COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. DEFENDANT: (NAME and ADDRESS): MDJ: Hon, DAVID H. JUDY, Esq. **AUTO** SALES Address: 50 Canal Street A2Z First Name Middle Name Last Name Royalton, PA 17057 2915 N. 2nd Street Philadelphia, PA 19133 Telephone: (717)944-4463 NCIC Extradition Gode 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 ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Incident Number **Date Filed** Complaint Number OTN/LiveScan Number Docket Number Services? CK-452 2022 121512022 ☐ YES Пио IFS210061 Co-Defendant(s) **GENDER** POB Add'l DOB DOB Middle Name Last Name Gen. First Name ☐ Female AKA RACE ☐ Native American Unknown White Asian Black Unknown ETHNICITY ☐ Hispanic ☐ Non-Hispanic GRY (Gray) SDY (Sandy) BLU (Slue) PLE (Purple) BRO (Brown) RED (Red/Aubn.) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye MAR (Maroon) Color HAZ (Hazel) PNK (Pink) XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO FBI Number MNU Number Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh, Code State Haz Registration Comm'l Veh. School Veh. Reg. Ind. same mat Plate# Sticker (MM/YY) as Def. Make Model Style Color VIN Year 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. X 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] (Subdivision Code) Harrisburg City (Place-Political Subdivision) in DAUPHIN County on or about 2018 - PRESENT [22]

(County Code)



							1989	POL	ICE (CRIMINA	_ (()	MPLAINI
Docket Nun	nber: 1-3022	Date File	l l	ОТ	N/LiveScan	Numl	oer			olaint/Incident 10061	Numbe	r
Defendant l		First:			Middle:			Last				
		A2Z			AUTO			SAL	<u>-E2</u>			-
When there (Set forth a be without more The age of the	e is more tha rief summary of is not sufficien	an one offer f the facts suff nt. In a summa ime of the offe	nse, each of icient to advis iry case, you n ense may be in	ffense she e the defen nust cite the cluded if kr	ould be nur dant of the na specific sect nown. In addit	mbere iture of tion(s) ion, so	d Chrono the offense and subsectial security	logica (s) cha tion(s) / numl	ally, arged. A c of the sta pers and f	atute(s) or ordina inancial informat	tute(s) al nce(s) al	llegedly violated,
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A		onspiracy 3 903			Nι	ımber of	Victims Age 60	or Older	
	5111		(a)(1)	of the	18		1	F	<u> </u>			
	lree	ection	Subsection		PA Statute	(Title)	Counts		Grade	NCIC Offense Code	UC	R/NIBRS Code
PennDO		Accident Numi	oer				Interstate	1		Safety Zone	(☐ Work Zone
(if appli Statute De		lude the na	ıme of statu	te or ordi	nance): DE	ALING	IN PROCE	EDS	OF UNLA	WFUL ACTIVIT	Y	
degree if the proceeds of u agent, repeat	Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), 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, by and through its agent, 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.											
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A		onspiracy 3 903			No	mber of	Victims Age 60	or Older	
□ 02	4117		(a)(1)	of the	18	7 - <u>13 - 1</u>	1	F3	,			
Lead? Offer		ection	Subsection		PA Statute	(Title)	Counts		Grade	NCIC Offense Code	UC	R/NIBRS Code
PennDO (if appli	マニマ きゅうこん こい ほしん	Accident Num	ber	-			Interstate			Safety Zone	1	☐ Work Zone
Acts of the intent to defrathe government	aud a State of I ent agency a do	sociated wi ocal government that o	th this Offer ent agency, na ontained false,	nse: The d mely, PA Do , incomplete	efendant, by a eptartment of e or misleadin	and thro Transp g inforr	ough its age ortation (Pe nation conc	ent and ennDO erning	T), file, pr a fact or	person(s), did kn resent or cause to thing material to	be filed the age	l or presented to ncy's
which is requ	ired or filed in r	esponse to an	agency's requ	iest; to wit:	the defendan	it, by ai	nd through	its age	ent, knowl	ngly and with int and information	ent to de	
Inchoate Offense	☐ Attemp 18 901		Solicitation 18 902 A		Conspiracy 8 903		Num	iber of	f Victims	Age 60 or Older	•	
	3 411	7	(a)(2)	of the	18		1		F3			
	ffense# OT Data	Section Accident	Subsection	[1000000][6000000]	PA Statute	e (Title)	Count	.s.	Grade	NCIC Offense	Code	UCR/NIBRS Code
(if app	licable)	Number					☐ Intersta			Safety Zone		☐ Work Zone
Statute De	scription (inc	lude the na	nme of statu	ite or ordi	nance): IN :	SURAN	ICE FRAUD)				
defraud an in- incompleted o	surer,did presei or misleading in	nt or cause to formation con-	be presented t cerning a fact	to an insure or thing ma	r a statement terial to the ir	formin nsuranc	g a part of, e claim; to	or in : wit: th	support of ie defenda	person(s), did, kn f, an insurance cl ant, by and throu made in support	aim that gh its ag	ent and/or



Complaint/Incident Number Docket Number: Date Filed: OTN/LiveScan Number CR 452-2022 JFS210061 First: Middle: Last: Defendant Name: A2Z **AUTO SALES** ☐ Attempt Inchoate □ Solicitation Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the 1 F3 04 4117 (a)(3)18 NCIC Offense Code UCR/NIBRS Code Offense# Section Subsection PA Statute (Title) Counts Grade Lead? PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): INSURANCE FRAUD Acts of the accused associated with this Offense: The defendant, by and through its agent and/or its salesperson(s), Knowingly and with the intent to defraud any insurer or self-insured, assists, abets, solicits or conspires with another to prepare or make any statement that is intended to be presented to any insurer or self-insured in connection with, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim, including information which documents or supports an amount claimed in excess of the actual loss sustained by the claimant to wit: the defendant, by and through its agent and/or salesperson(s), did knowingly and with the intent to defraud aninsurer, made material statement(s) intended to be presented to the insurer in connection with and/or in support of an insurance claim that contained false and/or incomplete and/or misleading information. Inchoate ☐ Solicitation Attempt ☐ Conspiracy Number of Victims Age 60 or Older 18 903 Offense 18 901 A 18 902 A of the 1 Γ 05 4117 (b)(4)18 53 M Offense# NCIC Offense Code UCR/NIBRS Code Lead? Subsection PA Statute (Title) Counts Section PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate (if applicable) Number Statute Description (include the name of statute or ordinance): INSURANCE FRAUD Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), may not knowingly and with intent to defraud any insurance company, self-insured or other person file an application for insurance containing any false information or conceal for the purpose of misleading information concerning any fact material thereto; to wit: the defendant, by and through its agent and/or salesperson(s), knowingly and with intent to defraud an insurance company, filed an application for insurance containing false and/or misleading information to conceal any fact material to the insurance company Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 902 A 18 903 18 901 A Offense of the 06 3922 18 1 F3 (a)(1)Offense# PA Statute (Title) NCIC Offense Code UCR/NIBRS Code Lead? Subsection Counts Grade PennDOT Data Accident Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), did knowingly and with the intent to obtain or withhold property of another by deception, created or reinforced a false impression, including false impressions as to law, value, intention or other state of mind; to wit; the defendant, by and through its agent and/or salesperson(s), did present or cause to be presented false, incomplete or misleading information material to the issuance of reconstructed title(s) by Penn DOT, for salvaged out-of-state vehicle(s) that were never present for repairs within the Commonwealth of Pennsylvania as purported within MV426B vehicle title applications.



Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number IFS210061												
Defendant Name:	First: A2Z	Middle: AUTO	Last: SALES									
<u> </u>	(*) R22	7 7010	JACES									
Inchoate		☐ Conspiracy 18 903	Number of Victin	ns Age 60 or Older								
□ 0 7 410	(a)(3)	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 ———		☐ Interstate	☐ Safety Zone	☐ Work Zone							
Statute Description (i	nclude the name of state	ute or ordinance): FORGERY										
A.A. (64)					2 12 11							
to defraud or injure anyon	e, or with knowledge that he i	nse: The defendant, by and thro is facilitating a fraud or injury to b	e perpretated by anyon	ne, the actor utters any w	riting which he knows							
to be forged in a manner s	pecified in paragraphs (1) or	(2) of this subsection, to wit: the g a fraud, uttered a writing which	defendant, by and thro	ugh its agent and/or sale	sperson(s), with the							
section.	lowledge that he is rachitating	j a naud, uttered a writing winch	tie knows to be jurged	in a manner specific in p	aragraph (2) Or this							
Inchoate												
[] [00 74	21	of the 75	1 641									
08 71	Section Subsection		Counts Grad	e NCIC Offense Code	UCR/NIBRS Code							
PennDOT Data (if applicable)	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone							
	3	ute or ordinance): FALSE AP	PLICATION FOR CER	TIFICATE OF TITLE OF	REGISTRATION							
		nse: The defendant, by and throme or address or makes a mater										
any other material fact in a	in application for a certificate	of title or for a registration, to wi	ti the defendant, by an	d through its agent and/o								
made a material false state	ment and/or concealed any o	ther material fact in an application	n for a certificate of titl	e.								
		TEL Consultant										
Inchoate	pt	Consuracy	Number of Victin	ie Ago 60 or Older								
Inchoate		☐ Conspiracy 18 903	Number of Victin	s Age 60 or Older								
Offense 18 901	A 18 902 A			as Age 60 or Older								
Offense 18 901 09 712 Lead? Offense#	18 902 A 18 902 A (3) Section Subsection	18 903	Number of Victin		UCR/NIBRS Code							
Offense 18 907 09 712 Lead? Offense# PennDOT Data	18 902 A 12 (3)	of the 75 PA Statute (Title)	1 M1		UCR/NIBRS Code ☐ Work Zone							
Offense 18 907 Offense# PennDOT Data (if applicable)	22 (3) Section Subsection Accident Number ———	of the 75 PA Statute (Title)	1 M1 Counts Grade	NCIC Offense Code								
Offense 18 907 O9 712 Lead? Offense# PennDOT Data (if applicable)	22 (3) Section Subsection Accident Number ———	18 903 of the 75 PA Statute (Title)	1 M1 Counts Grade Interstate	NCIC Offense Code								
Offense 18 907 Og 712 Lead? Offense# PennDOT Data (if applicable) Statute Description (i	18 902 A (2) (3) Section Subsection Accident Number — nclude the name of state associated with this Offe	of the 75 PA Statute (Title) ufe or ordinance): ALTERED nse: The defendant, by and three	1 M1 Counts Grade Interstate FORGED, OR COUN	NCIC Offense Code Safety Zone FERFEIT DOCUMENTS alesperson(s), is guilty of	☐ Work Zone a misdemeanor of the							
Offense 18 907 Lead? Offense# PennDOT Data (if applicable) Statute Description (if the person, certificate of title or any of the person of the person of the person, certificate of title or any of the person of the person of the person, certificate of title or any of the person	Section Subsection Accident Number — nclude the name of state associated with this Offe with fraudulent intent, afters of her document issued or preparation.	of the 75 PA Statute (Title) ute or ordinance): ALTERED unse: The defendant, by and three or forges an assignment of a certilated for issue by the deparment,	1 M1 Counts Grade Interstate FORGED, OR COUNT Ough its agent and/or solicate of title, or an assisto wit: the defendant,	NCIC Offense Code Safety Zone TERFEIT DOCUMENTS alesperson(s), is guilty of gnment or release of a so by and through its agent	☐ Work Zone a misdemeanor of the ecurity interest on a							
Offense 18 907 Lead? Offense# PennDOT Data (if applicable) Statute Description (if the person, certificate of title or any of the person of the person of the person, certificate of title or any of the person of the person of the person, certificate of title or any of the person	Section Subsection Accident Number — nclude the name of state associated with this Offe with fraudulent intent, afters of her document issued or preparation.	of the 75 PA Statute (Title) ute or ordinance): ALTERED nse: The defendant, by and three or forges an assignment of a certification.	1 M1 Counts Grade Interstate FORGED, OR COUNT Ough its agent and/or solicate of title, or an assisto wit: the defendant,	NCIC Offense Code Safety Zone TERFEIT DOCUMENTS alesperson(s), is guilty of gnment or release of a so by and through its agent	☐ Work Zone a misdemeanor of the ecurity interest on a							



Docket Number: CR 452-2022	Date Filed:	OTN/LiveScan Nu	mber Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: SALES
<u> चर्चात्राम् स्थापनायम् । एक्ष्यं कर्त्रः १८५५ । ५५५० । १५</u>	7,22	7.010	
Inchoate		☐ Conspiracy	Number of Victims Age 60 or Older
Offense 18 901 /	4 18 902 A	18 903	
□ 10 490 ⁴	· \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	of the 18	1 M3 M3
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Tit	
(if applicable)	Number	or ordinance): UNCM	☐ Interstate ☐ Safety Zone ☐ Work Zone DRN FALSIFICATION TO AUTHORITIES
Statute Description (inc.	lude the hame of statute t	or ordinance). SNSW	ORN FALSIFICATION TO AUTHORITIES
Acts of the accused ass	ociated with this Offense	: The defendant, by and	hrough its agent and/or salesperson(s), made a written false statement
which he did not believe to be	e true, on or pursuant to a form	bearing notice, authorize	d by law, to the effect that false statements made therein are
			course of criminal conduct, in which he knowingly and intentionally tements which he did not believe to be true.
Inchoate	Solicitation 18 902 A	⊠ Conspiracy 18 903	Number of Victims Age 60 or Older
	(a)(1) o	fithe 18	1 F1 - 1
Lead? Offense# S	ection Subsection	PA Statute (Title	
PennDOT Data (if applicable)	Accident		☐ Interstate ☐ Safety Zone ☐ Work Zone
	lude the name of statute	or ordinance): CRIMI	NAL CONSPIRACY -DEALING IN PROCEEDS OF UNLAWFUL
	ociated with this Offense	' The defendant by and i	hrough its agent and/or salesperson(s), with intent of promoting of
facilitating the commission of	one or more of the following cr	imes: Dealing in Proceeds	of Unlawful Activity, Washing Vehicle Titles, Deceptive Business
Practices, Tampering with Pul	blic Records or Information, Fals (s) and / or business(es) that th	se Application for Certifica nev or one or more of the	te of Title or Registration, and Unsworn Falsification to Authorities, did n will engage in conduct which constitutes such crime(s) or an attempt
or solicitation to commit such	crime(s); to wit; the defendant	t, by and through its agen	t and/or salesperson(s), did agree with one or more individuals, that one
or more would engage in con- engaged in an overt act in pu		nentioned crime(s), or an	attempt or solicitation to commit such crime(s). One or more of them
Inchoate		Conspiracy	Number of Victims Age 60 or Older
Offense 18 901 /	4 18 902 A	18 903	
☐ 12 911		of the 18	1 F1 e) Counts Grade NCIC Offense Code UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Section Subsection Accident Number ———	PA Statute (Tit	e) Counts Grade NCIC Offense Code UCR/NiBRS Code Interstate Safety Zone Work Zone
	lude the name of statute	or ordinance): corru	PT ORGANIZATIONS
			only person who has received any income derived, directly or indirectly,
proceeds of such income, in t	he acquisition of any interest in	, or the establishment or	to use or invest, directly or indirectly, any part of such income, or the operation of, any enterprise, to wit: the defendant, by and through its
agent and/or salesperson(s),		e derived, directly or indi	ectly, from a pattern of racketeering activity and used, directly or
munectly, any part of this inc	отне апауот на ргосееаѕ ю оре	I ale MAL,	



	t Number:	1	e Filed: 5_ 3033	OTN/LiveScan I	Number		Complaint/Incident Nu IFS210061	mber
CANNA	lant Name	First:		Middle:		Last:		
		": A2Z		AUTO		SAL	<u>ES</u>	
Incho Offen		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	1	Number of V	/ictims Age 60 or Older	
Lead?	13 Offense#	911 Section	(b)(2) Subsection	of the 18	itle) C	ounts C	Srade NCIC Offense Code	UCR/NIBRS Code
Per	nDOT Da applicable	ta Accid	lent		☐ Inte		☐ Safety Zone	☐ Work Zone
			- 175 V 0.05	or ordinance); CORR	UPT ORGA	NIZATION	S	
	•	•		•				
maintain,	directly or i	indirectly, any inte	erest in or control of a	e: It shall be unlawful for ny enterprise; to wit: the ctly, interest in or control	e defendant,	by and thro	attern of racketeering activity ugh its agent and/or salesper	to acquire or son(s) through a
Incho Offen	TOTAL SECTION 1	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	1	Number of V	/ictims Age 60 or Older	
Lead?	14 Offense#	911 Section	(b)(3)	of the 18	1	F1	Grade NCIC Offense Code	UCR/NIBRS Code
Per	nDOT Da	ta Accid	lent .	1 A Gladid (1	☐ Inte		☐ Safety Zone	☐ Work Zone
	applicable Descripti		7	or ordinance): CORR	UPT ORGA	NIZATION	S	
participat agent and	e, directly o	r indirectly, in the erson(s), was an c	conduct of such ente	rprise's affairs through a	pattern of	racketeering	y or associated with any ente activity, to wit: the defendant I the enterprise's affairs throu	, by and through its
Inchc Offer		Attempt 18 901 A	Solicitation	☐ Conspiracy		Number of	Victims Age 60 or Older _	
	15	911	(b)(4)	of the 18		T F		
Lead?	Offenser	¥ Section	Subsection	PA Statute		Counts	Grade NCIC Offense Cod	e UCR/NIBRS Code
	nnDOT Da applicabl		ident mber ———		☐ In	terstate	☐ Safety Zone	☐ Work Zone
			<u> </u>	or ordinance): CORR	UPT ORGA	NIZATION	S	I
(2), or (3) of this sub	section. To wit: t	d with this Offense he defendant, by and esections (1), (2), and	through its agent and/or	any persor salespersor	i to conspire n(s), conspir	to violate any of the provision ed with other individuals to er	ns of paragraphs (1), Igage in a pattern of



Docket Number: CR-45 J-3032	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	A2Z	AUTO	SALES

- 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 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.)

(Date)

(Year)

AND NOW, on this date

Lawher to, 7072 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.

(Notice of Affiant)

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

Docket Number: CR-453 3032	Date Filed: 131513033	0	TN/LiveScan Number		Complaint/incident Number IFS210061
	First:		Middle:	Last:	
Defendant Name:	A2Z		AUTO	SALE	ES

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title

Docket Number: CR 457 3032	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	A2Z	AUTO	SALES

- 37. J&J Car & Truck Sales LLC
- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- 42. Docuservices
- 43, Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45, Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

My commission expires first Monday of January

day of

(Signature of Affiant)

mper

Magisterial Clauses and ge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon, DAVID H. JUDY, Esq. **AUTO** Address: 50 Canal Street ABBY Middle Name Last Name First Name Ge Royalton, PA 17057 608 Torresdale Avenue Philadelphia, PA 19149 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. D-Misdemeanor No Extradition 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 **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? 121512622 □ NO ☐ YES IFS210061 Co-Defendant(s) GENDER Add'I DOB DOB ☐ Male Middle Name Last Name Gen. First Name ☐ Female AKA RACE White Black Native American Unknown Asian Hispanic ETHNICITY ☐ Non-Hispanic Unknown BRO (Brown) BLU (Blue) RED (Red/Aubn.) SDY (Sandy) PLE (Purple) GRY (Gray) Hair ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) BLK (Black) Color BLN (Blonde / Strawberry) BRO (Brown) GRN (Green) GRY (Gray) BLK (Black) BLU (Blue) Eve HAZ (Hazel) MAR (Maroon) PNK (Pink) Color XXX (Unknown) MUL (Multicolored) DNA **DNA Location** WEIGHT (lbs.) □ NO FBI Number **MNU Number** Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Reg. State Haz Registration Comm'l Veh. Ind. same mat Plate # Sticker (MM/YY) 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER <u> 737643/BADGE # 736</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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] (Subdivision Code) Harrisburg City (Place-Political Subdivision) in DAUPHIN County on or about 2018-PRESENT [22]

(County Code)



							水糖的 , L	UL		PKIMINAL	· COM	PLAINI
Docket Nur	nber: 5-3011	Date File	Filed: OTN/LiveScan Number				er			laint/Incident I 10061	Number	-
Defendant	\$40,245,200 \$0,000 rdgr	First:	100/01		Middle:			Last:	<u> </u>			
		ABBY			AUTO							
When ther (Set forth a b without more The age of th	e is more tha <i>rief</i> summary of , is not sufficien	n one offen the facts suffi it. In a summa me of the offe	ise, each of icient to advis ry case, you n nse may be in	ffense sho e the defen nust cite the cluded if kr	Ould be nu dant of the n specific se- lown. In add	imbere ature of ction(s) a ition, soc	d chronolo he offense(s nd subsecti ial security	ogical s) char on(s) c numbs	lly. rged. A c of the sta ers and fi	allegedly viol itation to the stat tute(s) or ordinar inancial informati	ute(s) allege ice(s) allege	dly violated, dly violated.
Inchoate Offense	☐ Attempt 18 901 A	, 	Solicitation 18 902 A		onspiracy 3 903			Nun	nber of '	Victims Age 60 o	r Older _	
	5111		(a)(1)	of the	18		1	F1	.			
Lead? Off	ense Se	ction	Subsection		PA Statute	: (Title)	Counts	G	irade	NCIC Offense Code	UCR/NI	BRS Code
PennDC (if appli		ccident Numb	er				Interstate			Safety Zone	□v	/ork Zone
		lude the na	me of statu	te or ordí	nance): D i	EALING	IN PROCEE	EDS O	F UNLA	WFUL ACTIVITY	′	
proceeds of agent, Mohar activity with the activ	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, by and through its agent, Mohammad Alkurdi, 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. Inchoate Attempt Solicitation Conspiracy Number of Victims Age 60 or Older											
Offense	18 901 A		18 902 A		3 903							
□ 02	4117		(a)(1)	of the	18		1	F3				
		ction	Subsection		PA Statute	e (Title)	Counts	G	irade	NCIC Offense Code	UCR/NI	BRS Code
PennDC (if appli	icable)	Accident Numb		-			Interstate			Safety Zone	v	Vork Zone
Acts of the to defraud a government a approving or or filed in res	State of local go agency a docum disapproving a r ponse to an age	sociated wit vernment age ent that conta motor vehicle incy's request;	h this Offer ncy, namely, f ined false, inc insurance rate to wit: the de	1Se: The d PA Deptartr omplete or filing, a ma efendant, by	efendant, by nent of Tran misleading in otor vehicle i y and throug	and throsportation formation is a general transportation for the second	ugh its ager (PennDOT n concernin transaction nt, Mohamm), file, g a fac or oth ad Alk	present of t or thin er motor curdi, kno	Alkurdi, did know or cause to be file g material to the vehicle insurance wingly and with i and information p	ed or present agency's del action which action which	ted to the termination in th is required raud the PA
Inchoate	☐ Attemp		Solicitation 18 902 A		Conspiracy 8 903		Numb	er of \	Victims	Age 60 or Older		
Offense			i	Taxina de la constante de la c	8			7_	-			
	03 4117 Offense#	Section	(a)(2) Subsection	of the	18 PA Statu	te (Title)	Counts	[F:	ර Grade	NCIC Offense (ode UC	R/NIBRS Code
PennD	OT Data ilicable)	Accident Number	3 3				☐ Interstate	e] Safety Zone		Nork Zone
	scription (inc		me of statu	te or ordi	nance): I M	ISURAN	CE FRAUD		 -			
defraud an in incompleted o	surer,did presen or misleading inf	it or cause to l ormation cond	be presented terning a fact of	to an insure or thing ma	r a statemer terial to the	nt forming Insuranc	a part of, one claim; to w	or in su <i>i</i> it: the	upport of defenda	Alkurdi, did, know, , an insurance cla nt, by and throug support of an ins	im that cont ih its agent,	ained false, Mohammad

Docket Number: D	ate Filed:	OTN/LiveScan Nu	mber	Complaint/Incident Nu IFS210061	mber						
Defendant Name: Firs		Middle:	Last:								
ABI	BY	AUTO									
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of Vi	ctims Age 60 or Older							
☐ 04 4117 Lead? Offense# Section	(a)(3) of Subsection	the 18 PA Statute (Title)	1 F3	rade NCIC Offense Code	UCR/NIBRS Code						
PennDOT Data Acc	ident ———	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	☐ Interstate	☐ Safety Zone	☐ Work Zone						
Statute Description (include	the name of statute o	r ordinance): INSURA	NCE FRAUD		•						
Acts of the accused associated with this Offense: Knowingly and with the intent to defraud any insurer or self-insured, assists, abets, solicits or conspires with another to prepare or make any statement that is intended to be presented to any insurer or self-insured in connection with, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim, including information which documents or supports an amount claimed in excess of the actual loss sustained by the claimant to wit: the defendant, by and through its agent, Mohammad Alkurdi, did knowingly and with the intent to defraud aninsurer, made material statement(s) intended to be presented to the insurer in connection with and/or in support of an insurance claim that contained false and/or incomplete and/or misleading information.											
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of \	/ictims Age 60 or Older _							
U 05 4117 Lead? Offense# Section		f the 18 PA Statute (Title		8' M Grade NCIC Offense Cod	e UCR/NIBRS Code						
PennDOT Data Ac	coldent	FA dialote (Title	☐ Interstate	☐ Safety Zone	☐ Work Zone						
Statute Description (include		r ordinance): INSURA	INCE FRAUD	<u> </u>							
Acts of the accused associate to defraud any insurance company, misleading information concerning defraud an insurance company, file company.	self-insured or other perso any fact material thereto; t	on file an application for in o wit: the defendant, by	nsurance containing a and through its agent	ny false information or conce , Mohammad Alkurdi, knowin	eal for the purpose of agly and with intent to						
Inchoate	☐ Solicitation 18 902 A	Conspiracy 18 903	Number of Vi	ctims Age 60 or Older							
□ 06 3922	(一)(一)	the 18	1 F3								
	Subsection ident mber ———	PA Statute (Title)	Counts G	rade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone						
Statute Description (include		r ordinance): THEFT I	BY DECEPTION	<u></u>							
Acts of the accused associat to obtain or withhold property of an state of mind; to wit: the defendant information material to MV426B app Commonwealth of Pennsylvania dur	other by deception, create t, by and through its agent plication and documents for	d or reinforced a false in , Mohammad Alkurdi, did r out-of-state vehicle repa	pression, including fa present or cause to b	alse impressions as to law, va ne presented false, incomplet	alue, intention or other ' e or misleading						



	Number (45-34			Filed: 5 13032		ОТ	N/LiveScar	n Nı				Com	plaint/incident No.		AIIT
safety years	ant Nam	美国工工工	First: ABBY				Middle: AUTO				La	st:			
	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	istris en valera	ADDY	Α		L	AUTU								
Incho Offen		Attempt 18 901 A		Solicita 18 902 /			nspiracy 903			Number	r o	f Victims /	Age 60 or Older _		
	07	4101		(a)(3) of	the	18			1		M1			
Lead?	Offense#		ection	Subse	ction		PA Statute	(Title	e)	Counts		Grade	NCIC Offense Cod	e UCR/NIE	RS Code
120 110 110 110 110 110 110 110 110 110	applicab	Signatura (Charles and Charles	Accide Numbe	mag langth						Interstate] Safety Zone	☐ Work	Zone
			ude the	name of	statute o	r ordi	nance): Fo	RGE	ERY						
				\									Alkurdi, is guilty of		
be forged to defrau	d in a man Id and/or l	ner specifie	ed in para that he is	agraphs (1) of facilitating	or (2) of thi	is subs	ection, to wit	: the	e defer	idant, by a	nd	through it	actor utters any wis agent, Mohammad hich he knows to be	l Alkurdi, with	the intent
Inchoate															
П	08	7121		1		f the	75			1	M1				
ے Lead?	Offense		Section	Subs	ection		PA Statut	te (Tit	tle)	Counts	<u>l</u>	Grade	NCIC Offense Co	de UCR/NI	BRS Code
	nnDOT D applicat		Accid Numi	N. 46 T. 18 T.						Interstate	;		☐ Safety Zone	□ Wor	k Zone
					statute o	r ordi	nance): FA	LSE	APPL	ICATION	FC	OR CERTI	CATE OF TITLE	OR REGISTR	ATION
first degr other ma	ee if the p terial fact	erson uses in an appli	a false o	or ficticious r a certificate	name or ade e of title or	dress o for a re	r makes a m	ateri o wit	al false :: the o	e statemen lefendant, l	t, o by	or fails to d and throug	Alkurdi, is guility of isclose a security in the its agent, Moham	terest, or conc	eals any
Incho	ate 🗆 🗀	Attempt		☐ Solicita	ition	☐ Co	onspiracy			Number	ro	of Victims /	Age 60 or Older		
Offen	se	18 901 A		18 902	4	18	903								
	09	7122		(3)	of	the	75			1		M1			
Lead?	Offense#		ection	Subse	ction		PA Statute	(Title	e)	Counts		Grade	NCIC Offense Cod	le UCR/NII	RS Code
- ". " - " - " - "	applicab		Accide Numb	5.77 .37 1				1		Interstate			Safety Zone	☐ Worl	Zone
Acts of	the acc	used ass erson, with	ociated	l with this ent intent, al	Offense: ters or forg	The d	efendant, by assignment o	and of a c	throug ertific	jh its ageni ate of title,	t, I	Mohammad an assigni	Alkurdi, is guilty of ment or release of a	a misdemean security intere	est on a
													ation (Penn DOT), to pared for Issue by P		aldanc, Dy



Docket Number:	Date Filed:	OTN	I/LiveScan Numb	er	Complaint/Incident Num IFS210061	iber
Defendant Name:	First: ABBY		Middle: AUTO	Last:		
						,
Inchoate			onspiracy 903	Number of 1	Victims Age 60 or Older	
□ 10 4904	(b)	of the	18	1 P	11	
Lead? Offense# : PennDOT Data	Section Sul Accident	section	PA Statute (Title)		Grade NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Number —			Interstate	☐ Safety Zone	☐ Work Zone
which he did not believe to be punishable; To wit: the defend	ociated with this true, on or pursual dant, by and throug lept. of Transportati	o Offense: The def nt to a form bearing h its agent, Mohamn on (PennDOT)) form	endant, by and thro notice, authorized by nad Alkurdi, engaged	ugh its agent, Moh law, to the effect in a continuous c	nammad Alkurdi, made a writte t that false statements made the course of criminal conduct, in we ents which he did not believe to	nerein are which he knowingly
Inchoate ☐ Attempt Offense 18 901 A	Solici 18 902		ispiracy 103	Number of V	ictims Age 60 or Older	
11 5111 Lead? Offense# So	(a)(1) of the	18 PA Statute (Title)	1 F1	Stade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —] Interstate	☐ Safety Zone	☐ Work Zone
		f statute or ordin	ance): CRIMINAL	CONSPIRACY -	DEALING IN PROCEEDS OF	UNLAWFUL
facilitating the commission of Practices, Tampering with Pub agree with such other person(or solicitation to commit such	one or more of the lic Records or Infor s) and / or business crime(s); to wit; the t that constitutes the suance of the const	following crimes: De- mation, False Applica (es) that they or one e defendant, by and e aforementioned cr piracy.	aling in Proceeds of lation for Certificate of e or more of them with through its agent, M	Unlawful Activity, f Title or Registrat Ill engage in condu ohammad Alkurdi, It or solicitation to	nammad Alkurdi, with intent of Washing Vehicle Titles, Decept ion, and Unsworn Falsification uct which constitutes such crim did agree with one or more in commit such crime(s). One of	ve Business to Authorities, did le(s) or an attempt dividuals, that one or
Offense 18 901 A			903	Number of	Victims Age 60 or Older	
12 911 Lead? Offense# 5	(b) Section Suf	(1) of the	18 PA Statute (Title)	1 F	I Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident — Number —	iseC((O(1	7	Interstate	Safety Zone	☐ Work Zone
Statute Description (incl		f statute or ordin	ance): CORRUPT	ORGANIZATION	IS	
from a pattern of racketeering proceeds of such income, in the	activity in which sune acquisition of any gaged in and receive	ich person participato interest in, or the e ed income derived, o	ed as a principal, to stablishment or oper directly or indirectly,	use or invest, directation of, any ente	occived any income derived, dir ctly or indirectly, any part of su rprise, to wit: the defendant, b racketeering activity and used,	ich income, or the y and through its

Docket Number: Date Filed: OTN/LiveScan Number CR-U15-2032 1215-13032 IFS210061														
Defenc	lant Nam	e:	First: ABBY			Middle: AUTO			L	.ast:				
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 903			Number	of Vi	ctims /	lge 60 or Older		
	13	911		(b)(2)	of the	18	·		1	F1				
THE REPORT OF THE PARTY OF THE	Offense# InDOT D	ata	ection Accident	Subsection		PA Statute	(Title)		Counts Interstate	G	rade	NCIC Offense Cod Safety Zone	Ţ	CR/NIBRS Code Work Zone
	applicab l Descript		Number Ide the na	me of statut	e or ordin	ance): cor	RUP			ONS				
maintain, pattern o	directly or f racketeer	indirectly,	any interest maintained,	in or control of	any enterp	rise; to wit: tl	he def	end	ant, by and	throu	igh íts a	racketeering activi gent, Mohammad A ation and document	ikurdi, t	hrough a
	Inchoate													
	14	911		(b)(3)	of the	18			1	F1				
	Offenset InDOT D	ata	ection Accident Number	Subsection		PA Statute	(Title)		Counts Interstate	G	rade	NCIC Offense Cod Safety Zone		CR/NIBRS Code] Work Zone
	applicabl Descript			me of statut	e or ordir	ance): cor	RUP	T OF	RGANIZAT.	ONS	5		<u> </u>	
participat agent, Mo	e, directly chammad , ing activity	or indirectly Alkurdi, wa	y, in the conds an operator	duct of such en	terprise's at	fairs through	a pati	tern	of racketee and conduct	ring a ted th	activity, ne enter	ociated with any ent to wit: the defenda prise's affairs throu	nt, by ar	nd through its
	15	911		(b)(4)	of the	18			1	F:				
	Offense nnDOT D applicab	ata	Section Accident Number	Subsection		PA Statut	e (Title		Counts Interstate		Grade	NCIC Offense Co		JCR/NIBRS Code] Work Zone
			ide the na	me of statut	e or ordir	ance): cor	RRUP	TOI	RGANIZAT.	IONS	3			
(2), or (3) of this su	bsection. T	o wit: the de		d through i							e any of the provisi ner individuals to en		

Docket Number: CR 445-3032	Date Filed: 	OTN/LiveScan Number		Complaint/Incident Number IFS210061	
	First:	Middle:	Last:		
Defendant Name:	ABBY	AUTO			

- 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 $\underline{}$.
- 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 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)

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
(R 445-2022)	1215 12032	Nagara yeleki Tilinin da kalanarara		IFS210061
	First:	Middle:	Last:	
Defendant Name:	ABBY	AUTO		

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- Oleg ZELENKO
- 3. David MORRISON
- Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC



Docket Number: R-445-2012	Date Filed: 12 15 13/032	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: ABBY	Middle: AUTO	Last:

- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- 42. Docuservices
- 43. Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

My commission expires first Monday of Jahuary, 20

ku h

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COUNTY OF: DAUPHIN** COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-02-03 VS. **DEFENDANT:** MDJ: Hon. DAVID H. JUDY, ESO. (NAME and ADDRESS): Address: 50 CANAL ST. ROYALTON, PA 17057 **ITTAMA** AUTO SALES First Name Middle Name Last Name 28 N. 16TH ST LEBANON, PA 17042 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 6-Felony Pending Extradition Determ. 2-Felony Limited □ D-Misdemeanor No Extradition 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 Docket Number Date Filed OTN/LiveScan Number Complaint Number Incident Number Services? CR-438 ☐ YES ☐ NO 12/05/2022 IFS210061 GENDER Co-Defendant(s) DOB POB Add'i DOB ☐ Maie Middle Name Last Name First Name Gen. ☐ Female AKA ☐ White ☐ Hispanic RACE ☐ Black ☐ Unknown ☐ Native American Unknown] Asian ETHNICITY Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Pumle) BRO (Brown) Hair BLK (Black) PNK (Pink) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Bionde / Strawberry) GRY (Grav) BLU (Blue) BRO (Brown) GRN (Green) BLK (Black) Eye MAR (Maroon) PNK (Pink) Color HAZ (Hazel) MUL (Multicolored) XXX (Unknown) DNA **DNA Location** WEIGHT (lbs.) ☐ YES ☐ NO FBI Number MNU Number Defendant Fingerprinted YES NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State School Veh. Oth, NCIC Veh. Code Reg. Registration Comm'l Veh. Ind. 🔲 mat П same Plate# Sticker (MM/YY) as Def. VIN Make Model Style Color Year \Box 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). CDAG ROBERT G. LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Date) RACHEL A. STORY (Name of the Affiant) 759307/#583 (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. M 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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) in DAUPHIN County [22] on or about 2018-PRESENT (County Code)

