

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 Steet
Royalton, PA 17057

DEFENDANT: (NAME and ADDRESS):
ALVARO ANTONIO RODRIGUEZ
First Name Middle Name Last Name Gen
843 CAMP FRANCIS JOHNSON ROAD
ORNAGE PARK, FL 32065

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 <i>CR-325-22</i>	Date Filed <i>09/30/22</i>	OTN/LiveScan Number <i>R 365936-4</i>	Complaint/Incident Number 20AT022 / PA21420227	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 04/04/1972	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name		Last Name
AKA				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
HAIR COLOR <input checked="" 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 checked="" 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			WEIGHT (lbs.) 215
FBI Number	MNU Number		Ft. HEIGHT In. 6 00	
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.
(Name of the attorney for the Commonwealth)

Richard H. Bradbury, Jr.
(Signature of the attorney for the Commonwealth)

09/29/2022
(Date)

I, <u>Det. Mark H. MURRAY / TFC. Ramon TORRES</u> (Name of the Affiant)	<u>44428, 13-19 / 00610536, 12077</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of <u>Lackawanna County Detectives / PA State Police</u> (Identify Department or Agency Represented and Political Subdivision)	<u>PA0352800 / PAPSP1A00</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 <u>[301]</u> <u>CITY OF HARRISBURG</u> (Subdivision Code) (Place-Political Subdivision)	
In DAUPHIN County <u>[22]</u> (County Code)	on or about <u>12/06/20 - 12/16/20</u> (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-325-22</i>	Date Filed: <i>09/13/22</i>	OTN/LiveScan Number <i>R 365936-4</i>	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

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 checked="" 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	911	(b)(2)	of the	PA CRIMES CODE	01	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input checked="" type="checkbox"/> 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): **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.

<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	911	(b)(3)	of the	PA CRIMES CODE	01	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input type="checkbox"/> 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): **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.

<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	911	(b)(4)	of the	PA CRIMES CODE	01	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input type="checkbox"/> 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): **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).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-325-22</i>	Date Filed: <i>09/10/22</i>	OTN/LiveScan Number: <i>R 365936-4</i>	Complaint/Incident Number: 20AT022 /PA21420227
Defendant Name	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

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	5111	(a)(1)	of the	PA CRIMES CODE	01	F1		300
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

Acts of the accused associated with this Offense: A person commits a felony of the first degree if the person conducts a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful activity. To wit: the defendant repeatedly engaged in financial transactions with knowledge that the property involved represented the proceeds of unlawful activity with the intent to promote the carrying on of said unlawful activity.

<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	4101	(a)(2)	of the	PA CRIMES CODE	14	F2		100
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: A person is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act, or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, to wit: the defendant, with intent to defraud or injure anyone, or with knowledge that he/she is facilitating a fraud or injury to be perpetrated by anyone, made, completed, executed, authenticated, issued, and/or transferred 14 writings so that they purported to have been executed at a time or place other than was in fact the case.

<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?	06	4101	(a)(3)	of the	PA CRIMES CODE	14	F2		100
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: A person is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: on 14 occasions the defendant, with intent to defraud and/or injure anyone, and/or with knowledge that she was facilitating a fraud or injury to be perpetrated by anyone, uttered a writing which she knew to be forged in a manner specified in paragraph (2) of this section.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-325-22	Date Filed: 07 Feb 22	OTN/LiveScan Number R 365936-4	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

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 checked="" 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?	07 Offense#	5711 Section	(a)(1) Subsection	of the	PA CRIMES CODE	01 Counts	F1 Grade	100 NCIC Offense Code	UCR/NIBRS Code
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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**

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.

<input checked="" 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?	08 Offense#	4118 Section		of the	PA CRIMES CODE	14 Counts	F3 Grade	110 NCIC Offense Code	UCR/NIBRS Code
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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 14 applications for a certificate of title for a motor vehicle which included materially false or fictitious information.

<input checked="" 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?	09 Offense#	4107 Section	(a)(4) Subsection	of the	PA CRIMES CODE	14 Counts	F3 Grade	110 NCIC Offense Code	UCR/NIBRS Code
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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 14 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-325-22</i>	Date Filed: <i>09/14/22</i>	OTN/LiveScan Number <i>R 365936-4</i>	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

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?	10	4911	(a)(1)	of the	PA CRIMES CODE	14	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 14 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.

<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?	11	7121		of the	PA VEHICLE CODE	14	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 14 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?	12	7122	(2)	of the	PA VEHICLE CODE	14	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 14 occasions, the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-325-22</i>	Date Filed: <i>09/13/22</i>	OTN/LiveScan Number <i>R 365936-4</i>	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

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"/>			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:

<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"/>	13	5101		of the	PA CRIMES CODE	14	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): **OBSTRUCTING ADMINISTRATION OF LAW**

Acts of the accused associated with this Offense: A person commits a misdemeanor of the second degree if he intentionally obstructs, impairs or perverts the administration of law or other governmental function by force, violence, physical interference or obstacle, breach of official duty, or any other unlawful act, to wit: on 14 occasions the defendant intentionally obstructed and/or impaired and/or perverted the administration of law or other governmental function by breach of his/her official duty and/or any other unlawful act.

<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"/>	14	4904	(a)(1)	of the	PA CRIMES CODE	14	M2		110
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): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: A person commits a misdemeanor of the second degree if, with intent to mislead a public servant in performing his official function, he makes any written false statement which he does not believe to be true, to wit: the defendant with the intent to mislead the Pennsylvania Department of Transportation and/or other public servants employed by or contracted therewith, made 14 written statements which he/she did not believe to be true.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-325-22</i>	Date Filed: <i>09/30/22</i>	OTN/LiveScan Number <i>R 365936-4</i>	Complaint/Incident Number 20AT022 /PA21420227
Defendant Name	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

- 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 06.
- 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 Det. Mark H. Murray
 (Date) (Year) (Signature of Affiant)

AND NOW, on this date OCTOBER 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.

12-09-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket #: <u>CR-325-22</u>	Date Filed: <u>09/16/22</u>	OTN/LiveScan Number: <u>R 365936-4</u>	Complaint/Incident Number: <u>20AT022 /PA21420227</u>
Defendant Name:	First: <u>ALVARO</u>	Middle: <u>ANTONIO</u>	Last: <u>RODRIGUEZ</u>

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. Shefir 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.

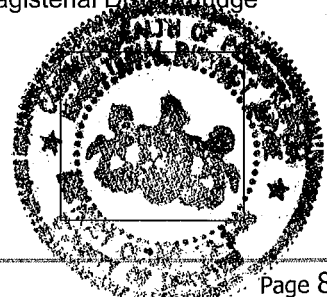
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

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: CR-325-22	Date Filed: 09/13/22	OTN/LiveScan Number: R 365936-4	Complaint/Incident Number: 20AT022 / PA21420227
Defendant Name:	First: ALVARO	Middle: ANTONIO	Last: RODRIGUEZ

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. Paul H. Murray / TCR-12-12
(Signature of Affiant)

INTRODUCTION

We, the members of the Forty-Seventh Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code and the Pennsylvania Vehicle Code occurring in Lackawanna, Luzerne, Berks, Carbon, Lehigh, Lebanon, Schuylkill, Bucks, Montgomery, Philadelphia, York, and Dauphin Counties pursuant to Notice of Submission of Investigation No. 18, do hereby make the following findings of fact and recommendation of charges.

OVERVIEW

The Grand Jury is conducting an extensive investigation into a criminal enterprise consisting of used-car dealers, certified inspectors and tag agents, who reaped significant financial benefits by conspiring to illegally "wash" the titles of vehicles that were totaled and then export and/or re-sell these unsafe vehicles, allowing them to be driven on the roadways by unsuspecting motorists.

Pennsylvania law permits heavily damaged vehicles to be repaired and returned to the roads of the Commonwealth when certain requirements are met. Once a totaled vehicle is repaired, the owner is required to take it to an enhanced vehicle safety inspector. This individual, certified by and subcontracted with the Pennsylvania Department of Transportation ("PennDOT"), is required to do a full safety inspection of the vehicle and ensure that it is not only repaired and roadworthy, but fully restored to the manufacturer's original standard. The owner and the enhanced vehicle safety inspector complete a three-page application, attach supporting documentation such as photographs and repair invoices, and take the packet to a tag agent or directly to PennDOT. The tag agent, who is also licensed and subcontracted with PennDOT, then reviews and officially submits the paperwork to PennDOT. The end result is a

reconstructed title, which allows the now-repaired vehicle to be used or re-sold just like any other vehicle.

In this case, the Grand Jury found widespread fraud at every step in the reconstructed title process. The vehicle owners involved in this investigation - - all of whom are used-car dealers with ties to other states or countries - - never presented the totaled vehicles for the required safety inspection. Instead, they paid George Fretto and his team of enhanced vehicle safety inspectors to complete the requisite paperwork without ever even seeing the vehicles that they were supposed to "inspect." Once the falsified forms were completed, Fretto would rifle through a drawer, attach some stock photographs, and take the packet to a certain tag agency. The tag agents would then process stacks of title applications which, because they were being submitted online, would result in PennDOT immediately and automatically issuing the reconstructed title. Then, after about a week's time, the used-car dealers had what appeared to be a perfectly valid Pennsylvania reconstructed title. These titles were then used to export vehicles out of New York and New Jersey ports, to re-sell the vehicles, or, to legitimize stolen vehicles.

The financial gains reaped by members of this criminal organization were quite significant. Once any fixed costs - - such as mandatory fees and supplies - - were addressed, everything else was a profit. The Grand Jury received testimony from one dealer who laundered between two and three thousand vehicle titles. Netting approximately \$50 in profit per title, she made between \$100,000 and \$150,000 over a four-year period. The Grand Jury also reviewed evidence that, in slightly over a one-week period, Fretto and a colleague completed paperwork for 245 fraudulent inspections. While Fretto told investigators that he charged \$60, some dealers reported that they paid him \$80, \$85, or \$100 for each application. At a rate of \$60, Fretto

would have netted \$14,700. At a rate of \$80, he would have collected \$19,600. All for simply filling out paperwork for just a few hours each day. The tag agency was similarly enriched; the owner received a cut of \$20 for each reconstructed title application that was shuffled through to PennDOT.

FINDINGS OF FACT

I. VEHICLE TITLING AND THE RECONSTRUCTED TITLE PROCESS

A. Vehicle Titles Generally

Trooper Bijan Rastegarpanah of the Pennsylvania State Police appeared before the Grand Jury and explained the process of titling a vehicle. A title is the proof of legal ownership of a vehicle and it is registered with the Commonwealth of Pennsylvania through PennDOT. In addition to owner information, the title also denotes information about the make and type of vehicle, the model year, the year the vehicle was first titled in Pennsylvania, the odometer reading, and the Vehicle Information Number ("VIN"). The VIN is a unique identifier that is physically attached to a vehicle. It is displayed on the dashboard and it is also stamped in various other places throughout the vehicle. Trooper Rastegarpanah testified that as an added security measure, many vehicles now include a second, secret VIN hidden elsewhere within each vehicle.

The Grand Jury learned that it is common for criminals to conceal a stolen car by replacing the VIN. Physical replacement of the VIN allows a thief to evade detection absent a more thorough search of the vehicle. Such a vehicle is known colloquially as a "re-VIN" with the process referred to as "re-VINing."

B. Transferring or "Flipping" a Vehicle Title

Trooper Rastegarpanah testified that when a vehicle is transferred to another person, the name, address, and signature of both parties are documented on the rear of the title, along with the odometer reading. This title, along with an appropriate form, is then sent to PennDOT. The new owner's information is registered with the Commonwealth and PennDOT sends the new owner a title in his/her name. This process of transferring a vehicle title - - either between owners or from one type of title into another - - is known as "flipping" a title.

C. Types of Vehicle Titles

A regular, or "clean" title is the standard type of vehicle title which reflects the vehicle ownership. This type of title can be freely transferred and registered. If a vehicle is badly damaged, however, it may qualify for a salvage title (also known as a "Salvage Certificate" or "S-Title.") The Pennsylvania Vehicle Code defines a salvaged vehicle as "a vehicle which is inoperable or unable to meet the vehicle equipment and inspection standards . . . to the extent that the cost of repairs would exceed the value of the repaired vehicle." In other words, a salvage vehicle is one that has been "totaled." It is not roadworthy and can be neither driven nor registered in Pennsylvania.

