COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF DAUPHIN COMMONWEALTH OF PENNSYLVANIA DEFENDANT: (NAME and ADDRESS): Magisterial District Court 12-2-03 **MULTISERVICES** SALAZAR AUTOS SALES & Magisterial District Judge David H. Judy, Esquire Ge First Name Middle Name Last Name 50 Canal Street Royalton, Pa 17057 1857 W. King Street, York, PA 17404 Telephone: (717): 944-4463 **NCIC Extradition Code Type** ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States 1-Felony Full ☐ Distance: 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited 3-Felony Surrounding States A-Misdemeanor Full □ E-Misdemeanor Pending Extradition ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Complaint Number Incident Number Docket Number Date Filed** OTN/LiveScan Number Services? ☐ YES ⊠ NO -314-22 09/30/2022 IFS200116 Co-Defendant(s) X Add'I DOB **GENDER** POB DOB Gen. Last Name First Name Middle Name □ Female AKA Black Native American Unknown RACE ☐ White ☐ Asian **ETHNICITY** ■ Non-Hispanic Unknown Hispanic ☐ PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair PNK (Pink) GRN (Green) BLK (Black) ☐ WHI (White) XXX (Unk./Bald) ONG (Orange) Color BLN (Blonde / Strawberry) GRY (Gray) BRO (Brown) GRN (Green) BLK (Black) BLU (Blue) Eye PNK (Pink) Color ☐ HAZ (Hazel) MAR (Maroon) XXX (Unknown) WEIGHT (lbs.) **DNA Location** DNA □ YES □ NO **FBI Number MNU Number** ENTITY# 4122566 Ft. HEIGHT In. ⊠ NO **Defendant Fingerprinted** ☐ YES Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** Comm'l Veh. Oth, NCIC Veh, Code Reg. School Veh. Haz Registration same Ind. mat Plate # Sticker (MM/YY) as Def. Style Color VIN Year Make Model 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). 09/30/2022 SDAG JOHN T. DICKINSON ignature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General

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

Page 1 of **∑**

(Police Agency ORI Number)

(Subdivision Code)

on or about JULY 18, 2012 THROUGH MAY 31, 2021

Harrisburg City

(Place-Political Subdivision)

in DAUPHIN County

(Identify Department or Agency Represented and Political Subdivision)

therefore designated as John Doe or Jane Doe

1. ☑ I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

do hereby state: (check appropriate box)