					Jackson L	JLIUL	CLIMMAT	COMPLAIN
Docket Nu	mber: 138-22	Pate Filed: /2/5/ ハン	OTN/Live	Scan Numb	ər		plaint/incident N 210061	lumber
Defendant	Name:	First: AMATTI	Middle AUTO		1	ast: SALES		
Acres (Control of Control of Cont								
When their (Set forth a limit without more The age of the set of t	re is more that brief summary of e, is not sufficient to victim at the ti	n one offense, e the facts sufficient t it. In a summary cas me of the offense m	described below with ach offense should be advise the defendant of e, you must clie the specified by be included if known. Headlished, list only the last	e numbered the nature of the fic section(s) and naddition, soci	chronolog ne offense(s) nd subsection al security n	gically. charged. A n(s) of the st umbers and	citation to the statu atute(s) or ordinan- financial informatic	ite(s) allegedly violated, ce(s) allegedly violated.
Inchoate Offense	Attempt 18 901 A	Solicii 18 902		асу		Number of	Victims Age 60 or	r Older
⊠ 0 1		(b)(1) of the 18		1	F1		
r'ead.	#	ction Subse	ction PA (Statute (Title)	Counts	Grade	NCIC Offense Code	, UCR/NIBRS Code
	OT Data icable)	ocident Number			Interstate		Safety Zone	☐ Work Zone
		lude the name o	f statute or ordinance): CORRUPT	ORGANIZA	rions .		
from a patter proceeds of a received inco	rn of racketeering such income, in t	g activity in which su he acquisition of any ctly or indirectly, fro	s Offense: It shall be un ich person participated as Interest in, or the establi in a pattern of racketeerin	a principal, to o shment or oper	use or invest, ation of, any	directly or le enterprise, l	ndirectly, any part o to wit: the defendar	of such income, or the nt engaged in and
Inchoate	☐ Attempt	☐ Solici		асу	[Number of	Victims Age 60 or	Older
Offense	18 901 A	18 902	A 18 903					
□ 02	911	(b)(2	of the 18		1	F1	NCIC Offense	
	mse# Se DT:Data	ction Subse	ction PA :	Statule (Title)	Counts	Grade	Code	UCR/NIBRS Code
lqqs li)	(cable)	ccident Number	f statute or ordinance		Interstate		Safety Zone	☐ Work Zone
Acts of the	accused assectly or indirectly	sociated with this	Offense; It shall be un control of any enterprise; t	lawful for any p	person throug	gh a paltern	of racketeering acti of racketeering activ	lvity to acquire or vity maintalned, directly
Inchoate Offense	☐ Attemp 18 901 A	t		асу	Numbe	r of Victims	Age 60 or Older	
3.	911	(b)			1	F1		MODELLE DE CALL
PennC	Offense# OOT Data Olicable)	Section Sub Accident Number —	section PA	Statute (Tille)	Counts Interstate	Grade	NCIC Offense Co Safety Zone	ode UCR/NIBRS Code ☐ Work Zone
Statute De Acts of the participate, d	escription (incl e accused ass lirectly or indirect	lude the name or sociated with this sty, in the conduct of	statute or ordinance Offense; It shall be un such enterprise's affairs to nd conducted the enterprise	lawful for any p hrough a patte	person emplo rn of rackete	yed by or as ering activity	, to wit: the defend	enterprise to conduct or dant was an operator

	Number: 438-22		Filed:	OTN/LiveScan	Number		Complaint/Incident Nu IFS210061	mber
	ant Name:	First:		Middle:	***************************************	Last:		
		機関 AMA	11	AUTO		JALE		
						·	e e	
Incho Offen		ttempt 8 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903	Nur	nber of Vi	ctims Age 60 or Older	
	04	911	(b)(4)	Mile 18	11/1	F1		
Lead?	Offense#	Section a Accide	Subsection	PA Statute (1			rade NCIC Offense Code	UCR/NIBRS Gode
(11)	applicable)	Numb	er		Interst	1	☐ Safety Zone	☐ Work Zone
Statute	Description	on (include the	e name or statute of	or ordinance): cor	RUPT ORGAN	IZATION	S	
(2), or (3	the accus) of this sub and/or (3).	ed associated section. To wit: t	l with this Offense he defendant conspired	: It shall be unlawful fo i with other Individuals	or any person b s to engage in a	o conspire o pattern o	to violate any of the provision fracketeering activity in viol	ons of paragraphs (1), ation of subsections
Incho Offer		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	No	ımber of V	fictims Age 60 or Older	
Lead?	05 Offense#	5111 Section	(a)(1) Subsection	of the 18	1 (Title) Cou	F1	Grade NCIC Offense Cod	e UCR/NIBRS Code
the state of the state of	nnDOT Dat applicable	And the second s			☐ Inters	tate	☐ Safety Zone ¹	☐ Work Zone
			name of statute	or ordinance); DEA	LING IN PRO	CEEDS OF	UNLAWFUL ACTIVITIES	
knowledg Intent to	ge that the promote the represented	roperty involved, carrying on of th	Including stolen or illege te unlawful activity. To	gally obtained property	, represents the	e proceeds ed in finano of said unia	f the person conducts a fina of unfawful activity, the per clai transactions with knowled wful activity.	rson acts with the
	06	4118		the 18		F3		
Lead?	Offense#	Section	Subsection	PA Statute (1	ille) Coun		rade NCIC Offense Code	UCR/NIBRS Code
FR. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	inDOT Dat applicable)	the same of the sa			☐ Interst	ate	⊠ Safety Zone	☐ Work Zona
Statute	Description	on (include the	name of statute	or ordinance): was	HING VEHIL	E TITLES		
knowledg made an	ge that the particular for application f	erson is facilititing or a certificate of	g a deception to be pe title for a motor vehic	rpretated by anyone co le which includes mate	oncerning the training the training the training training the training training the training training the training training the training trai	rue mileage clicious inf	If, with the intent to deceive e of a motor vehile, the pers formation to wit: with intent materially false or ficticious	on makes/causes to be to deceive anyone, the

	POI	ICE	CRIMINAL	COMPL	ΔΙΜΊ
13.5		11.	CRUMINAL		AIIV

Docket Number:	Date Filed: / /	OTN/LiveScan N	umber	Complaint/Incident No IFS210061	imber
Defendant Name:	First:	Middle:	l l	ast:	
	AMATTI	AUTO		SALES	
The Property of Control		<u> </u>	7		
Inchoate		Conspiracy 18 903	Number	of Victims Age 60 or Older	
☐ 07 4117 Lead? Offense# S	(a)(1) Section Subsection	of the 18 PA Statute (Title	1 e) Counts	F3 Grade NGIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Accident		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statute	e or ordinance): Insu l	RANCE FRAUD		
namely, PA Deptartment of T false, incomplete or misleadir insurance rate filing, a motor	ransportation (PennDOT), file ng Information concerning a fa vehicle Insurance transaction t, knowingly and with Intent t	 present or cause to be file act or thing material to the or other motor vehicle instruction defraud the PA Dept. of 	ed or presented to agency's determin urance action whic	e intent to defraud a State of loc the government agency a docun ation in approving or disapprovin h is required or filed in response nnDOT), submitted documents to	nent that contained ig a motor vehicle to an agency's
Inchoate		Conspiracy 18 903	Numbe	r of Victims Age 60 or Older	
☐ 08 4101 Lead? Offense#	(a)(3) Section Subsection	of the 18	1 Counts	F2 Grade NCIC Offense Cod	le UCR/NIBRS Code
PennDOT Data (If applicable)	Accident Number	.71 5 4.100	☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statute	e or ordinance): FORG	ERY		
is facilitating a fraud or injury	to be perpretated by anyone, the defendant, with the Inten	, the actor utters any writing to defraud and/or injure	ng which he knows anyone, and/or wil	to defraud or injure anyone, or to be forged in a manner specifi th knowledge that he is facilitatin aph (2) of this section.	ed in paragraphs (1) or
Inchoate ☐ Attempt	☐ Solicitation	☐ Conspiracy	Number	of Victims Age 60 or Older	
Offense 18 901 A	18 902 A	18 903		7.00 L. 11	
	eotion Subsection	of the 75 PA Statute (Title	e) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (incl	lude the name of statute	e or ordinance): FALS E	APPLICATION F	OR CERTIFICATE OF TITLE	
name or address or makes a r	material false statement, or fa	alls to disclose a security in	terest, or conceals	e first degree if the person uses any other material fact in an app cealed any other material fact in	olication for a

\$ 5 C.			CRIMINAL		
(4.00 J.	PUL	ルしと	CKIMINAL	COMPL	AIN I

Docket Number:	Date Filed: / /		veScan Number	1	Complaint/Incident Nun IFS210061	nber
Defendant Name:	First: AMATTI	Mide AU		Last: SALE	S	
The second secon				<u> </u>		**************************************
•						
Inchoate Attemp				Number of \	/iclims Age 60 or Older	***************************************
□ 10 7122	2 (3)	of the 75		1 M	1	
PennDOT Data	Accident	section F	A Statute (Title)	Counts (Grade NCIC Offense Code	UCR/NIBRS Code Work Zone
(If applicable) Statute Description (inc	Number — lude the name o	f statute or ordinand	ce): ALTERED, FO	RGED OR COL	INTERFEIT DOCUMENTS	
Acts of the accused ass	ociated with this	Offense; A person is	guilty of a misdem	eanor of the firs	t degree if the person, with fra	audulent Intent,
alters or forges an assignmen prepared for Issue by the dep	t of a certificate of t	itle, or an assignment or	release of a securi	lty Interest on a	certificate of title or any other	document Issued or
deparmtent.						ş L
,						
Inchoate ☐ Attempt Offense ☐ 18 901 A	Solicit 18 902		racy	Number of Vi	ctims Age 60 or Older	
□ 11 4904		of the 18			M3	
Lead? Offense# S PennDOT Data (if applicable)	ection Subs Accident Number —	ection PA	Statute (Title)	Counts G	Adde NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
Statute Description (Incl	13-14-14-14-14-14-14-14-14-14-14-14-14-14-	f statute or ordinand	e): UNSWORN F	ALSIFICATION	TO AUTHORITIES	4
Acts of the accused ass	ociated with this	Offense: A person co	mmits a misdemea	nor of the third	degree If he makes a written	false statement
which he does not believe to I punishable; to wit: the defend authorized by law, to the effer	lant made a written	false statement to Penni	DOT which he did r	not believe to be	true, on or pursuant to a for	n bearing notice,
		·	,			
			<u> </u>			
Inchoate		itation		Number of V	ictims Age 60 or Older	
☐ 12 4117 Lead? Offense#	1_1	- DAMESTING TO SERVE	A Statute (Title)	1 F3	<u></u>	UCR/NIBRS Code
Lead? Offense# S PennDOT Data (if.applicable)	Section Sub Accident Number —	section P		Counts C Interstate	Grade NCIC Offense Code Safety Zone	☐ Work Zone
Statute Description (incl		f statute or ordinand	e): INSURANCE	FRAUD	<u> </u>	
Acts of the accused ass presented to an Insurer a state						
concerning a fact or thing mail such statements to be made in	terial to the insurance	e claim; to wit: the defe	ndant did make ma	aterially false, in	complete, or misleading states	ments or did cause

Docket Number:	Date Filed:	OTN/LiveScar	1 Number	Complaint/Incident N IFS210061	umber
Defendant Name:	First:	Middle:		Last:	
	AMATTI	AUTO		SALES	
	,				
Inchoate			Numbe	er of Victims Age 60 or Older _	
☐ 13 411	7 (a)(3) of the 18	1 8 5	F3	
Lead? Offense#	Section Subse	3-39-ScoreConstraint	1	Grade NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ——		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of s	tatute or ordinance): ɪns	URANCE FRAUD		
Acts of the accused ass	ociated with this C	Offense: Knowladly and with t	the Intent to defrauc	any insurer or self-insured, assist	ts, abets, solicits or
conspires with another to pre	pare or make any state	ment that is intended to be pro	esented to any insur	er or self-insured in connection wi	th, or in support of, a
supports an amount claimed	n excess of the actual	oss sustained by the dalmant	to wit: the defendan	al to the claim, including informati It did knowingly and with the inter	nt to defraud aninsurer,
made material statement(s) incomplete and/or misleading	ntended to be presente	d to the insurer in connection v	with and/or in suppo	ort of an insurance claim that cont	ained false and/or
indianated and at moderate				A CONTRACT OF THE PARTY OF THE	
Inchoate			Numbe	er of Victims Age 60 or Older	
□ 14 4117			1	M1	
Lead? Offense# PennDOT Data	Section Subse	otion PA Statute		Grade NCIC Offense Cod	
(if applicable)	Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of s	tatute or ordinance): INS	UKANCE FRAUD		
Acts of the accused ass	ociated with this C	ffense: A person may not kn	owingly and with int	tent to defraud any Insurance com	pany, self-insured or
				se of misleading information conce olication for insurance containing f	
Information to conceal any fa			21. (F2015) 11100 +(1 24)		
			•	•	
Inchoate	ot Solicit	ation Conspiracy	Numb	per of Victims Age 60 or Older	
Offense 18 901				Jet Of Victims Age to 0) Older	
□ 1 5 392	2 (a)(1	of the 18	1	F3	
Lead? Offense# PennDOT Data	Section Subs	ection PA Statute	1		
(if applicable)	Number		☐ interstate		☐ Work Zone
Statute Description (inc	ude the name of s	tatute or ordinance): THE	FT BY DECEPTION		
Acts of the accused ass	ociated with this C	ffense: The defendant did kr	nowingly and with th	ie intent to obtain or withhold pro	perty of another by
deception, created or reinfor	ced a false impression,	including false impressions as	to law, value, intent	ion or other state of mind; to wit: n material to an application for ins	the defendant did
breadilt or canse to he blead	CO CO OF THE PROPERTY OF THE CO.	mpany, roise, incomplete of th	जन्द्रवसाष्ट्र सारमावद्यक	ir diareant to an abbidadon for ins	ar array
			1		

Docket Number:	Date Filed:	OTN/LiveScan N	umber	Complaint/Incident	Number
Defendant Name:	First: AMATTI	Middle: AUTO	La: SA	st: ALES LLC	
When there is more that (Set forth a brief summary of without more, is not sufficient The age of the victim at the t	an one offense, e f the facts sufficient t nt. In a summary cas Ime of the offense m	described below with each A ach offense should be numb ach offense should be numb e advise the defendant of the natur e, you must alte the specific section ay be included if known. In addition tablished, list only the last four digit	ered chronologic e of the offense(s) c (s) and subsection(, social security num	cally. harged. A citation to the stat s) of the statute(s) or ordinar nbers and financial informati	ute(s) allegedly violated, nce(s) allegedly violated.
Inchoate	Solici 18 902		N	lumber of Victims Age 60 o	r Older
□ 16 7121		of the 75	10	MI	
Offense	ection Subse	clion PA Statute (Title	لنسكنشل	Grade NCIC Offense	UCRVNIBRS Code
PennDOT Data (if applicable)	Accident Number:		☐ Interstate	☐ Safety Zone	☐ Work Zone
	lude the name o	f statute or ordinance): cons	PIRACY/FALSE AP	PLICATION FOR CERTIFI	CATE OF TITLE, ETC.
following crimes: False Applic business(es) that they or one wit: the defendant did agree	cation for Certificate of or more of them when with one or more industrial would engage in cond	o Offense: The defendant, with in of Title or Registration, Unsworn Fall I engage in conduct which constitute lividuals (of the following: Oleg Zele luct that constitutes the aforemention	sification to Authorit es such crime(s) or a nko, David Morrison	ies, did agree with such othe an attempt or solicitation to o I, Amatti Auto Sales LLC, Nev	r person(s) and / or commit such crime(s); to croad Motors LLC, and/or
Inchoate Attemp Offense 18 901 /			Number o	of Victims Age 60 or Older	
Lead? Offense#		section PA Statute (Tit	le) Counts	Grade NCIC Offense C	ode UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Sun	Section PA Statute (11)	☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name o	statute or ordinance):			,
Acts of the accused ass	sociated with this	Offense:			
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
Inchoate			Number o	of Victims Age 60 or Older	
		of the			
Lead? Offense# PennDOT Data	Section Sub Accident	section PA Statute (Tit		Grade NCIC Offense C	
(If/applicable) Statute Description (inc	Number —	statute or ordinance):	☐ Interstate	☐ Safety Zone	☐ Work Zone
Clatare Description (mo	idde tiis name o	Statute of Oranianos,			
Acts of the accused ass	ociated with this	Offense:			
					ļ
			······································		

Docket Number:	Date Filed: O	TN/LiveScan Number	Complaint/Incident Number
CR-438-12	1215122		IF\$210061
	First:	Middle:	Last:
Defendant Name:	AMATTI	AUTO	SALES

- 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 faisification 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 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.)

	•	SI	A hacke a sing
(Date)	(Year)	_	(Signature of Affiant)
AND NOW, on this date	12/6/22	I certify that the complaint ha	as been properly completed and verified
An affidavit of probable cat	use must be completed befo	ore a warrant can be issued.	
4.2	~ (13	Ja Hall	SUTH OF SELLIN
(MagIsterial District Court)	Number)	(Issuing Authority)	SEAL
			The County of th

Docket Number: CR-438-22	Date Filed: /2/5/22	OTN/LiveScan Number		Complaint/Incident Number IFS210061
Defendant Name:	First:	Middle:	Last:	
	·AMATTI	AUTO	SALE	:5

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.

L.	Igor DRATCH
2.	Oleg ZELENKO

3. David MORRISON

1. Angel MENDEZ

5. Jefferson LOOR VALET

5. Maria PINEDA

7. Indalecia VASQUEZ

3. Somary IBETH Otanez De LOOR

). Beaki Antonia PEREZ

LO. Charlie JIMINAN

11. Margarete ALMSAHAQBEH

L2. Linda SANDOVAL-MARTINEZ-

HERERRA

13. Eulid URENA

L4. Adelalda GARCIA aka Adelalda

MENDOZA

L5. Edward SALDIVAR

16. Alberto LUCIANO

L7. Mohamed KERDI

18. Muhammad ALKURDI

19. Edgar COLLADO

20. Osiris FERNANDEZ GONZALEZ

21. Juana BELEN-VALDEZ

22. Juana BELEN-DEVANGELISTA

23. Rafael SANTIAGO-PACHECO

24. Jean AQUINO

25. Aristeds AQUINO

26. Ahmed LOPEZ

27. Jessica ENGELKE

20 Has now DODDICET Co

28. Jimmy RODRIGEZ Sr.

29. Nora RODRIGUEZ

30. Roberto GOMEZ

31. Amatti Auto Sales LLC

32. Newroad Motors LLC ,

33. Grig LLC

34. Santos Auto Gallery

35. Perfect Touch Auto Repair and Sales LLC

36. Pennsylvania Tag and Title

37. J&J Car & Truck Sales LLC

38. MP Notary and Tags LLC

39. AMCO Auto Sales

40. Charo's Auto Sales

41. A2Z Auto Tags

42. Docuservices

43. Emma's Auto Tags and Multiservices, Inc.

44. Wilfredo Auto Repair

45. Jessica's Auto Tags

46. JM Motors

47. Saldivar Group

48. Abby Auto

49. Carla Mattia LLC

50. G&G Auto Body and Auto Salvage

51. Mendoza Auto Sales

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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

POLICE CRIMINAL COMPLAI

Docket Number:	Date Flied:	OTN/LiveScan Number	Complainblincident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	AMATTI	AUTO	SALES

I, RACHEL A. STORY, 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.

Symptome and subscribed before methis day of December 2022

My commission expires first Monday of January, 2004

SEAL

Searched Stry

(Signature of Afflant)

And December 2022

Magisterial District, Judge

SEAL

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 DEFENDANT: (NAME and ADDRESS): MDJ: Hon, DAVID H. JUDY, Esq. MOTOR SALES Address: 50 Canal Street AMCO First Name Middle Name Ğe Last Name Royalton, PA 17057 2610 Frankford Avenue Philadelphia, PA 19134 Telephone: (717)944-4463 NCIC Extradition Code Type ☐ 5-Felony Pending Extradition ☐ C-Miso ☑ 1-Felony Full C-Misdemeanor Surrounding States ☐ Distance: ☐ 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO 1215 13032 IFS210061 GENDER Co-Defendant(s) DOB Add'l DOB Middle Name Last Name Gen. ☐ Male First Name ☐ Female ΔΚΔ RACE White Unknown Black Native American Asian ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (8lue) PLE (Purple) BRO (Brown) Hair PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLU (Blue) GRY (Gray) BLK (Black) BRO (Brown) GRN (Green) Eye ☐ HAZ (Hazel) PNK (Pink) MAR (Maroon) Color MUL (Multicolored) XXX (Unknown) DNA **DNA Location** WEIGHT (lbs.) ☐ YES ☐ NO FBI Number MNU Number Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code School Veh. 🔲 State Haz Registration Comm'i Veh. Reg. Ind. 🔲 same Plate# mat Sticker (MM/YY) as Def. VIN 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). Robert G. LaBar (Signature of the attorney for the Commonwealth) CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER <u> 737643/BADGE # 736</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (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] Harrisburg City (Place-Political Subdivision) (Subdivision Code) on or about 2018-PRESENT in DAUPHIN County [22] (County Code)



Docket Number:	Date Filed:	OTN/LiveScan N	umber		plaint/Incident I	Number
					210061	
Defendant Name:	First: AMCO	Middle: MOTOR		.ast: 5ALES		
	AMCO	INOTOK		DALLO		
When there is more the (Set forth a brief summary of without more, is not sufficient The age of the victim at the	an one offense, e of the facts sufficient o ont. In a summary cas time of the offense m	described below with each A each offense should be numb to advise the defendant of the natur e, you must cite the specific section ay be included if known. In addition tablished, list only the last four digit	ered chronologe of the offense(s) n(s) and subsection social security n	gically.) charged. A n(s) of the s umbers and	citation to the state tatute(s) or ordinar financial informati	ute(s) allegedly violated, nce(s) allegedly violated.
Inchoate	Solici			Number of	f Victims Age 60 o	r Older
57 [04] [4440						
Ø 01 4118 Offense		of the 18	1	F3	NCIC Offense	
Lead? # S	ection Subse	ction PA Statute (Titl	e) Counts	Grade	Code	UCR/NIBRS Code
(if applicable)	Accident Number		☐ Interstate		Safety Zone	☐ Work Zone
Statute Description (in	clude the name o	f statute or ordinance); was e	ING VEHICLE T	ITLES		
mileage of a motor vehile, t	ne person makes/caus with intent to deceive	or with knowledge that the person is ses to be made an application for a se anyone, the defendant made/caus lation.	certificate of title f	or a motor v	ehicle which includ	les materially false or
Inchoate	☐ Solici 18 902	- , ,	. [Number of	f Victims Age 60 o	r Older
Offense 18 901 A	18 902	2 A 18 903				r Older
Offense) of the 18	1 Counts	Number of	NCIC Offense	ur Older
Offense	(a)(4)) of the 18	e) Counts	58 /12 Grade	NCIC Offense Code	UCR/NIBRS Code
Offense 18 901 A D 02 4107 Lead? Offense# 5 PennDOT Data (if applicable)	(a)(4) ection Subse) of the 18 ction PA Statute (Title	e) Counts ☐ Interstate	58 M2 Grade	NCIC Offense Code Safety Zone	
Offense 18 901 A D	18 902 (a)(4) ection Subset Accident Number clude the name of the sociated with this ell, offer or expose for esperson(s), engaged) of the 18	e) Counts Interstate PTIVE BUSINES: through its agent modities, To wit: onduct in which the	Grade Grade S PRACTICE and/or sale in the course defendant	NCIC Offense Code Safety Zone ES sperson(s) in the code of business, the dot by and through its	UCR/NIBRS Code Work Zone Durse of business, did efendant, by and sagent and/or
Offense 18 901 A Decorporate 18 901 A Offense# 5 PennDOT Data (if applicable) Statute Description (in Acts of the accused as knowingly and with intent set through its agent and/or sal salesperson(s), knowingly and salesperson(s), knowingly an	action Subset Accident Number Clude the name of Subset Subset Subset Accident Number Clude the name of Subset Subs	of the 18 of the 18 of the 18 ction PA Statute (Title of Statute or ordinance): DECEI statute or ordinance): DECEI of Statute or ordinance of Statute or ord	e) Counts Interstate PTIVE BUSINES: through its agent modities, To wit: onduct in which the salvage and reconstitutions.	Grade S PRACTICE and/or sales in the course the defendant structed veh	NCIC Offense Code Safety Zone ES sperson(s) in the code of business, the dot by and through its	UCR/NIBRS Code Work Zone Durse of business, did lefendant, by and sagent and/or Dept. of Transportation
Offense 18 901 A O2 4107 Lead? Offense# 5 PennDOT Data (if applicable) Statute Description (in Acts of the accused as knowingly and with intent st through its agent and/or sal salesperson(s), knowingly ar (PennDOT). Inchoate Attem 18 901 O3 491	action Subset Accident Number Clude the name of Succession Subset	of the 18 ction PA Statute (Title of Statute or ordinance): DECEI Statute or ordinance): DECEI Goffense: The defendant, by and sale adulterated or mislabeled comin a continuing course of criminal citted fraudulent applications for PA statute or ordinance or page 18 903 (1) of the 18	e) Counts Interstate PTIVE BUSINESS through its agent modities. To wit: onduct in which the salvage and reconstitutes. Number	Grade S PRACTIC and/or sale in the course ne defendant structed veh	NCIC Offense Code Safety Zone ES Sperson(s) in the code of business, the did to by and through its icle titles to the PA Age 60 or Older	UCR/NIBRS Code Work Zone Durse of business, did lefendant, by and sagent and/or Dept. of Transportation
Offense 18 901 A Dead? Offense# 5 PennDOT Data (if applicable) Statute Description (in Acts of the accused as knowingly and with intent strough its agent and/or sal salesperson(s), knowingly ar (PennDOT). Inchoate Data Offense 18 901 Lead? Offense# PennDOT Data	action Subset (a)(4)	of the 18 ction PA Statute (Title of Statute or ordinance): DECEI S Offense: The defendant, by and sale adulterated or mislabeled comin a continuing course of criminal citted fraudulent applications for PA statute or ordinance of the defendant of the defendan	e) Counts Interstate PTIVE BUSINESS through its agent modities. To wit: onduct in which the salvage and reconstitutes. Number	Grade Grade Grade S PRACTIC and/or sale in the course the defendant structed veh or of Victims F3 Grade	NCIC Offense Code Safety Zone ES Sperson(s) in the code of business, the dot by and through its icle titles to the PA	UCRINIBRS Code Work Zone Durse of business, did efendant, by and sagent and/or Dept. of Transportation
Offense 18 901 A Dead? Offense# 5 PennDOT Data (if applicable) Statute Description (in Acts of the accused as knowingly and with intent sthrough its agent and/or sal salesperson(s), knowingly ar (PennDOT). Inchoate Data 18 901 Inchoate Data (if applicable)	action Subset Accident Number Clude the name of the sociated with this ell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this ell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this ell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this ell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this ell, offer or expose for	of the 18 ction PA Statute (Title Statute or ordinance): DECEI Statute or ordinance): DECEI Goffense: The defendant, by and sale adulterated or mislabeled comin a continuing course of criminal crited fraudulent applications for PA statute (Title PA Statute (Tit	e) Counts Interstate PTIVE BUSINESS through its agent modities. To wit: onduct in which the salvage and reconstitute of the	Grade Grade Grade Grade Grade Grade Grade Grade Grade	NCIC Offense Code Safety Zone ES Sperson(s) in the code of business, the dot by and through its icle titles to the PA Age 60 or Older NCIC Offense C	UCR/NIBRS Code Work Zone Durse of business, did efendant, by and sagent and/or Dept. of Transportation UCR/NIBRS Code UCR/NIBRS Code
Offense 18 901 A Dead? Offense# 5 PennDOT Data (if applicable) Statute Description (in Acts of the accused as knowingly and with intent sthrough its agent and/or sal salesperson(s), knowingly ar (PennDOT). Inchoate Data 18 901 Inchoate Data 491 Lead? Offense# PennDOT Data (if applicable)	action Subset Accident Number Clude the name of associated with this cell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this cell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this cell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this cell, offer or expose for esperson(s), engaged and intentionally submit of the sociated with this cell, offer or expose for expose f	of the 18 ction PA Statute (Title of Statute or ordinance): DECEI Statute or ordinance): DECEI Goffense: The defendant, by and sale adulterated or mislabeled comin a continuing course of criminal citted fraudulent applications for PA statute or ordinance or page 18 903 (1) of the 18	e) Counts Interstate PTIVE BUSINESS through its agent modities. To wit: onduct in which the salvage and reconstitute of the	Grade Grade Grade Grade Grade Grade Grade Grade Grade	NCIC Offense Code Safety Zone ES Sperson(s) in the code of business, the dot by and through its icle titles to the PA Age 60 or Older NCIC Offense C	UCR/NIBRS Code Work Zone Durse of business, did efendant, by and sagent and/or Dept. of Transportation UCR/NIBRS Code UCR/NIBRS Code



Docket Number:	Date Filed:	OTN/LiveSo	an Number		Complaint/Incident No IFS210061	
Defendant Name:	First: AMCO	Middle: MOTOF	₹	Last:		
make a false entry in, or required by law to be kep	false alteration of, any i t by others for informat	s Offense: The defendant, I ecord, documents or thing be ion of the government; To wit cuments, or things belonging	longing to, or rece the defendant, b	ived or kept y and throu	by, the government for info gh its agent and/or salespe	ormation or record, or
Inchoate		, -	N	ımber of Vi	ctims Age 60 or Older	
O4 71	1 _ 1	of the 75	1 ute (Title) Co	M1	ade NCIC Offense Code	uCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —		☐ Inter	1	☐ Safety Zone	☐ Work Zone
	include the name o	of statute or ordinance):	FALSE APPLICA	TION FOR O	CERTIFICATE OF TITLE C	OR REGISTRATION
the first degree if the pers	son uses a false or fiction an application for a cer	s Offense: The defendant, to ious name or address or make tificate of title or for a registration any other material fact in articles.	es a material false ition, to wit: the d	statement, o efendant, by	or fails to disclose a security and through its agent and,	/ interest, or conceals
Inchoate	empt		/ N	lumber of V	ictims Age 60 or Older	
		(1) of the 18	1		M/F/	
Lead? Offense# PennDOT Data	Section Su Accident Number	bsection PA Sta	tute (Title) C		Grade NCIC Offense Coo ☐ Safety Zone	ie UCR/NIBRS Code ☐ Work Zone
(if applicable) Statute Description (ACTIVITIES, ETC	Control of the Contro	of statute or ordinance):	CRIMINAL CON	PIRACY-I	DEALING IN PROCEEDS	OF UNLAWFUL
Acts of the accused facilitating the commission Practices, Tampering with agree with such other per or solicitation to commit s	n of one or more of the Public Records or Infor son(s) and / or busines uch crime(s); to wit; th conduct that constitute	S Offense: The defendant, it following crimes: Dealing in Praction, False Application for 6 (es) that they or one or more defendant, by and through its the aforementioned crime(s) piracy.	roceeds of Unlawf Certificate of Title e of them will enga ts agent and/or sa	ul Activity, V or Registrati ge in condu lesperson(s)	Vashing Vehicle Titles, Dece on, and Unsworn Falsification of which constitutes such on the did agree with one or mon	eptive Business on to Authorities, did rime(s) or an attempt re individuals, that one
Inchoate			Ni	ımber of Vid	ctims Age 60 or Older	
□ 06 91			1	F1		NODA SIDE CO.
Lead? Offense# PennDOT Data (if applicable)	Section Sub-	section PA State	ute (Title) Cor		ade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
		f statute or ordinance):	CORRUPT ORGA	NIZATION	S	
participate, directly or ind	irectly, in the conduct o	s Offense: It shall be unlaw f such enterprise's affairs thro d/or was associated with a vel	ugh a pattern of r	acketeering	activity, to wit: the defenda	nt, by and through its



	Number: -457- 8		Date File		ОТІ	N/LiveScan	Numb	er .		Com	plaint/Incident 10061		
7575250 Broad	ant Name	Fir	st:	1000		Middle: MOTOR			Las				<u></u>
		All All	ЧСО			MOTOR			SAI	LE9			
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 1903		Num	ber o	f Victims	Age 60 or Older		
Lead?	07 Offense#	911 Secti		(b)(4) Subsection	of the	18 PA Statute ((Tille)	1 Count		F1 Grade	NCIC Offense	Code	UCR/NIBRS Code
Per (if	nnDOT Da applicable	ta / /	Accident Number	7 3 3 4			Ε] Intersta	te		☐ Safety Zone	Odde	Work Zone
Statute	Descripti	on (include	the na	ne of statut	e or ordir	nance): cor	RUPT (ORGANIZ	ZATIC	N			
(2), or (3) of this sul	section. To v	vit: the de	n this Offens fendant, by an ons (1), (2), ar	d through i	be unlawful fo ts agent and/o	or any p or sales	erson to o person(s),	conspi consp	ire to viola pired with	te any of the pro other individuals	visions o to enga	of paragraphs (1), ge in a pattern of
Incho Offen		Attempt 18 901 A	,	Solicitation 8 902 A	☐ Con 18 9	nspiracy 903		Numb	er of	Victims A	ge 60 or Older		
					of the								
- 57 A 2 C (But 11)	Offense# InDOT Dat	the first of the first of the second	ccident	Subsection		PA Statute (T		Counts		Grade	NCIC Offense C Safety Zone	7	UCR/NIBRS Code Work Zone
	applicable Descripti		umber the na	ne of statut	e or ordir	nance):							
Acts of	the accus	sed associ	ated will	this Offen	se:		,,1.000 <u></u> ,1.000						
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 903		Num	iber o	of Victims	Age 60 or Older		
Lead?	Offense#	Secti	ion.	Subsection	of the	PA Statute ((Title)	Count		Grade	NCIC Offense	Code	UCR/NIBRS Code
Pei	nnDOT Da	ta /	Accident Number	Supsection		FA Statute] Intersta		7	☐ Safety Zone	Joue	☐ Work Zone
				ne of statut	e or ordir	nance):		,	<u> </u>			- <u></u>	
Acts of	the accu	sed associ	ated wit	n this Offen	se;	, , , , , , , , , , , , , , , , , , , ,							
Ĺ								<u></u>					



Dogket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-451-8082	12/5/2013	The state of the s	IFS210061
	First:	Middle:	Last:
Defendant Name:	AMCO	MOTOR	SALES

- 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 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.)