Trooper Rastegarpanah informed the Grand Jury that salvage titles are most common for vehicles that are purchased by insurance companies. Once a vehicle is "totaled," an insurance company will frequently purchase the vehicle from the insured in the form of a cash settlement. The company will then re-title the vehicle in its name by applying to either PennDOT or the relevant authorities in another state for a salvage title. The

COMMONWEALTH OF PENNSYLVANIA
CERTIFICATE OF SALVAGE FOR A VEHICLE
REGISTRATION NOT TO BE ISSUED

211-1039000287 001

VEHICLE IDENTIFICATION NUMBER	2012	MAKE	2012	MODEL	73104732501 DR
GV	SA	REG	REGISTRATION YEAR	DATE OF SALE	VEHICLE YEAR
12/08/12	05/21/11	MINI	MINI	MINI	MINI

VEHICLE INFORMATION

1. MAKE	2. MODEL	3. YEAR	4. VIN
MINI	MINI	2012	2012

SALE INFORMATION

1. DATE OF SALE	2. SALE PRICE	3. SALE TYPE	4. SALE LOCATION
05/21/11	043159	SALE	SALE

IMPORTANT NOTICE - CORE BUY-SELL MUST BE USED WHEN APPLYING FOR A "RECONSTRUCTED" PENNSYLVANIA CERTIFICATE OF TITLE. THIS SALVAGE VEHICLE MAY NOT BE OPERATED ON THE HIGHWAY UNTIL A "RECONSTRUCTED" TITLE IS ISSUED.

SALVAGE VEHICLE OWNER(S)
113001
USA
100 INDUSTRIAL WAY
CONROSDORFER PA 17078

VAUGHN GRAHAM, P.E.
Secretary of Transportation

5563041

exported. This creates enormous incentive for exporters to circumvent those requirements by acquiring reconstructed titles from the neighboring state of Pennsylvania.

This excerpt from Exhibit 159 is a copy of a typical Pennsylvania reconstructed title. The face of the title is clearly labeled as "reconstructed." Aside from this branding, however, a reconstructed title is virtually identical in both appearance and function to a regular or "clean" title.

D. The Reconstructed Title Process

The process of acquiring a reconstructed title requires the participation of three parties: 1) The applicant; 2) The enhanced vehicle safety inspector; and, 3) The tag agent. The first party, the applicant, could be anyone who purchases and attempts to repair a salvage-title vehicle. The Grand Jury's investigation focused primarily upon used-car dealers. The second party, the enhanced vehicle safety inspector, or enhanced inspector, is someone who is specifically authorized by PennDOT to perform enhanced inspections. The inspector is responsible for inspecting the repairs and verifying that vehicles have been "restored to their original operating condition as designated by the vehicle manufacturer and . . . conform to the original manufacturer's specifications and appearance." The third party, the tag agent, is responsible for reviewing the materials and submitting them to PennDOT on behalf of the applicant.

1. Applicant's Role and Responsibilities

The application for a reconstructed title is PennDOT form MV-426B. This form is used regardless of whether or not the vehicle has a Pennsylvania or an out-of-state salvage title. As noted below, however, the origin of the salvage title does affect how the application is subsequently processed and reviewed.

Most of the form is filled out by the applicant seeking the reconstructed title. On the first page, the applicant provides his/her name, address, and information. The applicant also chooses from one of thirteen possible explanations about the nature of the application and repairs. For example, option "A" indicates that

I, or my agent, performed the work necessary to reconstruct the vehicle and bring it into compliance with all applicable laws and Pennsylvania vehicle equipment and inspection regulations. A certificate of title/salvage and receipts for parts used are attached. I understand that my Pennsylvania Certificate of Title will be branded as Reconstructed.

(emphasis added.)

Likewise, only authorized dealers are able to select option "M" and indicate that

I am authorized to offer vehicles for sale in Pennsylvania. **Parts that were taken from business inventory and used in the reconstruction of the vehicle are identified on the vehicle bill of sale (attached).** I understand the Pennsylvania Certificate of Title will be branded as reconstructed.

(emphasis added.) Regardless of the explanation, the applicant is also required to identify all of the components of the vehicle that are repaired or replaced. As noted above, the applicant is required to attach "[a] copy of a receipt, invoice, or salvage certificate for each component replaced." The applicant must also certify that "this vehicle has been returned to road-worthy condition, by me or my agent, in accordance with all applicable laws and regulations." Finally, the applicant is required to "verify that the information set forth herein is TRUE and CORRECT to the best of my knowledge, information, and belief." (emphasis in original)

2. Enhanced Vehicle Safety Inspector's Role and Responsibilities

The balance of the application is completed by the enhanced vehicle safety inspector who is required to physically examine the vehicle. First, he/she is required to verify the vehicle's VIN to identify the actual vehicle in question. To that end, the enhanced vehicle safety inspector will note the date of the inspection and write out the entire VIN. He/she will also write his/her

name, inspection station number and information, and sign the document. The enhanced vehicle safety inspector then finalizes the inspection by affixing a sticker to the application. This sticker is the same sticker that is placed on a vehicle's windshield as part of an annual safety inspection. The sticker is cut in half; one half is attached to the application, while the other is affixed to the inspector's log book (MV-431). After completing the inspection, the enhanced vehicle safety inspector is likewise required on the third page to "hereby state that I have examined this vehicle and found it to be in road-worthy condition in accordance with all applicable laws and regulations." As with the applicant, the enhanced safety inspector is likewise required to "state that the information set forth herein is TRUE and CORRECT to the best of my knowledge, information, and belief." (emphasis in original)

A complete reconstructed title application must also include at least three sets of attachments. One is provided by the enhanced vehicle safety inspector; the others come from the applicant. The inspector is required to provide four photographs of the vehicle that show the front, rear, left, and right sides. These photographs must be signed and dated by the inspector. The applicant's first attachments are the "receipt[s], invoice[s], or salvage certificate[s] for each component replaced" in the course of the reconstruction. While it is not necessary to attach receipts for *repaired* components (such as labor for body work), repair estimates may be included so long as they are marked "paid" and are signed and dated by someone authorized by the repair facility. The applicant's second attachment is the existing salvage title for the vehicle in question. If the vehicle has a Pennsylvania salvage title, it may be immediately processed. If the vehicle has an out-of-state salvage title, however, it cannot be processed in this manner. This appears to be at least partially due to the fact that some out-of-state salvage titles provide that the vehicle is to be used for "parts only." These salvage titles cannot be the basis for a reconstructed

title. In the case of such out-of-state titles, the entire application must be sent to PennDOT for review *before* a reconstructed title is issued, rather than the other way around. A Pennsylvania salvage title, therefore, is a significant advantage for those who wish to commit fraud. The Grand Jury found that this is an important distinction that ultimately helped facilitate a substantial amount of the criminal activity in this case.

These attachments are required for all applications, but others documents may also be necessary. For example, if an applicant has a power of attorney (“POA”) to permit someone to sign paperwork on his/her behalf, said document must be included. Finally, if the vehicle is being titled in the name of a dealership or other business, the title application must include proof of the existence of the business (such as documentation from the Pennsylvania Department of State) as well as authorization for the applicant to act on behalf of the business organization. The address listed on the applicant’s proof of identification “must be the same address listed on the title and/or registration application.”

The Grand Jury heard testimony that once the application is complete, a certified document reviewer is required to attest that he/she has examined the title application and all supporting documentation and found it to qualify for a reconstructed title. This person is “trained to be able to go through and verify that all of the information that you’re supposed to have as part of your application package is there.” While this review can be completed by different people, the enhanced vehicle safety inspector is also permitted to fulfill this role. Such was the case for all of the title applications reviewed in the course of this investigation. The reviewer is required to “state that the information set forth herein is TRUE and CORRECT to the best of my knowledge, information, and belief.” (emphasis in original) All of the attestations on the MV-426B form - - by the applicant, enhanced vehicle safety inspector, and certified

document reviewer - - are "made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities."

3. Tag Agent/Processor's Role and Responsibilities

The application can be processed electronically through a local tag agent if the vehicle already has a Pennsylvania salvage title. These processors/tag agents are, like the enhanced vehicle safety inspectors, licensed by and contracted with PennDOT to provide these services. The processors/agents review title applications and documentation prior to submitting them to PennDOT. At the most basic level, the processors/agents ensure that the paperwork is completed, that the required signatures are present, and that the VIN number matches the VIN number on file. It is incumbent upon the agents to reject applications that have missing or incorrect information. After the application and attendant paperwork is processed, the applicant summary statement - - a form of a cover page - - is prepared and notarized by the processor/agent or another employee who is a certified notary public. This summary statement and the original paperwork are then signed, notarized, and mailed to an integrator for eventual scanning and filing with PennDOT. The integrators are third-party businesses which digitize the paperwork allowing for the online and immediate processing of most title applications. As soon as the documents are electronically filed, the application is accepted by PennDOT's system and a reconstructed title is already on the way to the applicant.

II. OVERVIEW OF THE GEORGE FRIETTO CRIMINAL ORGANIZATION

The Grand Jury heard testimony and received evidence about ten separate businesses and 15 individuals that were engaged in varying degrees and types of fraudulent activity related to the reconstructed title process. The Grand Jury learned that the lynchpin of the reconstructed title process is the enhanced vehicle safety inspector as he/she has both the experience and responsibility to ensure that salvage vehicles - - which can have serious structural, mechanical, or

hidden defects - - are not going to kill or harm either their own drivers or other unsuspecting motorists. Correspondingly, the lynchpin of this investigation is George Fretto, the owner and operator of George's Garage, an enhanced vehicle safety inspection station located in Scranton, Lackawanna County. The evidence presented to the Grand Jury revealed that Fretto and his three enhanced inspector employees - - Kara Cosgrove, John Mulea, and Angel Rios - - approved the reconstruction of over 200 vehicles without ever performing the required inspection. In fact, they never saw the vehicles at all.

These 200 vehicles came from eight different used-car dealerships, many of which appeared to have existed for the express purpose of laundering salvage vehicles through George Fretto and his garage. Some of these "dealerships" were based in or around the Scranton area. Others were located in neighboring counties. One dealership was actually located more than two hours away in the mid-state region. Although these businesses were located in Pennsylvania, the vehicles were often not. Notwithstanding this - and specific legal requirements to the contrary - these dealerships all acquired Pennsylvania reconstructed titles for vehicles that rarely, if ever, even entered the Commonwealth.

George Fretto and the dealerships would not have been able to acquire the titles without their conspirators who were needed to process and send these fraudulent documents to PennDOT. This role was filled by a Scranton tag agency that relied upon Fretto's fraud in order to remain afloat. The mother-daughter team working at this agency processed and submitted every one of the fraudulent applications during the narrow timeframes of this investigation. The Grand Jury heard evidence, however, that the agency had actually processed *thousands* of Fretto's reconstructed title applications since 2018.

A. George's Garage

George's Garage, inspection station DY79, is one part of a small, one-floor facility located at 531 N. Keyser Avenue in Scranton. It occupies only the left side of the building and includes a two-bay garage. The remainder of the front of the building is occupied by a former dealership - - REO Motors- - and Oli's Auto Sales. Behind the building are a handful of garage bays that are rented out to other individuals. Trooper Ramon Torres of the Pennsylvania Auto Theft Task Force appeared before the Grand Jury and testified that he spoke with George Fretto during the initial phase of this investigation. Fretto advised that he charges \$60 for an enhanced inspection, is open seven days a week, and completes enhanced inspections almost 24 hours a day. During the investigators' visit, Fretto, who is at least 70 years old, was unable to stand for more than five minutes. He explained that he recently had a medical procedure done and that it was difficult for him to stand for long periods of time. Fretto did not provide any insight as to how, given these physical limitations, he had been able to complete the inspections listed for that day. He just simply advised that he had done them.

