



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

DEFENDANT:

(NAME and ADDRESS):

LUIS

FERMIN

SALAZAR-MANON

First Name

Middle Name

Last Name

894 Lingg Road, New Oxford, PA 17350

Ge
n

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-309-22	Date Filed 09/30/2022	OTN/LiveScan Number R 365600-4	Complaint Number IFS200116	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 08/22/1974	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>	Gen.
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 type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location				WEIGHT (lbs.) 148
FBI Number	MNU Number				Ft. HEIGHT In. 5 6
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth Approved Disapproved because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

SDAG JOHN T. DICKINSON

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

09/30/2022

(Date)

I, **SPECIAL AGENT JEREMY BECKER**

(Name of the Affiant)

737643 / BDG # 736

(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of **Pennsylvania Office of Attorney General**

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

- 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 _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about **OCTOBER 2017 THROUGH APRIL 18, 2022**



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-309-22</i>	Date Filed: <i>9/10/22</i>	OTN/LiveScan Number <i>R 365600-4</i>	Complaint/Incident Number IFS200116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<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"/>	1	911	(b) (1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **§ 911 CORRUPT ORGANIZATION**

Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise. To wit: the defendant, while owner of York county car dealerships Salazar Auto Sales and Multiservices, LLC and N&G Towing, Body Shop & Sales, LLC, knowingly and intentionally acted as a principal in a continuing course of criminal conduct through a pattern of racketeering activity which included insurance fraud, theft by deception, vehicle title washing, dealing in proceeds of unlawful activity, tampering with public records or information, and unsworn falsification, and used income or proceeds of income derived from those activities to further the continued operations of his car dealerships.

<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"/>	2	911	(b) (2)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **§ 911 CORRUPT ORGANIZATION**

Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant, through a pattern of racketeering activity acquired and/or maintained, directly or indirectly, and interest in or control of any enterprise; To wit; the defendant, knowingly and intentionally engaged in a continuing course of conduct through a pattern of racketeering activity which included insurance fraud, theft by deception, vehicle title washing, dealing in proceeds of unlawful activity, tampering with public records or information, and unsworn falsification, and thereby acquired and/or maintained an interest in or control of York county car dealerships Salazar Auto Sales and Multiservices, LLC and N&G Towing, Body Shop, and Sales, LLC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	911	(b) (3)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **§ 911 CORRUPT ORGANIZATION**

Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant, while employed by or associated with an enterprise, did unlawfully conduct and/or participate, directly or indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity; to wit: the defendant, while owner of York county car dealerships Salazar Auto Sales and Multiservices, LLC, and N&G Towing, Body Shop and Sales, LLC, knowingly and intentionally conducted and / or participated in a continuing course of the conduct of the aforementioned dealerships' affairs through a pattern of racketeering activity which included insurance fraud, theft by deception, vehicle title washing, dealing in proceeds of unlawful activity, tampering with public records or information, and unsworn falsification.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-309-22</i>	Date Filed: <i>9/30/22</i>	OTN/LiveScan Number <i>R 365600-4</i>	Complaint/Incident Number IFS200116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

<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?	4	911	(b) (4)	of the	18	1	F1	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	

Statute Description (include the name of statute or ordinance): **§ 911 CORRUPT ORGANIZATION**

Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant did conspire with other persons to commit the crime of Corrupt Organizations, 18 PA.C.S.A §911(b)(3), to wit: the defendant, who owned York county car dealerships Salazar Auto Sales and Multiservices, LLC, and N&G Towing, Body Shop and Sales, LLC, did knowingly and intentionally conspire with employees and/ or associates Cynthia Salazar, Jose Rivera-Rivera, and/or Reyna Bonilla-Sanchez, to conduct or participate directly or indirectly in the conduct of one or both of the aforementioned dealerships' affairs through a pattern of racketeering activity which included vehicle title washing, dealing in proceeds of unlawful activity, tampering with public records or information, and unsworn falsification. In so doing, one or more of them did engage in an an overt act in pursuance of the conspiracy.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	5	5111	(a) (1)	of the	18	1	F1	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	

Statute Description (include the name of statute or ordinance): **§ 903 CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY, ETC.**

Acts of the accused associated with this Offense: On or about from October 2017 through April 18, 2022, the defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more of the following: Cynthia Salazar, Jose Rivera-Rivera, Reyna Bonilla-Sanchez, Salazar Auto Sales and Multiservices, LLC, N&G Towing, Body Shop and Sales, LLC and / or Beltin Auto Sales, LLC, that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt 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"/> Lead?	6	5111	(a) (1)	of the	18	1	F1	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	

Statute Description (include the name of statute or ordinance): **§ 5111 DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES**

Acts of the accused associated with this Offense: On or about from January 2019 through January 2022, the defendant did conduct a financial transaction or series of financial transactions under the following circumstances: 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: On or about January 2019 through January 2022, the defendant engaged in a continuing course of conduct wherein he received payments from out-of-state car dealers to illegally "wash" out-of-state salvage vehicles in PA. Knowing that the payments he received represented proceeds of unlawful activity, the defendant continued to accept payments in exchange for washing vehicle titles, with the intent to promote the carrying on of the illegal practice.

