WASHING VEHICLE TITLES**

Acts of the accused associated with this Offense: A person commits a felony of the third degree if, with intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information, to wit: with intent to deceive anyone, the defendant made/caused to be made 259 applications for a certificate of title for a motor vehicle which included materially false or fictitious information.

<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"/> Lead?	02	4107	(a)(4)	of the	PA CRIMES CODE	259	F3		110
	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): **DECEPTIVE or FRAUDULENT BUSINESS PRACTICES**

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 259 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.

<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"/> Lead?	03	4911	(a)(1)	of the	PA CRIMES CODE	259	F3		260
	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): **TAMPERING WITH PUBLIC RECORDS or INFORMATION**

Acts of the accused associated with this Offense: A person commits an offense if he knowingly makes a false entry in, or false alteration of, any record, document 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 259 occasions the defendant knowingly made a false entry in any record, document, and/or thing belonging to, and/or received and/or kept by, the government for information or record, and/or required by law to be kept by others for information of the government.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-336-1187</i>	Date Filed: <i>09/21/22</i>	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: PENNSYLVANIA	Middle:	Last: TAG & TITLE INC.

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.

<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"/> Lead?	04	7121		of the	PA VEHICLE CODE	259	M1		110
	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): **FALSE APPLICATION FOR CERTIFICATE OF TITLE**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for registration, to wit: on 259 occasions the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title.

<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"/> Lead?	05	7122	(2)	of the	PA VEHICLE CODE	259	M1		110
	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): **ALTERED, FORGED, OR COUNTERFEIT 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 259 occasions, the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.

<input type="checkbox"/> 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 type="checkbox"/> Lead?	6	4118		of the	PA CRIMES CODE	1	F3		
	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): **CONSPIRACY / WASHING...**

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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-336-2022</i>	Date Filed: <i>09/30/22</i>	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: PENNSYLVANIA	Middle:	Last: TAG & TITLE INC.

- 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 01 through 03.
- 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.)

9/30 2022
 (Date) (Year)

Det. Chad H. Myers
[Signature]
 (Signature of Affiant)

AND NOW, on this date 10/3/2022 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.

122-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-336-2022</i>	Date Filed: <i>09/13/22</i>	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name:	First: PENNSYLVANIA	Middle:	Last: TAG & TITLE INC.

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, DET. MARK MURRAY / TFC. RAMON TORRES, 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.

Det. Mark Murray / TFC. Ramon Torres

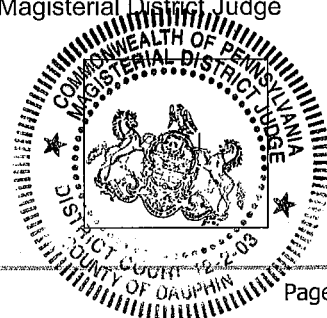
(Signature of Affiant)

Sworn to me and subscribed before me 3rd day of OCTOBER 2022

10/3/2022 Date

[Signature]
Magisterial District Judge

My commission expires first Monday of January, 2024





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CK-336-2022</i>	Date Filed: <i>09/16/22</i>	OTN/LiveScan Number	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name:	First: PENNSYLVANIA	Middle:	Last: TAG & TITLE INC.

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 General 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

Det. Matthew / TPR. [Signature]
(Signature of Affiant)