Investigators also interviewed Kara Cosgrove. She and her father were both employed by George Fretto. Cosgrove explained that she started working for Fretto during the COVID pandemic. She passed the test to be a regular safety inspector, and then became an enhanced vehicle safety inspector at George's Garage. Notwithstanding her credentials, Cosgrove admitted that she may have only performed one or two regular annual safety inspections with the assistance of other people. Cosgrove explained that these inspections were only performed if someone physically drove his/her vehicle to the garage.

Cosgrove advised that she had never actually done any enhanced vehicle safety inspections, but had "signed off" on hundreds of MV-426B applications. She told investigators that she and her associates' hands would actually cramp up from writing so many of the MV-

426B applications; accordingly, the business began pre-printing stacks of forms with the applicant and inspector's information already populated. While Cosgrove filled out the forms, Fretto would produce and attach the required page of photographs. Cosgrove advised investigators that since the vehicles were being shipped out of the country, Fretto told her that they did not have to actually perform the enhanced vehicle safety inspection. She advised that Fretto paid her \$15 for each MV-426B application that she completed.

Investigators also informed the Grand Jury about their interview with Angel Rios, another employee at George's Garage. Rios advised that he took the required tests to be licensed as both a regular vehicle safety inspector and an enhanced vehicle safety inspector. Rios told investigators that George Fretto advised that no actual inspections were required if the vehicles were being shipped out of the country. Even if this were true, however, Rios admitted that he had no way of knowing which vehicles were actually being exported. Fretto told Rios that he could complete 16 applications a day and it took Rios just two or three hours to complete a day's worth of MV-426B applications. Whereas Kara Cosgrove was paid \$15 per vehicle, Fretto only paid Rios \$12 per *hour* of work, plus occasionally provided him with parts for his car if Rios needed them. Accordingly, Rios received just \$24 for a day's "work" while Cosgrove received \$240.

As part of the investigation, Detective Mark Murray of the Lackawanna County District Attorney's Office and member of the Pennsylvania State Police Auto Theft Task Force reviewed the inspection sticker orders placed by George Fretto and George's Garage. These sticker orders are placed online through PennDOT and cost \$8 per sticker. The Grand Jury learned that enhanced inspection stations are not necessarily qualified to inspect all types of vehicles; most are approved for inspecting passenger vehicles and light trucks. However, there are other

categories for medium and heavy trucks and motorcycles. George's Garage is approved to perform enhanced inspections in four of the six possible categories.

For comparison and context, Detective Murray reviewed the inspection sticker orders for three other Lackawanna County enhanced vehicle safety inspectors. One such garage - - "Station A" - - is approved to perform enhanced inspections in all six categories. Within the six-month period of April 30, 2021 to October 2021, "Station A" ordered less than 200 stickers. Another garage - - "Station B" - - is approved to perform enhanced inspections in five of the six categories. During the same six-month period, "Station B" ordered a total of 160 inspection stickers. Detective Murray also examined the orders for the Scranton franchise of a large regional automotive repair business. This business - - "Station C" - - has five large garage bays and only handles regular, rather than enhanced, vehicle safety inspections. "Station C" ordered 1,300 inspection stickers during the ten months between January and October 2021.

By contrast, George's Garage purchased a truly enormous, and vastly disproportionate, number of inspection stickers. Between March 4, 2021 and mid-June 2021, George Fretto ordered 3,600 stickers.

The investigation revealed that ordering such a high volume of inspection stickers was the rule, rather than the exception. In 2019, Fretto ordered 8,040 stickers from PennDOT. In 2020, this amount increased to 10,380 stickers. From January 1, 2021 through March 4, 2021, Fretto ordered 1,800 stickers. In total, from 2019 through October 2021, Fretto ordered 23,820 stickers. At a price of \$8 per sticker, the total cost was \$190,560. It also represents a total of 23,820 potential inspections - - real or imagined - - during that time period. Assuming that Fretto was being truthful when he told Trooper Torres that he charged \$60 for each enhanced vehicle safety inspection he performed, he would have netted \$1,429,200 in this nearly three-

year period. Assuming that other sources were being truthful when they advised that Fretto more commonly charged between \$80 and \$85 per enhanced vehicle safety inspection, the actual figure is likely closer to between \$1.9 and \$2 million.

B. Pennsylvania Tag & Title

Pennsylvania Tag & Title (known interchangeably as "PA Tag & Title") is an agency located in a small strip mall at 1907 Pittston Avenue in Scranton. The business is purportedly owned by Peter Tayoun, a former civil law attorney. While the business is actually registered in the name of his wife, Tayoun is routinely present for the day-to-day operations of the business. The main employee is Sandra Klassner and the only other known employee is Alivia Auriemma who joined the business at some point after Klassner. Auriemma is both a notary and Klassner's daughter. In addition to being a notary and tag agent at PA Tag & Title, Klassner also has a Pennsylvania vehicle salesperson license and is associated with Luci's Auto Sales, LLC.

As part of his investigation, Detective Murray interviewed former employee Nathan Lee. Lee has his own notary business in Hazelton but had previously "helped out" at PA Tag & Title. Lee advised that Peter Tayoun evidently had a falling out with some of the previous employees, so Lee filled in and performed the title and notary work until a full-time employee could take over. The position was eventually filled by Sandra Klassner.

Lee informed Detective Murray that PA Tag & Title was doing "a crazy amount" of reconstructed title business. Lee repeatedly stated that it "didn't pass the smell test" because people were coming in with 50 groups of reconstructed title packages at a time. Lee characterized this as a "just ridiculous amount." For context, Lee explained that PA Tag & Title and his current business use the online service "Title and Go" to process title applications. Users pay "Title and Go" a fee per each title transaction. Lee advised that whereas he was paying

about \$1,500 per month for his own business, PA Tag & Title was paying over \$5,000 per month while he was working there.

Sandra Klassner appeared before the Grand Jury and explained her involvement in the reconstructed title process. She stated that she has been employed by PA Tag & Title since May 2018. For much of her employment Klassner was the sole employee and handled everything from processing titles, to answering phones, to routine banking for the business. Klassner was initially paid in cash but then paid "half in cash, half by check." She stated that in the entire time that she has worked for PA Tag & Title, Peter Tayoun has never provided her with a W-2, 1099, or other wage or tax documents.

Klassner advised that Tayoun purchased the tag business for his son a decade before she began working there. Tayoun's daughter-in-law initially ran the business; however, at some point, the relationship soured. Tayoun believed that the employees were stealing from him and installed cameras in the office. As a result, the entire staff quit. Klassner testified that she was hired shortly thereafter and worked with Tayoun to keep the business going. Shortly after this, George Fretto's daughter decided to open her own tag and title business under the apparent belief that PA Tag & Title was going to close. Thereafter, Fretto stopped bringing his title work to PA Tag & Title for approximately six months.

Klassner stated that she first met George Fretto when he came into the agency. At the time, Klassner was working with another employee. While she did not recall the specifics of the encounter, Klassner did recall that Fretto and the other employee gave her the impression that she did not know what she was doing with respect to the paperwork and that the other employee should handle everything.

Klassner informed the Grand Jury that when Fretto stopped bringing his business to PA Tag & Title, it crippled the agency. Prior to taking his business elsewhere, Fretto had been bringing in 100, or more, reconstructed titles per week. The agency charged \$90 for each reconstructed title application; \$58 for the title fee; \$11 for the integrator; and, a \$21 profit for the business. This was a special rate for Fretto and his associated dealers as the general public was charged \$123 to process a reconstructed title application. Fretto's activities constituted approximately \$9,000 worth of business and \$2,100 worth of profit for the agency every week. By contrast, regular walk-in business was accounting for only about 60-70 transactions per week. With Fretto taking his business elsewhere, the agency only took in a limited number of reconstructed title applications from private parties - - not from dealers - - and it was nowhere near the volume they had previously enjoyed. Klassner and the Tayouns discussed how they were going to keep the business afloat "without all that money coming in, because . . . that was the bulk of the business." Klassner advised that, additionally, prior staff had left a number of unpaid bills, including one in excess of \$10,000 due to the online integrator that allowed them to electronically process title work. The debt was so extensive that the tag agency ultimately had to set up payment plans.

George Fretto ultimately returned to PA Tag & Title in 2019 when his daughter declared that she was done with her business. Once this occurred, the agency's workload returned to the approximately 100 weekly transactions.

Klassner explained how a title transfer is ordinarily processed. She stated that someone coming into the tag agency would need to have the title along with his/her Pennsylvania driver's license and proof of insurance. If a Pennsylvania title was being transferred, the seller would have to be present unless the assignment had already been documented and notarized. After

checking that both the driver's license and insurance were valid, she would use an online integrator to electronically process the application. The various PennDOT fees for title transfers total \$75. Even with the online process, titles are only issued by PennDOT and usually arrive by mail in approximately one or two weeks. Tag agents such as Klassner are required to take a basic agent training course and then attend an advanced agent training course every two years. Klassner stated that she completed her initial training in 2016 and has completed update courses every two years since that time. This online course includes a testing component which includes questions about what kinds of supporting documentation are required to process title paperwork. Klassner advised that she has also been a notary public since 2016. The obligations of a notary including verifying the identity of a signer - - either through driver's license, personal knowledge, or other acceptable means - - and then recording the transaction in a journal.

Klassner also testified about the reconstructed title process. She explained that a salvage title is issued once the vehicle has been determined to be a total loss. Once the vehicle is repaired it can become a reconstructed title. She further explained:

In order to do that, you would have to see an inspection mechanic, a certified safety inspection mechanic, and he fills out an MV-426B, which is an enhanced safety inspection, and on that, he has to mark whatever repairs were done to the vehicle to bring it back up to being roadworthy. He also has to take pictures of each side, as well as the front and the back of the vehicle, and then submits it to us for processing. [...] My obligation is to make sure the paperwork is filled out correctly, repairs are marked, all the signatures are on there, make sure the VIN number that is taped on page 2 of the 426B matches the VIN number that is on the title.

Klassner added that the only thing that she was verifying was that the paperwork was completed, the required signatures were present, and that the VIN number matched the one reflected on the title. Klassner stated that when verifying signatures on salvage titles, she was able to recognize Fretto's signature because he was the same inspector for all of them.

Klassner was also familiar with George Fretto and his operation. She stated that his inspectors included Angel Rios, Kara Cosgrove and John Mulea. Fretto would come in almost every day with stacks of titles, applications and pictures. Klassner would remove the staples, make copies of the driver's license and POA, and "get to processing." Fretto had POA authority to sign for some of the dealers, and so Klassner had some of this information already on file. Because the POA documents were already notarized, Klassner advised that she just assessed its legitimacy by looking at the notary stamp. As the person submitting the electronic paperwork, Klassner's name was listed as the processor. Once she processed the paperwork online and submitted it through the integrator, the final step would be for Fretto to sign and Klassner to notarize piles of applicant summaries that would then be mailed to PennDOT.

Klassner came to know many of the local dealers who worked through Fretto in this way. She stated that Eva Contrares and her partner, Uribalda "Uri" Veloz-Janaro, would come in and sign for Best Value Auto Outlet/Oli's Auto Sales. Klassner knew Domingo Lopez as the operator of Aquino and that while he had a POA on file, his wife Anibelkis Garcia would mostly come in to sign the paperwork. Luis Leyva owned Alliance Auto Sport but had a POA that allowed Fretto to sign on his behalf. She advised that Armando De la Paz ran Luci's Auto Sales, LLC and would come into the agency to sign paperwork. Klassner stated that ALZ Auto Sales was run by Alvaro Rodriguez who also came into PA Tag & Title. Klassner stated that PBJ Motors was run by Pawel Bryla who would also come into the agency.

Klassner testified that George Fretto would always pay in cash. This was the case even when he was bringing in large volumes of titles and paying thousands of dollars at a time. Klassner was instructed to take \$20 from each transaction and put it in an envelope for Peter Tayoun. She would then give the envelope to Tayoun the next time that she saw him. The

amount of cash in the envelope could run into the thousands of dollars. This directive came directly from Tayoun and applied *only* to the salvage/reconstructed title process. Notably, this practice came to a halt after Klassner, Fretto, and De la Paz were arrested by Trooper Torres in June 2021 for title washing and related offenses. Since that time, business has slowed down so considerably that the \$20 has to be reinvested into the business in order to keep up with the integrator fees and operating expenses.