		MAIIATO
		011/194
(Date)	(Year)	(Signature of Affiaht)
AND NOW, on this date	December 6, 2022	I certify that the complaint has been properly completed and verified.
An affidavit of probable ca	ause must be completed before a warra	nt/can be issued.
12-2-0	03	Muly Service And Distriction
(Magisterial District Court	Number) (Issuing	Adthority)

Docket Number: CR-45+2032	Date Filed: 12151 2082	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	AMCO	MOTOR	SALES

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.	Igor DRATCH
2.	Oleg ZELENKO
3.	David MORRISON
4.	Angel MENDEZ
5.	Jefferson LOOR VALET
6.	Maria PINEDA
7.	Indalecia VASQUEZ
8.	Somary IBETH Otanez De LOOR
9,	Beaki Antonia PEREZ
10.	Charlie JIMINAN
11.	Margarete ALMSAHAQBEH
12.	Linda SANDOVAL-MARTINEZ-HERERRA
13.	Eulid URENA
14.	Adelaida GARCIA aka Adelaida MENDOZA
15.	Edward SALDIVAR
16.	Alberto LUCIANO
17.	Mohamed KERDI
18.	Muhammad ALKURDI
19.	Edgar COLLADO
20.	Osiris FERNANDEZ GONZALEZ
21.	Juana BELEN-VALDEZ
22.	Juana BELEN-DEVANGELISTA
23.	Rafael SANTIAGO-PACHECO
24.	Jean AQUINO
25.	Aristeds AQUINO
26.	Ahmed LOPEZ
27.	Jessica ENGELKE
28.	Jimmy RODRIGEZ Sr.
29.	Nora RODRIGUEZ
30.	Roberto GOMEZ
31.	Amatti Auto Sales LLC
32.	Newroad Motors LLC
33.	Grig LLC
34.	Santos Auto Gallery
35.	Perfect Touch Auto Repair and Sales LLC
36.	Pennsylvania Tag and Title
37.	J&J Car & Truck Sales LLC

(Signature of Affiant)

Docket Number:	Date Filed: 1 2 15 12033	OTN/LiveScan Number	Complaint/incident Number JFS210061
	First:	Middle:	Last:
Defendant Name:	AMCO	MOTOR	SALES

38.	MP Notary and Tags LLC
39.	AMCO Auto Sales
40.	Charo's Auto Sales
41.	A2Z Auto Tags
42.	Docuservices
43.	Emma's Auto Tags and Multiservices, Inc.
44.	Wilfredo Auto Repair
45.	Jessica's Auto Tags
46.	JM Motors
47.	Saldivar Group
48.	Abby Auto
49.	Carla Matia LLC
50.	G&G Auto Body and Auto Salvage
51.	Mendoza Auto Sales

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 All day of becember

/d /6/3632Date , Magisterial District Judge

My commission expires first Monday of January,

CONTRACTOR ALIBERTAL		POLICE CRIMINAL COMPLAINT							
COUNTY OF:DAUPHIN		COMMONWEALTH OF PENNSYLVANIA VS.			A				
Magisterial District Number: 12-2-03 MDJ: Hon, DAVID H. JUDY, Esq.	DEFENDANT:		(NAME and ADDRESS):						
Address: 50 Canal Street	CARLA MATIA	AUTO SALES, INC.							
Royalton, PA 17057	First Name	Middle	Name Last No		Gθ				
	3949 Kensingt	on Avenue							
Telephone: (717)944-4463	Philadelphia, P								
	NCIC Extradition Code nding Extradition	Type C Mindomonnor Sur	ounding States						
1	-	C-Misdemeanor Surrounding States							
☐ 3-Felony Surrounding States ☐ A-Misdemea		E-Misdemeanor Pen							
☐ 4-Felony No Extradition ☐ B-Misdemea	nor Limited	F-Misdemeanor Pen	ling Extradition						
DI	EFENDANT IDENTIFICATION	NFORMATION			iezekeen				
	OTN/LiveScan Number	Complaint Number	Incident Number	Request Lab Services?	ļ				
CV-44622 1215122		IFS210061		[] YES [] NO				
GENDER DOB / POB		Add'I DOB	<u> </u>	Co-Defendant					
│	Middle Name		Last Name		Gen.				
☐ Female AKA									
RACE White Asian	☐ Bia n-Hispanic ☐ Uni	ck 🔲	Vative American	Unknown					
☐ GRY (Gray) ☐ RED (Red/Aubn.)			(Purple)	BRO (Brown)					
Hair ☐ BLK (Black) ☐ ONG (Grange)	☐ WHI (White) ☐ XX	X (Unk./Baid) GRI	l (Green)	PNK (Pink)	,				
BLN (Blonde / Strawberry) Eve BLK (Black) BLU (Blue)	☐ BRO (Brown)	GRN (Green)	m.	GRY (Gray)					
Eye ☐ BLK (Black) ☐ BLU (Blue) Color ☐ HAZ (Hazel) ☐ MAR (Maroon)	PNK (Pink)	MUL (Multicolored)		XX (Unknown)					
DNA		ET MOE (Mallionored)		WEIGHT (bs.)				
FBI Number	MNU Number			1					
Defendant Fingerprinted YES NO				Ft. HEIG	HT dn. 🕍				
Fingerprint Classification:									
State Haz	DE: MINDINI (E17, VALUE 17, 17, 10		ool Veh. Oth. NCI	C Veh. Code	Reg.				
Plate# mat Sticke		rd.		O VOII. OOUG	same				
		odel	Style	Color	as Def.				
				1					
Office of the attorney for the Commonwealth Approved Disapproved because:									
•	□ Apbroved □ pisabbro	ved because:		L					
(The attorney for the Commonwealth may require that the			ed by the attorney for t	ne Commonweal	th prior				
(The attorney for the Commonwealth may require that the to filing. See Pa.R.Crim.P. 507).	complaint, arrest warrant affida	vit, or both be approv	ed by the attorney for t	ne Commonweal	th prior				
to filing. See Pa.R.Crim.P. 507).	complaint, arrest warrant affida	vit, or both be approv	ed by the attorney for t						
(The attorney for the Commonwealth may require that the to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth)	complaint, arrest warrant affida	vit, or both be approv	ed by the attorney for t	ne Commonweal	022				
to filing. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth)	complaint, arrest warrant affida Robert (Signature of the attorney	vit, or both be approv		_ 12/05/2	022				
to filing. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR	complaint, arrest warrant affida Robert (Signature of the attorney	vit, or both be approv G. LaBar for the Commonwealth) 737643/BADGE	# 736 Assigned Affiant ID Nu	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant)	complaint, arrest warrant affida Robert (Signature of the attorne)	vit, or both be approv G. LaBar for the Commonwealth) 737643/BADGE	# 736 Assigned Affiant ID Nu	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Poli	complaint, arrest warrant affida Robert (Signature of the attorney	vit, or both be approv G. LaBar for the Commonwealth) 737643/BADGE	: # 736 Assigned Affiant ID Nu	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Polit do hereby state: (check appropriate box)	Robert (Signature of the attorney General lical Subdivision)	vit, or both be approv G. LaBar Tor the Commonwealth) 737643/BADGE (PSP/MPOETC- PA0222400 (Police Agency C	: # 736 Assigned Affiant ID Nu	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Poli	Robert (Signature of the attorne) General Ilical Subdivision)	vit, or both be approv G. LaBar Tor the Commonwealth) 737643/BADGE (PSP/MPOETC- PA022240) (Police Agency Content above	: # 736 Assigned Affiant ID Nu	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I, JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Polit do hereby state: (check appropriate box) 1. 🛛 I accuse the above named defendant w	Robert (Signature of the attorne) General Ilical Subdivision)	vit, or both be approv G. LaBar Tor the Commonwealth) 737643/BADGE (PSP/MPOETC- PA022240) (Police Agency Content above	: # 736 Assigned Affiant ID Nu	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Polit do hereby state: (check appropriate box) 1. 🖾 I accuse the above named defendant w □ I accuse the defendant whose name is	Robert (Signature of the attorney General lical Subdivision) who lives at the address so unknown to me but who in the popular designation or	vit, or both be approv G. LaBar 737643/BADGF (PSP/MPOETC PA0222400 (Police Agency County) et forth above s described as	# 736 Assigned Affiant ID Nu) RI Number)	12/05/2 (Da	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Polit do hereby state: (check appropriate box) 1. 🖾 I accuse the above named defendant w □ I accuse the defendant whose name is □ I accuse the defendant whose name ar therefore designated as John Doe or Ja	Robert (Signature of the attorney General lical Subdivision) who lives at the address so unknown to me but who in the popular designation or the popular	vit, or both be approved by LABAY 737643/BADGF (PSP/MPOETC) PA0222400 (Police Agency Color forth above a described as unickname are unickname	Assigned Affiant ID Number) RI Number)	12/05/2 (Damber & Badge #	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Polit do hereby state: (check appropriate box) 1. 🖾 I accuse the above named defendant w □ I accuse the defendant whose name is	Robert (Signature of the attorney General lical Subdivision) who lives at the address so unknown to me but who in the popular designation or the popular	vit, or both be approved by LABAY 737643/BADGF (PSP/MPOETC) PA0222400 (Police Agency Color forth above a described as unickname are unickname	# 736 Assigned Affiant ID Nu PRI Number) Known to me and v	12/05/2 (Damber & Badge #	022 ite)				
to filling. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) I. JEREMY BECKER (Name of the Affiant) of Pennsylvania Office of Attorney (Identify Department or Agency Represented and Polit do hereby state: (check appropriate box) 1. 🖾 I accuse the above named defendant w □ I accuse the defendant whose name is □ I accuse the defendant whose name ar therefore designated as John Doe or Ja	Robert (Signature of the attorney General lical Subdivision) who lives at the address so unknown to me but who in the popular designation or the popular	vit, or both be approved by LABAY 737643/BADGE (PSP/MPOETC-PA022240) (Police Agency Color forth above a described as nickname are unlined at [301] (Subdivision Color for both above at [301]	# 736 Assigned Affiant ID Nu) RI Number) Known to me and v	12/05/2 (Damber & Badge #	022 ite)				

Docket Number:	Date Filed:	OTN/LiveScan N	lumber	Complaint/Incident						
Defendant Name:	First: CARLA MATIA	Middle:		Last: AUTO SALES, INC.						
		·								
When there is more that (Set forth a brief summary of without more, is not sufficient the age of the victim at the ti	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 clte 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.)									
Inchoate	Solicita 18 902 A			Number of Victims Age 60 o	or Older					
Ø 01 5111	(a)(1)	oratie 18	1	F1 NCIC Oftense						
Leady # Se	ction Subsecti	on PA Statute (Ti		Grade Code	UCR/NIBRS Code					
(if applicable)	Accident Number		☐ Interstate	Safety Zone	☐ Work Zone					
Statute Description (inc.	lude the name of t	statute or ordinance): DEAL	ING IN PROCEE	EDS OF UNLAWFUL ACTIVITY	,					
Acts of the accused associated with this Offense: The defendant, by and through its agent(s), 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, by and through its agent(s), 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 sald unlawful activity.										
Inchoate	Solicitat 18 902 A			Number of Victims Age 60 o	r Older					
□ 02 3922	(a)(1)	of the 18	1	F3 NCIC Offense						
PennDOT Data	ction Subsection	on PA Statute (Til	· · · · · · · · · · · · · · · · · · ·	Grade Code	UCR/NIBRS Code					
(if applicable)	ccident Number	tatute or ordinance): THEF	Interstate	Safety Zone	☐ Work Zone					
Statute Description (incl	idde tile Hallie Of S	nature of ordinance). Ther	I DI DECEPTIO	N						
another by deception; to wit: to vehicle title application(s) to	the defendant, by and the Pennsylvania De	Offense: The defendant, by and through its agent(s), did presen partment of Transportation (Peni obtained for reconstructed vehic	t or cause to pres n DOT). As a resu	ent, false, incomplete or mislead alt of the defendant's deception,	ling information material the fraudulent					
Inchoate ☐ Attempt Offense			Numbe	er of Victims Age 60 or Older						
☐ 03 3925 Lead? Offense#	(a) Section Subse	SALTOKSKIK SSSSIFF	Itle) Counts	Grade NCIC Offense C	ode UCR/NIBRS Code					
RennDOT Data (If applicable)	Accident Number —		☐ Interstate		☐ Work Zone					
		tatute or ordinance): RECE	IVING STOLEN	PROPERTY						
Acts of the accused associated with this Offense: The defendant, by and through its agent(s), is guilty of theft if he intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner; to wit: The defendant, by and through its agent(s), did intentionally receive, retain or dispose of movable property, belonging to another, with no intent to restore it to the owner, knowing that such property was stolen, or believing that it had probably been stolen, and the property stolen is an automobile, airplane, motorcycle, motorboat, or other motor propelled vehicle in violation of Section 3925(a) of the PA Crimes Code										

			damen,	CLICE	CKIIVIIIVAL	COMPLAIN
Docket Number:	Date Filed:	OTN/LiveSci	an Number	Com	plaint/incident N	umber
C1-446-22	1 1				210061	
	First:	Middle:		Last:	210001	
Defendant Name:	4	Wildule.			I EC TAIC	[
	CARLA MATIA			AUTO SA	LES, 1NC.	
				Ī		
				· · · · · · · · · · · · · · · · · · ·		
Inchoate			Numb	er of Victims .	Age 60 or Older 🔔	
Offense 18 901 A	18 902	4 18 903	11	·	<u> </u>	
	1		North Addressed A Stanford Co.		a paratita antenenta	2014 : S 0 11 5 5 5 5 6 6 6 6 8
□ 04 4120	맛이보면 맛있	of the 18		F3		
Lead? Offense#	Section Subse			Grade	NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data	Accident		☐ Interstate		T Cofety Zone	D Mark Zono
(if applicable)	Number ——		☐ interstate	' L	Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of	statute or ordinance): II	DENTITY THEFT			
				····		
Acts of the accused as	sociated with this	Offense: The defendant, by	and through its age	nt(s), commits	the offense of ident	ity theft of another
person if he possesses or use	es, through any means	, identifying information of ar	rother person withou	t the consent o	of that other person	to further any unlawful
purpose, to wit: the defenda-	nt, by and through its	agent(s), committed identity	theft of another pers	on through the	means of identifyin	g information of
another person / business wi	thout the consent of t	hat other person / business to	further any unlawfu	l purpose.		
						ļ
}						
mana usus suurestaalistaa j						
Inchoate			Numi	ber of Victims	Age 60 or Older	
Offense 18 901	A 18 902	A 18 903				
	. Store of New House		. Note that the state of the		H. 1.250.3.33.3.3.3.3.3.3.3.3	8 454 (F. 15 115 (F. 15 11 11 11 11 11 11 11 11 11 11 11 11
□ 05		of the 75	2	M1 ···		
Lead? Offense#	Section Subs	ection PA State	ite (Title) Counts	Grade	NCIC Offense Co	de UCR/NIBRS Code
PennDOT Data	Accident		F1 (-1		T1 C-4-44 7-2-	El Made Zone
(if applicable)	Number	·	☐ Interstat	•	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of	statute or ordinance): Fa	ALSE APPLICATION	FOR CERTI	FICATE OF TITLE	DR REGISTRATION
, , , , , , , , , , , , , , , , , , ,		•				
Acts of the accused as:						
person uses a false or ficticlo						
in an application for a certific			nt, by and through it	s agent(s) mad	le a material false st	atement and/or
concealed any other material	fact in an application	for a certificate of title.				
						1
			<u></u>			
ERRORES AND STREET						
Inchoate			Numb	er of Victims .	Age 60 or Older 🔔	<u> </u>
Offense 18 901 A	18 902 /	18 903				
	्र इस्त्राच्याकारकार ।		9 (19 km) 10 km	. N. 4. 5. 17 V. 5. 17	19-4-11-15-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	
□ 06 7122	(3)	of the 75		M1 ∰		
	Section Subse	ction PA Statute		Grade	NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data	Accident					I
(if applicable)	Number	····	☐ Interstate	' L] Safety Zone	☐ Work Zone
Statute Description (inc		statute or ordinance). A	TERED. FORGED	OR COUTER	EIT DOCUMENTS	·
Ciamo Docomption (inc	THE TIMES OF	ounce of oranianou), A		workill		
			·· ·			
Acts of the accused ass	soclated with this	Offense: The defendant, hy	and through its age	nt(s), is quilty	of a misdemeanor of	f the first degree if the
person, with fraudulent inten						
any other document issued o	r prepared for issue h	the Pennsylvania Departmen	nt of Transportation	Penn DOT). t	o wit: the defendant	, by and through its
agent(s) with fradulent intent						, ,
The state of the s	,		, = (=======, *)			

Docket Number:	Date Filed:	OTN/Liv	eScan Num	ber		laint/Incident Nu 10061	ımber		
Defendant Name:	First: CARLA MATIA	Midd	le:	1	Last: AUTO SALI				
	CARLA MATIA			LL	AOTO SALI		<u></u>		
/	·			<u></u>	-W ₁		· · · · · · · · · · · · · · · · · · ·		
Inchoate			всу	Number	of Victims A	ge 60 or Older			
D 07 4107	(a)(4	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Statute (Title)	Counts	F3 Grade	NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (If applicable)	Accident Number		T T	☐ Interstate		Safety Zone	☐ Work Zone		
Statute Description (inc	lude the name of	statute or ordinance	e): DECEPTIV	VE BUSINES:	S PRACTICES				
intent sell, offer or expose for engaged in a continuing cours	Acts of the accused associated with this Offense: The defendant, by and through its agent(s) in the course of business, did knowingly and with intent sell, offer or expose for sale adulterated or mislabeled commodities. To wit: In the course of business, the defendant, by and through its agent(s), engaged in a continuing course of criminal conduct in which the defendant by and through its agent(s), knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT).								
Inchoate									
		of the 18			M M2				
	Section Subs	TAX PROPERTY OF THE PARTY OF TH	Statule (Title)	Counts	Grade	NCIC Offense Cod	le UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number ——			☐ Interstate	l	Safety Zone	☐ Work Zone		
Statute Description (incl	ude the name of	statute or ordinance	e): UNSWOR	n falsific <i>i</i>	TION TO AU	THORITIES			
Acts of the accused ass believe to be true, on or pursu defendant, by and through its Transportation (PennDOT)) for were punishable by law.	ant to a form bearing agent(s), engaged in	g notice, authorized by la na continuous course of	aw, to the effe criminal condu	ct that false s ict, in which h	tatements mad e knowingly a	ie therein are punis nd intentionally sigr	hable; To wit: the ned (PA Dept. of		
Inchoate	☐ Solicita 18 902 /		icy	Number	of Victims Ag	je 60 or Older			
☐ 09 41.17 Lead? Offense# Se	(a)(3		Statute (Title)	1 Counts	F3 Grade	NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Subse	CHOIL		Interstate		Safety Zone	☐ Work Zone		
Statute Description (incl		statute or ordinance): INSURAN	CE FRAUD		<u> </u>	······································		
Acts of the accused associated with this Offense: Knowingly and with the intent to defraud any insurer or self-Insured, assists, abets, solicits or conspires with another to prepare or make any statement that is intended to be presented to any insurer or self-Insured in connection with, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim, including information which documents or supports an amount claimed in excess of the actual loss sustained by the claimant to wit: the defendant, by and through its agent(s), did knowingly and with the intent to defraud an insurer, made material statement(s) intended to be presented to the insurer in connection with and/or in support of an insurance claim that contained false and/or incomplete and/or misleading information.									

Docket Number:	Date F		OTN/LiveScan I	Number		Complaint/incident Num	nber		
Defendant Name:	First:		Middle:		Las	t:			
	CARLA	MAIIA			AU	TO SALES, INC.			
	ttempt 3 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number o	f Victims Age 60 or Older			
<u> </u>	4118		of the 18	Tillo)	Counts	F3 Grade NCIC Offense Code	UCR/NIBRS Code		
Lead? Offense# PennDOT Data (if:applicable)	Section Acciden Numbe		PA Statute (interstate	☐ Safety Zone	☐ Work Zone		
Statute Description	(include the r	name of statute o	or ordinance): was	HING VI	HICLE TITL	ES			
Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilititing a deception to be perpretated by anyone concerning the true mileage of a motor vehile, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or ficticious information to wit: with intent to deceive anyone, the defendant, by and through its agent(s) made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or ficticious information.									
Inchoate	empt [Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 or Older			
□ <u>11</u> 4	911	(a)(1) of	tine 18		F	3			
Lead? Offense# PennDOT Data (if applicable)	Section Accident Number	Subsection	PA Statute (Ti		Counts iterstate	Grade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone		
	(include the r	name of statute o	r ordinance): TAMI	PERING	WITH PUBL	IC RECORDS OR INFORMAT	ION		
or false alteration of, an	y record, docume nation of the gov	ents or thing belongir ernment; To wit: the	ng to, or received or ke defendant, by and thr	pt by, the	e government	did knowingly and with Intent r for information or record, or re e false entries in, and/or false a	quired by law to be		
	tempt	Solicitation	Conspiracy 18 903	7	Number o	f Victims Age 60 or Older			
	5111		Value 18	1000		F1	HODWING Order		
Lead? Offense# PennDOT Data (if applicable)	Section Acciden Numbe		PA Statute (Counts Interstate	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone		
	(include the r	name of statute o	r ordinance): CRIN	INAL C	ONSPIRACY	-DEALING IN PROCEEDS O	FUNLAWFUL		
commission of one or m with Public Records or I person(s) and / or busin such crime(s); to wit; th	ore of the followl information, False ness(es) that they ne defendant, by a	ng crimes: Dealing ir Application for Certi or one or more of tr and through its agen	n Proceeds of Unlawful ficate of Title or Regist nem will engage in con t(s), did agree with on	Activity, ration, and duct which e or more	Washing Vehi nd Unsworn F th constitutes nindividuals, i	with intent of promoting of fact icle Titles, Deceptive Business P alsification to Authorities, did ag such crime(s) or an attempt or that one or more would engage ore of them engaged in an overt	ractices, Tampering pree with such other solicitation to commit in conduct that		

Docke	et Number:	~ [/	Filed:	OTN/LiveScar		FUL	Complaint/Incident No IFS210061		
Defen	dant Name	First:	A MATIA	Middle:		Last:	<u> </u>		
<u> </u>									
Inche		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy		Number of V	ictims Age 60 or Older		
	13	911	(b)(1)	of the 18	V. I	F1			
	Offense# nnDOT Daf			PA Statule		Counts C erstate	Grade NCIC Offense Cod	UCR/NIBRS Code Work Zone	
	applicable Description		name of statute o	or ordinance): COR					
from a p proceeds agent(s)	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 wilt: the defendant, by and through its agent(s), 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 Carila Matia AUto Sales LLC.								
Incho Offer		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of V	ictims Age 60 or Older		
Lead?	14 Offense#	911 Section	(b)(2) Subsection	if the 18 PA Statute	Title)	F1	orade NCIC Offense God	UCR/NIBRS Code	
Pei	nnDOT Dat applicable	a Accide	ent	11,000		erstate	☐ Safety Zone	☐ Work Zone	
Statute	Description	on (include the	name of statute of	or ordinance): cor	RUPT ORG	ANIZATIONS	S	· · · · · · · · · · · · · · · · · · ·	
maintain,	, directly or Ir naintained, di	ndirectly, any inter	rest in or control of an	y enterprise; to wit: th	he defendant	, by and throi	attem of racketeering activit ugh its agent(s), through a p nents to individuals both out	pattern of racketeering	
Inche Offe		Attempt 18 901 A	Solicitation	Conspiracy		Number of V	Victims Age 60 or Older _		
	15	911	(b)(3)	of the 18	··	[A	· · · · · · · · · · · · · · · · · · ·		
***	Offense# nnDOT Dai applicable		**************************************	PA Statute]	Counts nterstate	Grade NCIC Offense Co	de UCR/NIBRS Code Work Zone	
			name of statute of	or ordinance): co R	RUPT ORG	ANIZATION!	5		
participa	te, directly or	Indirectly, in the	conduct of such enterp	orise's affairs through	a pattern of	racketeering	y or associated with any ent activity, to wit: the defendar airs through a pattern of rac	nt, by and through its	



POLICE CRIMINAL COMPLAINT | Complete Number | Incident Number

CV 44622	145122	O I MILIVESCAN IV	umper	1	piaint wu 210061	mber mon	r mordent wanther	
Defendant Name	First:	Middle:			Last:	CALEC INC		
	CARLA MATIA		 		AUTO	SALES, INC.		
The acts committed by the appropriate. When there is (Set forth a brief summary of the violated, without more, is not suff affegedly violated.)	more than one offens facts sufficient to advise th	se, each offense se defendant of the	should in sture of the	be numbe ne offense(s	red chro	nologically. A citation to the s	tatute(s) allegedly	
Inchoate Attempt Offense 18 901 A	Solicitation 18 902 A		onspiracy 903		Numb	er of Victims Age	60 or Older	
16 911 Lead? Offense# Section	(B)(4) of	the 18 PA Statute		1 Coun(s	F1 Grade	NCIC Offense C	ode UCR/NIBRS Code	
PennDOT Data Acc (if applicable) Nu	ident nber		ים	nterstate		Safety Zone	☐ Work Zone	
Statute Description (include	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, by and through its agent and/or salesperson(s), conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).								
Inchoate	Solicitation 18 902 A		onspiracy 903		Numb	er of Victims Age	60 or Older	
	Ōſ	line	.					
Lead? Offense# Section PennDOT Data Acc	Subsection Ident	PA Statute (· · · · · · · · · · · · · · · · · · ·		NCIC Offense Code	T	
1 - 2 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4	mber	ar ardinanaa):	<u> </u>	nterstate	<u> </u>	Safety Zone	☐ Work Zone	
Statute Description (include	the hame of statute	or ordinance).						
Acts of the accused associa	ated with this Offense);				<u> </u>		
,								
Inchoate	Solicitation 18 902 A		onspiracy 903		Numb	er of Victims Age	60 or Older	
	i of	the			T			
Lead? Offense# Section PennDOT Data Acc	Subsection	PA Statute (1	NCIC Offense Code	T	
(if applicable) Nur	nber 🔝			nterstate		Safety Zone	☐ Work Zone	
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								

			POLICE CRIMINAL COMPLAIN
ocket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
efendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, INC.
I ask that a warrar made.	nt of arrest or a summ	ons be issued and that the defen	dant be required to answer the charges I have
belief. This verific	ets set forth in this con ation is made subject ation to authorities.	nplaint are true and correct to the to the penalties of Section 4904	best of my knowledge or information and of the Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	nsists of the preceding	page(s) numbered <u>1</u> through _	<u>~</u>
	vania that require filing		Public Access Policy of the Unified Judicial cuments differently that non-confidential
of Pennsylvania and	were contrary to the A	Act(s) of the Assembly, or in viola	he peace and dignity of the Commonwealth ation of the statutes cited. se must be completed, sworn to before the
issuing authority, a	nd attached.)		A BAL
(Date)	C	(ear)	(Signature of Affiant)
AND NOW, on this date	12-6-20	I certify that the co	omplaint has been properly completed and verified.
An affidavit of probable	cause must be complete	ed before a warrant can be issued.	

(Magisterial District Court Number)

	Decket Number:	Date Filed: 0	DTN/LiveScan Number		Complaint/Incident Number IFS210061
1		First:	Middle:	Last:	
i	Defendant Name:	CARLA MATIA		AUTO	SALES, INC.

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 6. Maria PINEDA
- Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC



				POLICE CRIMINAL COMPLAINT
Docket Number:		Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
		First:	Middle:	Last:
0.000 to 1.000 to 1.0	endant Name:	CARLA MATIA		AUTO SALES, INC.
38.	MP Notary and T	ags LLC		
39,	AMCO Auto Sale	s		
40.	Charo's Auto Sal	es		
41.	A2Z Auto Tags		•	
42	Docuservices			

- 43. Emma's Auto Tags and Multiservices, Inc. Wilfredo Auto Repair 44.
- Jessica's Auto Tags 45.
- JM Motors 46.
- Saldivar Group 47.
- **Abby Auto** 48.
- Carla Matia LLC 49.
- 50, G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

My commission expires first Monday of January,

(Signature of Afflant)

Magisterial District

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esa. (NAME and ADDRESS); DEFENDANT: AUTO SALES Address: 50 Canal Street CHARO First Name Middle Name Last Name Royalton, PA 17057 648 E. Erie Ayenue Philadelphia, PA 19134 Telephone: (717)234-0949 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full TI E-Misdemeanor Pending Extradition F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO IFS210061 CR-443-22 1215122 Co-Defendant(s) GENDER Add'l DOB DÖB POB ☐ Male First Name Middle Name Last Name Gen. ☐ Female AKA ☐ White RACE Black Unknown Asiar Native American ETHNICITY: Hispanic Non-Hispanic Unknown BRO (Brown) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Pumie) GRY (Gray) Halr BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color. BLN (Blonde / Strawberry) BLU (Blue) GRN (Green) GRY (Gray) BLK (Black) BRO (Brown) MAR (Maroon) PNK (Pink) Color HAZ (Hazel) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number MNU Number ☐ YES ☐ NO Ft. HEIGHT In. Defendant Fingerprinted Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Registration Comm'l Veh. School Veh. Oth, NCIC Veh. Code Reg. Haz Ind. same maf Plate# Sticker (MM/YY) as Def. VIN Model Style Make Color Office of the attorney for the Commonwealth Approved Disapproved because: (The alterney 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature 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 # ting the by the best of the said office of the PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] Subdivision Code) in DAUPHIN County on or about 2018- PRESENT [22](County Code)

	Number: 443-72	Date Filed:	o	TN/LiveScan	Number	FOL		laint/incident N	유명은 생각 시간 사람들이 가는 사람들이 살아보니 없다.
The State of	775 // int Name:	First:	<u> </u>	Middle:		Last:		(0061	
		CHARO	į.	AUTO		SALI	ES		
When the (Set forth without many The age o	nere is more that a brief summary of nore, is not sufficient if the victim at the ti	n one offense, e the facts sufficient t t. In a suffimary case	ach offense si to advise the defe e, you must cite ti ay be included if i	nould be nur ndant of the na he specific sect known, in additi	nbered chro ture of the offe ion(s) and sub ion, social sec	nologica nse(s) cha section(s) urity numbe	ily, rged. A ci of the sta ers and fi	tation to the state tute(s) or ordinan nancial informatio	ated, if appropriate. ste(s) allegedly violated, ce(s) allegedly violated, on (e.g. PINs) should not
Inchoat Offense		☐ Solici 18 902		Conspiracy 18 903		Nur	mber of V	rictims Age 60 o	r Older
	01 5111	(a)(1) of the	18	10	Fi	XXXX		
Lead?	<i></i>	clion Subse	cllon	PA Statule (Title) Cou	ints C	Grade	NCIC Offense Gode	UCR/NIBRS Code
The state of the s	DOT Data pplicable)	acident Number			☐ Interst	ate		Safety Zone	☐ Work Zone
		lude the name o	f statute or ord	linance): DE	LING IN PRO	OCEEDS O	F UNLAV	VFUL ACTIVITY	
Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, 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, by and through its agent, Jean Aquino, 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.									
Inchoat Offense	Great Control	☐ Solicit		Conspiracy 8 903		Nur	nber of V	listims Age 60 o	r Older
Last services and	2 4117	(a)(1		18		 F3.			
تنسا	<u> </u>	ction Subsection		PA Statute (rade	NCIC Offense	UCR/NIBRS Code
	DOT Data	ccident Number	· · · · · · · · · · · · · · · · · · ·		☐ Interst	ate		Code Safety Zone	☐ Work Zone
	plicable) Description (inc	lude the name o	f statute or ord	linance): INS	URANCE FRA	IUD			
defraud a governme approving or filed in	State of local gover nt agency a docum- or disapproving a r response to an age	nment agency, nament that contained fa notor vehicle insurar	ely, PA Deptartme else, incomplete or nce rate filing, a m : the defendant, b	ent of Transport r misleading infi notor vehicle ins ny and through	ation (PennDC ormation conceurance transactions) its agent, Jean	ot), file, pro erning a fac ction or oth Aguino, kr	esent or c ct or thing er motor nowingly a	ause to be filed o I material to the a vehicle insurance and with intent to	igency's determination in action which is required defraud the PA Dept. of
Inchoa Offens				Conspiracy 18 903	N	umber of \	Victims A	ge 60 or Older	
Lead?	03 4117 Offense#		2) of the	18 PA Statute	1 (Title) C	runis F	3 Grade	NGIC Offense Co	ode UCR/NIBRS Code
Peni	nDOT Data	Accident Number	SCOROTT	1110101010	☐ Inte			Safety Zone	☐ Work Zone
		ude the name of	f statute or ord	inance): INS	URANCE FRA	du	-1		
an insurer, incomplete	did present or caused or misleading inf	e to be presented to	an insurer a state a fact or thing me	ement forming aterial to the in:	a part of, or In surance claim;	support of to wit; the	f, an Insur defendar	ance claim that on the by and through	n its agent, Jean Aguino,

Docket Number:	Date Filed:	OTN/LiveSc	can Number Complaint/Incident Number IFS210061						
	First:	Middle:		Last:					
Defendant Name:	CHARO	AUTO		SALES					
Inchoate ☐ Attempt Offense ☐ 18 901 A	☐ \$olicit 18 902	1	Numbe	or of Victims Age 60 or Older					
☐ 04 4117 Lead? Offense# 8	(a)(3		le (Title) Counts	F3 Grade NCIC Offense Cor	de UCR/NIBRS Code				
PennDOT Data (if applicable)	Accident Number ——		☐ Interstate	☐ Safety Zone	☐ Work Zone				
Statute Description (inci	Statute Description (include the name of statute or ordinance): INSURANCE FRAUD								
Acts of the accused associated with this Offense: Knowingly and with the intent to defraud any insurer or self-insured, assists, abets, solicits or conspires with another to prepare or make any statement that is intended to be presented to any insurer or self-insured in connection with, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim, including information which documents or supports an amount claimed in excess of the actual loss sustained by the claimant to wit: the defendant, by and through its agent, Jean Aquino, dld knowingly and with the intent to defraud aninsurer, made material statement(s) intended to be presented to the insurer in connection with and/or in support of an insurance claim that contained false and/or incomplete and/or misleading information.									
Inchoate			Numb	er of Victims Age 60 or Older					
☐ 05 4117 Lead? Offense#		132398874588345	lute (Title) Counts	Grade NCIC Offense Co	ode UCR/NIBRS Code				
PennDOT Data (if applicable)	Accident Number —		☐ Interstate		☐ Work Zone				
Statute Description (incl		statute or ordinance): 1	NSURANCE FRAUD						
defraud any insurance compai misleading information concer	ny, self-insured or ot ning any fact materi	ter person file an application if thereto; to wit: the defenda	for Insurance containing the formal for the formal formal formal for the formal formal formal for the formal for the formal	t, Jean Aquino, may not knowing ng any false information or conce agent, Mohammad Alkurdi, know formation to conceal any fact ma	al for the purpose of ingly and with intent to				
nchoate	☐ Solicita	tion Conspiracy	Numbe	r of Victims Age 60 or Older					
Offense 18 901 A	18 902 .								
	(a)(1	* Englishmentation	te (Title) Counts	F3 Grade NCIC Offense Cod	le UCR/NIBRS Code				
PennDOT Data (if applicable)	Accident ———		☐ Interstate	Safety Zone	☐ Work Zone				
Statute Description (incl	ude the name of	statute or ordinance): T	HEFT BY DECEPTIO	ч					
obtain or withhold property of state of mind; to wit; the defe	another by deception and through the angle of the angle o	n, created or reinforced a fai th its agent, Jean Aguino, did	se Impression, includir present or cause to b	t, Jean Aquino, did knowingly and g false impressions as to law, val e presented false, incomplete or i Idnetification Numbers (VIN) for	lue, Intention or other misleading information				

			¥35 <u>8</u> 44		E CRIMINAL	C COLUMN TOTAL
Docket Number:	Date Filed: / /	OTN/LiveSca	n Number		omplaint/incident Nu S210061	mber
Defendant Name:	First:	Middle:		Last:		
	CHARO	OTUA		SALES		
Inchoate		1	N	umber of Vict	lms Age 60 or Older	
☐ 07 392! Lead? Offense#	5 (a) Section Subs	rofithe 18	le (Tille) Co	ounts Grad		UCR/NIBRS Code
PennDOT Data (if applicable)	Accident		☐ Inte		☐ Safety Zone	☐ Work Zone
		statute or ordinance): RE	CEIVING STO	LEN PROPERT	ΤΥ	
receives, retains, or disposes Is received, retained, or dispo belonging to another, with no	of movable property o sed with intent to rest intent to restore it to	Offense: The defendant, by f another knowing that it has ore it to the owner; to wit: The the owner, knowing that such ite, motorboat, or other motor	been stolen, or ne defendant did n property was s	believing that il Intentionally re tolen, or believi	t has probably been stole ecelye, retain or dispose c ing that it had probably b	n, unless the property of movable property, een stolen, and the
Inchoate	☐ Solicital 18 902 A		Nu	mber of Victin	ns Age 60 or Older	
□ 08 4101	(a)(3)		1	F3		
Lead? Offense# S PennDOT Data (if applicable)	ection Subsec Accident Number —	tion PA Statute	(Title) Cou ☐ Inters		NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
Statute Description (inc		statute or ordinance): FO	RGERY			
Acts of the accused ass defraud or injure anyone, or the be forged in a manner specific defraud and/or knowledge the specific in paragraph (2) of the	with knowledge that he ed in paragraphs (1) o at he is facilitating a fr	e is facilitating a fraud or injur r (2) of this subsection, to wit	y to be perpreta : the defendant,	ted by anyone, by and throug	the actor utters any writh its agent, Jean Aguino,	ing which he knows to with the intent to
Inchoate			N	umber of Victi	ms Age 60 or Older	
☐ 09 7121 Lead? Offense#	Section Subse	of the 75	1 1	M1	e NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (frapplicable)	Accident Subset	- PA Statut	□ Inter		☐ Safety Zone	☐ Work Zone
Statute Description (inc	ude the name of	statute or ordinance): FA	LSE APPLICAT	ION OF TITLE	OR REGISTRATION	
Acts of the accused ass degree if the person uses a fa material fact in an application statement and/or concealed a	lse or ficticious name for a certificate of title	or address or makes a materia or for a registration, to wit: t	al false statemer the defendant, b	it, or fails to dis	sclose a security interest,	or conceals any other