Docket		ber: - 22	Date 9 /3/	Filed:		ОТ	N/LiveScan I			Co	ompla S200	int/Incident N	umber
Defendant Name:		First:				Middle: SALES &			ast:	FRVI	CES LLCLLO		
			SALAZ	AR AU	105		SALES &			IOLITO	PLIAT	CL3 LLCLLC	
The ac	cts co	mmitted	by the accu	used are	e descr	ribed belo	w with each	Act of	Assembl	y or stat	tute a	llegedly viola	ated, if appropriate.
(Set fort	th a <i>brie</i> more, i	ef summary is not suffic	of the facts: cient. In a sun ne time of the	sufficient nmary cas offense n	to advis se, you n nav be in	e the defend nust cite the ncluded if kr	dant of the nate specific section	ure of the on(s) and on, socia	e offense(s) I subsectio I security n	charged. n(s) of the umbers a	e statu ınd fina	te(s) or ordinan	ite(s) allegedly violated, ce(s) allegedly violated. on (e.g. PINs) should not
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(if a	<mark>applic</mark> e Des	able) cription (include the	name (of statu	- ute or ordi	nance): § 90	3 CRIM	INAL CON	ISPIRAC'	Y -DE	ALING IN PRO	CEEDS OF UNLAWFUL
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Docket Number: CR - 3/4-22	Date Filed:	ОТ	'N/LiveScan Nเ	ımber		IFS20	laint/Incident Num)0116	lber
Defendant Name:	First: SALAZAR AUT	ros	Middle: SALES &		Last:		ICES LLCLLC	
Acts of the accused asswith knowledge that the defebe made an application for a through May 31, 2021, with i which the defendant made of underwent enhanced inspection.	sociated with this ndant is facilitating a certificate of title for the to deceive the caused to be made	s Offense: The da deception to be parameter a motor vehicle w PA Dept. of Transpapplications for ce	erpetrated by any hich includes mate portation (PennDO rtificates of recons	one concerrerially false on the control of the cont	ing the tr or fictitious ndant end	ue mileag s informat jaged in a	e of a motor vehicle, tion, to wit: On or abo continuing course of	made or caused to out July 18, 2021 criminal conduct in
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Inchoate ☐ Attempt Offense 18 901 A			onspiracy 1903	Nui	nber of V	ictims Aq	ge 60 or Older	
□ 4 4117	(a)(A CARROLINA SALES AND A COLUMN	18	1		2-040	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Subs	section	PA Statute (Title) Cour		Grade	Safety Zone	☐ Work Zone
(if applicable) Statute Description (inc		of statute or ord	inance): § 411 7	INSURAN	CE FRAU	D		-
to defraud a State or local go incomplete or misleading info insurance rate filing, a motor request; To wit: On or about (PennDOT), submitted a seriabout Erie's insurance covera	ormation concerning vehicle insurance to January 25, 2019 the sof license plate reace of the dealership	any fact or thing mansaction or other irough March 16, 2 inewal/replacement is license plates.	naterial to the age motor vehicle inst 020, the defendar t applications and Conspiracy	ncy's determ irance action it, knowingly supporting (nination in which is and with documents	approving required intent to s to PennI	g or disapproving a m or filed in response to defraud the PA Dept.	otor vehicle o an agency's of Transportation ading information
Offense 18 901			18 903					
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Lead? Offense# PennDOT Data (if applicable)	Accident Number —	bsection	PA Statute (11	lie) Co ☐ Inter			Safety Zone	☐ Work Zone
Statute Description (inc	(if applicable) Number Statute Description (include the name of statute or ordinance): § 4911 TAMPERING WITH PUBLIC RECORDS OR INFORMATION							
Acts of the accused associated with this Offense: The defendant, by and through its agent, Luis Salazar-Manon, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: On or about July 2012 through May 31, 2021, the defendant, with intent to defraud the PA Dept. of Transportation (PennDOT), engaged in a continuing course of conduct, whereby the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT, including application forms for PA motor vehicle titles and/or supporting documentation submitted to PennDOT by the defendant; as well as inspection station records required by law to be kept by personnel at official inspection stations in PA for information of the government.								
Inchoate			onspiracy 8 903	Nu	mber of \	Victims A	ge 60 or Older	
□ 6 4117	(b)((4) of the	18	1_	M	11		
Lead? Offense# PennDOT Data	Accident	section	PA Statute (Titl	e) Cou		Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code ☐ Work Zone
(if applicable) Statute Description (inc	Number —— clude the name o	of statute or ord	linance): § 411					
Acts of the accused as defraud any insurance comp misleading information cond Company, filed an applicatio employees/drivers at the deformation of which was material to Erice.	any, self-insured or o erning any fact mate n for a garage policy fendant used car dea	other person file ar erial thereto; To wit with Erie Insurance elership, and conce	n application for in :: On or about Jan ce, which containe laled for the purpo	surance con uary 25, 201 d false infor use of mislea	taining ar 19, the de mation co ding infor	ny false int fendant, v Incerning t mation pe	formation or conceal (with intent to defraud the number of dealer ertaining to the defend	for the purpose of Erie Insurance plates and