Klassner informed the Grand Jury that she would also receive tips from George Fretto and Armando De la Paz. Fretto would “always” tip. For example, if he brought in \$640 worth of titles, he would give Klassner \$700 and tell her “to keep the change.” Fretto did most of the tipping because he brought in all of the titles for the dealers except for De la Paz. If De la Paz came into the office himself, he would generally tip \$100; and, if she had not seen him for a few weeks, he would give her \$300.

Klassner testified that she was asked to, and did, notarize open titles for De la Paz. He told her that the titles were going to the dealers and that he had to sign them over, so she notarized the titles for him. Klassner noted that she “blindly trusted” De la Paz.

Klassner denied that any of her training or education about reviewing paperwork included looking at re-inspection documents and reconstructed titles. Even so, she admitted that she had read the MV-426B and reviewed what was required. She stated that she was aware that photographs of the vehicle had to be attached to the application; however, she did not review the content of these photographs or cross-reference them against the vehicle on the title. Klassner likewise advised that she was not looking for a parts list or other related paperwork “because we weren’t required to turn them in.” She stated that when she first started, she was advised that she “didn’t have to.” At some point during the COVID pandemic, Klassner had an application

rejected pending receipts for parts. When Klassner questioned this, she was advised by PennDOT - - and she acknowledged - - that the form itself indicated that such receipts were required.

As part of this process, Klassner was never required to confirm that the vehicles had been repaired. Klassner testified that she did not verify the VINs herself. She explained that she had been told by a prior employee at PA Tag & Title that she could “verify” the VINs based upon what George Fretto had listed on the MV-426B. Klassner also claimed that, after her initial arrest by Trooper Torres, she had confirmed this with a PennDOT supervisor. In her time working at PA Tag & Title, Klassner estimated that she had processed between 8,000 and 10,000 reconstructed title applications from and through Fretto.

Klassner testified that stacks of new reconstructed titles would typically come back to PA Tag & Title every few days. These titles would be in the names of the various dealerships. The titles would be all packed together, so Klassner had to separate them by dealer. Klassner would usually call Fretto to pick up the titles because she believed that he was “fronting” the costs and would retain the titles until the dealers paid him. Some owners/operators of the local dealerships, including Best Value, PBJ and ALZ, would come in themselves, but otherwise Klassner would call Fretto to pick up the new titles.

C. Dealerships

1. Luci's Auto Sales, LLC

Luci's Auto Sales, LLC is a one-floor facility located at 12 Lonesome Road in Old Forge, Lackawanna County. The building includes an enclosed, two-bay garage. The Grand Jury learned that there are two registered salespersons: Armando De la Paz (also spelled Delapaz) and Sandra Klassner. Throughout the investigation, Trooper Torres observed numerous vehicles on

the premises at various times. He also learned that Luci's Auto Sales, LLC had completed over 11,000 transactions between February 2019 and June 2020. For context, he explained that in his experience, a dealership of that size would only be engaged in a few hundred transactions per year.

Klassner testified that while she had worked for De la Paz, it was only for a week or two. She explained that she was supposed to be paid if she sold a car, but that never happened. Klassner stated that she used to go to Luci's Auto Sales, LLC before and after work to clean up and make sure that the vehicles had the required documentation. However, she stopped doing so because De la Paz was never there and expected her to do all of that work.

2. Newroad Motors

Newroad Motors operates out of a small utility shed in the city of Lebanon in Lebanon County. While David Morrison is the ostensible owner, all of the business recorded on the MV-426B applications was in the name of George or Jorge Santos/Santos-Hernandez. Santos-Hernandez also maintained an address for Newroad in Covington Township, Lackawanna County that appeared on some of the paperwork recovered or reviewed in this case. Santos-Hernandez appeared before the Grand Jury and testified that he worked as a salesperson for Newroad from January 2016 through at least the end of 2020. He denied visiting the utility shed office in Lebanon County. Santos-Hernandez stated that he is originally from New Jersey and is familiar with most of the dealerships and repair shops, particularly in his home area. He explained that individuals would contact him for assistance in obtaining a reconstructed title. This was because the inspection process was easier and quicker in Pennsylvania than in New Jersey. If the title was not open, this would require obtaining a Pennsylvania salvage title, and "some would go straight to the inspector, George [Frietto]." Santos-Hernandez would take the salvage title "to an inspector in Scranton, George, and then he would do the process of getting

the inspection done and then I would get a reconstructed title from him.” Santos-Hernandez explained that it was his understanding that Fretto “is supposed to do the inspection, check the cars and that is how the inspection should be, and then he will just sign that off, I guess . . . [I]ike I said before, some cars didn’t even made [sic] it to him.” Indeed, most of the cars involved in this process never came into Pennsylvania. Santos-Hernandez acknowledged that in most cases he would just bring the title to Fretto instead of the actual vehicle. He explained that he would bring the titles to Fretto’s office on N. Keyser Avenue and Fretto would call him when the titles were complete. Santos-Hernandez also indicated that he knew Sandra Klassner from the title agency he used in Scranton. Santos-Hernandez explained that “[a]s far as I am concerned, George, who do [sic] the inspection and bring it to Sandra to process [the] inspection.” He testified that he generally charged his New Jersey customers \$275 for each title. He, in turn, paid Fretto \$165 for the entire reconstructed title process, and part of the payment would be applied to the fees and expenses of Fretto and Klassner. Santos-Hernandez explained that he and his associates would then use the reconstructed titles to ship cars overseas.

After departing from Newroad, Santos-Hernandez opened his own dealership: Santos Auto Gallery. This dealership is located approximately three miles from Fretto’s Garage. Investigators ultimately executed search warrants on Santos Auto Gallery and recovered several piles of vehicle titles, applications, and related documents. During the search, investigators also ran VIN numbers and identified the title status of numerous vehicles on the premises. Many of these vehicles had conspicuous damage and salvage titles. Others, by contrast, were equally, if not more damaged, but had reconstructed titles.

3. Best Value Auto Outlet/Oli’s Auto Sales

Oli’s Auto Sales is located adjacent to and within the same building as George’s Garage at 531 N. Keyser Avenue. The business had previously been known as Best Value Auto Outlet

while based at 4706 Birney Avenue in Moosic, Lackawanna County. The businesses are both operated by Eva Contrares and her partner, Uribaldi "Uri" Veloz-Janaro. The prior business was located in a small cinderblock building surrounded by a number of campers, boats, and vehicles in varying stages of repair and disrepair.

Eva Contrares appeared and testified before the Grand Jury. She stated that she is the sole owner of Oli's Auto Sales and had previously owned Best Value Auto Outlet which opened in 2016 and closed in March 2020. At the same time Contrares also owned another dealership - - also named Best Value - - located in Ohio. She stated that she opened the Ohio dealership in or about early 2019. Contrares testified that she owned the Ohio dealership "for the sole purpose" of flipping New York salvage titles. Contrares explained that Pennsylvania would not accept the New York 907A salvage titles for the purpose of an exportable (reconstructed) title. Accordingly, she would use the Ohio dealership to obtain a salvage title and then transfer it to the Pennsylvania dealership for eventual "reconstruction." Contrares testified that during the four-year life of Best Value Auto Outlet, she flipped approximately 2,000 to 3,000 vehicle titles.

Contrares explained to the Grand Jury the process by which she would flip titles. She stated that she would be contacted by individuals with a salvage title who wanted a reconstructed title. She would then go either to PennDOT directly or to one of several intermediaries to acquire a salvage title. Contrares confirmed that she understood salvage vehicles to be damaged vehicles that had been involved in an accident, purchased by the insurance company, and then re-sold at auction. Her dealership would be re-assigned the salvage title, which she would then take to the inspector. Once the inspector gave her the inspection paper [the MV-426B], she would obtain a reconstructed title. Contrares testified that an inspection was required in order to get a reconstructed title. She explained that "you are supposed to bring the vehicle to the inspector,

and the inspector is supposed to inspect that there is no frame damage, that the damages that were on the car had been fixed.”

Contrares testified that *none* of the reconstructed vehicles she flipped through Best Value Auto Outlet had ever been inspected. She explained that she would simply take the salvage title to the inspector who would “do the inspection paper.” She would then take it to a tag agency that would send the paperwork to PennDOT. PennDOT, in turn, would then send a reconstructed title. All of these reconstructed vehicle applications were “inspected” at Fretto’s garage. Through photographs, Contrares identified George Fretto, Kara Cosgrove, and John Mulea. Contrares admitted that she was aware that the vehicles needed to actually be seen by the inspector. While none of the vehicles she flipped went to the garage, she claimed to have ensured that the vehicles she personally sold through her dealership were inspected.

Contrares also explained the finances involved in these transactions. She would charge \$220 for a reconstructed title. In the beginning of the fraudulent scheme, George Fretto charged her \$85 for each inspection, but later lowered his price to \$80 when her volume of business increased. She stated that she usually paid Fretto in cash, but sometimes wrote a check to him. Contrares advised that the tag agency charged an additional \$90. She stated that she initially went to PA Tag & Title and briefly went to another agency in Luzerne County before returning to PA Tag & Title. She stated that she initially dealt with a prior employee before subsequently working with Sandra Klassner.

Contrares testified that she would charge \$35 for flipping an out-of-state salvage title. For New York customers, however, she would charge \$100 for flipping a New York 907 salvage title. Contrares handled about 90 such New York transactions while Best Value Auto Outlet was in business. The cost for flipping an out-of-state salvage certificate into a Pennsylvania title

varied by how she processed the paperwork. PennDOT did not charge anything for the salvage title application, while some tag agencies would charge from \$10 to \$15, and finally to \$20 per application.

Contrares also testified about why out-of-state titles - - particularly those from New Jersey and New York - - were being flipped through Pennsylvania. Contrares explained the process in New Jersey takes longer and New York was also a difficult state in which to flip salvage titles. In Pennsylvania, by contrast, she was able to obtain a reconstructed title within one to two weeks. Contrares explained that she engaged in this practice because she was trying to have a side business "aside from just depending on car sales."

Contrares was also familiar with several other dealerships who similarly engaged with George Fretto for inspections. She stated that she knew Jorge Santos and had flipped titles for him on one occasion. That one occasion, however, involved about 40 individual titles. Contrares informed the Grand Jury that she understood Santos was also flipping titles through Newroad Motors and Fretto. She was also aware that Armando De la Paz ran Luci's Auto Sales, LLC and was involved in similar activities with and through Fretto.

As part of this investigation, Detective Murray identified Dakar Motors, a New Jersey dealership offering vehicles for sale, that had titles in the name of Oli's Auto Sales. The dealership is located in Jersey City and run by an individual named Yasir Ali. A review of the Dakar Motors website revealed that three vehicles were being offered for sale with reconstructed titles that were still in the name of Oli's Auto Sales. In reviewing the MV-426B forms, it appeared that the photographs of the vehicles did not match the ones attached to their reconstructed title applications.

4. PBJ Motors

PBJ Motors is owned and operated by Pawel Bryla. It is a second-floor office located within the same complex as other small dealerships - - including Santos Auto Gallery - - at 9 S. Keyser Avenue in Taylor, Lackawanna County. It is a large warehouse-style building, housing a number of different automotive dealers and repair shops. Bryla also rented another portion of the building that houses what appeared to be a repair garage.

When investigators visited PBJ Motors, there were several vehicles located outside and inside the garage. All were in varying states of disrepair. The office was very disorganized, with piles of papers, titles, PennDOT paperwork strewn throughout. The Grand Jury learned that the business did not have the required paperwork for prior sales and transactions. The business did, however, have several mailing envelopes from Connecticut, Massachusetts, and New Jersey which apparently included out-of-state titles. At least one of these packages was sent to Bryla's New Jersey address.