XXX.	DOLLCE	CRIMINAL	COMPL	AIND
CONTRACT:	PURICE	CRUMINAL	CUMPL	AIIN I

Docket Number:	Date Filed:	OTN/LiveSo	ean Number	Complaint/incident Number			
Defendant Name:	First:	Middle:		Last:			
	CHARO	AUTO		SALES			
·							
Inchoate	☐ Solicii	tation	Numb	er of Victims Age 60 or Older			
Offense 18 901 A	18 902	A 18 903	· ·				
□ 10 7122	(3)	of the 75	1	M1 M3			
Lead? Offense# S PennDOT Data	ection Subs Accident	ection PA State	ite (Title) Counts	Grade NCIC Offense Co			
(if applicable)	Number		☐ Interstate		☐ Work Zone		
Statute Description (Inclu	ide the name or	statute or ordinance): A	LTERED, FORGED, C	R COUNTERFEIT DOCUMENT			
Acts of the accused asso	clated with this	Offense: The defendant, by	and through its agen	, Jean Aquino, is guilty of a misd	emeanor of the first		
degree if the person, with frau	dulent intent, alters	or forges an assignment of a	certificate of title, or a	n assignment or release of a secu of Transportation (Penn DOT). It	rity interest on a		
				or prepared for Issue by Penn DO			
Inchoate	Solicit	ation		wat Waters Ave CO or Oider			
Offense 18 901 A	18 902			er of Victims Age 60 or Older			
Lead? Offense# Se	(b)	of the 18	ate (Title) Counts	M1/13 Grade NCIC Offense Co.	de UCR/NIBRS Code		
PennDOT Data	Accident	ecolori 1 A Olato	☐ Interstate	☐ Safety Zone	☐ Wark Zone		
(If applicable) Statute Description (inclu	Number —— de the name of	statute or ordinance): U	nsworn falsific	TION TO AUTHORITIES			
Acts of the accused asso	clated with this	Offense:					
Inchoate			Numt	er of Victims Age 60 or Older			
Inchoate			Numt	er of Victims Age 60 or Older			
Offense 18 901 A) 18 90:	2 A 18 903 (1) Of the 18		F1			
Offense 18 901 A Lead? Offense# 5 PennDOT Data) 18 90:	2 A 18 903 (1) Of the 18	tule (Title) Counts	F1 Grade NCIC Offense Co	ode UCR/NIBRS Code		
Offense 18 901 A Lead? Offense# S PennDOT Data (If applicable)	18 90: (a)(Section Sub- Accident Number —	2 A 18 903 1) of this 18 section PA Sta	tule (Title) Counts	F1 Grade NCIC Offense C	ode UCR/NIBR\$ Code		
Offense 18 901 A Lead? Offense# S PennDOT Data (If applicable)	18 90: (a)(Section Sub- Accident Number —	2 A 18 903 1) of this 18 section PA Sta	tule (Title) Counts	F1 Grade NCIC Offense Co	ode UCR/NIBR\$ Code		
Offense 18 901 A Lead? Offense# 5 PeninDOT Data (if applicable) Statute Description (inclu ACTIVITIES, ETC Acts of the accused asso	(a)(Section Subsection Subsectio	2 A 18 903 (1) of the 18 section PA State statute or ordinance): Cl	ute (Title) Counts Interstate RIMINAL CONSPIRA and through its agent	Grade NCIC Offense Company Cry - DEALING IN PROCEEDS Jean Aquino, with intent of pron	ode UCR/NIBRS Code Work Zone OF UNLAWFUL noting of facilitating the		
Offense 18 901 A Lead? Offense# 5 PennDOT Data (if applicable) Statute Description (inclu ACTIVITIES, ETC Acts of the accused asso commission of one or more of t with Public Records or Informat	(a)(Accident Accident Number de the name of clated with this (he following crimes:	2 A 18 903 (1) of the 18 section PA State Statute or ordinance): Comparison of the	tule (Title) Counts Interstate RIMINAL CONSPIRA and through its agent viul Activity, Washing Vigistration, and Unswor	Grade NGIC Offense Company of the NGIC Offense Company of	ode UCR/NIBRS Code Work Zone OF UNLAWFUL noting of facilitating the Practices, Tampering agree with such other		
Offense 18 901 A D 12 5111 Lead? Offense# S PennDOT Data (If applicable) Statute Description (inclu ACTIVITIES, ETC Acts of the accused asso commission of one or more of t with Public Records or Informat person(s) and / or business(es)	(a)(Section Sub- Accident — Number — de the name of sche following crimes: ion, False Applicatio that they or one or	1) of the 18 section PA State Statute or ordinance): Ci Offense: The defendant, by Dealing in Proceeds of Unlaw in for Certificate of Title or Remore of them will engage in	tule (Title) Counts Interstate RIMINAL CONSPIRA and through its agent vful Activity, Washing 1 gistration, and Unswor	Grade NCIC Offense Company Cry - DEALING IN PROCEEDS Jean Aquino, with intent of pron	ode UCR/NIBRS Code Work Zone OF UNLAWFUL noting of facilitating the Practices, Tampering agree with such other or solicitation to commit		



Docket Number: (R-443-22	Date Filed /2 /5/22	: OTN/Live	Scan Numb	er	Complaint Number Incident Number IFS210061				
	First:	- 	Middle:	1	11 32.	Last:			
Defendant Name	CHARO					AUTO	SALES		
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.)									
Inchoate ☐ Attempt Offense 18 901 A		citation 02 A	Conspi 18 903	racy		Numb	er of Victims	Age 60 or Older]
□ 1 3 911	(B)(1)	of the 18		1		F1			
	tion Subsection	n P.	A Statute (Tille)	Cou		Grade	NCIC Offens	T	
(if applicable)	Number			☐ Inters		_ L	Safety Zone	☐ Work Zone	
Statute Description (incl	ude the name of s	tatute or ordina	nce): CORRU	IPT ORGAN	OTTASTI	INS			
from a pattern of racketeering proceeds of such income, in the agent, Jean Aquino, engaged	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, by and through its agent, Jean Aquino, 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 Charo's Auto Sales.								
Inchoate	☐ Soli 189	citation 02 A	Conspl 18 903	racy	•	Numb	er of Victims	Age 60 or Older	
□ 14 911	(B)(2)	of the 18		1	F1	T			
Lead? Offense# Sec	llon Subsectio	经济的社会的	Statute (Title)	Counts		rade	NCIC Offense C	ode UCR/NIBRS Cod	le
PennDOT Data (if applicable)	Accident Number			☐ Inters	tate		Safety Zone	☐ Work Zone	
Statute Description (incl	ude the name of s	tatute or ordina	nce): CORRU	IPT ORGAN	OLLAZI	NS	·····		
Acts of the accused ass maintain, directly or indirectly racketeering activity maintain state and within this organizat	any interest in or cone ed, directly or indirectly	trol of any enterpris	e; to wit: the	defendant	, by and	through	its agent, Jean	i Aquino, through a patteri	
Inchoate	☐ Soll 18 9	citation 02 A	Conspi 18 903	racy		Numb	er of Victims	Age 60 or Older	
□ 15 911	(B)(3)	of the 18		1	F1				
Lead? Offense# Sec	lion Subsectio Accident S	n PA	Statute (Title)	Counts		T	NCIC Offense C		
(if applicable)	Number			Inters			Safety Zone		
Statute Description (incl	ude the name of s	tatute or ordina	nce): CORRU	ipt organ	VIZTION	IS			
Acts of the accused ass or participate, directly or Indir through its agent, Jean Aquin racketeering activity.	ectly, in the conduct of	such enterprise's a	iffairs through	a pattern	of racke	teering a	tivity, to wit: 1	the defendant, by and	- 1



Docket Number: CR -443-22	Date Filed: 12 15 12 2	OTN/LiveScan Nur	l l	Complaint Number Incident Number IFS210061				
Defendant Name	First: CHARO	Middle:		Last:	SALES			
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 cliation 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.)								
Incheate	Solicitation 18 902 A	On Cone 18 96		Numb	er of Victims Age	60 or Older		
□ 1 6 911		of the 18	1	F1.				
	Subsection dent aber	PA Statute (T	ille) Counts □ Interstate	Grade	NGIC Offense C Safety Zone	ode UCR/NIBRS Code		
Statute Description (include		e or ordinance): COF	RRUPT ORGANIZA	TIONS				
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, by and through its agent, Jean Aquino, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).								
Inchoate	Solicitation 18 902 A	on Gons 18 90		Numb	er of Victims Age	60 or Older		
		of the			W010 07	Henri o d		
 Control of the Control of the Control	Subsection dent ober	PA Statute (Title	D) Counte □ Interstate		NCIC Offense Code] Safety Zone	UCR/NIBRS Code Work Zone		
Statute Description (include	the name of statut	e or ordinance);						
Acts of the accused associa	Acts of the accused associated with this Offense:							
Inchoate	☐ Solicitation 18 902 A	on Cons		Numb	er of Victims Age	60 or Older		
		ii line						
	Subsection dent ober	PA Statute (Title	Counts Interstate		NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone		
Statute Description (include		e or ordinance):		<u></u>				
Acts of the accused associa	ated with this Offen							

•		Francis	
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-443- 22	1215/22		IFS210061
	First:	Middle:	Last;
Defendant Name:	CHARO	AUTO	SALES

- 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 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.)

		<u> </u>	(MM/V)
(Date)	(Year)		(Signature of Affiant)
AND NOW, on this date	12/5/22	I certify that the complaint has be	en properly completed and verified
An affidavit of probable cause	must be completed before a w	/arrant can be issued.	eminimini.
12-2	, -0]	De MAhry	
(Magisterial District Court Nu	mber) (Iss	uing Authority)	SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number
UK-443-12	1216172		IFS210061
	First:	Middle:	Last:
:Defendant Name:	CHARO	AUTO	SALES

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- 2. Oleg ZELENKO
- David MORRISON
- Angel MENDEZ
- Jefferson LOOR VALET
- 6. Meria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amattl Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
BR-443-12	1215122		IFS210061
	First:	Middle:	Last:
Defendant Name:	CHARO	AUTO	SALES

- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- 42. Docuservices
- 43. Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49 Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

My commission expires first Monday of January,

(Signature of Affiant)

, Magisterial District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): Address: 50 Canal Street **DOCUSERVICES** Middle Name First Name Last Name Royalton, PA 17057 406 E. Wyoming Avenue Philadelphia, PA 19120 Telephone: (717)944-4463 NGIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Date Filed** OTN/LiveScan Number Complaint Number Incident Number Docket Number Services? ☐ YES Alad 2000 FS210061 GENDER Co-Defendant(s) Add'l DOB DOB ☐ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☐ White ☐ Hispanic ☐ Black ☐ Unknown Unknown Asian Native American ETHNICITY ☐ Non-Hispanic BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) DNA **DNA Location** WEIGHT (lbs.) ☐ YES ☐ NO FBI Number MNU Number Defendant Fingerprinted ☐ YES ☐ NO Ft, HEIGHT in. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth. NCIC Veh. Code State Haz Registration Comm'l Veh. Reg. mat Ind. same 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] Subdivision Code) in DAUPHIN County [22] on or about 2018 - PRESENT (County Code)



			SEARCH PO	OLICE CF	RIMINAL	COMPLAINT
Docket Number: CR-449-3132	Date Filed: 12/3/3032	OTN/LiveScan Nu	nber	Complain IFS2100	nt/incident Nu N61	imber
Defendant Name:	First: DOCUSERVICES	Middle:	. [.ast:		
<u> 1985 an Charles (Charles Charles Cha</u>	DOCOSENVICES					
The acts committed by When there is more tha (Set forth a brief summary of without more, is not sufficien The age of the victim at the tipe listed. If the Identity of an	n one offense, each of the facts sufficient to advise t. In a summary case, you m me of the offense may be in	fense should be numbe the defendant of the nature ust cite the specific section(sciuded if known. In addition,	red chronolog of the offense(s) s) and subsection social security n	gically. charged. A citati n(s) of the statute umbers and finar	ion to the statute	e(s) allegedly violated, e(s) allegedly violated.
Inchoate	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Vict	ims Age 60 or	Older
	(a)(1)	of the 18	1	[1]		
Lead? Offense Se	ction Subsection	PA Statute (Title)	Counts	Grade No.	CIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	occident Number		☐ Interstate	☐ Safe	ety Zone	☐ Work Zone
Statute Description (inc	lude the name of statut	e or ordinance): DEALIN	IG IN PROCEE	OS OF UNLAWF	UL ACTIVITY	
agent, Margarete Almashaqbractivity with the intent to pro-	mote the carrying on of said :	unlawful activity.		Number of Vict		
Offense 18 901 A	18 902 A	18 903				
□ 02 4117	(a)(1)	of the 18		F3	CIC Offense	
PannDOT Data	ction Subsection	PA Statute (Title)		Grade	Code	UCR/NIBRS Code
(if applicable) Statute Description (inc	Accident Number		☐ Interstate	☐ Safe	ety Zone	☐ Work Zone
Acts of the accused assintent to defraud a State of ke the government agency a dod determination in approving owhich is required or filed in reintent to defraud the PA Depipertaining to vehicles.	ocal government agency, nar cument that contained false, r disapproving a motor vehic esponse to an agency's requi	nely, PA Deptartment of Tran incomplete or misleading info le insurance rate filing, a mot est; to wit: the defendant, by	sportation (Penr ormation concerr or vehicle insura and through its	nDOT), file, presenting a fact or thin since transaction of agent, Margarete	nt or cause to bo og material to the or other motor ve e Almashaqbeh,	e filed or presented to e agency's ehicle insurance action knowingly and with
Inchoate		☐ Conspiracy 18 903	Numbe	er of Victims Age	60 or Older _	
□ 03 4117	(a)(2)	of the 18	1	F3		
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Title			NCIC Offense Co	
(if applicable) Statute Description (inc	Number ———	e or ordinance): Theren	☐ Interstate	Цs	Safety Zone	☐ Work Zone
orarine nescribition (INC	idde me name oi statul	e or ordinance). INSUR	MUE FRAUD			
Acts of the accused ass intent to defraud an insurer,o contained false, incompleted agent, Margarete Almashaqoo insurance claim.	id present or cause to be pro or misleading information co	esented to an insurer a stater ncerning a fact or thing mate	nent forming a price of the properties of the formal real to the insuration of the formal real real real real r	oart of, or in supp ince claim; to wit	ort of, an insura the defendant,	nce claim that by and through its



Docket Nu	mber:	Date /	Filed:		ОТ	N/LiveScar	an Number Complaint/Incident Number IFS210061				iber			
Defendant	Name:	First: DOCL	JSERVIC	ES		Middle:			1	_ast:				
Inchoate Offense	Attempt 18 901 A		Solicit			onspiracy 903	Ī		Number	of Vic	tims A	ge 60 or O	lder	
□ [0·	<u></u>	<u> </u>	(a)(fthe	18		į		F3				
PennD	fense# S OT Data licable)	Section Accide Numb	nt	ection	···· <u>·</u> ·····	PA Statule	(Title)	☐ Ir	Counts iterstate	Gra	ade	NCIC Offe Safety Zor		UCR/NIBRS Code Work Zone
	scription (inc	lude the	name o	f statute	or ordi	nance): IN	SURA	NCE	FRAUD					
conspires wit claim that co or supports a did knowingly	h another to pre ntains any false,	pare or n incomple ed in exce itent to d	nake any sta ete or mislea ess of the ac efraud an ir	atement tha ading inforr ctual loss su surer, mad	at is inte nation c ustained le mater	ended to be p concerning and by the claim rial statement	resent y fact ant to (s) int	ed to or thi wit: t ended	any insur- ng materia he defend I to be pre	er or so al to th lant, by	elf-insu ie claim y and tl	red in conn , including rrough its a	ection with information igent, Marg	abets, solicits or a, or in support of, a n which documents garete Almashaqbeh, with and/or in
Inchoate Offense	☐ Attemp 18 901		☐ Solic 18 90			onspiracy 8 903			Numbe	r of Vi	ctims	Age 60 or (Older	
)5 411. Offense#	7 Section	(b)	(4)	of the	18 PA Statute	o (Title)		1 Counts		M]	NCIC Off	fense Code	UCR/NIBRS Code
PennD	OT Data blicable)	Accio	ent	JSECTION		FA Statute	1146		nterstate	Ĭ		Safety Zo		☐ Work Zone
	scription (inc	lude the	name o	f statute o	or ordi	nance): IN:	SURA	NCE	FRAUD	<u> </u>			<u> </u>	
intent to defr purpose of m and with inte	aud any insuran isleading inform	ce compa ation con	ny, self-inst cerning any	ured or oth fact mater	er perso ial there	on file an appleto; to wit: th	lication e defe	n for i Indant	nsurance , by and t	contair through	ning any n its ago	, false infor ent, Margar	mation or e te Almasi	knowingly and with conceal for the naqbeh, knowingly eal any fact material
Inchoate Offense	Attempt 18 901 A		☐ Solicit 18 902			onspiracy 903			Number	of Vic	tims A	ge 60 or O	lder	
			(a)(:	1) o	f the	18 PA Statute	(Title)	1	Counts	F3	ade	NCIC Offe	noo Codo	UCR/NIBRS Code
PennD	OT Data licable)	ection Accide Numbe	nt	ection		PA Statute	(Fille)	☐ Ir	terstate	J.		Safety Zor		☐ Work Zone
Statute De	scription (inc	lude the	name o	f statute o	or ordi	nance): TH	EFT B	Y DE	CEPTION					
intent to obta or other state misleading in	nin or withhold p e of mind; to wit formation mater	roperty o ; the defe	f another by andant, by a	y deception and through	Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, did knowingly and with the intent to obtain or withhold property of another by deception, created or reinforced a false impression, including false impressions as to law, value, intention or other state of mind; to wit: the defendant, by and through its agent, Margarete Almashaqbeh, did present or cause to be presented false, incomplete or misleading information material to application and documents for vehicle titles that the defendant, by and through its agent, Margarete Almashaqbeh, submitted to Penn DOT							e impression e to be pres	ons as to la sented fals	



Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number IFS210061							
First: Middle: Last:							
DOCUSERVICES DOCUSERVICES							
		Tra .	1				
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of	Victims Age 60 or Older			
☐ 07 4101 Lead? Offense# Se	(a)(3)	of the 18 PA Statute (Ti		M1 Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident	777 Oktabet (17	☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (inclu	de the name of statute	or ordinance): FORG	GERY				
Acts of the accused asso intent to defraud or injure anyon knows to be forged in a manne with the intent to defraud and/ in a manner specific in paragra	one, or with knowledge that I r specified in paragraphs (1) or knowledge that he is facili	he is facilitating a fraud on or (2) of this subsection	r injury to be perpreta , to wit: the defendan	ated by anyone, the actor utters t, by and through its agent, Ma	s any writing which he rgarete Almashaqbeh,		
Inchoate							
☐ 08 7121 Lead? Offense# S	ection Subsection	of the 75	Title) Counts	M1 Grade NCIC Offense Cod	e UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number	(7,7,0,0,0,0,0)	☐ Interstate	☐ Safety Zone	☐ Work Zone		
	<u> </u>	or ordinance): FALS	E APPLICATION FO	R CERTIFICATE OF TITLE O	R REGISTRATION		
Acts of the accused asso the first degree if the person u any other material fact in an ap made a material false statemer	ses a false or ficticious name oplication for a certificate of t	or address or makes a n title or for a registration,	naterial false statemer to wit: the defendant,	nt, or fails to disclose a security by and through its agent, Mar	interest, or conceals		
Inchoate	Solicitation 18 902 A	☐ Conspiracy 18 903	Number of	Victims Age 60 or Older			
□ 09 7122		of the 75		М1			
Lead? Offense# Se PennDOT Data (if applicable)	ction Subsection Accident ———	PA Statute (Ti	tle) Counts Interstate	Grade NCIC Offense Code Safety Zone	UCR/NIBRS Code ☐ Work Zone		
		or ordinance): ALTE	RED, FORGED, OR	COUNTERFEIT DOCUMENTS			
the first degree if the person, value a certificate of title or any other	vith fraudulent intent, alters r document issued or prepar	or forges an assignment ed for issue by the Penns	of a certificate of title sylvania Department o	largarete Almashaqbeh, is guilt, , or an assignment or release o of Transportation (Penn DOT). nent issued or prepared for issu	f a security interest on to wit: the defendant,		

\$0200							
	POL	.ICE	CRIMIN	NAL	COMP	LA	INT

Docket Number:	Date Filed:	OTN/LiveScar	ı Number	Complaint/Incident Nu IFS210061	ımber
Defendant Name:	First: DOCUSERVIC	Middle:	L	ast:	
Inchoate			Numbe	r of Victims Age 60 or Older	
□ 10 4904		of the 18	1	MW8	HOW PRODUCT
Lead? Offense# PennDOT Data (if applicable)	Section Sut Accident Number —	osection PA Statut	(Title) Counts Interstate	Grade NCIC Offense Cod	UCR/NIBRS Code Work Zone
	ude the name o	f statute or ordinance): un	SWORN FALSIFICA	TION TO AUTHORITIES	
statement which he did not be punishable; To wit: the defen	elieve to be true, on dant, by and throug gned (PA Dept. of T	or pursuant to a form bearing n h its agent, Margarete Almashaq ransportation (PennDOT)) forms	otice, authorized by la beh, engaged in a cor	Margarete Almashaqbeh, made a w, to the effect that false statem itinuous course of criminal condu en false statements which he did	ents made therein are ct, in which he
Inchoate	☐ Solici 18 902		Number	of Victims Age 60 or Older	
□ 11 5111	(a)(1	F1	
Lead? Offense# Si PennDOT Data (if applicable)	Accident Subs	ection PA Statute	(Title) Counts Interstate	Grade NCIC Offense Code	UCR/NIBRS Code
		f statute or ordinance): c R	IMINAL CONSPIRA	CY - DEALING IN PROCEEDS	OF UNLAWFUL
facilitating the commission of Practices, Tampering with Put agree with such other person or solicitation to commit such	one or more of the olic Records or Informals; and / or business crime(s); to wit; the conduct that constill	following crimes: Dealing in Proc mation, False Application for Cer s(es) that they or one or more of e defendant, by and through its cutes the aforementioned crime(eeds of Unlawful Activ tificate of Title or Regi them will engage in c agent, Margarete Alma	Margarete Almahaqbeh, with into vity, Washing Vehicle Titles, Dece stration, and Unsworn Falsificatio conduct which constitutes such cr ishaqbeh, did agree with one or r slicitation to commit such crime(s	ptive Business on to Authorities, did ime(s) or an attempt nore individuals, that
Inchoate		"	Numbe	r of Victims Age 60 or Older _	
12 911 Lead? Offense#	(b) Section Sub	(1) of the 18	1 Counts	F1 Grade NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Sur Number —	section FA Statute	Interstate	☐ Safety Zone	☐ Work Zone
	ude the name o	f statute or ordinance): co	RRUPT ORGANIZAT	IONS	
from a pattern of racketeering proceeds of such income, in the	activity in which sune acquisition of any h, engaged in and r	ich person participated as a prino interest in, or the establishmen eceived income derived, directly	cipal, to use or invest, t or operation of, any	as received any income derived, or directly or indirectly, any part of enterprise, to wit: the defendant, attern of racketeering activity and	such income, or the by and through its



	t Numb	er: 1 1022	Date /2/2	Filed:	01	N/LiveScar	1 Numb		C	Comp	olaint/Incident N 10061	umbei	
Defen	dant Na	de bat de vi	First:	SERVICES		Middle:		Last:					
			DOCO	PEKAICEP								.,	
Incho		Attempt		Solicitation 18 902 A		onspiracy 903		Number	of Victi	ims A	ge 60 or Older _		
	13	911		(b)(2)	of the	18		1	F1	y NT			
Lead?	Offens	e#	Section	(b)(2) Subsection		PA Statute	(Title)	Counts	Grac	de	NCIC Offense Cod	le I	JCR/NIBRS Code
	nnDOT applica	STATE STATE OF STATE	Accider Numbe	4.049 A. 44 %		j		Interstate			Safety Zone		☐ Work Zone
			ude the r	name of statute	or ordir	ance): COR	RUPT O	RGANIZATI	IONS	· · · · · · · · · · · · · · · · · · ·		<u> </u>	
					·								
											racketeering activi gent, Margarete Alr		
pattern c	f rackete		y maintaine								ation and document		
OUL OF SU	ate and v	vitilii tilis Gr	yarıızauori.										
													, <u>.</u>
Incho Offer	T. S. T. L. S.	Attempt 18 901 A		☐ Solicitation 18 902 A		nspiracy 903		Number	of Victi	ims A	ge 60 or Older _		
	14 Offens	911	Section	(b)(3) Subsection	of the	18 PA Statute	(Tide)	1 Counts	F1 Grad		NCIC Offense Cod		UCR/NIBRS Code
- 1 - A - A - A - A - A - A - A - A - A	nnDOT.	Data	Accider	t s		PA Statute	· · · · · · · · · · · · · · · · · · ·	Interstate	Glac		Safety Zone	1	Work Zone
	applica Descri		Numbe ude the r	name of statute	or ordir	iance): con	RUPTO	RGANIZATI	IONS			i	
		,				,							
participa	te, direct argarete	ly or indirect Almashaqbe	ly, in the c	onduct of such ente	erprise's a	ffairs through	a pattern	of racketeer	ring acti	ivity,	ociated with any ent to wit: the defenda enterprise's affairs t	nt, by a	and through its
racketee	ing activ	ity,											
					·····								
											r		
Inche Offe		☐ Attemp 18 901		☐ Solicitation 18 902 A		onspiracy 8 903		Numbe	r of Vic	tims	Age 60 or Older		
Lead?	15 Offer	911	Section	(b)(4) Subsection	of the	18 PA Statute	o (Titto)	1 Counts	F1	ade	NGIC Offense Co) do	UCR/NIBRS Code
Pe	nnDOT applic	Data	Accide Numb	ent		(A Olate)	T	Interstate			Safety Zone		Work Zone
				name of statute	or ordir	nance): cor	RUPTO	RGANIZATI	IONS				
Acts of	the ac	cused ass	ociated v	vith this Offense	e: It shall	be unlawful f	or any ne	erson to cons	pire to	violate	e any of the provisi	ons of t	paragraphs (1),
(2), or (3)	3) of this	subsection.	To wit: the	defendant, by and	through i	ts agent, Mar					th other individuals		
or racket	eering a	AIVILY ITI VIOII	auon of Sul	sections (1), (2), a	aira/or (3)	•							
		···	· <u> </u>										



		c.uddan.	
Docket Number: CR-449-3022	Date Filed: 12/5/3/052	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: DOCUSERVICES	Middle:	Last:
			dent he required to appropriate a sharp of horse

- 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 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.)

(Date)

(Year)

AND NOW, on this date Decem

cew/Acv 6, 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 sue

(Magisterial District Court Number)

/Isentha Authority

			1-40-4		
Docket Number:	Date Filed:	QTN/Live	Scan Number		Complaint/Incident Number
CK444-A027	121512622				IFS210061
	First:	Middle	e:	Last:	
Defendant Name:	DOCUSERVICES	ļ			

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- Oleg ZELENKO
- David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC



			POLICE CRIMINAL COMPLAINT
Doc	ket Number: Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Def	endant Name: First: DOCUSERVICES	Middle:	Last:
38.	MP Notary and Tags LLC		
39.	AMCO Auto Sales		
40.	Charo's Auto Sales		
44	ACT Auto Togo		

- A2Z Auto Tags 41.
- 42. Docuservices
- Emma's Auto Tags and Multiservices, Inc. 43.
- Wilfredo Auto Repair 44.
- 45 Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- G&G Auto Body and Auto Salvage 50.
- Mendoza Auto Sales 51.

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.

(Signature of Affiant) Sworn to me and subscribed before me this My commission expires first Monday of January,

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: DAUPHIN POLICE CRIMINAL COMMONWEALTH OF PEN	
Magisterial District Number: 12-2-03 VS.	
MDJ: Hon. DAVID H. JUDY, Esq. DEFENDANT: (NAME and ADDRI	
	FISERVICES,
Royalton, PA 17057 First Name Middle Name Last No. 4261 Frankford Avenue	allie P
Telephone: (717)234-0949 Philadelphia, PA 19124 NCIC Extradition Code Type	
□ 1-Felony Full □ 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States	☐ Distance:
☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition	
□ 3-Felony Surrounding States □ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition	
4-Felony No Extradition B-Misdemeanor Limited F-Misdemeanor Pending Extradition	
Defendant IDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint Number Incident Number	Request Lab
0	Services?
(1-444-22 14512) IFS210061	☐ YES ☐ NO
GENDER DOB / POB Add'I DOB / /	Co-Defendant(s)
☐ Male First Name Middle Name Last Name	Gen.
☐ Female AKA	
RACE White Asian Black Native American ETHNICITY Non-Hispanic Unknown	☐ Unknown
GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple)	☐ BRO (Brown)
Half TIPLE (Place) TIPLE (Transp) TIMAL (Albita) TIVY (Link (Reld)) TIGAN (Green)	☐ PNK (Pink)
Color BLN (Blonde / Strawberry)	
	GRY (Gray)
- TENNA	(XX (Unknown)
DNA PYES NO DNA Location	WEIGHT (lbs.)
FBI Number MNU Number	
Defendant Fingerprinted ☐ YES ☐ NO	Ft. HEIGHT In.
Fingerprint Classification:	
A STATE OF THE PROPERTY OF THE	C Veh, Code Reg.
Plate # mat Sticker (MM/YY) / Ind. [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 filling. See Pa,R,Crlm,P, 507).	he Commonwealth prior
Duhant A La Dan	
CDAG ROBERT LABAR (Name of the altorney for the Commonwealth) (Signature of the altorney for the Commonwealth)	_12/05/2022_
(Hambe of the automoty for the Communication)	(Date)
I, JEREMY BECKER (Name of the Afflant) 737643/BADGE # 736 (PSP/MPOETC -Assigned Afflant ID Nu	mber & Badge #
of Pennsylvania Office of Attorney General PA0222400	
(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	ľ
☐ 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 vertherefore 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	,
In DAUPHIN County [22] on or about 2018 - PRESENT (County Code)	

Docket				1 15 march	POLICE	CRIMINAL	. COMPLAINT
t i ai	Number:/-22	Date Filed:	OTN/LiveScan	Number		olaint/Incident I	Number
	1-1100	/ 4512 3 First:	Middle:		Last:	10061	
Defend	ant Name:	EMMA AUTO TA	l l			VICES, INC.	
The ac	ts committed by	the accused are de	scribed below with each	n Act of Assem	bly or statute	allegedly viol	ated, if appropriate.
When t	there is more tha	n one offense, each	n offense should be nun Ivise the defendant of the nat	nbered chrono	logically.	ilation to the etat	hotelolis utbonolio (alolus
without r	more, is not sufficien	f. In a summary case, vo	ou must cite the specific sect	ion(s) and subsec	lon(s) of the st	atute(s) or ordinar	ice(s) allegedly violated.
The age be listed	of the victim at the ti , if the identity of an	me of the offense may b account must be establi	e included if known. In additi shed, list only the last four d	on, social security igits. 204 PA.Code	numbers and 1 §§ 213.1 – 213,	inancial informati 7.)	on (e.g. PINs) should not
•	-						
Inchoa Offens		☐ Solicitation 18 902 A	n Conspiracy 18 903		Number of	Victims Age 60 o	r Older
\boxtimes	01 5111	(a)(1)	of the 18	1.	F1		
Lead?	Offense Se	ction Subsection	PA Statute (Tille) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code >
	nDOT Data pplicable)	coldent Number		☐ Interstate		Safety Zone	☐ Work Zone
		ude the name of st	atute or ordinance): DE	LING IN PROCE	EDS OF UNLA	WFUL ACTIVITY	
							ment
			fense: The defendant, by a saction with knowledge that				
represent	ts the proceeds of ur	lawful activity, the person	on acts with the Intent to pro-	mote the carrying	on of the unlaw	ful activity. To will	: the defendant, by and
through i	its agent, Linda Sand	oval Herrera-Martinez, r	epeatedly engaged in financia te the carrying on of said uni	al transactions with	n knowledge tha	at the property inv	olved represented the
proceeus	Of Utiliawith activity	with the litteric to profito	te the carrying on or said din	avius activity.			
r av Saviencia	ww-3:11 <u></u>		pros.				
Inchoa Offens		☐ Solicitation 18 902 A	on ☐ Conspiracy 18 903		Number of	Victims Age 60 o	r Older
		(A)			A PER SUSSE		
ł	02 4117	(a)(1)	of the 18	1.2%	F3	NCIC Offense	
	Offense# Sei	tion Subsection	PÅ Statute (Title) Counts	Grade	Code	UCR/NIBRS Code
and the second second	pplicable)	coldent Number		☐ Interstate		Safety Zone	☐ Work Zone
Statute	Description (inc	ude the name of st	atute or ordinance): INS	URANCE FRAUD			
				· · · · · · · · · · · · · · · · · · ·			
			fense: The defendant, by a agency, namely, PA Deptart				
	d to the government	agency a document tha	t contained false, incomplete	or misleading info	rmation concer	ning a fact or thin	g material to the agency's
presente	allan in americalian as	: disamproving a motor v	ehicle insurance rate filing, a	motor vehicle inst	irance transacti	on or other motor	vehicle insurance action Martinez, knowingly and
presente determin	required or filed in re	snonse to an agency's r		: by and through i	ts agent. Linda.	aantuvai menera	
presented determin which is with Inter	required or filed in re nt to defraud the PA	sponse to an agency's r Dept, of Transportation	(PennDOT), submitted applic	, by and through i ations and docum	ts agent, Linda ents which frau	dulently misrepres	ented facts and
presented determin which is with inter	required or filed in re	sponse to an agency's r Dept, of Transportation	(PennDOT), submitted applic	, by and through trations and docum	ts agent, Linda ents which frau	dulently misrepres	ented facts and
presente determin which is with Inter Informati	required or filed in re nt to defraud the PA ion pertaining to yehi	sponse to an agency's r Dept, of Transportation cles.	(PennDOT), submitted applic	ations and docum	ents which frau	dulently misrepres	ented facts and
presented determin which is with inter	required or filed in re nt to defraud the PA ion pertaining to vehi ate	sponse to an agency's r Dept, of Transportation cles.	(PennDOT), submitted applic	ations and docum	ents which frau	dulently misrepres	sented facts and
presented determin which is with Inter Informati	required or filed in rent to defraud the PA ion pertaining to vehicate ate Attempt 18 901 A	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A	(PennDOT), submitted applic	ations and docum	ents which frau	dulently misrepres	ented facts and
presented determine which is with Intelemental Inches	required or filed in rent to defraud the PA ion pertaining to vehicate ate	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A (a)(2)	on Conspiracy 18 903 Softhe 18	Num	ents which frau	Age 60 or Older	ented facts and
presented determin which is with interinformati	required or filed in rent to defraud the PA ion pertaining to vehicate Attemptise Attemptise 18 901 A 03 4117 Offense#	sponse to an agency's r Dept, of Transportation cles. Soficitati 18 902 A (a)(2) Seallon Subsect Accident	on Conspiracy 18 903 Softhe 18	Num	ber of Victims F3 Grade	dulently misrepres	ented facts and
presented determin which is with interinformati	required or filed in rent to defraud the PA ion pertaining to vehicate Attemptise Attemptise 18 901 / Offense#	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A (a)(2) Section Subsect Accident Number	on Conspiracy 18 903 on PA Statute	Num (Title) Count	ber of Victims F3 Grade	Age 60 or Older	ented facts and Ode UCR/NIBRS Code
presented determin which is with interinformati	required or filed in rent to defraud the PA ion pertaining to vehicate Attemptise Attemptise 18 901 / Offense#	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A (a)(2) Section Subsect Accident Number	on Conspiracy 18 903 Softhe 18	Num (Title) Count	ber of Victims F3 Grade	Age 60 or Older	ode UCR/NIBRS Code
presented determin which is with interinformati inches Offen Lead? Reg Reg (if Statute	required or filed in rent to defraud the PA ion pertaining to vehicate Date 18 901 / Offense# nnDQT Data applicable) Description (incl	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A (a)(2) Section Subsect Accident Number ude the name of ste	on Conspiracy 18 903 on PA Statute atute or ordinance): INS	Num (Title) Count Intersta URANCE FRAUD	ber of Victims F3 Grade	Age 60 or Older NCIC Offense C	ode UCR/NIBRS Code Work Zone
Incho Incho Offen Lead? Statute Acts of with Inter	required or filed in rent to defraud the PA ion pertaining to vehicate	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A (a)(2) Section Subsect Accident Number ude the name of state oclated with this Of rer,did present or cause	on Conspiracy 18 903 con PA Statute atute or ordinance): INS fense: The defendant, by at to be presented to an insure	Num (Title) Count Intersta URANCE FRAUD and through its age r a statement form	ber of Victims F3 Grade e [Age 60 or Older NCIC Offense C Safety Zone NOTE TO STATE TO STA	ode UCR/NIBRS Code Work Zone Dez, did, knowingly and a Insurance claim that
presented determin which is with Interiormati Incho Offen Lead? Per (if Statute Acts of with Interiormatic Incho Offen Incho Offen Incho Offen Incho Offen Incho Offen Inch Inch Inch Inch Inch Inch Inch Inc	required or filed in rent to defraud the PA ion pertaining to vehicles ate	sponse to an agency's r Dept, of Transportation cles. Solicitati 18 902 A (a)(2) Section Subsect Accident Number ude the name of state octated with this Of rer,did present or cause or misleading information	on Conspiracy 18 903 on PA Statute atute or ordinance): INS	Num (Tille) Count Intersta URANCE FRAUD Int through its age r a statement form naterial to the insu	ber of Victims F3 Grade e [Int, Linda Sando hing a part of, o	Age 60 or Older NCIC Offense C Safety Zone Val Herrera-Martin or in support of, ar wit: the defendar	ode UCR/NIBRS Code Work Zone Dez, did, knowingly and a Insurance claim that alt, by and through its