 **POLICE CRIMINAL COMPLAINT**

Docket Number: CR- 309-22	Date Filed: 9/30/22	OTN/LiveScan Number A 365600-4	Complaint/Incident Number IFS200116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

<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?	Offense# 7	Section 3922	Subsection (a) (1)	of the	PA Statute (Title) 18	Counts 1	Grade F3	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		

Statute Description (include the name of statute or ordinance): § 3922 THEFT BY DECEPTION

Acts of the accused associated with this Offense: The defendant did intentionally obtain or withhold property of another by deception; To wit: on or about January 25, 2019 through March 16, 2020, the defendant did present or cause to be presented to Erie Insurance Company, false, incomplete or misleading information material to an application for an Erie policy covering the defendant's York county car dealership, Salazar Auto Sales and Multiservices, LLC. As a result of the defendant's deception about the number of employees/drivers and license plates the dealership had, as well as the nature of the dealership's operations, Erie issued the policy for the business at an annual premium rate that was approximately \$19,000.00 less than what Erie subsequently determined the coverage warranted. Further, Erie also determined that had the insurer not been deceived by the defendant, Erie would not have issued the policy in the first place.

<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?	Offense# 8	Section 4118	Subsection	of the	PA Statute (Title) 18	Counts 1	Grade F3	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		

Statute Description (include the name of statute or ordinance): § 4118 WASHING VEHICLE TITLES

Acts of the accused associated with this Offense: The defendant, with intent to deceive anyone or with knowledge that he is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the defendant made or caused to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information, to wit: on or about October 2017 through April 18, 2022, the defendant engaged in a continuing course of criminal conduct, with intent to deceive the PA Dept. of Transportation (PennDOT), the defendant made or caused to be made applications for certificates of reconstructed motor vehicle titles which falsely asserted that the vehicles underwent enhanced inspections and were deemed to have been restored to roadworthiness.

<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?	Offense# 9	Section 4911	Subsection (a) (1)	of the	PA Statute (Title) 18	Counts 1	Grade F3	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		

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, with the intent to defraud or injure anyone, knowingly made 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 or about October 2017 through April 18, 2022, the defendant, with intent to defraud the PA Dept. of Transportation (PennDOT), engaged in a continuing course of conduct, whereby the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT, including application forms for PA motor vehicle titles and/or supporting documentation submitted to PennDOT; as well as inspection station records required by law to be kept by personnel at official inspection stations in PA for information of the government.

 **POLICE CRIMINAL COMPLAINT**

Docket Number: CR-309-22	Date Filed: 9/20/22	OTN/LiveScan Number R 365600-4	Complaint/Incident Number IFS200116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

<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"/>	10	4117	(a) (1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance): § 4117 INSURANCE FRAUD

Acts of the accused associated with this Offense: The defendant did knowingly and with intent to defraud a State or local government agency files, presents or causes to be filed with or presented to the government agency a document that contains false, incomplete or misleading information concerning any fact or thing material to the agency's determination in approving or disapproving a motor vehicle insurance rate filing, a motor vehicle insurance transaction or other motor vehicle insurance action which is required or filed in response to an agency's request; To wit: On or about January 25, 2019, through March 16, 2020, the defendant, knowingly and with intent to defraud the PA Dept. of Transportation (PennDOT), engaged in a continuing course of criminal conduct involving the submission to PennDOT of license plate renewal / replacement applications and supporting documents, containing misleading information about Erie Insurance's coverage of license plates registered to Salazar Auto Sales and Multiservices, LLC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	4117	(b) (4)	of the	18	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance): § 4117 INSURANCE FRAUD

Acts of the accused associated with this Offense: The defendant knowingly and with intent to defraud any insurance company, self-insured or other person filed an application for insurance containing any false information or concealed for the purpose of misleading information concerning any fact material thereto; To wit: On or about January 25, 2019, the defendant, with intent to defraud Erie Insurance Company, filed an application for a garage policy with Erie Insurance, which contained false information concerning the number of dealer plates and employees/drivers at the defendant's used car dealership, Salazar's Auto Sales and Multiservices, LLC, and concealed for the purpose of misleading information pertaining to the dealership's operations, all of which was material to Erie's determination of whether to extend coverage to the business and how much to charge for the policy.