Pawel Bryla was interviewed by investigators and he explained that he purchases salvaged vehicles, repairs them, obtains reconstructed titles, and then either exports or sells the vehicles. He admitted that not all of the vehicles that he exports are repaired, however. Bryla indicated that he exports vehicles to Poland, which allows imports with a salvage title. Detective Murray informed the Grand Jury that he observed paperwork indicating that a Volkswagen with a salvage title had been exported to Poland. Other exports, by contrast, did have reconstructed titles. Bryla did not provide any information about the types of vehicles or the volume of vehicles that he was exporting. Bryla initially stated that he repaired all the vehicles himself, but then admitted that he allowed a few people to use his license to purchase, repair, and sell

vehicles in New Jersey. Bryla would not identify these individuals, however. Bryla stated that he had previously owned a business in New Jersey but had moved on from it.

Bryla advised that he used George Fretto and his garage for enhanced inspections. He stated that he paid Fretto \$100 for an enhanced inspection. He also stated that he then paid Klassner, of PA Tag & Title, \$93 to process the MV-426B paperwork. Aside from this, however, Bryla did not want to discuss the other individuals operating under the PBJ name, or how he was compensated for allowing them to do so.

5. ALZ Auto Sales

ALZ is located at a moderately-sized freestanding building at 184 Sterling Road in Mount Pocono, Monroe County. It is owned and managed by Alvaro Rodriguez. When investigators visited ALZ Auto Sales, Rodriguez did not have the required documentation for prior vehicle sales.

During an interview, Rodriguez was quite candid about his involvement in the reconstructed title process. He stated that when he started doing mostly reconstructed titles, he found it to be a very time-consuming process. He explained that it was very involved to purchase a salvage vehicle and convert it to reconstructed title, given the need to tow or otherwise take the vehicles to be inspected. Rodriguez stated that he got to a point where he could just take the title packages to George's Garage without actually taking the vehicles. George's Garage would do the enhanced vehicle safety inspection and then the title work would be processed at PA Tag & Title. Rodriguez advised that George Fretto specifically directed him to utilize that tag agency.

When confronted with the illegality of his conduct, Rodriguez admitted that he knew that he was supposed to bring the vehicles to the garage for inspection, but that doing so cost too

much time and money. Given the location of ALZ Auto Sales, Rodriguez stated that he could spend half a day or a full day transporting just one vehicle.

Rodriguez also provided additional information about his own operation. He explained that there were approximately six individuals who purchase vehicles under his license. Rodriguez only would provide information about two of them, however. The first individual would purchase vehicles under the ALZ license, repair them, and have Rodriguez handle the reconstructed title paperwork. This individual would then export the vehicles. Rodriguez advised that he charged this individual \$200 per vehicle for use of his license and \$100 per vehicle for handling the reconstructed title application paperwork. Rodriguez stated that the second individual runs a taxi business and purchases vehicles with clean titles under the ALZ Auto Sales name. He advised that he charges this second individual \$120 per vehicle for use of his license, and \$100 per vehicle for handling the paperwork through PA Tag & Title. As these were clean vehicle titles, there was no need for an enhanced inspection. None of the six individuals are registered salespersons or dealers with ALZ.

6. Aquino Auto Mall

Aquino is a small, one-story freestanding combination garage bay and office building, as part of an evidently larger complex of similar businesses, at 134 Sgt. Stanley Hoffman Boulevard in Lehighton, Carbon County. Throughout the investigation, Detective Murray and other law enforcement officers located forms and documentation referring to the business as both "Aquino" and "Aguino." It appeared that this was a typographical error on the pre-printed MV-426B forms, however, as both variants of the name had the same business address. While the registered and legal owner of Aquino is Anibelkis Garcia, the business is actually operated by Domingo Lopez.

Detective Murray interviewed both Garcia and Lopez on January 25, 2022. When asked how the business operates, Garcia advised that Lopez "takes care of all of it" and she did not appear to have any knowledge as to how her business actually functioned. The business did not have the required paperwork for prior sales and transactions.

Lopez explained that he purchases cars at auctions and has them sent to various garages in Newark, New Jersey so that they can be repaired to a reconstructed state. Lopez then takes care of the paperwork in order to get the salvage certificates converted to Pennsylvania documents and obtains the reconstructed titles. The Grand Jury learned that while these vehicles were evidently repaired to some degree, only some of the vehicles actually made it to Pennsylvania. The majority of the vehicles remained in New Jersey and New York.

Lopez explained his involvement in the reconstructed title process. He advised Detective Murray that he pays George Fretto "like \$100" in order to get the enhanced inspection. He would not provide any more specifics about the exact price. Lopez stated that he would then pay PA Tag & Title \$73 per vehicle to process the application and for the notary work. He would not provide any additional details about his revenue beyond stating that "he makes what he makes" and that he sends the vehicles to the garages to do the work.

Lopez stated that most of these vehicles are exported and that he had a dealership - - also named Aquino Auto Mall - - located in the Dominican Republic. He advised that he pays \$550 to export each vehicle. While he would not provide any names, Lopez indicated that he had individuals in Delaware, New York, and New Jersey who purchase vehicles for him at auction. Lopez then pays \$174 per month for a company to move the purchased vehicles from the auctions to the repair shops. Lopez likewise would not provide the names of the body shops where the vehicles were allegedly being repaired. His profit consisted of the value of the

vehicle, less the transport, repair, title application, and export costs. Lopez explained that he went through Pennsylvania because New York requires the use of new parts and airbags, and the process "just takes too long."

Almost exactly two months after Detective Murray's interview, Trooper Anthony Kowalick and a PennDOT auditor went to Aquino for an inspection and audit. Trooper Kowalick is assigned to the Vehicle Fraud Investigation Unit at Troop N in Hazelton and had previously driven past Aquino and noticed that there were no vehicles offered for sale at the business. When he arrived in late March, there were cars on the lot but none with any signage indicating that they were for sale.

As part of the audit, Trooper Kowalick reviewed the dealership's license and license for any salespeople. Anibelkis Garcia was the only listed salesperson. He then began asking about vehicles offered for sale, but there were not any. The dealership had titles on the property for vehicles that did not belong there, as well as seven open titles for other vehicles that were not on the property. There was no documentation at the dealership to reflect any of the vehicles that the dealership was purportedly buying or selling.

Trooper Kowalick then spoke with Anibelkis Garcia and Domingo Lopez. He noted for the Grand Jury that while Garcia was registered as both the owner and a vehicle salesperson, Lopez, by contrast, was registered as neither. When Trooper Kowalick would ask a question, Lopez would always answer, even though the questions were directed to Garcia.

Garcia and Lopez did indicate that they went to PA Tag & Title in order to process their paperwork. Lopez explained that he would go to PA Tag & Title because he had the titles even though the vehicles he had purchased were still physically at the auction. Lopez indicated that he went to Scranton because that is where he does most of his business. Trooper Kowalick noted

that Scranton is 45 to 60 minutes north of Lehigh and that there are plenty of notaries in both the Allentown and Lehigh areas. When questioned about this, Lopez became defensive and expressed that he can go to anywhere he chooses.

7. EOS Auto Sales

EOS Auto Sales was based out of a trailer at 9 Keyser Avenue in Taylor. This is part of the same complex of dealerships and offices that houses PBJ Motors. EOS Auto Sales is owned and operated by Sherif Helmy.

Detective Murray testified that he interviewed Helmy on June 22, 2022. Helmy explained that he had four businesses across two states. In Newark, New Jersey, he operated GW Auto Sales, along with a laundromat. In Pennsylvania, Helmy had both EOS Auto Sales and a garage that he had been trying to open since October 2021. Helmy stated that he had moved about 500 vehicles through the EOS Auto Sales location in Scranton prior to leaving due to a mold problem. Since leaving, all of his EOS business was being handled on his behalf by another business at the 9 Keyser Avenue complex. This was consistent with Detective Murray's own observations, as the EOS Auto Sales trailer always appeared to be abandoned whenever he attempted to contact Helmy at that address.

Helmy stated that all of the approximately 500 vehicles had undergone the reconstructed title process. When Detective Murray questioned this - - given the substantial inconvenience associated with moving 500 vehicles from New Jersey to the enhanced vehicle inspection station and back - - Helmy stated that he used a courier or transporter. Helmy explained that his business was in Pennsylvania and the titling process was faster here. When Detective Murray continued to express skepticism, Helmy conceded that "maybe some" of the cars did not undergo

the required enhanced vehicle safety inspection. Helmy stated that he used PA Tag & Title to process his paperwork.

8. Alliance Auto/Alliance Auto Sport, Inc.

Alliance Auto, also known as Alliance Auto Sport Inc., was ostensibly based in a decrepit one-story building at 1612 State Route 92 in Exeter, Luzerne County. Even though the building appeared to be abandoned, Alliance Auto was still submitting and processing paperwork through PennDOT as of November 2021. Two salespersons associated with Alliance included Sheriff Helmy and Luis Leyva.

Detective Murray reviewed Alliance Auto's dealership application and noted that Leyva owned Alliance. In these same documents, Leyva listed that he had previously worked for GW Auto, a business in Newark owned by Helmy. Even though Helmy owned EOS Auto Sales, Helmy was also listed as a salesman for Alliance. During his interview, Helmy was able to provide Detective Murray with Leyva's telephone number and explained that they are from the same small town of Kearny in New Jersey.

III. INVESTIGATIONS

This Presentment is the product of multiple overlapping and interconnected investigations into the businesses and individuals comprising the Fretto Criminal Organization. The investigation began with a Berks County traffic stop of a stolen vehicle that had been reconstructed and then re-sold to an unknowing buyer. The evidence gathered in that case prompted investigators to conduct covert surveillance outside George Fretto's garage and to compare the actual activity against the MV-426B applications prepared during that time. Through execution of an ensuing series of search warrants, investigators discovered additional evidence involving Fretto and several of his associates. While these investigations were progressing, another stolen vehicle that had similarly undergone the reconstructed title process

was found at the Port of Newark. Finally, as the case began to conclude, investigators stumbled upon Fretto and his associates attempting to restart and revitalize their enterprise in a new location. These various investigations will now be detailed.

A. The "Reconstructed" Stolen Audi

The Grand Jury heard testimony that Nathan Paban wanted to buy a car and searched for a vehicle through the phone app "OfferUp." "OfferUp" is one of many different types of commercial applications that allow users to post and subsequently sell a wide range of personal items including motor vehicles. Through "OfferUp," Paban found a black Audi A6 for sale and struck up a text-message conversation with the seller. Paban and the seller - - identified only as "Angelo" - - negotiated a purchase price of \$3,500 and agreed to meet. Paban and his girlfriend ultimately met "Angelo" at a Shop Rite grocery store in Philadelphia. Unable to find an open notary in Philadelphia, the three traveled to Paban's home city of Reading. Once there, a tag agent completed the MV-4 sale form to transfer the vehicle to Paban.

Several weeks later, Nathan Paban was driving the Audi in Berks County. PSP troopers on patrol checked the license plate and found it did not match the vehicle. The troopers stopped Paban, who showed them the copy of the sale paperwork which, among other things, indicated that the license plate should have been transferred. When the troopers checked the Audi's VIN, they discovered - - unbeknownst to Paban - - - that it had been reported as stolen. Paban was handcuffed and detained at the scene. Paban was adamant, however, that he had purchased the vehicle legally. Given the conflicting information and paperwork, the troopers contacted Trooper Torres to assist in the investigation.

Trooper Torres began his investigation by doing additional research on the Audi's VIN. The resulting information indicated that the vehicle had last been registered and owned by Luci's Auto Sales, LLC. He was likewise able to determine that the Audi had a reconstructed title.

Based upon this information, Trooper Torres acquired and reviewed the title history for the Audi's VIN in order to determine the vehicle's ownership and the transactions in Pennsylvania.

As expected from a reconstructed vehicle, the process began with a salvage title. The salvage title for the Audi was issued in July 2019 in the name of Erie Insurance. Trooper Torres learned that the vehicle had been previously involved in an accident and was considered to be a total loss. Photographs of the damaged car suggested a front-end collision as there was damage to a headlight, impact damage to the hood and bumper, and potential damage to and around the safety structure near the front bumper and radiator.