	POLICE	CRIMINAL	COMPL	ΔΙΝΙΊ
* 1200 m	PULIUE	CKIMINAL		Ally I

Docket Number:	Date	e Filed:	OTN/LiveScan	Number		Complaint/incident Nu IFS210061	ımber
Defendant Name:	First: EMM	A AUTO TAG	Middle: AND	···	Las MU		
	all Asia and a						**************************************
Inchoate	ttempt	☐ Solicitation	☐ Conspiracy		Number of	Victims Age 60 or Older	
	8 901 A	18 902 A	18 903			VIOLENTS AGO OF OILLE	
D4 Lead? Offense#	4117 Section	(a)(3) Subsection	of the 18	Fille)	Counts	3 Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Acolde	ent i			terstate	☐ Safety Zone	☐ Work Zone
			or ordinance): INS	URANCE	FRAUD		
conspires with another claim that contains an or supports an amoun Martinez, did knowing	r to prepare or r y false, incomple t claimed in exc ly and with the i	make any statement the ete or misleading infor ess of the actual loss on tent to defraud anins	nat is intended to be pro mation concerning any sustained by the claima	esented to fact or thi nt to wit: ! atement(s	any insurer o ng material to the defendant) intended to l	y insurer or self-insured, assis or self-insured in connection w o the claim, including informat , by and through its agent, Li be presented to the insurer in	Ith, or in support of, a lon which documents nda Sandoval Herrera
Inchoate	Attempt	Solicitation	☐ Conspiracy	-	Alumban at	EVII-timo Ano CO ou Oldon	
	18 901 A	18 902 A	18 903		Walinger of	Victims Age 60 or Older	
☐ 05 Lead? Offense#	4117 Section	(b)(4)	of the 18	(Tille)	1 Counts	Grade NCIC Offense Coo	le UCR/NIBRS Cods
PennDOT Data (if applicable)	a Accid	lent	,		Interstate	☐ Safety Zone	☐ Work Zone
		e name of statute	or ordinance): INS	URANCE	FRAUD		
and with Intent to defir the purpose of mislead	aud any Insuran Ilng information ent to defraud a	ice company, self-insu concerning any fact n an insurance company,	red or other person file naterial thereto; to wit:	an application	ation for Insur dant, by and i	ida Sandoval Herrera-Martine; ance containing any false info through its agent, Linda Sandi alse and/or misleading informa	rmation or conceal for oval Herrera Martinez,
	tempt 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of \	Victims Age 60 or Older	
	3922	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	of the 18		F.		
Lead? Offense# PennDOT Data (if applicable)	Section Accide Numb		PA Statute (1		Counts teratate	Grade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
			or ordinance): THE	FT BY DE	CEPTION	.1	
with the intent to obtaintention or other state	in or withhold p e of mind; to wit incomplete or m	roperty of another by a the defendant, by ar disleading information	deception, created or r nd through its agent, Li material to application (einforced nda Sando	a false impres val Herrera M	da Sandoval Herrera-Martinez sion, including false impressio lartinez and/or its employee(s cle titles that the defendant, b	ons as to law, value,), did present or cause

	POLIC	E CR	ΙΜΙΝΔΙ	COMPL	ΔΙΝΤ
7 10 TO 10 T			III A WILLIAM	CALTIBILITY	

Docket Number:	Date Filed:	OTN/LiveSc	can Number		Complaint/Incident Nu IFS210061	mber
Defendant Name:	First: Middle; Last: EMMA AUTO TAG AND MULTISERVICES, INC.					
(All and a second secon			····			
Inchoate			V N	umber of Vi	ctims Age 60 or Older _	
[management	1-1-3-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1		NASATARANAL NYA.	A		
	Section Sub-	of the 18 accilon PA Sta	tute (Title) Co	ounts G	rade NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<u> </u>	☐ Inter		☐ Safety Zone	☐ Work Zone
Statute Description (incl	ude the name of	statute or ordinance): I	RECEIVING STOL	LEN PROPE	RTY	
Acts of the accused ass						
another knowing that it has be restore it to the owner; to wit movable property, belonging it	The defendant, by	and through its agent, Linda	Sandoval Herrera I	Martinez, did	intentionally receive, retail	n or dispose of
been stolen, and the property PA Crimes Code	stolen is an automol	itent to restore it to the own offe, airplane, motorcycle, mo	er, knowing that st otorboat, or other n	notor property	led vehicle in violation of S	Section 3925(a) of the
PA Grites Code						
Inchoate	□ Solicita	ation			thus Aug CO or Older	
Offense 18 901 A	18 902		l Nui	mper or Vic	tims Age 60 or Older	<u> </u>
□ 08 4101	(a)(3	Control of the Contro	1 Y	F3		
PennDOT Data	Accident Subse	clion PA Statu	ite (Title) Gour		de NGIC Offense Code ☐ Safety Zone	UCR/NIBRS Code
(if applicable) Statute Description (incl	Number —— ude the name of	 statute or ordinance): I	FORGERY			
Note of the market and	a state of with their	Office on The Life days h			Condendation Markhan	in on the sec Courses in
Acts of the accused ass with intent to defraud or injury which he knows to be forged in	e anyone, or with kno	owledge that he is facilitating	a fraud or Injury t	to be perpret	ated by anyone, the actor	utters any writing
Herrera Martinez, with the inte knows to be forged in a mann	ent to defraud and/or	knowledge that he is facilita	ating a fraud, utter	ed a writing	(vehicle applications and de	ocuments) which he
Knows to be rorged in a filanti	er specific in bologio	pri(2) or this section.				
Inchoate			, Nr	umber of Vi	ctime Age 60 or Older	
D 09 7121		or the 1/5	1.	M1		
Lead? Offense# 5 PennDOT Data (if applicable)	Section Subs Accident Subs Number —	ection PA Sta	lute (Tille) Cor	T	rade NGIC Offense Cod	e UCR/NIBRS Code ☐ Work Zone
Statute Description (incl	· · · · · · · · · · · · · · · · · · ·	statute or ordinance); r	ALSE APPLICATI	ION OF TIT	LE OR REGISTRATION	L
Acts of the accused ass						
misdemeanor of the first degree interest, or conceals any other	material fact in an a	pplication for a certificate of	title or for a regist			
						1111
Sandovai Herrera Martinez, ma	ade a material false s	tatement and/or concealed a	any other material (fact in an ap	plication for a certificate of	title.

	DOL	IOE	CRIMINAL	COMBI	AINIT
CARROLI	POL	JGE	CRIMINAL	COMPL	AIN I

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number IFS210061		
Defendant Name:	First:	Middle:		Last:	1 Annual Value of the Control of the	
Defendant Name:	EMMA AUTO	AG AND		MULTISERVICES, INC.		
Inchoate	☐ Solicit 18 902		Numb	er of Victims Age 60 or Older		
□ 10 7122	(3)	of the 75		M1		
Lead? Offense# S	ection Subs	acilon PA Statul	e (Title) Counts	Grade NCIC Offense Go	de UCR/NIBRS Code	
RennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (inclu	ide the name of	statute or ordinance): AL	TERED, FORGED, C	R COUNTERFEIT DOCUMENTS	3	
misdemeanor of the first degre security interest on a certificate	e If the person, with e of title or any other	fraudulent intent, alters or for document issued or prepared	ges an assignment o for issue by the Pen	t, Unda Sandoval Herrera Martine f a certificate of title, or an assign nsylvania Department of Transpor	ment or release of a tation (Penn DOT). to	
wit: the defendant, by and thro issue by Penn DOT.	ough Its agent, Linda	Sandoval Herrera Martinez, w	ith fradulent intent, a	altered and/or forged any docume	nt issued or prepared for	
	1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2					
Inchoate	☐ Solicite 18 902		Number of Victims Age 60 or Older			
Lead? Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code						
PennDOT Data (if applicable)	Accident Number		☐ Interstate		☐ Work Zone	
Statute Description (inclu	Allegations desired and second	statute or ordinance): u n	SWORN FALSIFIC	ATION TO AUTHORITIES		
Acts of the accused asso	clated with this	Offense: The defendant, by	and through Its agen	r, Linda Sandoval Herrera Martine:	z, made a written false	
statement which he did not bell punishable; To wit: the defende	leve to be true, on o ant, by and through	r pursuant to a form bearing n its agent, Linda Sandoval Herr	otice, authorized by era Martinez, engage	aw, to the effect that false staten d in a continuous course of crimin	nents made therein are lai conduct, in which he	
	knowingly and Intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.					
			,			
Inchoate			Numi	per of Victims Age 60 or Older		
12 5111 Lead? Offense#		1) of the 18	ite (Tille) Counts	F1 Grade NCIC Offense Co	ode UÇR/NİBRS Code	
PennDOT Data	Accident	FA Olati	Interstat		☐ Work Zone	
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC						
Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera Martinez, with intent of						
promoting of 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 ther	n will engage in conduct which co Linda Sandoval Herrera Martinez,	nstitutes such crime(s)	
more individuals, that one or 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 in pursuance of the conspiracy.						
AND ACTIVES OF CIERS CHARGES	· · · · · · · · · · · · · · · · · · ·	SECTION OF STREET, STR				



Docket Number:	Date Filed: /2/5/3-7_	OTN/LiveScan N	umber	IFS21	aint Numbei 3061	Incide	nt Number
Defendant Name	First:	1	Middle: Last:			CEDIACEC TAIC	
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.)							
Inchoate	☐ Solicitation 18 902 A		Conspiracy 18 903		Number of Victims Age 60 or Older		
□ 1 3 911		of the 18	1	F.			
	vcc/dent	PA Statute	(Title) Co		T	IC Offense Cod	e UCR/NIBRS Code ☐ Work Zone
(if applicable) Statute Description (inclu	Number [ide the name of statut	e or ordinance): 0	ORRUPT ORGA	NIZATION:	<u> </u>		
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, by and through its agent, Linda Sandoval Herrera Martinez, 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 Emma Auto Tag.							
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A		☐ Conspiracy 18 903		Number of Victims Age 60 or Older		
□ 14 911		of the 18	1	F1			
	on Subsection Accident Number	PA Statute	Fitle) Counts ☐ Inter			Offense Gode bly Zone	UCR/NIBRS Code Work Zone
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, by and through its agent, Linda Sandoval Herrera Martinez through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of fraudulent vehicle title application and documents to individuals both out of state and within this organization.							
Inchoate			Conspiracy 18 903		Number of Victims Age 60 or Older		
□ 1 5 911	(B)(3)	of the 18	1	F1			
(if applicable)	Accident	PA Statute (1	☐ Inter	state	☐ Safe	offense Code ety Zone	UCR/NIBRS Code Work Zone
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZTIONS							
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, by and through its agent, Linda Sandoval Herrera Martinez, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.							



Docket Number:	Date Filed: 12-15-12-2	5 12 IFS2		Comple IFS210	oint Number	Incident Number	
Defendant Name	First: EMMA AUTO TA	Middle: .G AND			Last: MULTISERVICES, INC.		
The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)							
Inchoate	Solicitati 18 902 A		Conspiracy 18 903		Number of Victims Age 60 or Older		
□ 1 6 911	L \ /\ / Is	of the 18	1	F.			
Lead? Offense# S PennDOT Data (If applicable)	ection Subsection Accident Number	PA Statute ((Title) Gau ☐ Inters		Grade NCIC Off ☐ Safety Zo	ne UCR/NIBRS Code	
	clude the name of statu	le or ordinance): co	DRRUPT ORGAI	VIZATION:	6		
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, by and through its agent, Linda Sandoval Herrera Martinez, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).							
Inchoate	☐ Solicitati		nspiracy		Number of Victin	ns Age 60 or Older	
Offense 18 901 A	18 902 A	\$2255.00	903				
	ection Subsection	or the PA Statute (Ti	l le) Counts	Grad	te NCIC Offens	e Code UCR/NIBRS Code	
Penn DOT Data (if applicable)	Accident Number		☐ Inters	tale	☐ Safety Zor	ne 🔲 Work Zone	
Statute Description (include the name of statute or ordinance):							
Acts of the accused associated with this Offense:							
Inchoate							
Offense 18 901 A	18 902 A		903		ivumper of victin	is Age 60 or Older	
Lead? Offense# S	ection Subsection	of the PA Statute (Ti	Itle) Counts	Grad	de NCIC Offens	e Code UCR/NIBRS Code	
PennDOT Data	Accident Number	1710111100 (11	☐ Inters		☐ Safety Zo		
Statute Description (include the name of statute or ordinance):							
Acts of the accused associated with this Offense:							

Docket Number:	Date Filed: 0	TN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last
Defendant Name:	EMMA AUTO TAG	AND	MULTISERVICES, INC.

- 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 filling 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, sword to before the issuing authority, and attached.)

(Date)

(Year)

(Signalure of Affiant)

(Signalure of Affiant)

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

(Magisterial District Court Number)

(Issuing Authority)

		11	
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
ar444.22	12512		IFS210061
	First:	Middle:	Last:
Defendant Name:	EMMA AUTO TAG	AND	MULTISERVICES, INC.

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.

- Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecla VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC

				POLICE CRIMINAL COMPLAINT
Do	cket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
919		First:	Middle:	Last:
De	fendant Name:	EMMA AUTO TAG	AND	MULTISERVICES, INC.
38. 39. 40. 41. 42. 43.	MP Notary and T AMCO Auto Sale Charo's Auto Sal A2Z Auto Tags Docuservices Emma's Auto Tag Wilfredo Auto Re	es es gs and Multiservices, Inc.		

- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

My commission expires first Monday of January,

day of

MBer =

Magisterial District white

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon, DAVID H. JUDY, Esq. (NAME and ADDRESS): Address: 50 Canal Street G & G AUTO BODY AND **AUTO SALVAGE** First Name Middle Name Last Name : Royalton, PA 17057 325 W. Glenwood Avenue Philadelphia, PA 19140 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Date Filed** OTN/LiveScan Number Complaint Number Incident Number **Docket Number** Services? 15122 ☐ YES ☐ NO IFS210061 Co-Defendant(s) GENDER DOB POB Add'l DOB Maie First Name Middle Name Last Name Gen. ☐ Female AKA ☐ White ☐ Hispanic Black RACE Native American Unknown Aslan ETHNICITY Non-Hispanic Unknown BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Halr BLK (Black) ONG (Orange) XXX (Unk./8ald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) BLK (Black) Eve Color: HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) **DNA** Location WEIGHT (lbs.) DNA MYES MINO FBI Number MNU Number Ft. HEIGHT in. Defendant Fingerprinted YES NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh. Code Registration Comm'l Veh. Reg. State Haz Ind. same mat Plate# Sticker (MM/YY) as Def. VIN Year Make Model Color Style 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signalure of the altorney for the Commonwealth) (Name of the altorney for the Commonwealth) I, JEREMY BECKER 737643/BADGE # 736 (Name of the Afflant) (PSP/MPOETC -Assigned Afflant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) on or about 2018 - PRESENT in DAUPHIN County [22] (County Code)

			Pi	OLICE CRIMINAL	
Docket Number:	Date Filed:	OTN/LiveScan Nu	ımber	Complaint/incident N IFS210061	umber
Defendant Name:	First: G & G AUTO BODY	Middle:		ast: AUTO SALVAGE	
	G & G AUTO BODT AND AUTO SALVAGE				
When there is more the (Set forth a brief summary of without more, is not sufficier	in one offense, each off the facts sufficient to advise it. In a summary case, you mu ime of the offense may be inc	ense should be numbe the defendant of the nature ust cite the specific section Juded if known. In addition,	ered chronolog of the offense(s) s) and subsection social security n	charged. A citation to the statun(s) of the statute(s) or ordinand nmbers and financial information	te(s) ellegedly violated, ce(s) allegedly violated.
Inchoate	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Victims Age 60 or	Older
	(a)(1)	of the 18	1	EL VIII	
#	ction Subsection	PA Stalute (Tille) Counts	Grade NCIC Offense Gode	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statute	e or ordinance): bealt	VG IN PROCEE	S OF UNLAWFUL ACTIVITY	
first degree if the person con- the proceeds of unlawful action	ducts a financial transaction v vity, the person acts with the z Sr,repeatedly engaged in fir	vith knowledge that the prop Intent to promote the carryl Lancial transactions with kno	perty involved, ind ing on of the unla	Roberto GOmez Gomez Sr, con cluding stolen or illegally obtaine wful activity. To wit: the defend property involved represented th	ed property, represents lant, by and through its
Inchoate	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Victims Age 60 or	Older
□ 02 3922	(a)(1)	of the 18	1	F3	
	clion Subsection	PA Statute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Gode
(if applicable)	ccident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statute	e or ordinance): THEFT	BY DECEPTION		
Intent to obtain or withhold of	roperty of another by decepti ne defendant, by and through	on, created or reinforced a f Its agent, Roberto Gomez G	alse impression, i Somez Sr, did pre	Roberto Gomez Gomez Sr, did Including false impressions as to sent or cause to be presented fa	law, value, Intention or
Inchoate		☐ Conspiracy 18 903	Number	of Victims Age 60 or Older	
□ 03 3925		of the 18		F3	
PennDOT Data	Section Subsection Accident	PA Stalute (Tilk	Ounts Interstate	Grade NCIC Offense Co	de UCR/NIBRS Code Work Zone
(if applicable) Statute Description (incl	Number ude the name of statute	or ordinance): RECEIV			
Acts of the accused ass Intentionally receives, retains, the property is received, retain Sr. did intentionally receive, re	ociated with this Offens or disposes of movable propertied, or disposed with intent to etain or dispose of movable pitched had probably been stolen, as	e: The defendant, by and the orty of another knowing that or restore it to the owner; to roperty, belonging to another or the property stolen is an	nrough Its agent, tit has been stole wit: The defende er, with no intent	ROberto GOmez Gomez Sr, is g en, or believing that it has proba int, by and through its agent, R to restore it to the owner, know ane, motorcycle, motorboat, or	ibly been stolen, unless oberto Gomez Gomez ving that such property
, , , , , , , , , , , , , , , , , , , ,	(a) a a a a a a a a a a a a a a a a a a				

Docket	Number:	Date Filed:	OTN/LiveScan N		Complaint/Incident Number IFS210061			
Defend	lant Name;	First: G & G AUTO BODY	Middle: AND	Last: AUT	O SALVAGE			
Incho Offen			Conspiracy 18 903	Number of V	ictims Age 60 or Older			
	04 4120		ofthe 18	1 F3	Mar (20) 20 (20)			
	inDOT Data	Section Subsection Accident	PA Statute (Ti	tie) Counts C ☐ Interstate	rade NCIC Offense Code	UCR/NIBRS Code Work Zone		
	applicable) Description (inc	Number lude the name of statut	e or ordinance): IDEN	TITY THEFT				
identity t	heft of another person r any unlawful purpo	sociated with this Offens on if he possesses or uses, th ose, to wit: the defendant, by ying information of another po	rough any means, Identify and through its agent, Ro	ing information of anoth berto Gomez, Gomez Sr	ner person without the conse , committed identity theft of	nt of that other person another person		
Incho Offer			Conspiracy 18 903	Number of	Victims Age 60 or Older			
Lead?	05 7121	Section Subsection	of the 75	2 M	1 Grade NCIC Offense Cod			
	nnDOT Data applicable)	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute	Description (inc	lude the name of statute	e or ordinance): FALS	E APPLICATION FOR	CERTIFICATE OF TITLE O	R REGISTRATION		
of the fire	st degree if the perso any other material fa	sociated with this Offens on uses a false or ficticious na act in an application for a cerl alse statement and/or conceal	ame or address or makes a dificate of title or for a regi	e material false statements restration, to wit: the defi	nt, or fails to disclose a secur endant, by and through its ag	fity interest, or		
Incho Offen		Solicitation 18 902 A	Conspiracy 18 903	Number of V	ictims Age 60 or Older			
Lead?	06 7122 Offense# S	(3) Section Subsection	of the 75 PA Statute (Till	1 M	L Yade NCIC Offense Code	UCR/NIBRS Code		
Per	inDOT Data applicable)	Accident Unmber	777 Ottable 771	☐ interstate	☐ Safety Zone	☐ Work Zone		
		lude the name of statut	e or ordinance): ALTE	RED, FORGED, OR CO	OUTERFEIT DOCUMENTS			
of the fir	st degree if the perso ificate of title or any nt, by and through its	sociated with this Offens on, with fraudulent intent, alto other document issued or pro s agent, Roberto Gomez Gom	ers or forges an assignmen epared for issue by the Pe	nt of a certificate of title nnsylvania Department	, or an assignment or release of Transportation (Penn DOT	e of a security interest), to wit: the		

XXX	DO!	ICE	CRIMINAL	COMPI	AINIT
生态性 力	PUL	ᇿᆫ	CKIMINAL	CUMPL	.AIIV I

Docket Number:	Date Filed:	OTI	N/LiveScan N	umber		Complaint/incident Number JFS210061				
Defendant Name:	First:		Middle:		Last:					
	G & G AUTO I	אַן אַטטאַ	DY AND /			O SALVAGE				
•										
Inchoate	☐ Solicit 18 902		nspiracy 903	N	Number of V	ictims Age 60 or Older				
□ 07 4107	\$76.5 (C.C.)									
PennDOT Data	ection Subs Accident	ection	PA Stalute (Title	e) C Inte		Grade NCIC Offense Code	UCR/NIBRS Code Work Zone			
(If applicable) Statute Description (inc	Number —— ude the name o	 statute or ordin	ance): DECER	·		<u> </u>	- VIOIR ZOIIG			
Statute Boson, paori (mo	was the hatte o		iano, i amomi		W-10-10 ()					
Acts of the accused ass	ociated with this	Offense: The def	fendant, by and	through It	s agent, Rot	perto Gomez Gomez Sr, In the	e course of business,			
through its agent, Roberto Go	mez Gomez Sr, enga	ged in a continuing	course of crimb	nal conduc	ct in which th	ne defendant by and through	its agent(s), knowingly			
and Intentionally submitted from	auquient applications	ror PA salvage and	reconstructea v	enicie atio	es to the PA	Dept. or Transportation (Pen	RDOT).			
				, , , , , , , , , , , , , , , , , ,						
Inchoate ☐ Attemp Offense 18 901 A			onspiracy 903		Number of	Victims Age 60 or Older _				
□ 08 4904	·····	of the g	18	i	у	MM3				
PennDOT Data	Accident	section	PA Statute (Til		Counts erstate	Grade NCIC Offense Cod	UCR/NIBRS Code ☐ Work Zone			
(if applicable) Statute Description (incl	Number — ude the name of	statute or ordin	ance): UNSW			_L				
- 1211.1.2										
Acts of the accused ass statement which he did not be punishable; To wit: the defend	elieve to be true, on dant, by and through	or pursuant to a for its agent, Roberto	m bearing notice Gomez Gomez S	e, authoriz Sr. engage	ted by law, to ed in a contin	o the effect that false statem wous course of criminal cond	ents made therein are luct, in which he			
knowingly and intentionally slo on forms bearing notice that f	gned (PA Dept. of Tr alse statements wer	ansportation (Penni punishable by law.	OOT)) forms the ·	reby maki	ng written fa	ilse statements which he did	not believe to be true,			
			<u></u>							
Inchoate	☐ Solicita 18 902		spiracy 03	N	lumber of V	ictims Age 60 or Older				
□ 09 4117	(a)(3	2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1	18	ì						
PennDOT Data	ection Subse Accident	ction	PA Statute (Title)Co ☐ Inte		Brade NCIC Offense Code	UCR/NIBRS Code Work Zone			
(if applicable) Statute Description (Incl	Number —— ude the name of	 statute or ordin	ance): INSUR							
Acts of the accused ass	ociated with this	Offense: Knowing	gly and with the	intent to	defraud any	insurer or self-insured, assist	ts, abets, solicits or th, or in support of, a			
conspires with another to prepare or make any statement that is intended to be presented to any insurer or self-insured in connection with, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim, including information which documents or supports an amount claimed in excess of the actual loss sustained by the claimant to wit: the defendant, by and through its agent, Roberto Gomez Gomez										
or supports an amount claims Sr, did knowingly and with the support of an insurance claim	Intent to defraud a	insurer, made mate	erial statement(s) intended	d to be prese	ented to the Insurer in conne	ction with and/or in			
				·						

_	t Number	r: -22	Date FI	_ \$	O'	ΓN/LiveScan			Complaintincident No IFS210061	
Defen	dant Nam	e:	First:	UTO BODY		Middle: AND		Last:	O SALVAGE	
<u> </u>		1	GROP	, 1000 010		AND		1 701	O SALVAGE	
	oate nse	18 901 A		Solicitation 18 902 A		Conspiracy 18 903		Number of	Victims Age 60 or Older _	
Lead?			ection	Subsection	of the	18 PA Statute	(Title)	1 F	Grade NCIC Offense Co.	1# UCR/NIBRS Code
	ennDOT (f applical		Accident Number					Interstate	☐ Safety Zone	☐ Work Zone
Acts o third de mileage fleticious	e Descrip f the acc gree if, wit of a motor s information	used assort the Intention to wit: w	ude the noclated was to deceive person mai	ame of statute ith this Offens anyone or with kee/causes to be	e: The donormade an the defe	efendant, by ar that the perso application for ndant, by and t	nd throug n is facilit a certifica hrough it	h its agent, Rob Iting a deceptio Ite of litte for a s agent, Roberti	perto Gomez Gomez Sr, com n to be perpretated by anyou motor vehicle which includes o Gomez Gomez Sr, made/ca	ne concerning the true materially false or
Inch		Attempt		Solicitation		onspiracy	7	Number of V	ictims Age 60 or Older	
Offer	nse	18 901 A		18 902 A	18	903	<u> </u>			
	11	4911		(a)(1)	ofthe	18		1 F3		
	Offense# nnDOT D	ata	ction Accident	Subsection		PA Statute (1		Counts G nterstate	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone
	applicab e Descrip		Number ude the n	ame of statute	or ord	inance): TAM	PERING	WITH PUBLI	C RECORDS OR INFORMA	TION
intent m	iake a false or required	entry in, or by law to b	false alterate false false	ation of, any reco thers for informal	rd, docur Jon of th	nents or thing t e government;	elonging To wit: ti	to, or received ne defendant, b	erto Gomez Gomez Sr, did k or kept by, the government y and through its agent, Rob kept by Penn DOT.	for information or
Inch Offe		Attempt 18 901 A	, ~	Solicitation 18 902 A		Conspiracy 8 903		Number of	Victims Age 60 or Older _	
Lead?	12 Offense		ection	(a)(1) Subsection	of the	18 PA Statute	(Title)	1 F	1 Grade NCIC Offense Co.	de UCR/NIBRS Code
Asset Services Control of	nnDOT I f applicat		Accident Number					Interstate	Safety Zone	☐ Work Zone
Statute		tion (incl	ide the n	ame of statute	or ord	inance): CRI	MINAL C	ONSPIRACY -	DEALING IN PROCEEDS	OF UNLAWFUL
facilitati Practice agree w or solici one or r	ng the com s, Tamperi lith such ot tation to co nore would	mission of a ng with Pub her person(s mmlt such a l engage in a	one or more lic Records s) and / or l crime(s); to conduct tha	of the following or Information, Fousiness(es) that wit; the defenda	crimes: I alse Appl they or c nt, by an aforemer	Dealing in Proce ication for Certione or more of to through its ac	eds of Ur ficate of them will gent, Rob	nlawful Activity, Fitle or Registra engage in cond erto Gomez Gor	perto Gomez Gomez Sr, with Washing Vehicle Titles, Dece tion, and Unsworn Falsificati uct which constitutes such a mez Sr, did agree with one o ation to commit such crime(s	eptive Business on to Authorities, did rime(s) or an attempt r more individuals, that

1/ /	t Numbe	r: - <i>ə ə</i>	Date Filed: /2/S/ンみ	OTN/LiveScan I	lumber		Complaint/Incident Ni IFS210061	ımber
Defen	dant Nar	- Carrier 1999	First:	Middle: AND		Last:	O SALVAGE	
MERCHI			G & G AUTO BODY	[AND		AUT	OSALVAGE	
Incho Offer		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nui	nber of V	ictims Age 60 or Older	
Lead?	13 Offense	911 # Sec		66/the2 18 PA Statute (Ti	1 (le) Cour	F1	Orade NCIC Offense Cod	UCR/NIBRS Code
Pei	nnDOT E applicat	ata	Accident Number ———		☐ Interst		☐ Safety Zone	☐ Work Zone
			e the name of statute	or ordinance): corr	UPT ORGAN	ZATION	S	
from a pa proceeds agent, Ro	attern of ra of such ir oberto Gor	acketeering ac scome, in the a nez Gomez Sr,	tivity in which such person pacquisition of any interest in	participated as a principa , or the establishment or Icome derived, directly o	l, to use or im operation of,	est, direcany enter	telved any income derived, of thy or indirectly, any part of prise, to wit: the defendant, ern of racketeering activity a	such Income, or the by and through its
Incho Offer		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nur	nber of V	lctims Age 60 or Older	
Lead?	14 Offense	911 # Sect	PA PA	of the 18 PA Statute (T)	lle) Cour	F1	Brade NCIC Offense Code	UCR/NIBRS Code
	mDOT D applicab		Accident Number ———		☐ Interst	ate	☐ Safety Zone	☐ Work Zone
			e the name of statute of	or ordinance): corr	UPT ORGANI	ZATION	5	,
maintain, pattern o	directly o Fracketee	r indirectly, an	y interest in or control of an aintained, directly or indired	iv enterprise; to wit: the	defendant, by	and thro	attern of racketeering activit ugh its agent, Roberto GOm le application and document	ez Gomez Sr, through a
Incho Offe		☐ Attempt 18 901 A	Solicitation	Gonspiracy 18 903	Nu	mber of	Victims Age 60 or Older _	
Lead?	15 Offens	911 e# Se	(b)(3)	of tile 18	Title) Cor	F	1 Grade NCIC Offense Co	de UCR/NIBRS Code
	nnDOT [applical		Accident Number		☐ Inter	state	☐ Safety Zone	☐ Work Zone
			e the name of statute o	or ordinance): CORR	UPT ORGANI	ZATION	s	
participat agent, Ro	e, directly	or Indirectly, i nez Gomez Sr,	In the conduct of such enter	prise's affairs through a	pattern of rac	keteering	y or associated with any ent activity, to wit: the defendar ucted the enterprise's affairs	nt, by and through its



								-2-LEBM-2	, L.			CIZITAL	IAVE	OOKIL PAII	141
Docket	Numbe	r:	Da	te Filed:	OTN/Li	veScan	Numbe	r	Con	npla	int Nu	mber	incide	nt Number	
CN-	-441	-92	121	15122					IFS	210	061				ļ
TO SERVICE			First:		. t	Middl	le:				ast:				
Defend	Defendant Name G & G AUTO BODY				AND				AUTO SALVAGE						
Inconsequence and the consequence of the consequenc															
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.)															
Inchoa Offens		Attempt 18 901 A		Solicitati 18 902 A	on		Conspir 18 903	асу	,	Number of Victims Age 60 or Older					
_{F-1} [4 6	011		(0)(4)	of the			1	·	[_{C1}					
- · · L	16	911		(一)(リー)	OTTUB	L8		1		F1		11110 54			
	Offense# nDOT:D	Section		Subsection		PA State	ute (Title)	<u>C</u>	ounts		Grade	NCIC OF	ense Cod	e UCR/NIBRS C	ode
		ata Acc e) Nur	dent					☐ Inte	rstate			Safety Zo	ne	☐ Work Zone	•
		otion (include		me of etabli	o or ordi	nancal	: COppu	OT ODG	ANITAT	TONG	<u> </u>				
Statute	Descri	Juon (monde	uic iic	airie di sialui	ie oi oiui	(ance)	. CORRO	- i Orta	KINIZM I	TOLAN	,				
												<u> </u>			
(1), (2), (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, by and through its agent, Roberto Gomez Gomez Sr, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).														
										, ,					
Inchoa Offens		Attempt 18 901 A	·····	Solicitation 18 902 A	ón ————		Conspir 18 903	асу			Numb	er of Victin	ns Age 6	0 or Older	
			·····		of the				\Box						
£		l		[37]	25 A 46 E	24 00 1.1				O		NCIC Offens	- 6.44	UCR/NIBRS Cod	l
	Offense# nDOT D	Section	dent	Subsection		PA Statute	9 (1Me) 	Coun		Grad			···		
****	pplicab		nber					☐ Inte	rstate			Safety Zo	ne	☐ Work Zone	3
		otion (include		me of statut	e or ordi	nance)	- L			~	L.,				
Otatute	L) COOLI	Mon (monde	uic ne	ino or statut	O O O	suriou,	•								
Acts of	the acc	used associa	ated wi	th this Offen	se:										
				····						, ,					
inchoa		Attempt		☐ Solicitation	on		Conspir	эсу			Numb	er of Victin	ns Age 6	0 or Older	
Offens	e	18 901 A		18 902 A			18 903] [
- -		<u> </u>	J	<u> </u>	of the										
				- F	20 20 20 20 20 20 20 20 20 20 20 20 20 2		[ــــــــــــــــــــــــــــــــــــــ				
	Offense#	Section	Q~429331	Subsection		PA Statute	e (Title)	Coun	s	Grad	le	NCIC Offens	e Code	UCR/NIBRS Co	de
	nDOT D		dent nber					☐ Inte	rstate			Safety Zo	ne	☐ Work Zone	•
	pplicab	otion (include		mac of ototul	a or ardi	nancel	<u>- </u>				!		L	,	
Statute	Descrit	epoloni) nonc	HO HO	and or statu	e or ordi	nance)	•								
	***************************************			····											
Acts of	Acts of the accused associated with this Offense:														

Decket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
1 CV 441-221	12/5/22/		IFS210061
	First:	Middle:	Last:
Defendant Name:	G & G AUTO BODY	AND	AUTO SALVAGE
•			

- 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 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.)