POLICE CRIMINAL COMPLAINT Complaint/Incident Number OTN/LiveScan Number Date Filed: **Docket Number:** CR-314-22 IFS200116 9 130122 Middle: Last: First: **Defendant Name:** MULTISERVICES LLCLLC SALAZAR AUTOS SALES & ☐ Conspiracy **Inchoate** ☐ Attempt ☐ Solicitation Number of Victims Age 60 or Older _ Offense 18 901 A 18 902 A 18 903 M1 7 of the 75 1 7121 П NCIC Offense Code Counts Grade UCR/NIBRS Code PA Statute (Title) Offense# Section Subsection Lead? PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate Number (if applicable) Statute Description (include the name of statute or ordinance): § 7121 FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION Acts of the accused associated with this Offense: The defendant, by and through its agent(s), Luis Salazar-Manon, did knowingly and intentionally make a material false statement, or conceal any other material fact in an application for a certificate of title or for registration; To wit: on or about July 2021 through May 31, 2021, the defendant engaged in a continuing course of criminal conduct, knowingly and intentionally making material false statements or concealing other material facts on applications for certificates of salvage and reconstructed vehicle titles and/or on applications for renewal or replacement of license plate registrations, submitted to the PA Dept. of Transportation (PennDOT) on behalf of the defendant. ☐ Conspiracy Inchoate ☐ Attempt ☐ Solicitation Number of Victims Age 60 or Older 18 903 18 901 A 18 902 A Offense of the 1 M2 (a)(4)18 8 4107 **NCIC Offense Code** UCR/NIBRS Code PA Statute (Title) Counts Grade Subsection Lead? Offense# Section PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate (if applicable) Number Statute Description (include the name of statute or ordinance): § 4107 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES Acts of the accused associated with this Offense: The defendant, by and through its agent(s), Luis Salazar-Manon, in the course of business did knowingly and with intent sell, offer or expose for sale adulterated or mislabeled commodities. To wit: On or about July 2012 through May 31, 2021, in the course of business, the defendant engaged in a continuing course of criminal conduct in which the defendant knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT). The information on the applications pertained to out of state vehicles that were not present at the defendant dealership and therefore the information could not be verified and/or the "reconstructed" vehicles did not undergo enhanced safety inspections as required by law to ensure the vehicles' roadworthiness. ☐ Conspiracy ☐ Attempt ☐ Solicitation Inchoate Number of Victims Age 60 or Older _ 18 903 18 901 A 18 902 A Offense

PA Statute (Title)

Counts

☐ Interstate

Grade

of the

Subsection

UCR/NIBRS Code

☐ Work Zone

NCIC Offense Code

☐ Safety Zone

Lead?

Offense#

PennDOT Data

(if applicable)

Section

Acts of the accused associated with this Offense:

Accident

Number

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

Docket Number: (R - 314-22	Date Filed: 9 1301 2 2	OTN/LiveScan Number	Complaint/Incident Number IFS200116
Defendant Name:	First:	Middle:	Last:
	SALAZAR AUTOS	SALES &	MULTISERVICES LLCLLC

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{\hspace{1cm}}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were a	gainst the peace and dignity of the Commonwealth
of Pennsylvania and were contrary to the Act(s) of the Assembly, or	r in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probal	ble cause must be completed, sworn to before the
issuing authority, and attached.)	$\cdot \wedge \wedge \cdot /$

(Date)

(Year)

AND NOW, on this date

(1) CTOBER 2 1 2000 I certify that the complaint has been properly completed and verified.

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

(Magisterial District Court Number)

(Issuing Authority)

Docket Number: CR - 3/4-22	Date Filed: 9 1301 22	OTN/LiveScan Number	Complaint/Incident Number IFS-20-0116
	First:	Middle:	Last:
Defendant Name:	SALAZAR AUTOS	SALES &	MULTISERVICES LLCLLC

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Jeremy Becker of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, depose and say;

Your Affiant has been conducting a criminal investigation into violations of the criminal laws of the Commonwealth of Pennsylvania. This investigation has used the resources of the Forty-Seventh Statewide Investigating Grand Jury. On September 16, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 17. On September 19, 2022 the Honorable Supervising Judge Lillian H. Ransom, First Judicial District, Philadelphia County, Pennsylvania, entered a court order accepting the Grand Jury's recommendation of charges and findings. The Presentment, attached and herein incorporated by reference, recommends that the Attorney General of Pennsylvania or his designee file the charges specified in this criminal complaint and Presentment No. 17 against the below listed individuals and corporations. Pursuant to 18 Pa.C.S.A. §307 (a)(3) – A corporation may be convicted of the commission of an offense if: (3) the commission of the offense was authorized, requested, commanded, performed or recklessly tolerated by the board of directors or a high managerial agent acting in behalf of the corporation within the scope of his office or employment.

- 1. Luis Fermin Salazar-Manon
- 2. Cynthia Salazar
- 3. Jose R. Rivera Rivera
- 4. Reyna Bonilla Sanchez
- 5. Salazar Auto Sales & Multiservices, LLC.
- 6. N&G Towing, Body Shop and Sales, LLC.
- 7. Beltin Auto Sales, LLC.

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

I, JEREMY BECKER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

Sworn to me and subscribed before me this day of the last of the l

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My commission expires first Monday of

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number		
CR-314-22	9 1301 22		IFS-20-0116		
	First:	Middle:	Last:		
Defendant Name:	SALAZAR AUTOS	SALES &	MULTISERVICES LLCLLC		