Accordingly, Erie applied for and received a salvage certificate titling the vehicle in its name before it went to auction. The reverse of the salvage title reflected that it was purchased by "KD Fuller Motors" with an address listed in Rehoboth Beach, Delaware. The purchaser was listed as "Mercy Oppong." The salvage title further indicated that the title was transferred to Armando De la Paz of Luci's Auto Sales, LLC.

The Grand Jury learned that De la Paz subsequently applied for a reconstructed title by signing and submitting an MV-426B form. The "Explanation" section had box "M" checked, indicating that De la Paz was authorized to offer vehicles for sale in Pennsylvania and parts that were taken from business inventory to make the specified repairs were identified in the attached bill of sale. The form similarly indicated that the "entire front clip assembly" of the vehicle had been repaired. Trooper Torres testified that the enhanced vehicle safety inspection had been performed by George Fretto. Fretto indicated that he had "examined the title application and all related documentation and found it to qualify" for a reconstructed title. No supporting documentation, such as receipts or work orders were attached, however. Although Fretto had

attached four photographs as required, they depicted a vehicle of a different model and a different color than the actual Audi.

Notwithstanding these obvious defects, the application was successfully processed by Sandra Klassner. The cover sheet was notarized by Klassner and again signed by Armando De la Paz. Klassner would later testify that, unlike some dealers, De la Paz would come into PA Tag & Title and sign these documents himself. A copy of De la Paz's driver's license and a credential for a PennDOT dealer license plate were also attached. Trooper Torres testified that a reconstructed title was ultimately issued in the name of Luci's Auto Sales, LLC.

Trooper Torres reviewed the reconstructed title and quickly identified two significant problems. First, it was an illegal "open title." A notary public is responsible for witnessing, identifying, and verifying that transactions are legal. Notwithstanding this fact, the reverse of the title indicated that Klassner notarized a "transaction" on August 26, 2019 between De la Paz and no one. Trooper Torres testified that he was familiar with this kind of "back door sale" as a way that certain organizations will circumvent the notary requirement and later re-sell the vehicle elsewhere. Such was the case with this vehicle as the next entry reflected the purchase by Nathan Paban some nine months later. By creating an "open title," Klassner indicated that a transaction was "subscribed and sworn before her" but that never actually happened. The second problem was that there was no record of "Angelo" on the title.

Trooper Torres was eventually able to identify Martin Fuller as "Angelo." A search warrant for the "OfferUp" account of "Angelo" revealed that Fuller was the individual who had sold the vehicle to Paban. Additionally, Trooper Torres checked another database and learned that Fuller and the Audi were involved in a crash in New Jersey just prior to the sale. Finally, he learned that the vehicle was listed as stolen because it had previously been towed to, and

subsequently stolen from, a police impound lot in New Jersey. Nathan Paban and his girlfriend each identified Fuller in a photo array as "Angelo." Fuller was subsequently charged in Berks County with title washing and related offenses.

Martin Fuller testified before the Grand Jury about this transaction. He stated that he had purchased the Audi at an auction house in 2019 under the name of "KD Fuller Motors" which was actually registered in Ghana. Fuller explained that the "KD Fuller Motors" account had been set up by his father, who had used it to purchase and then ship another vehicle. Fuller had previously been a registered salesman in Delaware, but not in New Jersey or Pennsylvania. He let his license lapse and stopped selling vehicles because he lacked enough capital to purchase vehicles for re-sale. He stated that he used the name "Angelo" on "OfferUp" because in 2017 he had been working for an "Angelo Auto Sales" in Abington and that he still had access to the account. Fuller testified that he was trained as a mechanic and therefore he bought the parts and repaired the Audi himself. He testified that, at the time of purchase, the Audi had damage to the fender and the passenger side headlight.

Fuller also testified about how he received the Pennsylvania reconstructed title while still in New Jersey. He explained that a mechanic friend had introduced him to a man named Yasir Ali. Ali told Fuller that he could help him "reconstruct the title, get a salvage deal." Fuller claimed that he had previously attempted to go through the New Jersey government for a reconstructed title, but the offices were closed during the pandemic. Fuller paid Ali the requested \$600 and gave Ali the title. A week later, Ali provided him with the Pennsylvania reconstructed title. Ali did not provide any details about how he had acquired the title, but told Fuller to contact him if he knew anyone who needed one. Fuller did not know and had never met Klassner, but her notary stamp and name appeared on the title. Similarly, he did not know and

had never met De la Paz. He testified that the vehicle never left his possession during the week when the title was being "reconstructed."

Trooper Torres testified that he attempted to contact Luci's Auto Sales, LLC to advise the dealership on how to claim its since-impounded vehicle. None of these calls were answered or returned. Mail to the address went unanswered and the telephone number was eventually disconnected. Trooper Torres advised that he physically went to the business but nobody was present.

Next, Trooper Torres and Detective Murray visited George's Garage on October 29, 2020. Upon arrival, they informed George Fretto that they were conducting an investigation into the Audi. Given that the photographs from the MV-426B did not match the actual Audi, Trooper Torres advised that he was looking to see if there had been a clerical error. Fretto allowed the investigators to review his ledgers. Although the ledgers reflected that he had inspected several Audis, none matched the description of the vehicle that Nathan Paban had purchased.

Trooper Torres testified that he noticed several unusual things while at George's Garage. First, there were stacks of blank MV-426B forms that contained the pre-printed names of multiple dealerships. Some of the dealerships - - Best Value Auto Outlet, PBJ Motors, EOS Auto Sales, and Luci's Auto Sales, LLC - - were local to either Scranton or at least Lackawanna County. Others were from neighboring counties, such as ALZ Auto Sales, Alliance Auto Sport and Aquino. Still others were located much farther away, including Newroad Motors in Lebanon County. Since salvage vehicles are neither roadworthy nor able to be legally driven, each and every vehicle from this dealership would need to be towed all the way from Lebanon to Scranton. The only other alternative would be for the dealership to take the vehicle to one of the

several enhanced inspection stations local to Lebanon County. In addition to the dealership information on the first page, some of the forms also had also pre-populated *inspector* information. This was even more unusual because it meant that only the listed enhanced vehicle safety inspector could perform the inspection on a vehicle.

The second unusual thing that Trooper Torres observed involved the number of enhanced vehicle safety inspections that George Fretto had apparently already performed that day. Fretto's ledgers indicated that he had performed 32 enhanced inspections by the time investigators arrived at 2:40 p.m. Fretto advised that he had completed these inspections between the hours of 6:00 a.m. and 1:00 p.m. Trooper Torres testified that PennDOT regulations provide that each inspector can perform no more than two regular safety inspections per hour. Given the *enhanced* nature of an enhanced vehicle safety inspection, it would follow that an *enhanced* safety inspection would take longer than a *regular* safety inspection. Accordingly, if Fretto was working non-stop during this eight-hour period, he could only complete, at most, 16 *regular* inspections.

The purported number of enhanced inspections was further undermined both by Fretto's physical condition and the physical evidence observed at the scene. As noted previously, Fretto was unable to stand for more than five minutes. Additionally, Trooper Torres noted that on the day of their visit it had been raining heavily all day. By contrast, the garage floor was almost entirely dry. This was entirely inconsistent with vehicles regularly and repeatedly coming in-and-out of the bay during what Trooper Torres described for the jurors as a "torrential downpour."

After speaking with George Fretto, the investigators spoke with Sandra Klassner about the Audi transaction. She reviewed the title work and signatures, and indicated that they

appeared to include her own. When asked about her relationship with Armando De la Paz, she initially explained that she just got her salesperson license to help out with the business, but never did any real sales. She indicated that she came to know De la Paz through the processing all of the documents that were coming through his business.

Notaries are required to keep a record of the documents that they stamp and verify in a logbook. Klassner did not have the logbook for the time period of the Audi transaction with her at the business. The day after the investigators' visit, she retrieved the relevant log book from her home and provided it to Detective Murray. The log book, which covered the period of August 2019 during which the title was notarized, did not include the Audi transaction.

Based upon the totality of this evidence, Trooper Torres charged Fretto, Klassner, and De la Paz with title washing and related offenses in Lackawanna County.

B. "Operation Salvation:" The Investigation Continues

While Trooper Torres continued his investigation into the Audi, Detective Murray focused on George Fretto and George's Garage.

1. Phantom Inspections, False Log Entries and Fraudulent Title Histories

On the morning of December 6, 2020, Detective Murray and his colleagues set up a surveillance camera outside George's Garage. This camera was concealed within a speed display board trailer and was positioned directly across the street from the garage doors. The camera was kept in place for over a week before being removed ahead of an expected snowstorm.

Detective Murray then reviewed the footage. He testified that during the ten days of surveillance, only one vehicle ever entered and exited George's Garage and it was a pickup truck belonging to Fretto himself.

Pursuant to a subsequent search warrant, Detective Murray acquired and reviewed the MV-431 logbooks from George's Garage covering the ten days in which no other vehicles had entered or exited. According to these logbooks, George Fretto and John Mulea had performed the following inspections:

DATE	NUMBER OF INSPECTIONS
December 6, 2020	19
December 7, 2020	32
December 8, 2020	33
December 9, 2020	29
December 10, 2020	30
December 11, 2020	28
December 12, 2020	27
December 14, 2020	30
December 15, 2020	32

Although Fretto employed two other inspectors, only he and Mulea reportedly "inspected" vehicles during this time-frame. Across all ten days of surveillance, 260 vehicles were "inspected" by the pair. In reviewing the MV-431 logbooks it also became apparent that certain vehicle dealerships were acting as "high-volume customers" of George's Garage. This was consistent with the pre-populated MV-426B applications that were observed by Trooper Torres and Detective Murray in October 2020.

2. Fraudulently Reconstructed Title Histories

The Grand Jury was presented with evidence of reconstructed title histories for 244 of the 260 vehicles "inspected" by George's Garage during the period of video surveillance. The title histories for the remaining 16 vehicles were either incomplete or were not provided by PennDOT. The Grand Jury learned of 244 documented "inspections" during this time-frame. Of the 244 "enhanced inspections," George Fretto claimed to have performed 129 inspections and John Mulea claimed to be responsible for 115 of them.

Of the 244 inspections, there were a total of 228 reconstructed title applications from Aquino, PBJ Motors, ALZ Auto Sales, Best Value Auto Sales, Luci's Auto Sales, LLC and Newroad Motors. All of these title applications were processed by PA Tag & Title, with Sandra Klassner processing 103 of these fraudulent title applications and Alivia Auriemma processing 120 of them. Klassner notarized all 223. The remaining title histories were either missing the cover page or otherwise did not identify the processor and/or notary.

i. Luci's Auto Sales, LLC

Luci's Auto Sales, LLC had 38 vehicles "inspected" at George's Garage during the period of video surveillance. A review of the reconstructed title applications and vehicle title histories for these vehicles identified certain commonalities that illustrate the criminal activities of both companies.

Unlike the other dealers, a review of the title histories provided limited information about the vehicle prior to it being titled in Pennsylvania. This coincided with an unusually high number of native Pennsylvania salvage titles; that is, a title in which there was no apparent out-of-state history. The result was a large number of salvage titles that, at the beginning of the reconstruction process, were already in the name of Luci's Auto Sales, LLC. Of the 38 "enhanced vehicle safety inspections" during the period of surveillance, 27 were already titled in the name of this dealer. George Fretto signed the VIN verifications and completed the MV-6 salvage applications for the remaining nine vehicles. The commonality of dates suggests that Fretto may have completed the MV-6 forms at or about the same time. One of the salvage vehicles was branded "parts only" and, as such, was not eligible to be reconstructed. It was reconstructed anyway.