(Date)

(Year)

(Year)

(Year)

(Year)

(Year)

(Signature of Affiant)

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

(Magisterial District Court Number)

(Issying Authority)

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CV-441-22	12/5/27	·	IFS210061
	First:	Middle:	Last:
Defendant Name:	G & G AUTO BODY	AND	AUTO SALVAGE

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- Oleg ZELENKO
- David MORRISON
- Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Ántonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC



Docket Number:	Date Filed:		TN/LiveScan Num		LICE CRIMINAL COMPLAI Complaint/incldent Number
Cr441-22	/ 2_ <i> 5 ラ</i> ュ First:		Middle:	Las	IFS210061
Defendant Name:	G & G AUTO I	BODY	AND	1	TO SALVAGE
44. Wilfredo Auto R 45. Jessica's Auto R 46. JM Motors 47. Saldivar Group 48. Abby Auto 49. Carla Matia LLC 50. G&G Auto Body 51. Mendoza Auto S Your Affiant believes thr	Tags LLC les ales ags and Multiservicepair rags and Auto Salvage Sales ough participation e cause exists for	ces, Inc.	ation and as rece e above named p	ommended by parties and res	the forty-Seventh Investigating spectfully asks this Honorable Court court to answer to the charges set
FORTH IN THE FORE INFORMATION AND I CERTIFY THAT THIS POLICY OF THE UNIT	GOING AFFIDAV BELIEF. S FILING COMPLI FIED JUDICIAL S	IT ARE TRUE IES WITH THE YSTEM OF PE	AND CORRECT PROVISIONS CENNSYLVANIA	TO THE BES OF THE <i>CASE</i> THAT REQUIF	AND SAY THAT THE FACTS SET OF MY KNOWLEDGE, RECORDS PUBLIC ACCESS RE FILING CONFIDENTIAL FORMATION AND DOCUMENTS.
	BOOSINETITO BIL	, and the first	Λ	54	M
		1 31/	1		(Signature of Afflant)
Sworn to me and subs	cribed before me	this a TA	day of	(Do'c	embr 2022
12/16/22 Date)	1		۸ ,	Magisterial District Judge
My commission expire	s first Monday of	January,	024		SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COUNTY OF: DAUPHIN** COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ; Hon, DAVID H. JUDY, Esq. GRIG LLC Address: 50 Canal Street Last Name Royalton, PA 17057 First Name Middle Neme 30 N. 16TH ST. LEBANON, PA 17042 Telephone: (717)234-0949 NCIG Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ 6-Felony Pending Extradition Determ. D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition A-Misdemeanor Full 3-Felony Surrounding States F-Misdemeanor Pending Extradition 4-Felony No Extradition B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Date Filed** Incident Number **Docket Number** OTN/LiveScan Number Complaint Number Services? ☐ YES ☐ NO 12/05/2022 IFS210061 Co-Defendant(s) GENDER Add'l DOB Middle Name Last Name ☐ Male First Name Gen. ☐ Female AKA ☐ White ☐ Hispanic Unknown Aslan ☐ Black Native American ETHNICITY Non-Hispanic Unknown GRY (Gray) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) RED (Red/Aubn.) Hair ONG (Orange) GRN (Green) PNK (Pink) BLK (Black) WHI (White) XXX (Unk./Bald) Color BLN (Blonde / Strawberry) BLU (Blue) GRY (Gray) BLK (Black) BRO (Brown) GRN (Green) Eve PNK (Pink) MAR (Maroon) Color HAZ (Hazel) MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO FBI Number MNU Number Defendant Fingerprinted YES NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code State Registration Comm'l Veh. Reg. Haz mat Ind. same Plate# Sticker (MM/YY) as Def. VIN Model Style Color Year Make 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). CDAG ROBERT LABAR ROBERT G. LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) 759307/#583 RACHEL A. STORY (Name of the Affiant) (PSP/MPOETC -Assigned Afflant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (Police Agency OR! Number) (Identify Department or Agency Represented and Political Subdivision) 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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) in DAUPHIN County [22]on or about 2018-PRESENT (County Code)

				•	P P	OLICE	CRIMINAL	. COMPLAINT
Docket N	umber:	Date Filed:		TN/LiveScan N	lumber		plaint/incident l !10061	lumber
Defendar	I DI DE	First:		Middle:		Last;	.10001	
Dejejidai	it ivallie.	GRIG LLC						Aller and a second a second and
							e allegedly vlol	ated, if appropriate.
(Set forth a	brief summary o	an one offense, f the facts sufficien	t to advise the defe	endant of the natu	re of the offense(s	s) charged. A	citation to the state	ute(s) allegedly violated,
The age of	the victim at the t	ime of the offense	may be included if	known. In additio	n, social security (numbers and	financial informati	ice(s) allegedly violated. on (e.g. PINs) should not
be listed. It	the identity of an	account must be a	stablished, list on	y the last four dig	jits, 204 PA.Code \$	§§ 213,1 – 213.	.7.)	
Inchoate Offense	☐ Attempt 18 901 A	☐ Soil 18 9		Conspiracy 18 903		Number of	Victims Age 60 o	r Older
	911	(b)(1) of the	18	1	F1		
Lead?	Offense Se		section	PA Statute (T	ille) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
3-14 - 1334 - 1354 - 1354	OT Data olicable)	Accident Number			☐ Interstate		Safety Zone	☐ Work Zone
		lude the name	of statute or or	dinance): con	SPIRACY	I		
		<u></u>	40-4	-				•
								i, directly or indirectly,
from a patt proceeds o	em of racketeerin f such income. In	g activity in which the acquisition of a	such person partici nv interest In, or ti	patéd as a princip e establishment d	oal, to use or inves or operation of, an	t, directly or 11 v enterprise, t	ndirectly, any part to wit: the defenda	of such income, or the int engaged in and
received in	come derived, dire	ectly or indirectly, f	rom a pattern of ra	cketeering activity	y and used, directl	y or indirectly,	, any part of this ir	ncome and/or its
proceeds to	operate Newroa	d Motors LLC.						
· · · · · · · · · · · · · · · · · · ·				······································				
Inchoate :Offense	☐ Attempt 18 901 A	☐ Soli 18 9		Conspiracy 18 903		Number of	Victims Age 60 o	r Older
	3-31		18.50.50				1 12 2 3 3 1	
	<u> </u>	(b)(1200CD-XI-MINON	18	1	F1	NCIC Offense	
	fense# Se	ection Sub	section	PA Statute (Ti	itie) Counts	Grade	Code	UCR/NIBRS Code
if ap		Accident Number			☐ Interstate		Safety Zone	☐ Work Zone
Statute D	escription (inc	lude the name	of statute or or	dinance): cor i	RUPT ORGANIZA	ATIONS		r
			Attion of the state of the stat					
Acts of the	ie accused as	sociated with th	ils Offense: It st	iall be unlawful fo	ir any person throu ie defendant throu	igh a pattern oh a nattern o	of racketeering act of racketeering act	tivity to acquire or ivity maintained, directly
		ntrol of Newroad N		orprise, to wit. an	io desestadric estod	gir a pattern t	A TOURSCEEING OCC	mey mamazinay associ
		•						
		······································						
Inchoat	× 5 7	, F3 p. 1	icitation 🔲	Canadaa	¬			
Offensi			902 A	Conspiracy 18 903	Numb	er of Victims	Age 60 or Older	
<u> </u>	03 911	74)(3) of the	a 10		F1		
Ll [03 911 Offense#		ubsection	PA Statute (1 Title) Counts	Grade	NCIC Offense C	ode UCR/NIBRS Code
Penn	DOT Data	Accident			☐ Interstate		Safety Zone	☐ Work Zone
	oplicable) Description (inc	Number - lude the name	of statute or or	dinance): CORI	RUPT ORGANIZA	ATIONS		
		are straiting	· · · · · · · · · · · · · · · · · · ·					
Acts of th	e accused as	sociated with th	is Offense: It sh	all be unlawful fo	r any person empi	oyed by or as	sociated with any	enterprise to conduct or
participate,	directly or indirect	tly, in the conduct vehicle dealership	of such enterprise!	s affairs through a	a pattern of racket	eering activity	, to wit: the defen	dant was an operator
distribit Maga	GOODGICH WILL C	ചെവർ മവേതാവി	and conducted the	oncipiada alla	нь оторун а ракс	an or racketee	and arnally	
			•					

A CON	DOL	ICE	CRIMIN	٨١	IGMACO	AINT
1,18,313	PUI.		CKIIVIIN	AL.	COMPL	AIN

Docket No	mber:	Date F	iled;	OTN/LiveSc	an Number			laint/incident Nu 10061	mber
Defendan	Name:	First: GRIG L	LC	Middle:		Las		10001	, , , , , , , , , , , , , , , , , , ,
Inchoate Offense	☐ Attemp 18 901 /		Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims A	ge 60 or Older	
Ł	4 911	Section	(b)(4) Subsection	of the 18	te (Tilla)	Counts	1 Grade	NCIC Offense Code	UCR/NIBRS Code
Pennt (If ap)	OT Data Ilicable)	Accident Number				nterstate		Safety Zone	☐ Work Zone
Statute De	escription (ind	clude the r	name of statute	or ordinance): C	CORRUPT O	RGANIZATIO	NS		
(2), or (3) of	this subsection.	sociated v . To wit: the	vith this Offense defendant conspire	e: It shall be unlawf d with other individ	ul for any per uals to engag	son to conspi e in a pattern	re to violat of rackete	e any of the provisi ering activity in viol	ons of paragraphs (1), ation of subsections
(1), (2), and	or (3).								
Inchoate Offense	☐ Attemp		Solicitation 18 902 A	Conspiracy		Number o	f Victims A	Age 60 or Older _	
)5 511			of the 18		1	F1		
Lead?	Offense#	Section Acciden	Subsection	李松明在美国新 亚	ule (Title)	Counts	Grade	NGIC Offense Coc	
(if ap	olicable)	Numbe		or ordinance): c		Interstate		Safety Zone	☐ Work Zone
Statute De	scription (inc	nude ule i	iame of statute	or ordinance). L	YEALING IN	rkoceps	OF UNLAY	ALOT WELLALLI	
knowledge to Intent to pro	at the property note the carryin	involved, inc g on of the	duding stolen or ille unlawful activity. To	gally obtained prop	erty, represei repeatedly e	nts the procee ngaged in fina	ds of unlay	wful activity, the per actions with knowle	ncial transaction with rson acts with the adge that the property
Inchoate Offense	☐ Attempt 18 901 A] Solicitation 18 902 A	⊠ Conspiracy 18 903		Number of	Victims Aç	ge 60 or Older	
			(~/(~/)	tine 18			Fi	NOIS OF	1000
PennD	fense# OT Data (icable)	Section Accident Number	Subsection	PA Statu		Counts nterstate	Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
			name of statute	or ordinance): c	ONSPIRAC	//DEALING:	IN PROCE	EDS OF UNLAWF	UL ACTIVITY
foilowing crir engage in co individuals (c	nes: Dealing in I nduct which con If the following:	Proceeds of U stitutes such Igor Dratch.	Unlawful Activity, di 1 crime(s) or an atto Oleo Zelenko, Dav	t: The defendant, v d agree with such c empt or solicitation id Morrison, Amatti attempt or solicitati	ther person(s to commit su Auto Sales LL	i) and / or bus th crime(s); to C, and/or Nev	siness(es) to wit: the conroad LLC)	that they or one or lefendant did agree , that one of more v	more of them will with one or more would engage in

Defendant Name: First: Middle: Last:	Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Inc IFS210061	cident Number	
Defendant Name: CPTC LLC		First:	Middle: .	Last:			
GRIG LLC	Defendant Name:	GRIG LLC					

- 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 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.)

(Date)

(Date)

(Year)

(Year)

(Year)

(Signature of Afflant)

AND NOW, on this date

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

(Magisterial District Court Number)

(Issuing Authority)

(Signature of Afflant)

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
CV43122	12/5/22			IFS210061
	First:	Middle:	Last:	
Defendant Name:	GRIG LLC			

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.	Igor DRATCH	ł
2.	Oleg ZELENK	((

3. David MORRISON

4. Angel MENDEZ

5. Jefferson LOOR VALET

6. Maria PINEDA

7. Indalecia VASQUEZ ...

8. Somary IBETH Otanez De LOOR

9. Beaki Antonia PEREZ

10. Charlie JIMINAN

11. Margarete ALMSAHAQBEH

12. Linda SANDOVAL-MARTINEZ-HERERRA

13. Eulid URENA

 Adelaida GARCIA aka Adelaida MENDOZA

15. Edward SALDIVAR

16. Alberto LUCIANO

17. Mohamed KERDI

18. Muhammad ALKURDI

19. Edgar COLLADO

20. Osiris FERNANDEZ GONZALEZ

21. Juana BELEN-VALDEZ

22. Juana BELEN-DEVANGELISTA

23. Rafael SANTIAGO-PACHECO

24. Jean AQUINO

25. Aristeds AQUINO

26. Ahmed LOPEZ

27. Jessica ENGELKE

28. Jimmy RODRIGEZ Sr.

29. Nora RODRIGUEZ

30. Roberto GOMEZ

31. Amatti Auto Sales LLC

32. Newroad Motors LLC

33. Grig LLC

34. Santos Auto Gallery

35. Perfect Touch Auto Repair and Sales LLC

36. Pennsylvania Tag and Title

37. J&J Car & Truck Sales LLC

38. MP Notary and Tags LLC

39. AMCO Auto Sales

40. Charo's Auto Sales

41. A2Z Auto Tags

42. Docuservices

43. Emma's Auto Tags and Multiservices, Inc.

44. Wilfredo Auto Repair

45. Jessica's Auto Tags

46. JM Motors

47. Saldivar Group

48. Abby Auto

49. Carla Mattia LLC

50. G&G Auto Body and Auto Salvage

51. Mendoza Auto Sales

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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

AND THE	POLICE	CRIMINAL	COMPLAIN

		14dahr.		OF ALKHRINGE AARRESTER
Decket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
C1431-22	125122			IFS210061
	First:	Middle:	Last:	
Defendant Name:	GRIG LLC			

I, RACHEL A. STORY, 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 December 2027

| December 2027
| Magisterial District Judge | SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS); MDJ: Hon. DAVID H, JUDY, ESQ. J&J CÅR AND 🕛 TRUCK SALES, LLC Address: 50 CANAL ST. First Name Middle Name Lasi Name ... ROYALTON, PA 17057 1815B SOUTH 4TH STREET ALLENTOWN, PA 18103 :5 Telephone: (717)944-4463 NCIC Extradition Code Type ☐ 6-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Date Filed Request Lab Services? OTN/LiveScan Number Complaint Number incident Number Docket Number ☐ YES ☐ NO 12/05/2022 IFS210061 GENDER: Go-Defendant(s) POB Add'I DOB ☐ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☐ White Unknown ∆stan Black Native American Unknown ETHNICITY ::: Hispanic ☐ Non-Hispanic BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Pumle) Hair PNK (Plnk) BLK (Black) ONG (Orange) WHI (While) XXX (Unk./Bald) GRN (Green) Color . BLN (Blonde / Strawberry) Eye BLK (Black) GRY (Gray) BLU (Blue) BRO (Brown) GRN (Green) MAR (Margon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA TYPES INO DNA Location WEIGHT (lbs.) FBI Number MNU Number Ft. HEIGHT In. Defendant Fingerprinted A YES NO Fingerprint Classification: ... DEFENDANT VEHICLE INFORMATION Comm'i Veh. School Veh. Oth, NGIC Veh, Code Reg. State Haz Registration same as Plate# mat Sticker (MM/YY) Def. VIN Year Mako 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 affidavil, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). ROBERT A. LABAR ROBERT G. LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Signature of the allomey for the Commonwealth) (Date) SA RACHEL A. STORY // DET. LINDSAY YETTER (Name of the Afflunt) 759307/#583 // 4<u>3</u>79<u>9/#13</u> (PSP/MPOETC -Assigned Afflant ID Number & Badge # Interiory Lehigh County Pennsylvania Office of Attorney General PA0222400 PADSGIACO (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. It is 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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (डिप्पर्वीपडाठम Cठवड) In DAUPHIN County on or about 2018- PRESENT [22]

(County Code)

Docket Number:	Date Filed:	OTN/Live	Scan Numbe		Comp	laint/Incident 10061	Number
Defendant Name:	First:	Middle):	I -	ast:		J.
	J&J CAR AND	AND	·	L	RUCK SA	LES, LLU	
The acts committed to When there is more to (Set forth a brief summary without more, is not suffic. The age of the victim at the listed. If the identity of a	nan one offense, ea of the facts sufficient to lent. In a summary case a time of the offense ma	ach offense should be advise the defendant of , you must cite the specif y be included if known, ir	e numbered the nature of th ic section(s) an addition, soci	chronolog ne offense(s) nd subsection al security no	jically. charged. A c n(s) of the sta umbers and f	itation to the sta itute(s) or ordina inancial informat	tute(s) allegedly vlolated, nce(s) allegedly vlolated.
Inchoate			асу		Number of \	/ictims Age 60	or Older
□ □ □ □ □ □ □	(a)(1)	of the 18		1	F1		
Lead? Offense	Section Subsec	1999	Statute (Tiple)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Acoldent Number			nterstate		Safety Zone	☐ Work Zone
Statute Description (i	nclude the name of	statute or ordinance): DEALING I	N PROCEED	S OF UNLA	WFUL ACTIVIT	Y
Acts of the accused a knowledge that the proper intent to promote the carn involved represented the p	ty involved, including st ling on of the unlawful :	olen or illegally obtained pactivity. To wit: the defend	property, repres dant repeatedly	sents the pro engaged in	ceeds of unia financial trans	wful activity, the sactions with kno	person acts with the
Inchoate			асу		Number of \	/ictims Age 6D	or Older
□ 02 4117	(a)(1)	of the 18	:	1	F3		
	Section Subsec	tion PAS	Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	Y		nterstate		Safety Zone	☐ Work Zone
Statute Description (in	nclude the name of	statute or ordinance): INSURANC	E FRAUD			
Acts of the accused a namely, PA Deptartment of false, incomplete or mislea insurance rate filing, a mot request; to wit: the defend misleading information about	°Transportation (Pennion) ding information concer or vehicle insurance tra ant, knowingly and with	OT), file, present or cause ning a fact or thing mater nsaction or other motor v n intent to defraud the PA	e to be filed or lal to the agend ehicle insurance	presented to cy's determin e action whic	the governmation in appro this required	ent agency a do oving or disappro or filed in respor	cument that contained oving a motor vehicle nse to an agency's
							• '
Inchoate ☐ Atten Offense 18 90		l ————————————————————————————————————	acy	Number	r of Victims /	Age 60 or Older	
□ 03 41		P. 12-18:22 4-4:45-1		1	F3		
Lead? Offense# PennDOT Data	Section Subs	eolion PA	Statule (Title)	Counts	Grade	NCIC Offense C	
(if applicable) Statute Description (in	Number	statute or ordinance		Interstate	<u> </u>] Safety Zone	☐ Work Zone
added proofipariff	,c.ago aro manto of	The second of the contract of	/·				
Acts of the accused a presented to an insurer a s concerning a fact or thing r such statements to be made	tatement forming a part naterial to the insurance	of, or in support of, an in claim; to wit: the defend	isurance claim	that containe	ed false, incor	noleted or mislea	iding information
	•		,				

Docket Number:	Date Filed:	OTN/LiveScan	Number	· · · · · · · · · · · · · · · · · · ·		plaint/Incident No 210061	ımber				
Defendant Name:	First:	Middle;		La	st:						
to Bridge are a medical programment and	J&J CAR AND	AND		. 115	CUCK SP	LES, LLC					
		•				•					
Inchoate	☐ Solicitation 18 902 A	☐ Conspiracy 18 903		Number o	F Victims A	\ge 60 or Older					
□ 04 4117	(a)(3)	of the 18		1	F3						
Lead? Offense# S PennDOT Data	ection Subsection	PA Statute (T	ille)	Counts	Grade	NGIC Offense Code	UCR/NIBRS Code				
(if applicable)	Accident Number			nterstate] Safety Zone	☐ Work Zone				
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD											
Acts of the accused associated with this Offense: Knowingly and with the intent to defraud any insurer or self-insured, assists, abets, solicits or											
conspires with another to pre	pare or make any stateme	nt that is intended to be pre	sented to	any insurer	or self-inst	ared in connection w	ith, or in support of, a				
claim that contains any false, or supports an amount claims	Incomplete or misleading I ad in excess of the actual in	nformation concerning any : oss sustained by the claimar	fact or th at to wit:	lng materlal the defendar	to the clair at did know	n, including informat /Ingly and with the ir	ion which documents itent to defraud				
aninsurer, made material stat	ement(s) intended to be p										
and/or incomplete and/or mis	steading information,	·									
			_								
Inchoate Attemp		Conspiracy		Number	of Victims	Age 80 or Older _					
			<u> </u>	<u> </u>		T					
05 4117	(b)(4) Section Subsection	of the 18	mile	1 Counts	M1 Grade	NCIC Offense Cor	de UCR/NIBRS Code				
PennDOT Data	Accident	· PA Statute (Interstate		Safety Zone	☐ Work Zone				
(If applicable) Statute Description (inc	Number	ute or ordinance): INSI									
Statute 2000 piloti (iiio		ato di bidiimilionji mod	-1031-00								
Acts of the accused ass											
other person file an application thereto; to wit: the defendant	in for Insurance containing t knowledly and with Intent	any false information or cor to defraud an insurance co	nceal for I Impany, f	the purpose : iled`an applic	of misleadi atlon for in	ng Information conc nsurance containing	erning any fact material false and/or misleading				
Information to conceal any fa			, ,,			•	• • • • • •				
					•						
<u> </u>				· · · · · · · · · · · · · · · · · · ·		 					
Inchoate	☐ Solicitation	☐ Conspiracy					, At				
Offense 18 901 A	18 902 A	18 903		Number of	Victims A	lge 60 or Older					
□ 06 3922	(a)(1)	of the 18		<u> </u>	F3						
Lead? Offense# S	ection Subsection	PA Stalute (T	11	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code				
PennDOT Data (if applicable)	Accident ———		. 🗖 1	nterstate] Safely Zone	☐ Work Zone				
Statute Description (inc	lude the name of state	ute or ordinance): THE	FT BY DE	CEPTION							
Acts of the accused ass	oclated with this Offe	nse: The defendant did kn	awinaly s	nd with the	Intent to ol	otain or withhold are	nerty of another by				
deception, created or reinform present or cause to be present	ced a faise impression, incl	uding false impressions as t	o law, va	lue, intentior	or other s	tate of mind; to wit:	the defendant dld				
present or cause to be presen	кео со ан изигансе сотр	ану, таке, висотряете от т	sieaugig	แหงเเกสเเบก (व्यवस्थित १०	ан аррисация тог т	ourance.				
			· · · · · · · · · · · · · · · · · · ·								

Docket Number:	Date Filed:	OTN/LiveScar	Number		Com	plaint/Incident N 10061	umber				
Defendant Name:	First:	Middle:		La	st:						
a property of the second	J&J CAR AN	D AND			RUCK SA	LES, LLC					
						. •					
Inchoate Attemp				Number	of Victims	Age 60 or Older					
□ 07 3925	1 1	of the 18	1		МЗ						
Lead? Offense# PennDOT Data (if applicable)	Section Sut Accident Number —	saction PA Statute	T	Counts terstate	Grade [NCIC Offense Co Safety Zone	de UCR/NIBRS Code Work Zone				
		f statute or ordinance): RE	CEIVING ST	OLEN PR	OPERTY		-				
another knowing that it has be restore it to the owner; to will to the owner, knowing that so	een stolen, or bellev :: The defendant did uch property was sto	Offense: A person is guilty of ing that it has probably been sto intentionally receive, retain or d ien, or believing that it had prob rehicle in violation of Section 39	olen, unless the Ispose of move Bably been sto	ne propert vable prop olen, and t	y Is received erty, belong the property	d, retained, or dispo ging to another, wit	osed with intent to h no intent to restore it				
Inchoate	☐ Solicit 18 902] [Number o	f Victime A	ge 60 or Older					
□ 08 4101	(a)(3		1		F3						
PennDOT Data	ection Subs Accident Number	ection PA Statute	(Title) C ☐ Inte	Counts erstate	Grade	NCIC Offense Cod Safely Zone	● UCR/NIBRS Code Work Zone				
		statute or ordinance): FOI	RGERY			······································					
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 perpretated 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: the defendant, with the intent to defraud and/or injure anyone, and/or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, uttered a writing which he knows to be forged in a manner specific in paragraph (2) of this section.											
Inchoate				Number	of Victims	Age 60 or Older	abonomina .				
□ 09 7121		of the 75	1		M1	NOIG OF THE STATE OF	d. (100)				
Lead? Offense# PennDOT Data (If applicable)	Section Sub Accident Number	section PA Statute		Counts terstate	Grade [NCIC Offense Co Safety Zone	de UCR/NIBRS Code Work Zone				
		statute or ordinance): FAL	SE APPLICA	ATION OI	F TITLE OF	REGISTRATION					
name or address or makes a	material false statem	Offense: A person is guility of ent, or falls to disclose a security lefendant made a material false	y interest, or	conceals a	any other m	aterial fact in an ap	plication for a				

Docket N	lumber:		Date F	iled: /		OT	N/LiveSca	n Numb	er			•	laint/Incid 10061	lent Num	ber
253,113,452		W.F. 184	First:	.1			Middle:	······································		T	ast:	11 02	10001		
Defenda	nt Name			AR ANI)		AND					K SA	ES, LLC		
Inchoate Offense		Attempt 18 901 A		Solicit 18 902			903		N	lumber	of Vic	tims A	ge 60 or Ole	der	
	10	7122		(3)		of the	75		1		M1				
Penn	Offense# DOT Da plicable	ta	action Acciden Number		ection		PA Statute	1		ounts rstate	- Gr	ade 🔲	NGIC Offer Safety Zon		UCR/NIBRS Code ☐ Work Zone
			ide the n	ame of	statute	or ordir	nance): AL1	rered, F	ORG	ED, OR	COU	NTERFI	IT DOCUM	IENTS	
or forges an	assignm r Issue by	ent of a ce	ertificate of	title, or a	n assignr	nent or re	elease of a se	ecurity int	terest	on a cei	rtifical	te of titl	e or any oth	er docume	idulent intent, alters ent issued or or issue by the
Inchoste Offense		Attempt 18 901 A	!	☐ Solicita 18 902			onspiracy 903		N	lumber	of Vic	tims A	ge 60 or Ol	der	
,	11	4904		(b)		of the	18		1		МЗ	{			
Pennl	Offense# DOT Da plicable	ta 🦠 🔻	Accident Number		ection		PA Statute	T		ounts rstate	Gr	ade	NCIC Offer		UCR/NIBRS Code Work Zone
					statute	or ordir	nance): UN	SWORN	FALS	IFICAT	ION.	TO AUT	HORITIES	i	
to a form be course of cri	earing noi Iminal coi	tice, autho nduct, in v	rized by la vhich he ki	w, to the a nowingly a	effect tha nd Intent	it false st ionally sig	fendant made atements ma gned (PA Dep ce that false	ide thereli pt. of Trai	n are nspor	punisha' tation (P	ble; T 'ennD	'o wit: ti OT)) fai	ne defendar ms thereby	it engaged	true, on or pursuant I in a continuous ritten false
			· 		<u>-</u>				Γ						
Inchoat Offense] Attempt 18 901 A		Solici 18 902			onspiracy 8 903			Numbei	r of V	ictims /	\ge 60 or O	lder	
	12	903		(a)(of the	18		1		F1				
	Offenser DOT Da	ıta 🦠	Section Acolder Number	1 t = {	section		PA Statu	1		Counts erstate		rade	NCIC OHE Safety Zo	nse Code ne	UCR/NIBRS Code Work Zone
	oplicable escription				statute	or ordin	ance): CRI	IMINAL	CONS	SPIRAC	Y TO	COMM	IT ABOVE	OFFENSE	S
following crimbusiness(es) wit: the defe	mes: Fals) that the endant di Antonia F engage i	e Applicat y or one o d agree wi erez, Jorg n conduct	ion for Cer r more of i th one or i e Santos/S	tificate of them will e more indiv santos-Her	Title or R engage in Iduals (ol nandez, (legistration conduct f the folio Charlie Ji	on, Unsworn which consti wing: Jeffers minan, MP No	Falsification itutes such son Loor \ otary and	on to h crin Valet, I Tags	Authoritine(s) or Marla Pi	tles, d an att ineda, ntos A	ld agree empt or Indale luto Gal	: with such of solicitation da Vasquez, lery, Newro	other pers to commi . Somary I ad Motors	or more of the on(s) and / or t such crime(s); to beth Otanez De LLC), that one of nore of them



Docket Number:	Date Filed:	OTN/LiveScan Num		nplaint Number	Incident Number		
CR-414-22	1215722	O HALLAGOGAL MAIL		210061	Hioradif Milling		
Detendant Name	Firat:	Middle:		Last:			
	J&JCAR	AND	······································	TRUCK SALES,	LLC		
The acts committed by the appropriate. When there is (Set forth a brief summary of the violated,) is not su allegedly violated.)	s more than one offer	ise, each offense si the defendant of the nat	ould be numb	ered chronological	ly. o the statule(s) allegedly		
Inchoate :	☐ Solicitatio	n		Number of Victin	ns Age 60 or Older		
□ 13 911	(B)(1)	ine 18	1	F1			
Lead? Offenself Section PennDOT Date: Ar	i Subsection	PA Statute (Titi	* · · · · · · · · · · · · · · · · · · ·		lense Code UCRVNIBRS Code		
RennDOTiData Ac (if applicable) N			☐ Interstate	☐ Safely Zo	ne 🔲 Work Zone		
Statute Description (included)	le the name of statute	e or ordinance); cori	UPT ORGANIZAT	IONS			
Acts of the accused association a pattern of racketeering at proceeds of such income, in the received income derived, directly proceeds to operate J&J Car & Ti	tivity in which such person acquisition of any interest or indirectly, from a patte	n participated as a princh in, or the establishment	al, to use or inver r operation of, ar	st, directly or Indirectly, by enterprise, to wit: the	any part of such income, or the defendant engaged in and		
Inchoate	☐ Solicitation 18 902 A	Consp 18 903	Iracy	Number of Victin	ns Age 60 or Older		
C 14 911	(B)(2)	18	1 F	1			
Lead? Ollense# Section PennDOT: Data Ac	Subsection	PA Statule (Title)		Grada NCIC Offens			
(if applicable)	niber 🐙 💶 💮 💮		☐ Interstate	☐ Safety Zor	ne ☐ Work Zone		
Statute Description (includ	e the name of statute	or ordinance); corr	JPT ORGANIZATI	ONS			
Acts of the accused assoc maintain, directly or indirectly, ar directly or indirectly, interest in o	y interest in or control of a	any enterprise; to wit: th	any person throi defendant throu	ugh a pattern of rackete igh a pattern of rackete	eering activity to acquire or ering activity maintained,		
Inchoate	☐ Solicitation	I ☐ Consp 18 903	racy	Number of Victim	ns Age 60 or Older		
[] 15 911	(B)(3)	die 18	1 F.	1			
Lead? Offenseff Section	Subsection	PA Stalute (Title)	L	Grade NCIC Olfens	e Code UCIVNIBRS Code		
PennDOT Data Acc	idente. mber 13		☐ Interstate	☐ Safely Zor	19 🔲 Work Zone		
Statute Description (Include			IPT ORGANIZTIO	ns .			
Acts of the accused associ or participate, directly or indirectly operator and/or was associated w	 In the conduct of such e 	nterorise's affairs throug	a nattern of raci	keteering activity, to wit	t: the defendant was an		

POLICE CRIMINAL COMPLAINT Docket Number: OTN/LiveScan Number Date Filed: Complaint Number Incident Number CB-414-22 IFS210061 1<u>2/572</u>2 Middle: First: Last: Defendant Name J&JCAR AND TRUCK SALES, LLC 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 cliation 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.) Inchoate Offense Altempt | ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 903 18 802 A eof the 16 911 18 FI (B)(4) NCIC Offense Code Lead7 Offensell Section PA Statute (Title) Grade UCRINIBRS Code Subsection Counts ReinDOT Data Accident ☐ Interstate Safety Zone Work Zone 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). inchoate ☐ Attempt ☐ Solicitation Conspiracy Number of Victims Age 60 or Older Offense. 18 901 A 18 902 A 18 903 NCIC Offense Code UCR/NIBRS Code Lead? Section Subsection PA Slotuto (Title) Counts Grade PennDOT Data Accident Number ☐ Interstate Safely Zone ☐ Work Zone (If applicable) Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense; Solicitation Inchoale ☐ Attempt Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 office Subsection PA Statute (Tille) Grade NCIC Offense Code UCRINIBRS Code Lead? Offense# Counts Section RennDOT Data Accident ☐ Interstate Safely Zone Work Zone

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

Acts of the accused associated with this Offense:



		7	INVESTIGATION OF COMPLEMENT	1) ¥
Docket Number: CR-414-22	Date Filed: /2/57.22	OTN/LiveScan Number	And the state of the state of the state of the state of	
Defendant Name	First: J&J CAR AND	Middle:	Last: TRUCK SALES, LLC	
2. I ask that a warra made.	nt of arrest or a summo	ns be issued and that the d	efendant be required to answer the charges I hav	'e
belief. This verifle	ots set forth in this com catlon is made subject to catlon to authorities,	plaint are true and correct to o the penalties of Section 49	o the best of my knowledge or information and 904 of the Crimes Code (18 Pa.C.S. § 4904) relat	ting
4. This complaint co	onsists of the preceding	page(s) numbered 1 throug	ih,	
 I certify that this fi System of Pennsy Information and do 	Ivania that require filing	rovisions of the Case Reco confidential Information and	rds Public Access Policy of the Unified Judicial d documents differently that non-confidential	
of Pennsylvania and	were contrary to the A of arrest can be lesued	ot(s) of the Assembly, or in v	nst the peace and dignity of the Commonwealth violation of the statutes cited. cause must be completed, sworn to before the	е
	(D)	ale}	(Signature of Affight)	<u>, , , , , , , , , , , , , , , , , , , </u>
AND NOW, on this dat	· 12/5/2	22 Certify that II	he complaint has been properly completed and verified	i,
An affidavit of probable (Magisterial District Co		d before a warrant can be issue	ed.	
			COUNT NO DAINE	

	POLICE	CRIMINAL	COMPL	AINT
3 configuration	* ~		~~~!#!# L.	וייות

29. Nora RODRIGUEZ

30. Roberto GOMEZ

Docket Number: (14-4/4-22	Date Elled: 12 15122	OTN/LiveScan Number	Complaint/Incident Number
Defendant Name:	First: 3&J CAR AND	Middle:	Last: TRUCK SALES, LLC

AFFIDAVIT of PROBABLE CAUSE

Your Afflant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

Your co-affiant, is Detective Lindsay Yetter, badge #213, a duly sworn police officer assigned to the Lehigh County Auto Theft Task Force, and designated as a Special County Detective of the Lehigh County District Attorney's Office pursuant to P.S. 16 section 1441, who specializes in the investigations of auto thefts, and vehicle identification. Your Affiant has completed 7 years of law enforcement / criminal investigative experience.

Your affiant, Rachel Story, has attended numerous insurance fraud trainings, trainings involving vehicle crimes, auto theft and related crimes from the Pennsylvania State Police, Carfax for Police and the International Association of Auto Theft Investigators (IAATI). Your affiant is a current regional director of the North East Association of Auto Theft Investigators.

Your co-affiant, Yetter, has conducted and assisted with investigations involving stolen vehicles, insurance fraud, fraudulent title applications, the re-VINing of stolen vehicles, theft by deception and other forms of vehicle fraud. Your affiant has received training in insuring, titling, and the transfer of motor vehicles into and out of Pennsylvania.

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.