<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"/>	12	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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 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 October 2017 through April 18, 2022, the defendant engaged in a continuing course of criminal conduct wherein he knowingly and intentionally made material false statements or concealed 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 Salazar Auto Sales and Multiservices, LLC and N&G Towing, Body Shop and Sales, LLC.

Docket Number: CR-309-22	Date Filed: 9/13/22	OTN/LiveScan Number R 365600-4	Complaint/Incident Number IFS200116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

<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	4107	(a)(4)	of the	18	1	M2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): § 4107 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

Acts of the accused associated with this Offense: In the course business as a vehicle safety inspector at, and owner of, York county used car dealerships Salazar Auto Sales and Multiservices, LLC and N&G Towing, Body Shop and Sales, LLC, knowingly and intentionally sold, offered or exposed for sale adulterated or mislabeled commodities, to wit: on or about October 2017 through April 18, 2022, the defendant engaged in a continuing course of criminal conduct in which he knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles on behalf of Salazar Auto Sales and Multiservices, LLC and /or N&G Towing, Body Shop and Sales, LLC to the PA Dept. of Transportation (PennDOT). The applications pertained to out of state salvage vehicles which were not present at the aforementioned business and therefore the vehicle information was not verified and the "reconstructed" vehicles did not undergo enhanced safety inspections as required by law to ensure the vehicles' roadworthiness.

<input type="checkbox"/> Inchoate Offense	<input checked="" 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	(b)	of the	18	1	M3		
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	

Statute Description (include the name of statute or ordinance): § 4904 UNSWORN FALCIFICATION TO AUTHORITIES

Acts of the accused associated with this Offense: The defendant knowingly and intentionally made a written false statement which he did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; To wit: On or about from October 2017 through April 18, 2022, the defendant engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed PA Dept. of Transportation (PennDOT) forms, including application(s) for renewal of dealer license registration plates, application(s) for replacement of lost dealer plates, and applications for reconstructed vehicle titles on behalf of Salazar Auto Sales and Multiservices, LLC, and applications for reconstructed vehicle titles on behalf of N&G Towing, Body Shop and Sales, LLC, thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.

<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	

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

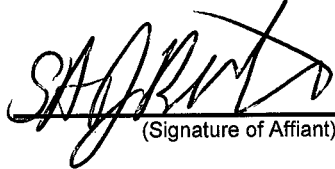
Acts of the accused associated with this Offense:

 **POLICE CRIMINAL COMPLAINT**

Docket Number: <u>CR-309-22</u>	Date Filed: <u>9/30/22</u>	OTN/LiveScan Number <u>R 365600-4</u>	Complaint/Incident Number IFS200116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

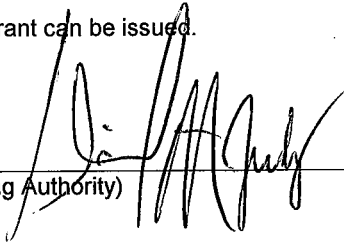
2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties 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 1 through ___.
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 than non-confidential information and documents.

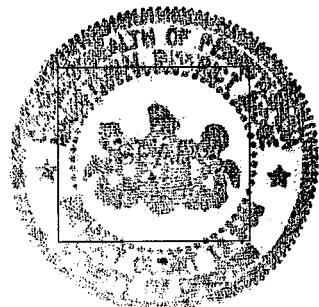
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be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

 (Date) (Year) 2022 
 (Signature of Affiant)

AND NOW, on this date SEPTEMBER 30, 2022, I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03
 (Magisterial District Court Number)


 (Issuing Authority)





Docket Number: CK-309-22	Date Filed: 9/30/22	OTN/LiveScan Number R 365600-4	Complaint/Incident Number IFS-20-0116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

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, SPECIAL AGENT 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.

[Handwritten Signature]

(Signature of Affiant)

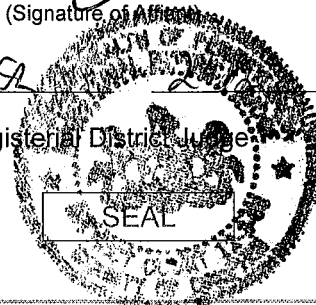
Sworn to me and subscribed before me this 30th day of

SEPTEMBER

, Magisterial District Judge

9/30/2022 Date

My commission expires first Monday of January, 2024





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-309-22</i>	Date Filed: <i>9/10/22</i>	OTN/LiveScan Number <i>R365600-4</i>	Complaint/Incident Number IFS-20-0116
Defendant Name:	First: LUIS	Middle: FERMIN	Last: SALAZAR-MANON