Of the 38 transactions, 36 title histories and applications were reviewed. The Grand Jury learned that these 36 applications indicated that the applicant was a vehicle dealer and that documentation of parts from inventory was attached. The vast majority of the vehicles - - 28 of the 36 - - had either the entire front (24) or rear (4) clip assemblies repaired. It was also discovered that Armando De la Paz would sign, but not always date, all of the application documents himself. Testimony revealed that while vehicle photographs were attached, none of the applications had the required supporting documentation attached. It was Sandra Klassner who processed and notarized these 36 title applications. The applications also included a copy of De la Paz's Pennsylvania driver's license and vehicle dealer credential.

ii. Newroad Motors

Newroad Motors had 108 vehicles "inspected" by George's Garage during the period of surveillance. A review of the records revealed several irregularities and inconsistencies among Newroad Motors' title histories. The histories reflected an approximately even split between out-of-state salvage titles flipped into Pennsylvania and "native" or existing Pennsylvania titles. There were 31 Pennsylvania titles in the name of this dealer. Many of the Pennsylvania salvage titles had multiple re-assignments. The Grand Jury heard testimony that some of the title histories indicated that Santos was purchasing vehicles in the name of other dealerships. There were a total of 45 out-of-state title flips into Pennsylvania. Nearly all of these flips were accomplished through a VIN verification and MV-6 form signed by Maria Pineda, a tag agent/notary in the Allentown area. In reviewing this paperwork, investigators stated that it appeared that several of these MV-6 forms were ink-stamped with Newroad Motors' information, signed by Pineda, and then left blank to be filled in later. Many of the title histories and applications also featured incomplete and undated bills of sale. In some cases, the bills of sale did not reflect a purchase from the titled owner of the vehicle.

Of the 108 transactions, 103 were reviewed by the Grand Jury. All of the MV-426B applications indicated that the applicant was a vehicle dealer and that documentation of parts taken from inventory were attached. The vast majority of the vehicles - - 79 of 102 - - had either the entire front (64) or rear (15) clip assembly repaired. These applications were signed by George Fretto using a POA. While photographs were provided, none of the applications had any of the required documentation such as bills of sale and/or receipts for parts.

Of the 103 title applications, Sandra Klassner processed 59 and Alivia Auriemma processed 43 of them. The applications also included a copy of Santos' driver's license and credentials for dealer tags. Klassner notarized all of these transactions. The Grand Jury learned that three of the reconstructed titles were subsequently sold in the name of Newroad Motors. These titles indicated that they were sold by David Morrison; however, Morrison denied ever seeing these vehicles.

iii. Best Value Auto Outlet

Best Value Auto Outlet supposedly processed 28 vehicles through Fretto's garage during the period of video surveillance. The Grand Jury learned that all of the reconstructed titles involved out-of-state title flips, followed by MV-426B applications for reconstruction. The states of origin ranged from New Jersey to California, and from Texas to Minnesota. George Fretto completed the VIN verifications and signed-off on the MV-6 forms for all of them.

Of the 28 transactions, 27 title histories were reviewed by the Grand Jury. All of these applications indicated that the applicant was a vehicle dealer and that documentation of parts taken from inventory were attached. Once again, the vast majority of the vehicles - - 19 of 27 - - had entire the entire front (17) or rear (2) clip assemblies repaired. Eva Contrares signed all of the applications, but only dated some of them. She did not use a POA. Each application had photographs attached and, in fact, two of these applications had the same photographs attached.

The "inspections" for both of these applications occurred on December 8, 2020. While the VINs and the ostensible damage were different, the photographs were nonetheless identical.

The evidence also revealed that Best Value Auto Outlet, George's Garage, and PA Tag & Title inexplicably managed to "reconstruct" the same 2012 Nissan twice in a six-month period. One was processed on August 20, 2020 and the other was processed on December 10, 2020, during the period of video surveillance. Eva Contrares signed the applications and Sandra Klassner notarized them both. The August reconstruction was done through a salvage title assigned to Best Value by Mercury Insurance. The December reconstruction, by contrast, was done through a salvage title in the name of Best Value. The August application indicated that the repairs were performed by Contrares or her agent and that supporting documentation for parts were attached. The December application, by contrast, indicated the now-boilerplate statement that Contrares was a vehicle dealer and the parts used from repairs were taken from inventory with supporting documentation attached. The August "inspection" was performed by Angel Rios and reflected repairs to the rear bumper, trunk/trunk lid, and air bag/air bag module. The December "inspection" was performed by George Fretto and reflected repairs to the entire rear clip assembly. Both applications were signed and dated by the inspectors, but not dated by Contrares. The photographs of both vehicles attached to the applications did not match.

Of the 27 vehicle applications reviewed, Alivia Aureimma processed 25; the other two did not list the processor. All were notarized by Sandra Klassner, however. The applications included copies of both Contrares and Uribaldi Veloz-Janero's drivers' licenses and credentials for use of a vehicle dealer's license plate.

iv. PBJ Motors

PBJ Motors had 22 vehicles “inspected” by George’s Garage between December 6, 2020 and December 15, 2020. The Grand Jury learned that two-thirds of these vehicles were out-of-state salvage titles. For nearly all of these applications, Fretto completed the VIN verifications and MV-6 forms to bring those vehicles into Pennsylvania. The dates of the MV-6 forms were consistent with the forms being completed at or about the same time. The Grand Jury learned, however, that five of the reconstructed title inspections, *pre-dated* the applications for *salvage* certificates. For example, one salvage certificate application was signed by George Fretto on December 15, 2020, while the reconstructed title inspection had been completed three days earlier.

Of the 22 transactions, 21 title histories were reviewed with the Grand Jury. All 21 of the MV-426B applications indicated that the applicant was a vehicle dealer and that documentation of parts taken from inventory were attached. Again, the majority of the vehicles - - 15 of the 21 - - had either the entire front (12) or rear (3) clip assembly repaired. Pawel Bryla appeared to have initialed, but neither fully signed nor dated, the applications. Photographs were provided for all of the applications, but none had any of the required documentation such as bills of sale and/or receipts for parts. Several of photographs were of conspicuously different vehicles, such as photographs of a Toyota Avalon being used for a Toyota Corolla.

Of the 21 vehicle applications reviewed, between Sandra Klassner and Alivia Auriemma, they processed all of them. The applications also included copies of Pawel Bryla’s New Jersey driver’s license and Pennsylvania vehicle dealer credential. The applications were successfully processed notwithstanding Bryla’s apparent failure to fully complete the MV-426B forms. Once again, Klassner notarized all of the applications.

v. ALZ Auto Sales

ALZ Auto Sales had 15 vehicles "inspected" by George's Garage during the period of surveillance. Special Agent Jeremy Becker testified that ALZ processed more than twice as many out-of-state vehicle titles as they did Pennsylvania salvage titles. Of the ten vehicles that came in with non-Pennsylvania titles, Alvaro Rodriguez signed and performed his own VIN verifications for the MV-6 forms. As no tracing of the VIN was attached to the form and Rodriguez is not an enhanced inspector or other authorized agent, it was not at all clear that he was legally permitted to do so.

Fourteen of the title histories were reviewed with the Grand Jury. All 14 of the MV-426B applications indicated that the applicant was a vehicle dealer and that documentation of parts taken from inventory were attached. Nearly all of the repairs - - 12 out of 14 - - were made to either the entire front or rear clip assemblies. Only one had some other form of receipt or documentation attached. The document appeared to be a bill of sale for the vehicle, even though the business in question did not appear anywhere on the title history. While a bill of sale for *other* vehicles can be a valid form of documenting repairs, there was no indication that any such parts were used here. Once again, all had photographs attached to the applications. Whether by happenstance or intent, the photographs for these applications tended to be closer to the actual vehicles, though small differences could be identified.

All 14 reconstructed title applications were processed through PA Tag & Title. Alivia Auriemma processed 11, while Sandra Klassner processed the remaining three. Klassner notarized all of the applications. Alvaro Rodriguez's signature appeared on all of the reconstructed title applications, but it may not be genuine. The signature appeared to be very different from that on his vehicle titles and other materials. However, in any event, the

applications were not dated. The applications included copies of Rodriguez's Pennsylvania driver's license and the registration credential for his Pennsylvania vehicle dealer license plate.

vi. Aquino

Aquino had 27 vehicles "inspected" by George's Garage during the period of surveillance. All except one involved flipping out-of-state salvage titles into Pennsylvania and then reconstructing the titles. This was accomplished by first converting the out-of-state salvage titles into Pennsylvania ones through the PennDOT MV-6 form. All of these MV-6 forms included purported VIN verifications signed by George Fretto. Approximately one-half of these forms were un-dated and several of the salvage titles were not actually assigned to Aquino. In these nine situations, the title packet included an "affadavit [*sic*] of corredction [*sic*]." This document, stamped by a New York notary, purported to state that the seller assigned the title to the incorrect party. The Grand Jury learned that the "correct" party was the ink-stamped Aquino name and address. In some cases, this "affidavit" was dated *after* Fretto completed the MV-6 form and VIN verification in the name of Aquino.

Testimony revealed that the MV-426B application forms were also remarkable. All 27 applications indicated that Aquino was authorized to offer vehicles for sale in Pennsylvania and that "[p]arts that were taken from business inventory and used in the reconstruction of the vehicle are identified on the vehicle bill of sale." The clear majority - - 23 of the 27 vehicles - - apparently had either the entire front or rear clip assembly repaired. While all 27 title applications had photographs of a vehicle, none had any documentation to substantiate the repairs or any replaced components.

Additionally, the Grand Jury learned that the purported "repairs" often did not correspond to the actual damage to the real vehicle. For example, one Aquino vehicle allegedly had repairs

done to the right fender, right front door, and right rear door. In reality, the damage was to the front bumper, grille, and hood. Similarly, another vehicle whose “entire front clip assembly” was repaired does not account for rear damage and flood damage to the actual car. In yet another case, the same photographs were used in the application for an Aquino vehicle on December 10, 2020 and a Best Value Auto Outlet vehicle on December 8, 2020. All of the MV-426B applications were signed by George Fretto using a POA in the name of Anibelkis Garcia. This document was signed and notarized by Fretto’s daughter in September 2018. All of the applications also included copies of Garcia’s New York driver’s license and Pennsylvania dealer credential. All 27 applications were processed at PA Tag & Title by Alivia Auriemma and notarized by Sandra Klassner.

C. Search Warrant Executed at George’s Garage

Working in concert with the Office of the Attorney General and numerous other law enforcement agencies, Detective Murray and Trooper Torres subsequently executed a search warrant on George’s Garage on June 16, 2021. Upon entry, Detective Murray observed numerous items of interest. First, there were 11 automatic inking stamps in the name of the following nine dealerships: ALZ Auto Sales, Aguino (*sic*) Auto Mall, Newroad Motors, Alliance Auto Sport, Oli’s Auto Sales, Best Value Auto Outlet, Luci’s Auto Sales, LLC, PBJ Motors, and EOS Auto Sales. These were many of the same dealerships whose names had appear on the pre-populated MV-426B forms that were observed during the October 2020 visit. These stamps were evidently used to conveniently and quickly complete the MV-431 logbooks that document the enhanced inspections, and are depicted below in an excerpt from Exhibit 240.



The second items of interest were numerous salvage certificates and photographs in the name of several of the dealerships including PBJ Motors, Luci's Auto Sales, LLC and Newroad Motors. Thirdly, there were stacks of stock photographs of vehicles that were evidently used for MV-426B applications, shown here in an excerpt from Exhibit 244, along with invoice books with the heading "George's Garage – For Quick Salvage Title Inspections."



1. Stock Photos

Special Agent Edward Wilson (SA Wilson) testified that he reviewed the stock photographs and loose titles recovered from the search warrant at George's Garage. SA Wilson and his colleagues sorted the piles of photographs by manufacturer and, in so doing, identified certain trends. The majority of the photographs were of Honda vehicles, but numerous other manufacturers were also represented in varying degrees. Each page contained four photographs depicting the front, rear, and both sides of a vehicle.

The Grand Jury learned that some of the stock photographs had clearly been assembled artificially. These photographs had a small sticker or watermark bearing the words "Pic Collage." Several other pages depicted the same pictures of the same vehicle but positioned in different places on the page. Significantly, these photographs all showed the exterior of George's Garage, suggesting that they were the product of George Fretto or his associates, rather than simply downloaded from the internet or acquired elsewhere.

SA Wilson testified that other pages of stock photographs were just copies with the same page of photographs reproduced multiple times or with minor alterations. The duplication was particularly obvious with some photographs, such as those in which the reflection of a photographer can be clearly seen in the foreground. Other duplicate photographs included details such as palm trees that suggested that they were not taken at George's Garage or elsewhere in the Scranton area.