DRATCH	12, Linda SANDOVAL-	21. Juana BELEN-VALDEZ
zelenko	MARTINEZ-HERERRA	22. Juana BELEN-
id Morrison	13. Eulid URENA	DEVANGELISTA
el MENDEZ	14. Adelalda GARCIA aka	23. Rafael SANTIAGO-
erson LOOR VALET	Adelalda MENDOZA	PACHECO
ia PINEDA	LS. Edward SALDIVAR	24. Jean AQUINO
lecia VASQUEZ	l6. Alberto LUCIANO	25. Aristeds AQUINO
ary IBETH Otanez De	L7. Mohamed KERDI	26. Ahmed LOPEZ
R	L8. Muhammad ALKURDI	27. Jessica ENGELKE
d Antonia PEREZ	l9, Edgar COLLADO	28. Jimmy RODRIGEZ Sr.
la PINEDA lecla VASQUEZ ary IBETH Otanez De R	L5. Edward SALDIVAR L6. Alberto LUCIANO L7. Mohamed KERDI L8. Muhammad ALKURDI	24. Jean AQUINO 25. Aristeds AQUINO 26. Ahmed LOPEZ 27. Jessica ENGELKE

20. Osiris FERNANDEZ

GONZALEZ

10. Charile JIMINAN

11. Margarete ALMSAHAQBEH



Page __ of __

			without 1	TIOT ALGIBITATE ACIDI
Docket Number:	Date Filed:	OTN/LiveScan	Number	Complaint/Incident Number
ID DO FAR AN HEID HAN KIN MINERAL	First: J&J CAR AND	Middle:	La TF	st: RUCK SALES, LLC
31. Amatti Auto Sales LLC	38. MP Notary	and Tags LLC	45. Jessica's	Auto Tags
32. Newroad Motors LLC	39, AMCO Auto	Sales	46. JM Moto	ors
33. Grig LLC	40. Charo's Aut	o Sales	47. Saldivar	Group
34. Santos Auto Gallery	41. A2Z Auto Te	igs	48. Abby Au	to
35. Perfect Touch Auto Repair	42. Docuservice	es	49. Carla Mi	attia LLC
and Sales LLC	43, Emma's Aut	to Tags and	50, G&G Au	to Body and Auto
36. Pennsylvania Tag and Title	Multiservice	es, Inc.	Salvage	
37. J&J Car & Truck Sales LLC	44. Wilfredo Au	ıto Repair	51. Mendoz	a Auto Sales

Your affiants believe 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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

AOPC 412A - Rev. 12/21

I, SA RACHEL A. STORY II DET. LINDSAY YETTER, 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.

	_ dmasay (JETTE)
· P	(Signature of Afflant)
Sworn to me and subscribed before me this 5th day of	1 December 2022
Date	, Maglaterial, District Judge
My commission expires first Monday of January,	SEAL.

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): AND Address: 50 Canal Street JESSICA AUTO **MULTISERVICES** First Name Middle Name Last Name Royalton, PA 17057 2805 N. 5th Street Philadelphia, PA 19133 Telephone: (717)944-4463 NCIC Extradition Gode Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full T E-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Date Filed Docket Number** OTN/LiveScan Number Complaint Number Incident Number Services? 15122 ☐ YES □ NO FS210061 Co-Defendant(s) GENDER Add'l DOB DOB POB ☐ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE White Asian Black Native American Unknown ETHNICITY Unknown Non-Hispanic Hisnanic ☐ BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) ☐ PLE (Pumle) Hair BLK (Black) ONG (Orange) [7 WHI (White) ☐ XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) ☐ BLU (Blue) ☐ BRO (Brown) GRN (Green) ☐ GRY (Grav) Eye Color HAZ (Hazel) MAR (Margon) PNK (Pink) XXX (Unknown) MUL (Multicolored) DNA Location WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number MNU Number Defendant Fingerprinted Ft. HEIGHT In. ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration School Veh. Oth, NCIC Veh, Code Reg. State Haz Comm'l Veh. Ind. mat same Plate # Sticker (MM/YY) 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) /Dafe\ JEREMY BECKER 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. X 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] (Subdivision Code) Harrisburg City (Place-Political Subdivision) in DAUPHIN County [22] on or about 2018- PRESENT (County Code)



· · · · · · · · · · · · · · · · · · ·	Pate Filed: 0	TN/LiveScan Numbe	r	Complaint/Incident IFS210061	Number
Defendant Name: Fin	st: SSICA AUTO TAGS	Middle: AND	Last:	TISERVICES, INC.	
	SSICA AUTO TAGS	MIND	[PriOL	TIDERVICES, INC.	
The acts committed by the When there is more than or (Set forth a brief summary of the twithout more, is not sufficient. In The age of the victim at the time of be listed. If the identity of an acco	ne offense, each offense s acts sufficient to advise the defe a summary case, you must cite t f the offense may be included if	hould be numbered indant of the nature of th he specific section(s) an known. In addition, socia	chronologica e offense(s) cha d subsection(s) al security numb	lly. rged. A citation to the sta of the statute(s) or ordina ers and financial informat	tute(s) allegedly violated, nce(s) allegedly violated.
Inchoate		Conspiracy 18 903	Nu	mber of Victims Age 60	or Older
⊠ 01 5111	(a)(1) of the .:	18	1 F1		= = = = = = = = = = = = = = = = = = = =
Lead? Offense Section	Subsection	PA Statute (Title)	Counts 0	Grade NCIC Offense Code	UCR/NIBRS Code
(if applicable)	ent Number		nterstate	☐ Safety Zone	☐ Work Zone
Statute Description (include	tne name of statute or ord	unance): DEALING I	N PROCEEDS C	F UNLAWFUL ACTIVIT	Y
Acts of the accused associate degree if the person conducts a find proceeds of unlawful activity, the agent, Adelaida Garcia Mendoza, ractivity with the intent to promote	nancial transaction with knowledg person acts with the intent to pro epeatedly engaged in financial tr	ge that the property invo mote the carrying on of ansactions with knowled	lved, including s the unlawful act	tolen or illegally obtained lvity, To wit: the defendar	property, represents the nt, by and through its
Inchoate		Conspiracy 18 903	Nu	mber of Victims Age 60	or Older
□ 0 2 4117	(a)(1) of the	18	1 F3		
Lead? Offense# Section	Subsection	PA Statute (Title)	Counts C	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable) Accid	ent Number		nterstate	Safety Zone	☐ Work Zone
Statute Description (include Acts of the accused associating intent to defraud a State of local good the government agency a docume determination in approving or disawhich is required or filed in respondintent to defraud the PA Dept. of Testing intent to vehicles.	ated with this Offense: The overnment agency, namely, PA I nt that contained false, incomple pproving a motor vehicle insuran use to an agency's request; to wi	defendant, by and throu Deptartment of Transporte te or misleading informa Ice rate filing, a motor ve It the defendant, by and	gh its agent, Ade tation (PennDOT tion concerning chicle insurance through its ager	 file, present or cause to a fact or thing material to transaction or other motor t, Adelaida Garcia Mendo 	be filed or presented to the agency's r vehicle insurance action za, knowingly and with
Inchoate ☐ Attempt Offense 18 901 A		Conspiracy 18 903	Number of	Victims Age 60 or Older	
□ 0 3 4117	(a)(2) of the	18	i F	3	
land the second of the second	on Subsection coldent lumber	PA Statute (Title)	Counts Interstate	Grade NCIC Offense	Code UCR/NIBRS Code Work Zone
Statute Description (include		linance): INSURANCI	E FRAUD		
Acts of the accused associal intent to defraud an insurer, did procontained false, incompleted or magent, Adelalda Garcia Mendoza, dinsurance claim.	esent or cause to be presented to sleading information concerning	o an insurer a statement a fact or thing material t	forming a part of the insurance of	of, or in support of, an insuctions, to wit: the defendant	urance claim that nt, by and through its



Docke	t Num	ber:	. [Date /	File	ed:		οτ	N/LiveSc	an Nu	mbe			Comp	laint/Incident I 10061		ber
Defend	dant N	ame		First:	ICA	AUTO TA	GS		Middle: AND			,	Last: MULT		VICES, INC.		
		HEQ SEL				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,											
Incho	ate	П	Attempt		П	Solicitation		□ Co	nspiracy			Numba	r of Vic	time A	ge 60 or Older		
Offer			18 901 A			18 902 A			903			Number		.tiilis A	ge oo or older		
	04		4117			(a)(3)	of t	he	18			1	F3				
Lead?	Offer nnDO			ection Accide	ant	Subsection			PA Statu	ite (Title)		Counts	Gr.	ade	NCIC Offense Co	de	UCR/NIBRS Code
(jf	applic	able)	Numb	er				<u></u>	<u> </u>		Interstate			Safety Zone		☐ Work Zone
Statute	e Des	cripti	on (incl	ude th	e na	me of statu	ute or	ordi	nance): I	(NSUR/	INC	FRAUD					
Acte	fthas	00011	eed ass	ociator	d wif	h this Offe	neo'	Kno	windly and	l with th	o inf	ant to date	and an	incure	r or colf-incured	acele	ts, abets, solicits or
conspire	s with a	anoth	er to prep	oare or r	nake	any statemer	nt that	is inte	nded to be	e presen	ted t	o any insur	er or s	elf-insu	red in connection	with,	or in support of, a
																	which documents ida Garcia Mendoza,
did knov	vingly a	ind w	ith the int	tent to d	efrau		made n	nateria	al statemer	nt(s) int	ende	d to be pre			insurer in connect		
Зарран		13U1 G1		THE COL			n Hiccord										
incho Offei			Attempt			Solicitation	,		onspiracy 903	,		Numbe	er of V	ictims /	Age 60 or Older		
Onei	nse	<u> </u>	10 9017		<u> </u>	10 902 A		10	903								
	05		4117	'		(b)(4)	364439	the	18			1		" m]			
Lead?	Offe nnDO	nse# T Da		Section Accid	lent	Subsection			PA Stat	tute (Title		Counts	—-Ī	rade	NCIC Offense C	ode	UCR/NIBRS Code
is in (if	appli	cable))	Num	ber		. 					Interstate		Ĺ] Safety Zone	_	☐ Work Zone
Statute	e Desc	cripti	on (incl	ude the	e na	me of statu	ute or	ordir	nance): I	:NSUR#	INCE	FRAUD					
															cia Mendoza, may r false information		knowingly and with
purpose	of misl	eadin	g informa	ition con	cerni	ng any fact m	naterial	there	to; to wit:	the defe	enda	nt, by and t	through	ı its age	ent, Adelaida Garc	ia Me	endoza, knowingly
and with to the in:				insuranc	e con	npany, filed a	in appli	ication	for insura	nce con	talnii	ng false and	d/or mi	sleadin	g Information to o	once	al any fact material
}																	
I									<u> </u>						<u>.</u>		
Incho Offen			Attempt 18 901 A			Solicitation 18 902 A][] Coi	nspiracy 903		•	Number	of Vic	tims A	ge 60 or Older		
	06		3922			(a)(1)	of ti	he	18			1	F3			7	
Lead?	Offen	se#		ection		Subsection			PA Statu	te (Title)	_	Counts	Gra	ide	NCIG Offense Co.	de	UCR/NIBRS Code
	mDO1 applic			Accide Numb								Interstate			Safety Zone		☐ Work Zone
						me of statu	ite or	ordir	ance): T	HEFT E	3Y D	ECEPTION	i				
																	ingly and with the
or other	state o	f mind	i; to wit:	the defe	endan	it, by and thro	ough its	s agen	it, Linda Sa	andoval	Herr	era Martine	ez and/	or its er	nployee(s), did pr	esen	v, value, intention t or cause to be
															defendant, by ar terfeit inspection :		
Penn DO			,				"										
L									- <u>-</u>			·					



Decket	Numbe	ri プン	Date F		ОТ	N/LiveSca	n Nu	mber		С	omp	laint/incident 10061		
Defend	lant Nam	i ė:	First:	A AUTO TAG	S	Middle: AND			1	.ast:		VICES, INC.		
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 903			Number	of Victin	ns A	ge 60 or Older		
	07	4101			of the	18				M1				
	Offenset InDOT D applicab	ata	ection Accident Number	Subsection		PA Statute	(Title)	[] II	Counts iterstate	Grade		NCIC Offense C Safety Zone	ode	UCR/NIBRS Code Work Zone
			* 1 % 1 / 1 / 1 / 1 / 1 / 1 / 1 / 1 / 1 /	ame of statute	e or ordi	nance): FC	RGEI	₹Y			·		<u></u>	
intent to knows to with the	defraud on the defraud of the defrau	or injure any d in a manr defraud and	one, or with	in paragraphs (1 ige that he is faci	he is facil) or (2) of	itating a frau this subsect	d or h ion, to	njury t wit: t	o be perpr he defend	etated by ant, by a	y any ind th	one, the actor ut prough its agent,	tters ar Adelai	ny writing which he da Garcia Mendoza, mows to be forged
Incho Offer		☐ Attempt 18 901 A		Solicitation 18 902 A		Conspiracy 8 903			Numbe	r of Vict	ims /	Age 60 or Older		
	08	7121			of the	75			1	M1				
	Offense n nDOT I	Data	Section Acciden			PA Statu	e (Title	. <u></u>	Counts Interstate	Grad		NGIC Offense (Safety Zone	Code	UCR/NIBRS Code ☐ Work Zone
	applicat Descrip		Number ude the n		e or ordi	nance): FA	LSE A	PPLI	CATION I	FOR CER	ettf:	CATE OF TITLE	E OR F	REGISTRATION
of the fire	st degree any other i, made a	if the personaterial fa	on uses a fal act in an app	se or ficticious na olication for a cert at and/or conceals	ame or addificate of the day of t	iress or make title or for a r	es a m egistr	nateria ation,	false stat to wit: the dication fo	ement, o defenda r a certif	or fail ont, b icate	s to disclose a se y and through its	curity	of a misdemeanor interest, or t, Adelaida Garcia
	09	7122		(3)	of the	75	 -	-	,	M1			$\overline{}$	
Lead?	Offense	S	ection Accident	Subsection		PA Statute	(Title)	L	Counts	Grade		NCIC Offense C	ode	UCR/NIBRS Code
(if	applicab	le)	Number	ame of statute	e or ordi	nance): AL	TERE		iterstate RGED, OI	R COUN		Safety Zone FEIT DOCUMEN	ITS	☐ Work Zone
the first o	degree if t ate of title	he person, or any oth	with fraudu er documen	lent intent, alters	or forges red for iss	an assignme ue by the Pe	nt of a	a certi ania C	icate of till epartment	de, or an t of Trans	assiq sport	gnment or releas ation (Penn DOT	e of a : '). to v	f a misdemeanor of security interest on wit: the defendant, by Penn DOT.



Docket Numbe	r	Date File	ed:	i: OTN/LiveScan Number Complaint/Incident Number IFS210061									
Defendant Nan	1e:	First: JESSICA	AUTO TAG	is	Middle: AND			Las		VICES, INC.			
	·												
1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.	Attemp		Solicitation		Conspiracy	\neg	Nu	mber d	of Victims	Age 60 or Older			
Offense	18 901 /	4	18 902 A		8 903								
	4904		(b)	of the	18		1		MM3				
Lead? Offens PennDOT I		Section Accident	Subsection		PA Statute (Cou		Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone		
(if applica Statute Descri		Number	me of statut	a or ordi	nance): IINC				l		- AAOIK ZOIIG		
Statute Descri	puon (mo	iuue ille ila	ine oi statut	e or ordi	nance). uns	WORN	LWLDI	TOAL	LON TO AL	THORITES			
										cia Mendoza, made a			
										ect that false statemer urse of criminal condu			
knowingly and into	entionally si	gned (PA Dep	t. of Transport	ation (Peni	nDOT)) forms th					ments which he did no			
on forms bearing i	notice that i	raise statemer	its were punisn	lable by la	₩.								
<u> </u>										<u></u>			
Inchoate [Attempt	TI	Solicitation	⊠ Co	nspiracy	7	Num	her of	Victims A	ge 60 or Older			
Offense	18 901 A		18 902 A		903		14011			ge 00 01 01001			
	5111		(a)(1)	of the	18		1		=1				
Lead? Offenser PennDOT D	ata	ection Accident	Subsection		PA Statute (Ti		Count Intersta		Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code ☐ Work Zone		
(If applicate Statute Descrip		Number ude the na	me of statut	e or ordi						IG IN PROCEEDS OF			
ACTIVITIES, ETC					,								
										cia Menodza, with inte Vehicle Titles, Decept			
Practices, Tamperi	ng with Put	olic Records or	Information, F	alse Appli	cation for Certifi	cate of	Title or	Registi	ration, and	Unsworn Falsification	to Authorities, did		
agree with such ot or solicitation to co	her person(ommit such	(s) and / or bu crime(s); to v	ısiness(es) that vit; the defenda	t they or o ant, by and	ne or more of th I through its age	iem will ent, Ade	engage laida Ga	e in cor arcia M	iduct which iendoza, dio	i constitutes such crim I agree with one or m	e(s) or an attempt ore individuals, that		
	l engage in	conduct that	constitutes the	aforemen	tioned crime(s),					ommit such crime(s).			
<u> </u>	H OYCIL GCL	III DOLGOGIJES	<u>or aric comonito</u>	ICY.									
	Attempt	; —	Solicitation		onspiracy		Nur	nber o	f Victims A	Age 60 or Older			
Offense	18 901 A	<u> </u>	18 902 A	1 1	903		<u> </u>						
□ 12	911		(b)(1)	of the	18		1	l	F1				
Lead? Offense PennDOT L		Section Accident	Subsection		PA Statute (1		Cour		Grade	NCIC Offense Gode	UCR/NIBRS Code		
(if applical	ole)	Number	<u> </u>				interst			Safety Zone	☐ Work Zone		
Statute Descrip	otion (incl	ude the na	me of statute	e or ordi	nance): corr	RUPT O	RGANI	ZATIC	ONS		Ì		
Acts of the acc	used ass	ociated with	n this Offens	SO. It chal	he unlawful for	anv ne	rson wif	າດ ຄລະ	received ar	ny income derived, dire	ectly or indirectly		
from a pattern of r	acketeering	activity in wh	iich such perso	n participa	ted as a princip	al, to us	e or inv	est, di	rectly or inc	ilrectly, any part of su	ch income, or the		
agent, Adelaida Ga	rcia Mendo	za, engaged ir	n and received	income de	rived, directly o					wit: the defendant, b keteering activity and			
indirectly, any part							-	,		•			



Da-les	A Missanhaa		Date I	tiod.			Ull bracean I	la constan		OLI				OWIPLAIN	
Cr-	t Number)-22	•	5/22		OTN/LiveScan Number					Complaint/Incident Number IFS210061				
Defend	dant Nam	The Control of the Control	First:		Middle:					Last					
10000000	(建位)		752216	CA AUTO) IAGE)	AND			MUL	IZEK	VICES, INC	<u> </u>		
Incho	ate 🗀 🗀	Attempt		☐ Salicit	ation	☐ Co	nspiracy	7	Numbe	er of Via	tims A	ge 60 or Older			
Offen		18 901 A		18 902	A	- 18 :		<u></u>							
	13	911		(b)(2)	of the	18		1	F1		***			
Lead?	Offense		ection	Subs	ection		PA Statute (Ti	(le)	Counts	Gr	ade	NCIC Offense	ode	UCR/NIBRS Code	
(11	applicab	le)	Acciden Number	3 —					Interstate			Safety Zone		☐ Work Zone	
statute	Descript	tion (inclu	ide the r	ame of	statute	or ordina	ance): corr i	UPT O	RGANIZA	TIONS					
ota of	the	read cost	ointo d · ·	iith thin	Offers		م براسید			ah ~ -	Horn -6	racketeering ac	hinita (t-	and the second	
naintain,	directly or	indirectly,	any intere	st in or co	ntrol of a	ny enterpr	ise; to wit: the	defend	ant, by an	d throu	gh its ag	jent, Adelaida G	iarcia M	lendoza, through a	
	f racketeer ite and witi			d, directly	or indired	ctly, intere	st in or control	of frau	dulent veh	icle title	applica	ition and docum	ents to	individuals both	
LIE OI STA	ite and with	iiii uiis org	ai ii zacioi i.												
											-				
Incho	ate [Attempt		☐ Solicit	ation	Co	nspiracy	7	Numbe	er of Vic	ctims A	ge 60 or Older			
Offen	se	18 901 A		18 902	<u>A</u>	18 (103	<u> </u>	<u></u>						
	14	911		(b)(3	3)	of the	18		1	F1			1		
Lead?	Offense#		ection	Subs	ection	A COLUMN TO THE STATE OF THE ST	PA Statute (Ti	lle)	Counts	Gr	ade	NCIC Offense	Code	UCR/NIBRS Code	
	applicabl		Acciden Number			<u></u>			Interstate			Safety Zone		☐ Work Zone	
Statute	Descript	ion (inclu	ide the r	ame of	statute	or ordina	ance): CORR I	UPT O	RGANIZA	TIONS					
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	4la a a a a	and ann	oloted	ilth thin	Offensa					ر بما قد مدد		alabad with any		dan barrandurk au	
articipat	e, directly	or indirectly	, in the co	induct of s	auch enter	rprise's aff	airs through a	pattern	of rackete	ering a	ctivity, t	o wit: the defer	idant, b	ise to conduct or by and through its	
	lelaida Gar ing activity		a, was an	operator a	ind/or wa	s associate	ed with a vehic	le deale	rship and	conduc	ted the	enterprise's affa	irs thro	ugh a pattern of	
dellecon	ing activity	•													
											·				
Incho		Attemp			itation		onspiracy		Numb	er of V	ictims /	Age 60 or Olde	r		
Offer	ise	18 901 A		18 90	2 A	18	903			:_					
	15	911		(b)	(4)	of the	18		1	F1	·				
Lead?	Offense	#	Section	Sub	section		PA Statute (Counts		Grade	NCIC Offense	Code	UCR/NIBRS Cod	
(if	applicab	le)	Accide Numbe	şř					Interstate] Safety Zone		☐ Work Zone	
Statute	Descript	ion (inclu	de the n	ame of	statute	or ordina	ance): CORR	UPT OI	RGANIZA	TIONS					
_ 	Ala		_:_4		O#								3-1-	-£	
acis of ' 2), or (3'	ine accu) of this su	sea asso bsection. T	iciated W o wit: the	nın ınıs (defendant	onense , by and t	i. It shail b through its	e uniawiui for agent, Adelaic	any per la Garc	son to cor a Mendoza	ispire to a, const	o violate oired wit	any or the prov h other individu	risions (ials to (of paragraphs (1), engage in a patterr	
	eering activ						= •			•				. ,	
												· · · · · · · · · · · · · · · · · · ·			
						_						_			



Docket Number:	Date Filed: C	OTN/LiveScan Number	Complaint/incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	JESSICA AUTO TAGS	AND	MULTISERVICES, INC.

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 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 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.)

(Date)

(Year)

(Signature of Afflant)

(Now, on this date

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

(Magisterial District Court Number)

(Issuing Authority)



Docket Number:	Date Filed: C	OTN/LiveScan Number	Complaint/Incident Number
CX -717-92	1215122		IFS210061
	First:	Middle:	Last:
Defendant Name:	JESSICA AUTO TAGS	AND	MULTISERVICES, INC.

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC

Docket Number: Date Filed: OTN/LiveScan Number | Complaint/Incident Number | IFS210061 |
Defendant Name: JESSICA AUTO TAGS | AND | MULTISERVICES, INC.

- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- 42. Docuservices
- 43. Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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.

gay of

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

, Magisterial District Judge

willillin.

COMMONWEALTH OF PENNSYLVANIA COUNTY OF:DAUPHIN						POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA									
Magisterial Dist						ą		J _a				'S.			
MDJ: Hon. DA			sq.			. 72	EFEND/	ANT	• •			nd ADDRE		<u> </u>	
	Canal Str	-				<u>][</u>				AUT		SALES		IC.	
Roy	alton, PA	1705	7			11.4	rst Name 801 N. 5	th S	treet	Midale	Name	Last Na	ime		Ge
Telephone: (71	7)944-44	163		Se toco/6		Pl	16、19、19年代表示2011年2月	iia, I	PA 19133						
☑ 1-Felony Full	<u> </u>	3578 V 8 T 8 T 8	5-1	elony F	Pending Ex] C-Misdemea	nor Suri	ounding Sta	ites	r	Distance:	141.93 (44. 24. 18.)
2-Felony Limit	ed		☐ 6-F	elony F	ending Ex	draditio	on Determ.] D-Misdemea	inor No I	Extradition		£! L	//starice	
3-Felony Surro	ounding State	es	☐ A-i	Misdem	eanor Full] E-Misdemea	nor Pen	ding Extradi	tion			
4-Felony No E	xtradition		□ B-I	Misdem	eanor Limi	ited] F-Misdemea	nor Pen	ding Extradi	tion			
			OSKO A	n New yard. Julie I, 1999	DEFEND	ANT ID	ENTIFICA"	LION	INFORMATIC	N					Maria Sig
Docket Number		Da	ate Filed		OTN/Liv	eScan	Number		Complaint N	lumber	Incident	Number		uest Lab /ices?	
CR-448	-22	12	1512	22_					IFS210	061			1		NO
GENDER	DOB /	1		POB	1				Add'l E)		Co-l	Defendant(s) 🗌
☐ Male		rst Name				7	Middle Na	me		T	Last Name				Gen.
-						1	111111111111111111111111111111111111111								
☐ Female	AKA														
RACE	White		[Asian				В	ack		Native Americ	an .		Inknown	L
ETHNICITY	☐ Hispanic				Non-Hispan	nic		U	nknown						
□ GRY	(Gray)	☐ RED	(Red/Aub	ın.)	☐ SD'	Y (Sand	y)	□ві	.U (Blue)	☐ PLE	(Purple)			RO (Brown)	
Hair Color □ BLK	(Black)	ONG	G (Orange))	☐ WH	II (White	a)	$\square \times$	XX (Unk./Bald)	☐ GR	V (Green)		□F	NK (Pink)	
The Part of the Control of the Contr	(Blonde / Strav	wberry)													
Eye 🔲 BLK			BLU			BRO (☐ GRN (Gr	een)			RY (G		
Color HAZ	(Hazel)		☐ MAR	(Maroo	n)] PNK (Pink)		MUL (Mu	Iticolored		X	<u>`</u>	iknown)	
DNA	۱ 🗆	/ES 🗌	NO [ONA Lo	cation								- 2	WEIGHT (I	bs.)
FBI Number					MNUN	lumbe	r								
Defendant Finge	rprinted	☐ YE	S 🗆 N	VO										Ft. HEIGI	HT In.
Fingerprint Class	sification:														
				Andri			IT VEHICL		ORMATION	War in					
Plate #		State	Haz mat	Stic	Registi *ker (MM/		,		mm'l Veh. Ind. □	Scn	ool Veh.	Oth. NCI	C Ven	. Code	Reg. same
VIN			<u> </u>	Year	Make			M	odel	<u>L</u>	Style	<u> </u>	Cole	or	as Def.
						, ,									
Office of the a	•										·				
(The attorney for to filing. See Pa.I			nay requi	ire that	the compla	aint, an	rest warran	t affid	avit, or both be	approv	ed by the at	torney for the	he Cor	mmonwealt	h prior
CDAG ROBER	ΓΙΔRΔD						Rob	ert	g. LaBa	r				12/05/2	022
(Name of the attorne		monweal	th)			(Sigr			ey for the Comm]		_	(Da	
I, JEREMY E									737643/E (PSP/MF		= # 736 Assigned A	ffiant ID Nu	mber	& Badge #	
of Penns	sylvania	Office	of At	torne	v Gene	ral			PAO:	22240	Ω .				÷
(Identify Depa	rtment or Ag	ency Re	presente	d and F	olitical Sul	bdivisio	on)				ORI Number)			
do hereby state: (check appropriate box) 1. ⊠ I accuse the above named defendant who lives at the address set forth above															
_ · · · _									iet forth abo is describe						į
1 accus	e ale dele	aruarit	WIIOSE	наше	io unitit	~ vv11 ((z mo but	.vi IO	10 GOOGEDE						
□ Localize the defendant whose name and nonular decignation or nickname are unknown to me and whom I have															
☐ 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															
							of Penns	ylvar	nia at [301]		Harris	sburg City	/		
	J F							·	(Suban	vision Co		ce-Poincal		vision)	
in DAUF	HIN Cour	nty		22]		(on or abo	ut 2	018-PRES	ENT					

(County Code)



			北西湖 东	OLICE CRIMINAL	COMPLAIN					
Docket Number:	Date Filed: (2.15.12.2)	OTN/LiveSca	n Number	Complaint/Incident N IFS210061	lumber					
Defendant Name:	First; JM	Middle: AUTO		Last: SALES, INC.	`					
	JI'S	TAGIO		SALLO, INC.						
When there is more that (Set forth a brief summary of without more, is not sufficient. The age of the victim at the tiple listed. If the identity of an inchoate Inchoate	an one offense, eac f the facts sufficient to a nt. In a summary case, y ime of the offense may l account must be establ Solicitati 18 902 A	h offense should be not divise the defendant of the round must cite the specific series included if known. In addished, list only the last four Don Conspiracy 18 903	umbered chronologature of the offense(section(s) and subsective of the security digits. 204 PA.Code (section of the section)	s) charged. A citation to the statuon(s) of the statute(s) or ordinan numbers and financial information (s) 213.1 – 213.7.) Number of Victims Age 60 or F1	ate(s) allegedly violated, ce(s) allegedly violated. on (e.g. PINs) should not					
Lead? #	ection Subsection	n PA Statut	e (Title) Counts	Grade Code	UCR/NIBRS Code					
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone					
	clude the name of s	tatute or ordinance): D	EALING IN PROCES	DS OF UNLAWFUL ACTIVITY						
		,								
degree if the person conduct proceeds of unlawful activity	s a financial transaction , the person acts with th oza, repeatedly engaged	with knowledge that the prive intent to promote the carl in financial transactions with said unlawful activity.	operty involved, includ ving on of the unlawl	nt, Adelaida Garcia Mendoza, com ding stolen or illegally obtained p ful activity. To wit: the defendant e property involved represented t Number of Victims Age 60 or	roperty, represents the , by and through its he proceeds of unlawful					
Offense 18 90 î A	18 902 A	18 903			r Older					
	(a)(1)	of the 18	1	F3 NCIC Offense	HODAIDE O. A.					
PennDOT Data	ection Subsection	n PA Statut		Grade Code	UCR/NIBRS Code					
(if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone					
Statute Description (inc	clude the name of s	tatute or ordinance): I	NSURANCE FRAUD							
intent to defraud a State of I the government agency a do determination in approving of which is required or filed in the	Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, did knowingly and with the intent to defraud a State of local government agency, namely, PA Deptartment of Transportation (PennDOT), file, present or cause to be filed or presented to the government agency a document that contained false, incomplete or misleading information concerning a 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: the defendant, by and through its agent, Adelaida Garcia Mendoza, knowingly and with intent to defraud the PA Dept. of Transportation (PennDOT), submitted applications and documents which fraudulently misrepresented facts and information pertaining to vehicles.									
Offense 18 901		1 —	Nunac	per of Victims Age 60 or Older						
□ 03 411		E - 1401 Magnotation	1	F3						
Lead? Offense# PennDOT Data	Section Subsection Subsection	tion PA State	ite (Title) Counts							
(if applicable)	Number ——		☐ Interstate	e Safety Zone	☐ Work Zone					
Statute Description (inc	clude the name of s	tatute or ordinance): I	NSURANCE FRAUD							
intent to defraud an insurer, contained false, incompleted	did present or cause to be or misleading information	ne presented to an insurer a concerning a fact or thin	statement forming a material to the insur	nt, Adelaida Garcia Mendoza, did, part of, or in support of, an insu rance claim; to wit: the defendan id cause such statements to be n	rance claim that t, by and through its					



Docket Number:	Date Filed:	OTN/LiveScan Number Complaint/Incident Number IFS210061					lber			
Defendant Name:	First:		Middle:			ast;	TNIC			
	JM		AUTO	· · · · · · · · · · · · · · · · · · ·		SALES,	, IIVC.	·	-,	
Inchoate	ı —		onspiracy 903		Number	of Victi	ms Age 60	or Older		
□ 04 4117)(3) of the	18		1	F3	NCV	Offense Code	LICE AUDDS Code	
PennDOT Data	Accident	bsection	PA Statute (Title		Counts nterstate	Grade	e NCR ☐ Safe		UCR/NIBRS Code Work Zone	
(if applicable) Number Little Littl										
	, indeed the fielding	or ordinate or ordinate			. 10.0-					
Acts of the accused associated with this Offense: Knowingly and with the intent to defraud any insurer or self-insured, assists, abets, solicits or conspires with another to prepare or make any statement that is intended to be presented to any insurer or self-insured in connection with, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim, including information which documents or supports an amount claimed in excess of the actual loss sustained by the claimant to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, did knowingly and with the intent to defraud aninsurer, made material statement(s) intended to be presented to the insurer in connection with and/or in support of an insurance claim that contained false and/or incomplete and/or misleading information.										
Inchoate			Conspiracy 8 903		Number	r of Vict	ims Age 6	0 or Older		
						T	Aa II			
☐ 05 4117 Lead? Offense#		(4) of the Subsection	18 PA Statute (Ti	tto)	1 Counts	Gra	[VI]	IC Offense Code	UCR/NIBRS Code	
PennDOT Data	Accident -	DODSCOTOTI	7 A Gladic (1)		Interstate			ety Zone	☐ Work Zone	
(if applicable) Statute Description (inc	9 10 10 10 10 10 10 10 10 10 10 10 10 10	of statute or ordi	nance): INSUR	RANCE	FRAUD					
Acts of the accused assintent to defraud any insuran purpose of misleading inform and with intent to defraud an to the insurance company.	ce company, self-in ation concerning a	nsured or other persony fact material there	on file an applicateto; to wit: the de	ion for i efendan	nsurance of t, by and th	containin hrough i	ig any false ts agent, A	information or o delaida Garcia M	conceal for the lendoza, knowingly	
Inchoate			onspiracy 903		Number	of Victir	ms Age 60	or Older		
□ 06 3922		of the	18			F3			TAGE INTO DO O A A	
Lead? Offense# S PennDOT Data (if applicable)	Accident Su Number —	bsection	PA Statute (Title		Counts nterstate	Grade	e NCIC	y Zone	UCR/NIBRS Code Work Zone	
	Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION									
Acts of the accused assintent to obtain or withhold p or other state of mind; to wit presented false, incomplete of Adelaida Garcia Mendoza, fra Penn DOT.	roperty of another the defendant, by misleading inforr	by deception, create y and through its age nation material to ap	d or reinforced a int, Linda Sandov plication and doc	i false ir al Herre uments	mpression, era Martine for vehicle	including z and/or titles th	g false imp its employ at the defe	ressions as to la ee(s), did prese ndant, by and th	w, value, intention nt or cause to be nrough its agent,	



Docket N			Date File		OTN/	LiveScan I	can Number Complaint/Incident Number IFS210061					
Defendar	nt Name		First:		I .	ddle:		2	_ast:			
	Designation of the second		JM		<u> A</u> l	UTO			SALES, IN	IC.		
							_					
Inchoate Offense	2 (23.58)	Attempt 18 901 A	—	Solicitation 18 902 A	☐ Cons 18 90			Number	of Victims	Age 60 or Older		
نـــا	07	4101		(~/\-/	of the 1	7 (4 7) 57 (4		1	M1			
	Offense# DOT Da		ction Accident	Subsection		PA Statute (Ti		Counts	Grade	NCIC Offense Co	T	R/NIBRS Code
(if ap	oplicable	e)	Number					nterstate] Safety Zone		Work Zone
Statute D	Descript	ion (incli	ude the nai	me of statute	or ordina	nce): FOR (SERY					
intent to de knows to b with the int	efraud or oe forged tent to de	injure any in a mann fraud and,	one, or with l er specified ir	knowledge that I I paragraphs (1) e that he is facili	ne is facilitat or (2) of thi	ing a fraud o	r injury , to wit:	to be perpi the defend	retated by ar lant, by and	arcia Mendoza, is g nyone, the actor ut through its agent, d documents) whic	ters any w Adelaida G	riting which he arcia Mendoza,
Inchoat Offens	C1000000000000000000000000000000000000	Attempt 18 901 A		Solicitation 18 902 A	☐ Con 18 9	spiracy 03		Numbe	er of Victims	Age 60 or Older		
Lead?	08 Offenset	7121	Section	Subsection	of the	75 PA Statute (Title)	1 Counts	M1 Grade	NGIC Offense C	ode U	CR/NIBRS Code
	າDOT Da pplicabl		Accident Number	7				Interstate		☐ Safety Zone		Work Zone
			and the second second	me of statute	or ordina	nce): FALS	E APPL	CATION	FOR CERTI	FICATE OF TITLE	OR REG	STRATION
of the first conceals ar	degree if ny other i made a m	the perso naterial fa	n uses a false ct in an applic se statement	or ficticious nar	ne or addres ficate of title	ss or makes e or for a reg material fact	a materia istration,	al false stat to wit: the plication fo	tement, or fa e defendant, or a certifical	arcia Mendoza, is g iils to disclose a se by and through its e of title.	curity inter	est, or
			<u>-</u>	(0)					T	1		
L.	09 Offense#	7122	ection	(3) Subsection	of the 7	5 PA Statute (T		1 Counts	M1 Grade	NCIC Offense Co	ide lir	CR/NIBRS Code
Penn	DOT Da	ta	Accident Number			7 A Olding (1)		nterstate		Safety Zone		Work Zone
			ude the na	me of statute	or ordina	nce): ALTE	RED, FO	ORGED, O	R COUNTE	RFEIT DOCUMEN	TS	
the first de a certificate	gree if the e of title	e person, or any oth	with fraudule er document i	nt intent, alters issued or prepar	or forges an ed for issue	assignment by the Penn	of a cert sylvania	ificate of ti Departmer	itle, or an as nt of Transpo	arcia Mendoza, is g signment or releas ortation (Penn DOT ed or prepared for	e <i>of a sec</i> u).to wit: t	rity interest on he defendant,

