

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

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

DEFENDANT: (NAME and ADDRESS):
PETER PAUL TAYOUN
First Name Middle Name Last Name

151 JERMYN DRIVE
WAVERLY TOWNSHIP, PA 18411

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: CR-303-1082 Date Filed: 09/13/22 OTN/LiveScan Number: R 364154-0 Complaint/Incident Number: 22AT022 / PA21420227 Request Lab Services? YES NO

GENDER: Male Female DOB: 04/05/1945 POB: _____ Add'l DOB: / / Co-Defendant(s)

First Name: _____ Middle Name: _____ Last Name: _____ Gen.: _____

AKA: _____

RACE: White Asian Black Native American Unknown

ETHNICITY: Hispanic Non-Hispanic Unknown

HAIR COLOR: GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown)
 BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink)
 BLN (Blonde / Strawberry)

EYE COLOR: BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray)
 HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown)

DNA: YES NO DNA Location: _____ WEIGHT (lbs.): _____

FBI Number: _____ MNU Number: _____ Ft. HEIGHT In.: 160

Defendant Fingerprinted: YES NO Ft. HEIGHT In.: 5 09

Fingerprint Classification: _____

DEFENDANT VEHICLE INFORMATION

Plate #: _____ State: _____ Hazmat: Registration Sticker (MM/YY): _____ / _____ Comm'l Veh. Ind.: School Veh.: Oth. NCIC Veh. Code: _____ Reg. same as Def.:

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, Det. Mark H. MURRAY / TFC. Ramon TORRES 44428, 13-19 / 00610536, 12077
(Name of the Affiant) (PSP/MPPOETC -Assigned Affiant ID Number & Badge #)

of Lackawanna County Detectives / PA State Police PA 0352800 / PAPSP1A00
(Identify Department or Agency Represented and Political Subdivision) (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] CITY OF HARRISBURG
(Subdivision Code) (Place-Political Subdivision)

In DAUPHIN County [22] on or about 06/04/18 - 03/11/21
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-303-2022</i>	Date Filed: <i>09 30 22</i>	OTN/LiveScan Number <i>R 364154-0</i>	Complaint/Incident Number 22AT022 /PA21420227
Defendant Name	First: PETER	Middle: PAUL	Last: TAYOUN

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)(1)	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 who has 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 engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate Pennsylvania Tag and 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?	02	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 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 Pennsylvania Tag & 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?	03	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 owned and was associated with Pennsylvania Tag & Title and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-303-2022</i>	Date Filed: <i>09/17/22</i>	OTN/LiveScan Number <i>R 364154-0</i>	Complaint/Incident Number <i>22AT022 /PA21420227</i>
Defendant Name	First: PETER	Middle: PAUL	Last: TAYOUN

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 Offense#	911 Section	(b)(4) Subsection	of the	PA CRIMES CODE	01 Counts	F1 Grade	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): **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).

<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 Offense#	5111 Section	(a)(1) Subsection	of the	PA CRIMES CODE	01 Counts	F1 Grade	NCIC Offense Code	300 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): **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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	06 Offense#	5111 Section	(A)(1) Subsection	of the	PA CRIMES CODE	01 Counts	F1 Grade	NCIC Offense Code	300 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 / DEALING ...**

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 Activity and/or Commercial Bribery agreed with other person or persons to engage in conduct which constitutes such crime and/or attempt and/or solicitation to commit same.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-303-2022</i>	Date Filed: <i>09/30/22</i>	OTN/LiveScan Number <i>R 364154-0</i>	Complaint/Incident Number 22AT022 /PA21420227
Defendant Name	First: PETER	Middle: PAUL	Last: TAYOUN

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"/>	07	4108	(b)	of the	PA CRIMES CODE	259	M2		260
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): **COMMERCIAL BRIBERY and BREACH OF DUTY TO ACT DISINTERESTEDLY**

Acts of the accused associated with this Offense: A person who holds himself out to the public as being engaged in the business of making disinterested selection, appraisal, or criticism of commodities or services commits a misdemeanor of the second degree if he solicits, accepts or agrees to accept any benefit to influence his selection, appraisal or criticism, to wit: on 259 occasions the defendant, who held himself out to the public as a being engaged in the business of making disinterested appraisal and / or criticism of commodities and / or services committed a misdemeanor of the second degree by soliciting and / or accepting and / or agreeing to accept a benefit to influence his appraisal and / or criticism.

<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: .

<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: <i>CR-303-2022 09/20/22</i>	Date Filed: <i>09/20/22</i>	OTN/LiveScan Number <i>R 364154-0</i>	Complaint/Incident Number 22AT022 /PA21420227
Defendant Name	First: PETER	Middle: PAUL	Last: TAYOUN

- 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 04.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently that non-confidential information and documents.

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

09/30 *2022*
 (Date) (Year)

Det. M. H. [Signature]

 (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.

R-2-03
 (Magisterial District Court Number)

[Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-303-2022</i>	Date Filed: <i>09/13/22</i>	OTN/LiveScan Number <i>R 364154-0</i>	Complaint/Incident Number 22AT022 /PA21420227
Defendant Name:	First: PETER	Middle: PAUL	Last: TAYOUN

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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Det. Mark Murray / TFC. Torres

 (Signature of Affiant)

Sworn to me and subscribed before me 30th day of

SEPTEMBER 2022

9/30/2022 Date

_____, Magisterial District Judge

My commission expires first Monday of January, 2024





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number: CR-303-2022	Date Filed: 09/30/22	OTN/LiveScan Number R 364154-0	Complaint/Incident Number 22AT022 /PA21420227
Defendant Name:	First: PETER	Middle: PAUL	Last: TAYOUN

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


(Signature of Affiant)