2. Loose Titles

SA Wilson also reviewed numerous title documents that were recovered pursuant to the execution of the warrant. One such document was a salvage title that had been assigned to Newroad Motors. When SA Wilson checked the VIN, he discovered that the assignment had never been registered with PennDOT. This title also had a page of photographs attached to it and appeared to be consistent with George Fretto's practice of bringing salvage titles with attached photographs to PA Tag & Title for processing. SA Wilson was familiar with these images, as he had found identical copies among the stacks of stock photographs.

SA Wilson also informed the Grand Jury that several of the salvage titles had subsequently been flipped into reconstructed titles. For example, he reviewed a salvage title, similarly assigned to Newroad Motors, that had subsequently been issued a reconstructed title in the name of another Scranton-area business. He testified that he was unable to provide a legitimate explanation for how a reconstructed title could be issued when the required document -- the salvage title -- had physically been seized as evidence a year prior. Additionally, this title was suspicious because the attached photographs were also among those recovered from the piles of stock photographs. In all, SA Wilson found four vehicles with identical *modus operandi*: All had been assigned to or were in the name of Newroad Motors; all had an attached page of photographs that were exact copies of those found in the piles of stock photographs; and, all had somehow been subsequently reconstructed, despite the fact that the salvage titles and ostensible photographs had been in police custody for over a year.

A review of the titles also provided additional information and insight into the operation of Fretto and his associates. Several of the recovered salvage titles were in the name of Luci's

Auto Sales, LLC. Two of these titles had handwritten post-it notes saying "Need pic's from customer."

COMMONWEALTH OF PENNSYLVANIA
CERTIFICATE OF SALVAGE FOR A VEHICLE
 REGISTRATION NOT TO BE ISSUED

202370403000037 001

4YDE37526J2760715 2018 AVALANCHE 03280903901 LH

TITLE: XX, XX, EXEMPT, 08/24/20, EXEMPT, 4

08/24/20 08/24/20 7,000 XXXXXX

ODOMETER DISCLOSURE EXEMPT BY FEDERAL LAW

IMPORTANT NOTICE - FORM MV-426B MUST BE USED WHEN APPLYING FOR A "RECONSTRUCTED" PENNSYLVANIA CERTIFICATE OF TITLE. THIS SALVAGE VEHICLE MAY NOT BE OPERATED ON THE HIGHWAY UNTIL A "RECONSTRUCTED" TITLE IS ISSUED.

SALVAGE VEHICLE LICENSEE: 000000
 LUCI AUTO SALES LLC
 12 LONGSHORE RD
 OLD FORGE PA 18518

5253693

Handwritten note:
 Need Pic's
 From
 Customer
 Joe Inguera

Exhibit 737 (Excerpt)

COMMONWEALTH OF PENNSYLVANIA
CERTIFICATE OF SALVAGE FOR A VEHICLE
 REGISTRATION NOT TO BE ISSUED

202250403000157 001

3JBVNAY270R000265 2010 CAR NATION 021883378001 LU

08/12/20 08/12/20 001241 0

08/12/20 08/12/20 XXXXXX XXXXXX

ODOMETER DISCLOSURE EXEMPT BY FEDERAL LAW

IMPORTANT NOTICE - FORM MV-426B MUST BE USED WHEN APPLYING FOR A "RECONSTRUCTED" PENNSYLVANIA CERTIFICATE OF TITLE. THIS SALVAGE VEHICLE MAY NOT BE OPERATED ON THE HIGHWAY UNTIL A "RECONSTRUCTED" TITLE IS ISSUED.

SALVAGE VEHICLE LICENSEE: 000000
 LUCI AUTO SALES LLC
 12 LONGSHORE RD
 OLD FORGE PA 18518

5253094

Handwritten note:
 Need Pic's
 From
 Customer
 Martin + 2 more

Exhibit 741

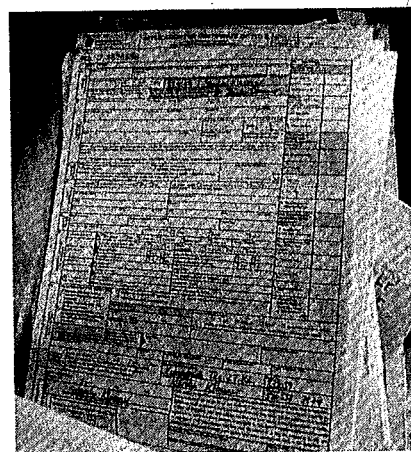
A heavy truck for Luci's Auto Sales, LLC contained a page of photographs, with a clear corporate watermark, that were taken in a large parking lot, evidencing that they were not taken by Frietto or his associates at the garage.

Aside from the titles for Luci's Auto Sales, LLC, the materials seized from Frietto included eight salvage titles in the name of PBJ Motors, 16 salvage titles in the name of Oli's Auto Sales, and 15 salvage titles and one reconstructed title in the name of Newroad Motors. Additionally, the Grand Jury learned that one of the Oli's Auto Sales vehicles had already been

exported to Togo. Finally, one of the six loose titles in the name of Luci's Auto Sales, LLC included a handwritten note in the margin: "GEORGE, already done" and is signed "Sandy."

D. Search Warrant Executed at Oli's Auto Sales

A search warrant was also executed on Oli's Auto Sales on June 16, 2021. As part of that warrant, investigators recovered numerous pieces of paperwork, including a blank MV-1 form already signed and notarized by Sandra Klassner. Seen here in an excerpt from Exhibit 274, this MV-1 form was used to apply for a certificate of title for a vehicle brought into Pennsylvania from out-of-state. As part of that process, a notary is required to physically verify the vehicle's VIN in order to, among other things, detect fraud. A blank, undated, signed, and notarized MV-1 form could be used to fraudulently acquire a Pennsylvania title for any vehicle at any time.



E. The Newark Jeep

While the investigations were unfolding in Scranton, Officer Dean Panzarino of the United States Custom and Border Patrol was on routine patrol at the port in Newark, New Jersey. Officer Panzarino is an "outbound enforcement officer" responsible for inspecting vehicles that are being exported out of the country. His focus is on stolen vehicles. To that end, Officer Panzarino walks through vast parking lots of thousands of to-be-exported vehicles looking for, among other things, vehicles with altered VINs.

He was patrolling one such lot on April 19, 2021 when he noticed a particular Jeep Wrangler that was being exported to the Dominican Republic. Officer Panzarino testified that he noticed that the VIN plate on the dashboard did not appear to be as firmly affixed to the dashboard as it should be. He then checked the sticker in the well of the driver door which lists

the VIN, as well as information about the vehicle's manufacture. Based upon his approximately sixteen years of experience, this sticker also did not appear to be legitimate. He next checked another area of the vehicle - - the passenger frame rail underneath the Jeep - - and found that the VIN number in that area had also been replaced. He was eventually able to locate the actual, or "true" VIN of the vehicle. This VIN was listed in law enforcement databases as having been stolen. The title history for the fraudulent VIN indicated that the vehicle was registered to Newroad Motors.

As the vehicle also had a reconstructed title, Trooper Torres reviewed the MV-426B. The application indicated that the enhanced inspection was performed on February 7, 2021. This was significant because Newroad Motors - - in the person of Santos - - did not apply for the prerequisite Pennsylvania *salvage* title until March. The MV-426B application also indicated that the enhanced vehicle safety inspector was Kara Cosgrove. Not only did the vehicle not have the Pennsylvania salvage certificate at the time, but the photographs that Cosgrove attached depicted a Jeep *Grand Cherokee*, not a Jeep Wrangler. The MV-426B application was both processed and notarized by Alivia Auriemma.

F. Helm's Garage and Subsequent Investigation into EOS Auto Sales and Alliance Auto Sport

Detective Sebastianelli is a Monroe County Detective who is also a member of the State Police Auto Theft Task Force. In April or May, 2022, he noticed some unusual activity at Helm's Garage, a small garage located behind the Monroe County Detective's office in Stroudsburg. In particular, he noticed that there were cars coming-and-going from the business, with at least one bearing a dealer license plate. He ran this dealer plate and discovered that it was registered to EOS.

On June 22, 2022, Trooper Torres and Detective Murray met with the Monroe County Detectives and proceeded to Helm's Garage. Upon arrival, they encountered Sheriff Helmy, along with a PennDOT Quality Assurance Officer. In speaking with the PennDOT employee, Detective Murray learned that June 22, 2022 was the date for their final inspection before Helm's Garage would be granted authorization to open as an enhanced vehicle safety inspection station. In speaking with Helmy, Detective Murray learned that Helmy had also hired George Fretto to be his inspection mechanic. Helmy noted that Fretto was very knowledgeable about the enhanced inspection business and was going to be his head inspection mechanic. The Grand Jury learned that during this conversation, Fretto arrived at the garage and was "pretty surprised" to see Detective Murray and Trooper Torres.

Helmy's attempt to revitalize Fretto's business also revitalized the investigation's interest into Helmy. As part of that investigation, the Grand Jury was presented with evidence that ten vehicles belonging to EOS Auto Sales underwent the reconstructed title process. All of these vehicles had an "enhanced vehicle safety inspection" at George's Garage on January 7, 2021. The inspector for all 10 vehicles was Kara Cosgrove, who would later tell investigators that she actually never performed these inspections. All 10 MV-426B applications were processed by Auriemma and subsequently notarized by Klassner.

The Grand Jury also heard evidence about a particular EOS Auto Sales reconstructed vehicle that had previously been reconstructed. A review of the title history indicated that this particular vehicle was reconstructed due to flood damage in 2012. As part of that prior reconstruction, an official from the Pennsylvania Department of Insurance reported the make and model of the vehicle to be a Chrysler Crossfire. The prior reconstruction also included photographs of the Chrysler Crossfire. Following apparent damage and the salvaging of the

vehicle, however, George Fretto performed an enhanced vehicle safety inspection on November 19, 2021. The photographs attached to the MV-426B completed by Fretto were not that of a Chrysler Crossfire.

The Grand Jury received evidence of the reconstructed title paperwork for four additional EOS vehicles that were likewise "inspected" by Kara Cosgrove. These four vehicles were significant insofar as the salvage titles reflected transfer from Luis Leyva with Alliance Auto Sport to Sherif Helmy at EOS. Helmy and EOS then submitted the MV-426B applications for reconstructed titles.

G. Connections to Prior Investigations

During his testimony, Detective Murray also advised the Grand Jury about additional investigations that had recently concluded involving a reconstructed BMW, a Re-VINed Motor Home and a Re-VINed Ford Truck.

1. The Reconstructed BMW

The Grand Jury learned that a BMW had a title reconstructed by George Fretto in 2018. As with all of the other MV-426B applications reviewed in this investigation, this earlier application did not have the required supporting documentation but also reflected repairs to the entire front clip assembly. Fretto performed the enhanced vehicle safety inspection on June 4, 2018. The Grand Jury learned that the photographs attached to the MV-426B were not of the same vehicle.

2. The Re-VINed Motor Home

The second vehicle was a stolen motor home that was re-VINed and then reconstructed. Detective Murray inspected the "new" VIN and found that the vehicle had been reconstructed through Santos at Newroad Motors and George Fretto at George's Garage. It was processed and

notarized by Sandra Klassner. As expected, the photographs attached to the MV-426B application did not correspond at all to the actual vehicle that was seized by the New York Police Department. Neither the photographs nor the damage "repaired" on the MV-426B form correspond to the actual vehicle that was the source of the new VIN.

3. The Re-VINed Ford Truck

The third vehicle was a Ford F-350 pickup truck that had been stolen from a dealership in Manheim. Detective Murray testified that he received a call that the F-350 had been recovered at a port in New Jersey where it was awaiting export. The F-350 had been re-VINed and reconstructed through George's Garage at the behest of Alliance Auto Sport. The salvage title and MV-426B form were signed by Luis Leyva. The enhanced vehicle safety inspection was performed by George Fretto on September 18, 2018. Detective Murray testified that he was able to locate the actual vehicle that was the source of the new VIN and found it bore no resemblance whatsoever to either the photographs or the damage listed on the MV-426B.