XXX	POLICE	CRIMINAL	COMPLAINT
-----	--------	----------	-----------

Docket Number:	Date Filed:	OTN/LiveScan	Number	Complaint/Incident Number IFS210061						
Defendant Name:	First:	Middle:		ast:						
Delengant Name.	JM	AUTO		ALES, INC.						
Inchoate		, — , , ,	Number	of Victims Age 60 or	r Older					
☐ 10 4904		of the 18 section PA Statute	(Title) Counts	MIM3 Grade NCIC C	Offense Code UCR/NIBRS Code					
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety						
Statute Description (include the name of statute or ordinance): UNSWORN FALSIFICATION TO AUTHORITIES										
Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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: the defendant, by and through its agent, AdelAIDA Garcia Menodza, engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.										
Inchoate	☐ Solicit 18 902	1 — · ·	Number	of Victims Age 60 or	Older					
	(a)(- DESCRIPTION OF THE PROPERTY	1	F1 No. 10 Of	The Code Hopers of					
PennDOT Data	Accident	ection PA Statute (Title) Counts Interstate	Grade NCIC Of	fense Code UCR/NIBRS Code one					
(if applicable) Statute Description (incl ACTIVITIES, ETC	Number lude the name of	statute or ordinance): CRI								
facilitating the commission of Practices, Tampering with Put agree with such other person or solicitation to commit such	one or more of the folic Records or Inform (s) and / or business crime(s); to wit; the conduct that constit in pursuance of the	utes the aforementioned crime(s conspiracy.	eds of Unlawful Activificate of Title or Regi them will engage in o gent, Adelaida García), or an attempt or so	ity, Washing Vehicle T stration, and Unsworn onduct which constitut Mendoza, did agree w	itles, Deceptive Business Falsification to Authorities, did tes such crime(s) or an attempt ith one or more individuals, that ch crime(s). One or more of					
Offense 18 901 A	; 		Number	Of Victims Age 60 O	Older					
☐ 12 911 Lead? Offense#	(b)(Section Sub	(1) of the 18 section PA Statute	(Title) Counts	F1 Grade NCIC C	Offense Code UCR/NIBRS Code					
PennDOT Data (if applicable)	Accident Number —		☐ Interstate	☐ Safety	Zone 🔲 Work Zone					
Statute Description (incl	ude the name of	statute or ordinance): cor								
from a pattern of racketeering proceeds of such income, in the agent, Adelaida Garcia Mendo	g activity in which su he acquisition of any iza, engaged in and i	Offense: It shall be unlawful f ch person participated as a princi interest in, or the establishment received income derived, directly eds to operate Jessica Auto Tags	ipal, to use or invest, or operation of, any or indirectly, from a	directly or indirectly, a enterprise, to wit: the	ny part of such income, or the defendant, by and through its					

Docket	Number:	12	Date Fil		OTN/LiveScan N	umber		Complaint/Incident N IFS210061	
Defend	ant Name:	the state of the s	First: 3M		Middle: AUTO		Last:	S, INC.	<u> </u>
[3 400 make		. N. Wed (1971)							
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A	Conspiracy 18 903	Nun	nber of Vic	tims Age 60 or Older	\ \
- 🗆	13	911			of the 18	-1	F1		
	Offense# nDOT Dat	a	ction Accident Number	Subsection	PA Statute (Tit	le) Coun		ade NCIC Offense Cod ☐ Safety Zone	e UCR/NIBRS Code ☐ Work Zone
	applicable Description		* ** ** ** ** * * * * * * * * * * * *	me of statute of	or ordinance): corr t	JPT ORGANI	ZATIONS		
pattern of	directly or in racketeering te and within	g activity n	naintained,	in or control of ar directly or indirec	y enterprise; to wit: the tly, interest in or control	defendant, by of fraudulent	and throug vehicle title	ph its agent, Adelaida Garc application and document	ia Mendoza, through a is to individuals both
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A	Conspiracy 18 903	Nun	nber of Vic	tims Age 60 or Older _	
Lead?	14 Offense#	911	ation	(b)(3)	of the 18 PA Statute (Tit	1 le) Coun	F1	ade NCIC Offense Cod	e UCR/NIBRS Code
Pen	nDOT Dat	a -	Accident Number	Supsection	r A Glattile (11)	Interst		Safety Zone	☐ Work Zone
				me of statute	or ordinance): CORRU	JPT ORGANI	ZATIONS		<u> </u>
participate agent, Ad	e, directly or elaida Garcia ing activity.	indirectly, a Mendoza,	in the cond , was an op	duct of such enter	prise's affairs through a p	pattern of rack e dealership a	eteering ad nd conduct	or associated with any ent ctivity, to wit: the defendar ed the enterprise's affairs actims Age 60 or Older	nt, by and through its
	15	911		(b)(4)	of the 18	1	F1		
The second of the Control of the	Offense# nnDOT Dat applicable	ta	ection Accident Number		PA Statute (1	itle) Cou		Region NCIC Offense Co ☐ Safety Zone	UCR/NIBRS Code Work Zone
			le the na	me of statute	or ordinance): corri	JPT ORGANI	ZATIONS		
(2), or (3)) of this subs	section. To	wit: the de	h this Offense efendant, by and t ections (1), (2), ar	hrough its agent, Adelaid	any person to la Garcia Mend	conspire to loza, consp	o violate any of the provision oired with other individuals	ons of paragraphs (1), to engage in a pattern



Docket Number: CR-448-22	Date Filed: C	TN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	JM	AUTO	SALES, INC.

- 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 $\underline{}$.
- 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 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)

AND NOW, on this date 12 12 1 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

SEAL



Docket Number: CR - 448-2-2	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	JM	AUTO	SALES, INC.

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- Oleg ZELENKO
- David MORRISON
- Angel MENDEZ
- Jefferson LOOR VALET
- Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title



Docket Number: CR-448-22	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	JM	AUTO	SALES, INC.

- 37. J&J Car & Truck Sales LLC
- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- Docuservices
- 43. Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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 methis

My commission expires first Monday of January

AOPC 412A - Rev.12/21

day of

(Signature of Affiant)

w j

Magistelland and the Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** MagIsterial District Number: 12-2-03 VS. MDJ: Hon, DAVID H, JUDY, Esq. DEFENDANT: (NAME and ADDRESS): MENDOZA AUTO SALE, INC. Address: 50 Canal Street First Name Middle Name Läst Name : Royalton, PA 17057 422 W. Luray Stret Philadelphia, PA 19140 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States □ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed OTN/LiveScan Number Complaint Number Incident Number Services? ☐ YES ☐ NO IFS210061 Co-Defendant(s) Add'l DOB First Name Middle Name Last Name Gen. Male Male ☐ Female ΔΚΔ ☐ White ☐ Hispanio RACE Unknown Black Native American Unknown ETHNICITY Non-Hispanic BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) GRN (Green) PNK (Plok) XXX (Unk./Bald) BLK (Black) ONG (Orange) ☐ Will (White) Calor BLN (Blonde / Strawberry) ☐ BLU (Blue) BRO (Brown) GRY (Gray) BLK (Black) GRN (Green) Eye PNK (Pink) MAR (Marcon) Color ☐ HAZ (Hazel) XXX (Unknown) MUL (Multicolored) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number MNU Number 3 Ft. HEIGHT In. Defendant Fingerprinted YES NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Registration Comm'i Veh. Reg. State Haz Ind. mat same Plate# Sticker (MM/YY) as Def. Style VIN Make Model Color Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavil, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the altorney for the Commonwealth) 737643/BADGE # 736 JEREMY BECKER (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (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] Harrisburg City (Subdivision Code) (Place-Political Subdivision) [22] on or about 2018-PRESENT in DAUPHIN County (County Code)

	מחו	ICE	CRIMINAL	COMPI	AINIT
3000	PUL		CKIIVIINAL	. COMPL	AINI

				₩ P	OLICE CRIMINA	L COMPLAINT
Docket Number:	Date /	Filed:	OTN/LiveScan	Number	Complaint/Incident	
	First:	<u> </u>	Middle:		Last:	
Defendant Name:	MEN!	DOZA	AUTO		SALE, INC.	
When there is mo (Set forth a brief sum without more, is not a The age of the victim	ore than one or mary of the facts sufficient. In a su at the time of the	offense, each of s sufficient to advise Immary case, you m e offense may be inc	fense should be nur the defendant of the na ust cite the specific sect	nbered chronolo ture of the offense(s ion(s) and subsection, social security i	 charged. A citation to the standard or ordinates charged. A citation to the standard or /li>	itute(s) allegedly violated, nce(s) allegedly violated.
Inchoate ☐ Att Offense 18	empt 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of Victims Age 60	or Older
⊠ 01 !	5111	(a)(1)	of the 1	1 1	51,500	
Lead? Offense	Section	Subsection	PA Statute (Title) · Counts	Grade NGIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Acoldent	January Control		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description	on (include th	e name of statut	e or ordinance): DE	ALING IN PROCEE	DS OF UNLAWFUL ACTIVIT	Y
of unlawful activity, the	ne person acts w epeatedly engag	ith the intent to pro ed in financial trans	mote the carrying on of t actions with knowledge t	he unlawful activity.	n or illegally obtained property, To wit: the defendant, by and olved represented the proceed	I through its agent,
Inchoate ☐ Att Offense 18	empt 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903		Number of Victims Age 60	or Older
□ 02 3	3922	(a)(1)	of the 18	1	F3	
Lead? Offense#	Section	Subsection	PA Statute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data		Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
(If applicable) Statute Description		e name of statut	e or ordinance): THE	FT BY DECEPTION	N	
obtain or withhold pro	perty of another the defendant, b nd documents fo	by deception, creat by and through its ac r out-of-state vehicl	ed or reinforced a false sent, did present or caus	impression, including to be presented fa	t, Patria Laureano, did knowing g false impressions as to law, alse, incomplete or misleading i being present within the Com	value, Intention or other nformation material to
	Attempt 18 901 A	Solicitation	Conspiracy 18 903	Numbe	er of Victims Age 60 or Older	
□ 0 3	3925	(a)	of the 18	1	F3	Ondo Herraldon and
Lead? Offense# PennDOT Data	Section Accid	Subsection ent	PA Statute		Grade NCIC Offense	
(if applicable	Numl	per de la composition della co	e or ordinance): REC	☐ Interstate		☐ Work Zone
receives, retains, or di is received, retained, or receive, retain or dispo	sposes of movator disposed with ose of movable probably been sto	le property of anoth intent to restore It to roperty, belonging t len, and the propert	ner knowing that It has be to the owner; to wit: The to another, with no intent	een stolen, or bellev defendant, by and t to restore It to the	, Patria Laureano, is guilty of t ing that it has probably been s through its agent, Patria Laure owner, knowing that such pro cle, motorboat, or other motor	tolen, unless the property ano, did intentionally perty was stolen, or

X TX	POLICE	CRIMINAL	COMPL	ΔΙΝΙΊ
43000-5	FULIUE	CKIMINAL	CONTL	MIN.

Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number				umber				
Defendant Na	ame:	First: MENDOZA		Middle: AUTO		Last SAL	·	•
Inchoate Offense	☐ Attempt 18 901 A			☐ Conspiracy 18 903		Number of V	/ictims Age 60 or Older _	
D 04	7121		of	ine 75 PA Statute (Tille)		1 NCIC Offense Cod	le UCR/NIBRS Code
PennDOT (if applic	Data able)	Accident Number —				nterstate	☐ Safety Zone	☐ Work Zone
Statute Desc	erlption (inc	lude the name o	of statute or	ordinance): FAL	SE APPLI	CATION FOR	CERTIFICATE OF TITLE	OR REGISTRATION
degree If the pe material fact in	rson uses a fa an application	alse or ficticious nam for a certificate of l	ne or address title or for a re	or makes a material	false state ne defenda	ment, or falls nt, by and thro	ria Laureano, is guility of a i to disclose a security interes ough its agent, Patria Laures	st, or conceals any other
Inchoate Offense	☐ Attemp		1	☐ Conspiracy 18 903		Number of	Victims Age 60 or Older	-4.50,,
U 05	7122		bsecllon	the 75	(Title)	1 N	11 Grade NCIC Offense Co	de UCR/NIBRS Code
PennDO) (if applic	Data able)	Accident Number —				interstate	☐ Safely Zone	☐ Work Zone
Statute Desc	ription (inc	lude the name o	of statute or	ordinance): ALT	ERED, FO	RGED, OR CO	DUNTERFEIT DOCUMENT	s
degree if the per certificate of title	rson, with fra e or any other	udulent intent, alter: ' document issued o	s or forges an or prepared for	assignment of a cer rissue by the Penns	rtificate of ylvania De	title, or an ass partment of Tr	ria Lauareno, is guilty of a n ignment or release of a sect ansportation (Penn DOT). It prepared for Issue by Penn	rity interest on a o wit: the defendant, by
							,	
Inchoate Offense	☐ Attempt 18 901 A	☐ Solicit 18 902		Conspiracy 18 903		Number of V	ictims Age 60 or Older	
☐ 06 Lead? Offens	4904	(b)	of t	he 18 PA Statute (TM3	e UCR/NIBRS Code
PennDOT (if application	Data	Acoldent —		171 datate (terstate	☐ Safety Zone	☐ Work Zone
Statute Desc	ription (inc	ude the name o	f statute or	ordinance): uns	WORN F	ALSIFICATIO	N TO AUTHORITIES	
he did not believ wit: the defenda	e to be true, nt, by and th of Transport	on or pursuant to a rough Its agent, Pati ation (PennDOT)) fo	form bearing rla Laureano,	notice, authorized being aged in a continu	y law, to t uous cours	ne effect that i e of criminal c	ria Laureano, made a writte false statements made there onduct, in which he knowing I not believe to be true, on i	eln are punishable; To Jly and intentionally

A 55.0					,
	POI	ICF	CRIMINAL	COMPL	AINT

Docket N	lumber: 450-22	Date Filed: - /2/5/22		OTN/LiveScan	Number	ber Complaint/incident Number IFS210061		
Defenda		First:	.)	Middle:		Last		
		MENDOZA		AUTO		SAL	E, INC.	
Inchoa Offens				☐ Conspiracy 18 903		Number of	Victims Age 60 or Older _	nagray to the subdiving
☐ {	07 4117 Offense#		(3) of the	ne 18	(Tille)	1 F	3 Grade NCIC Offense Cod	e UCR/NiBRS Code
Penr	iDOT Data pplicable)	Accident Number —	5350(A)1	· · · · · · · · · · · · · · · · · · ·	1	Interstate	☐ Safety Zone	☐ Work Zone
		ude the name o	of statute or	ordinance): INS	URANCE	FRAUD		
			-					
conspires v	with another to pre	pare or make any si	tatement that is	s intended to be pr	esented to	any insurer or	insurer or self-insured, assist self-insured in connection w	ith, or in support of, a
claim that	contains any faise,	incomplete or misle	ading informati	ion concerning any	fact or thi	ng material to	the claim, including informati by and through its agent, Pa	on which documents
knowingly	and with the intent	to defraud an insur tained false and/or	er, made mate	rial statement(s) ir	ntended to	be presented	to the insurer in connection w	ith and/or in support
UI di madi	ance dann blac con	italited tolse and/or	arcomplete and	ayor misicading an	ormadon.			
					,			
Inchoat Offense	24 (A) (A) (A) (A)	☐ Solici 18 902] Conspiracy 18 903		Number of V	fictims Age 60 or Older	
σГ	08 4118		of th	e 18				
Lead?	Offense# S	ection Subs	section	PA Statute (Title)	<u> </u>	Grade NCIC Offense Code	UCR/NIBRS Code
14.0	DOT Data plicable)	Accident Number				terstate	☐ Safety Zone	☐ Work Zone
		ude the name o	of statute or	ordinance): WA	SHING V	HICLE TITLE	s	
A oto of th	30 peopledd ace	painted with this	Offonos: Ti	no defendant by n	nd through	Ite seent Pat	ria Laureano, commits a felor	ou of the third degree
if, with the	intent to deceive a	nyone or with know	rledge that the	person is facilititin	g a decept	on to be perpi	etated by anyone concerning	the true mileage of a
information	i to wit: with intent	to deceive anyone,	the defendant	, by and through II	ts agent, R	oberto Gomez	e which includes materially fa Gomez Sr, made/caused to b	
for a certifi	cate of title for a m	iotor vehicle which i	included materl	ally false or ficticio	us informa	tlon.		
		·					±40.	
inchoat	60 N I II A	[[[[]]]		T Cananinani		<u> </u>		
Offens		☐ Solid		☐ Conspiracy 18 903		Number of	Victims Age 60 or Older _	
	09 4911	(a)	(1) oht	he 18	NEAL NE	1 (88) F	3	
Lead?	Offense#	Section Sui	bsection	PA Statute	(Title)	Counts	Grade NCIC Offense Cod	e UCR/NIBRS Code
100	DOT Data	Accident Number —				nterstate	☐ Safety Zone	☐ Work Zone
			f statute or o	ordinance): TAN	1PERING	WITHPUBLIC	RECORDSOR INFORMAT	ION
A		i-t- d with this	Officer	a Cardent Inc.	1.23	Itana and Dak	the factor and the state of the	and will be to be a local
false entry	in, or false alteration	on of, any record, d	ocuments or th	ing belonging to, a	or received	or kept by, the	ria Laureano, did knowingly a e government for information	or record, or required
by faw to b	e kept by others fo tions of, records, d	r information of the ocuments, or things	e government; " s belonging to,	To wit: the defend: or received or kepi	ant, by and t by Penn (through its ag OT.	gent, Patria Laureano, made	false entries in, and/or
Į			•	•				
	, ,							and the state of t

POLICE CRIMINAL COMPLAINT Date Filed: Complaint/Incident Number Docket Number: OTN/LiveScan Number IFS210061 (D-450 -Middle: Last: Defendant Name **MENDOZA AUTO** SALE, INC. Inchoate ☐ Attempt ☐ Solicitation □ Conspiracy Number of Victims Age 60 or Older 18 903 18 901 A 18 902 A Offense 5111 10 of the 18 (a)(1)Offense# PA Statute (Title) **UCR/NIBRS Code** Lead? Section Subsection Counts Grade NCIC Offense Code PennDOT Data Accident ☐ Interstate Safety Zone ☐ Work Zone (if applicable) Number Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNALWFUL ACTIVITIES, ETC Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, with intent of promoting of 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, by and through its agent, Patria Laureano, did agree with one or more individuals, that one or 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 in pursuance of the conspiracy. Inchoate. ☐ Solicitation ☐ Attempt Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the 911 1 1.650 F1 18 11 (b)(1) · Offense# PA Statule (Title) NCIC Offense Code UCR/NIBRS Code Lead? Section Subsection Counts PennDOT Data Accident ☐ Interstate Safety Zone Work Zone (if applicable) Number. 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, by and through its agent, Patria Laureano, 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 Mendoza's Auto Sales. Inchoate ☐ Attempt Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 18 FI : 12 % (b)(2)PA Statute (Title) UCR/NIBRS Code Offense# Counts Grade NCIC Offense Code Lead? Subsection Section

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, by and through its agent, Patria Laureano, through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of fraudulent vehicle title application and documents to individuals both out of state and within this organization.

Interstate

☐ Safety Zone

PennDOT Data

(if applicable)

Accident

Number

☐ Work Zone



			A. 1887	PO	LICE CRI	MINAL	CWIPLAIN
Pocket Number: CR - 450 - 22	Date Filed: /2/5/22	OTN/LiveScan N	umber	, ,	olaint Number 10061	Incident	Number
Defendant Name	First: MENDOZA	Middle: AUTO			Last: SALES	·	
The acts committed by the appropriate. When there is (Set forth a brief summary of the violated, without more, is not suf allegedly violated.)	accused are descril more than one offe	bed below with eanse, each offense	should be r	umber fense(s)	y or statute alle ed chronologic charged. A citatio	ally. n to the statut	e(s) allegedly
Inchoate	Solicitation 18 902 A		nspiracy 903		Number of Vic	tims Age 60	or Older
□ 13 911	(・/(-/	of the 18	1		F1		
Lead? Offense# Section PennDOT Data Acc	Subsection	PA Statute		ınls		Offense Code	UCR/NIBRS Code
	mber		☐ Inters	state	☐ Safety	Zone	☐ Work Zone
Statute Description (Include Acts of the accused associ or participate, directly or Indirectly through its agent, Patria Laureand of racketeering activity.	ated with this Offens	se; It shall be unlawfi enterprise's affairs thi	ıl for any perso ough a pattern	n emplo	yed by or associate	wit: the defe	ndant, by and
Inchoate	☐ Solicitatio		nspiracy 903		Number of Vic	tims Age 60	or Older
□ 1 4 911	トレーノン り 浸む	of the 18	1	F1			
	Subsection ident mber	PA Statute (1	ille) Counts		rade NCIC Off	ense Code Zone	UCR/NIBRS Code Work Zone
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, by and through its agent, Patria Laureano, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).							
							
Inchoate	☐ Solicitation 18 902 A		nspiracy 903		Number of Vic	tims Age 60	or Older
		of the					Lionations of L
	Subsection Ident Mber	PA Statute (T	itle) Counts		rade NCIC Off	Zone	UCR/NIBRS Gode
Statute Description (include		e or ordinance):					
Acts of the accused associ	ated with this Offens	5 0 :					

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IES210061
	First:	Middle:	Last:
Defendant Name:	MENDOZA	AUTO	SALE, INC.

- 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 ___.
- 5.1 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.)

		JAMES CONTRACTOR OF THE PARTY O
(Date)	(Year)	(Signature of Affiant)
AND NOW, on this date	12/6/22	I certify that the complaint has then properly completed and verified.
An affidavit of probable cause	must be completed before a w	varrant can be issued.
1-2-13		And DISTRICES
(Maglsterial District Court Num	ber) (Iss	uing Authority)

Docket Number:	Date Filed: 0	TN/LiveScan Number	Complaint/Incident Number
	First:	Middle:	Last:
Defendant Name:	MENDOZA	AUTO	SALE, INC.

AFFIDAVIT of PROBABLE CAUSE

Your Afflant, Special Agent Jeremy Becker of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- Maria PINEDA
- Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10, Charile JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16, Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jímmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC

		k	
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CK-450"/2	10/3/1		HFS210061
	First;	Middle:	Last:
Defendant Name:	MENDOZA	AUTO	SALE, INC.

- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- 42. Docuservices
- 43. Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

- 1 1 *f*-

My commission expires first Monday of January,

(Signature of Affiant)

(Signature of Amant)

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: DAUPHIN	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	CRIMINAL COMPLAINT /EALTH OF PENNSYLVANIA
Magisterial District Number: 12-2-03	COMMON	VEALTH OF PENNSTLVANIA VS.
MDJ: Hon. DAVID H. JUDY, ESQ.	DEFENDANT:	(NAME and ADDRESS):
Address: 50 CANAL ST.	MP NOTARY AND	TAGS INC.
ROYALTON, PA 17057	First Name Middle	
110 17 100 21 17 100	144 HAMILTON STREET	
Telephone: (717)944-4463	ALLENTOWN, PA 18103	
⊠ 1-Felony Full ☐ 5-Felony Pend	NCIC Extradition Code Type Ing Extradition Code Cype C-Misdemeanor Surce	unding States
	ing Extradition Determ. D-Misdemeanor No E	[Distance: [
☐ 3-Felony Surrounding States ☐ A-Misdemean	-	i i
☐ 4-Felony No Extradition ☐ B-Misdemean		-
DE	ENDANT IDENTIFICATION INFORMATION	
Docket Number Date Filed O	N/LiveScan Number Complaint Number	Incident Number Request Lab Services?
UR-434-22 12/05/2022		IFS210061 □ YES □ NO
GENDER DOB / / POB	Add'i DOB /	/ Co-Defendant(s)
☐ Male First Name	Middle Name	ast Name Gen.
☐ Female AKA		
RACE White Asian ETHNICITY Hispanic Non-	☐ Black ☐ N dispanic ☐ Unknown	ative American Unknown
174,774	SDY (Sandy) BLU (Blue) PLE	Purple)
Hair Day County Day Connect	☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN	
Color: BLN (Blonde / Strawberry)	TAME (ANUTE) TO VVV (GIR SPRIN) TO GAIN	(Green) LT PAK (Pink)
	☐ BRO (Brown) ☐ GRN (Green)	GRY (Gray)
Eye : BLK (Black) LI BLU (Blue) Color HAZ (Hazel) MAR (Maroon)	☐ PNK (Pink) ☐ MUL (Multicotored)	☐ XXX (Unknown)
DNA YES NO DNA Location		·
A STATE OF S	NU Number	WEIGHT (lbs.)
Defendant Fingerprinted YES NO	ing inditipat	Ft. HEIGHT In.
Fingerprint Classification;		Ft, ng(di) m,
1 tifethilit Alfaaticadou	DEFENDANT VEHICLE INFORMATION	<u> </u>
		Veh. ☐ Oth, NCIC Veh. Code Reg.
Plate# mat Sticker	(MM/YY) / Ind. □	same as Def.
	Take Model	Style Color
Office of the attorney for the Commonwealth	Approved ☐ Disapproved because:	
(The altorney for the Commonwealth may require that the	amplaint areast warrant affidault or both he engrous	d by the attacky for the Commonwealth prior to
filing. See Pa.R.Crim.P. 507).	omplaint, affest waitant amount, of pour be approve	by the attorney for the Continonwealth prior to

ROBERT G. LABAR (Name of the altorney for the Commonwealth)	ROBERT G. LABAR (Signature of the attorney for the Commonwealth)	
(Arathe of the addition for the commonwealth)	(aignature of the attorney for the commonwealth)	(Date)
I, SA RACHEL A. STORY // DET. LINDS/	Y YETTER 759307/#583 //	43799/#13
(Name of the Affiant) Lehigh COUNTY D		ssigned Afflant ID Number & Badge #
- D		PA0391900, THE WAR
of Pennsylvania Office of Attorney G (Identify Department or Agency Represented and Politic	al Subdivision) (Police Agency Of	
do hereby state: (check appropriate box)	(
1. 🛛 l accuse the above named defendant wh	o lives at the address set forth above	
☐ I accuse the defendant whose name is u	nknown to me but who is described as	
☐ I accuse the defendant whose name and	popular designation or nickname are unk	nown to me and whom I have
therefore designated as John Doe or Jan	e Doe	
with violating the penal laws of the Comm	onwealth of Pennsylvania at [301] (Supaivision Coa	Harrisburg City e) (Place-Political Supplivision)
	fadinaisian cad	o) (1 idoc-t outroit amprission)
in DAUPHIN County [22]	on or about 2018- PRESENT	,
(County Code		

Burton &				
心经验	POLICE	CRIMINAL	COMPL	AINT.

								COMPLAINT	
Docket Num	ber:	Date Filed:	O	'N/LiveScan N	umber		plaint/incident N 210061	umber	
Defendant N	ame'	First;		Middle:		Last:			
		MP NOTARY		AND		TAGS			
When there (Set forth a bri without more, The age of the	is more that of summary of is not sufficient victim at the t	an one offense, e f the facts sufficient i at. In a summary cas	each Offense sh to advise the defer e, you must cite th ay be included if k	ould be numb dant of the natur e specific section nown. In addition	ered chronologe of the offense(s (s) and subsection, social security (ogically. s) charged. A con(s) of the st numbers and controls.	citation to the statul atute(s) or ordinanc financial information	ted, if appropriate. te(s) allegedly violated, te(s) allegedly violated. n (e.g. PINs) should not	
Inchoate Offense	☐ Attempt 18 901 A	Solici 18 902		onspiracy 3 903		Number of	Victims Age 60 or	Older	
⊠ 01	5111	(a)(1) of the	18	1	F1			
Lead? Offer	ise Se	ection Subse		PA Stalute (Titl	e) Counts	Grade	NCIC Offense Code	UGR/NIBRS Code	
PennDOT (if applic	All the transfer of the second of the	Accident Number			☐ Interstate		Safely Zone	☐ Work Zone	
		lude the name o	f statute or ord	inance): DEAL I	NG IN PROCEE	DS OF UNLA	WFUL ACTIVITY		
Involved repres	ented the prod	ceeds of unlawful act	itivity with the Inter	t to promote the	carrying on of sa	ıld unlawful ac	Victims Age 60 or	ledge that the property Older	
Offense	18 901 A	18 902	India Security		<u> </u>		T		
□ 02	3922	(a)(1) if the	18	1	F3	NCIC Offense		
Lead? Offens		cilon Subse	ction	PA Statute (Titl	<u> </u>	Grade	Code	UCR/NIBRS Code	
(if applic	able) /	Accident Number			☐ Interstate		Safety Zone	☐ Work Zone	
deception, crea	Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION Acts of the accused associated with this Offense: The defendant did knowingly and with the intent to obtain or withhold property of another by deception, created or reinforced a false impression, including false impressions as to law, value, intention or other state of mind; to wit: the defendant did present or cause to be presented to PennDOT, false, incomplete or misleading information material to A MOTOR VEHICLE TITLE/REGISTRATION.								
Inchoate Offense	18 901 /		itation U C	onspiracy 8 903	Numbe	er of Victims	Age 60 or Older _		
D 03			of the section	18 PA Stalute (Til	L Counts	F3 Grade	NGIC Offense Co	de UCR/NIBRS Code	
PennDO (if appli	T Data	Accident Number —	ogotion.	1 M ORBIO (10	□ Interstate		☐ Safety Zone	☐ Work Zone	
		ude the name of	statute or ordi	nance): RECEI	VING STOLEN F	PROPERTY			
another knowing restore it to the to the owner, k	g that It has b owner; to wit nowing that st	een stolen, or believi	ing that It has prob intentionally receiv len, or believing th	ably been stolen, e, retain or dispo at it had probably	unless the prope se of movable pro been stolen, and	erty is received operty, belong to the property	d, retained, or dispo ging to another, witi	n no intent to restore it	

Docket Number:	Date Filed:	OTN/LiveScan	Number	Complaint/Incident No IFS210061	umber
Defendant Name:	First:	Middle:		ast:	
	MP NOTARY	AND]].	AGS	
Inchoste	Solicitation 18 902 A	Conspiracy 18 903	Number	of Victims Age 60 or Older	
□ 04 7121		75 75		M1	
Lead? Offense# Si PennDOT Data (If applicable)	ection Subsection Accident Number	PA Statute (Title) Counts [Interstate	Grade NCIC Offense Cod	UCR/NBRS Code Work Zone
		or ordinance): FAL	SE APPLICATION F	OR CERTIFICATE OF TITLE (R REGISTRATION
name or address or makes a r	naterial false statement, or fal	is to disclose a security	interest, or conceals	e first degree if the person uses any other material fact in an ap cealed any other material fact ir	plication for a
Inchoate		Conspiracy 18 903	Number	of Victims Age 60 or Older	
☐ 05 7122 Lead? Offense# 5	(3) Section Subsection	of the 75	(Tille) Counts	M1 Grade NCIC Offense Cod	10 UCR/NIBRS Code
PennDOT Data (If applicable)	Accident ———	ry ordine	Interstate	☐ Safety Zone	☐ Work Zone
		or ordinance): ALT	ERED, FORGED, OR	COUNTERFEIT DOCUMENTS	
alters or forges an assignment	of a certificate of title, or an a	assignment or release o	of a security interest o	e first degree if the person, with in a certificate of title or any oth any document issued or prepar	er document issued or
Inchoate	Solicitation	Conspiracy	Number o	of Victims Age 60 or Older	
□ 06 4904	(b)	fithe 18	i ji	Mrm3	
Lead? Offense# Se	colon Subsection Accident	PA Statute (Grade NCIC Offense Code	
(If applicable) Statute Description (incl	Number 🐇	or ordinance): אוע	☐ Interstate		☐ Work Zone
pursuant to a form bearing no	tice, authorized by law, to the conduct, in which he knowing!	effect that false staten y and intentionally sign	nents made therein ar ned (PA Dept. of Trans	nent which he did not believe to be punishable; To wit: the defen sportation (PennDOT)) forms the punishable by law.	dant engaged in a

	וחם	ICE	CRIMINAL	COMPI	AINIT
C. 1995	P()(11.	CREMININAL	CUNNIP	.Aliv i

Docket Number:	Date Filed:	OTN/LiveScar		Complaint/Incident Nu IFS210061	
Defendant Name;	First: MP NOTARY	Middle; AND	La T/		
			-		
Inchoate.			Number	of Victims Age 60 or Older _	
□ 07 903	(a)(STEEN STATE OF STATE	1	MM3	NODINION ON A
Lead? Offense# PennDOT Data (if applicable)	Section Subs Accident Number —	ection PA Statute	(Tille) Counts [] Interstate	Grade NCIC Offense Cod	e UCR/NIBRS Code Work Zone
	ude the name of	statute or ordinance); CR	IMINAL CONSPIRAC	Y TO COMMIT THE ABOVE O	FFENSES
following crimes: Dealing in P Registration, Altered Forged, they or one or more of them did agree with one or more in	roceeds of Unlawful A or Counterfelt Docum will engage in conduc dividuals (of the folio	ctivity, Theft by Deception, Recents, Unsworn Faisification to At which constitutes such crime(wing: Jefferson Loor Valet and/	ceiving Stolen Property, Authorities, did agree wi (s) or an attempt or soll (or J&J Car & Truck Sale	r facilitating the commission of False Application for Certificate th such other person(s) and / octation to commit such crime(s) as LLC), that one of more would or more of them engaged in an	of Title or r business(es) that r; to wit: the defendant engage in conduct
Inchoate ☐ Attempt Offense 18 901 A	Solicita	1	Number o	f Victims Age 60 or Older	
□ 08 911	(b)(1		11		
PennDOT Data	Accident Subse	ilon PA Statute	(Tille) Counts Interstate	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone
(If applicable) Statute Description (incl	market and the Control of the Control of the Control	statute or ordinance): co	RRUPT ORGANIZATI	ons	
from a pattern of racketeering proceeds of such income, in the	activity in which such ne acquisition of any l atly or indirectly, from	n person participated as a princ nterest in, or the establishment	cipal, to use or invest, d t or operation of, any e	received any income derived, of irectly or indirectly, any part of interprise, to wit: the defendant indirectly, any part of this inco	such income, or the engaged in and
Inchoate			Number	of Victims Age 60 or Older _	
O9 911	(b)(2		(Title) Counts	F1 Grade NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —	statute or ordinance): CO	[] Interstate	☐ Safety Zone	☐ Work Zone
, ,		,			
Acts of the accused ass maintain, directly or indirectly, interest in or con	any interest in or co	ntrol of any enterprise; to wit:	for any person through the defendant through	a pattern of racketeering activity a pattern of racketeering activity	y to acquire or y maintained, directly
	***************************************	A A A A A A A A A A A A A A A A A A A		A	

	e Filed: 15722	OTN/LiveScan I	lumber		Complaint/Incident Nu IFS210061	
First:	——————————————————————————————————————	Middle:		Last:		
MPI	NOTARY	AND		TAG	5	
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903	Nun	iber of Vi	ctims Age 60 or Older	
Lead? Offense# Section	(b)(3)	PA Statute (Ti	1 ((e) Coun	F1	rade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data Acoid	ent :		☐ Interst		☐ Safety Zone	☐ Work Zone
Statute Description (include the	015-10-15-	r ordinance); cor r	UPT ORGANI	ZATIONS	3	
			·			
Acts of the accused associated participate, directly or indirectly, in the						
and/or was associated with a vehicle d						
contest to considerate the location			-3 			
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nun	iber of Vi	ctims Age 60 or Older	
□ 11 911	(b)(4)	fthe 18	1	Fi		
Lead? Offense# Section	Subsection	PA Statute (T)	tie) Coun	1	rade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data Accid	per		☐ Intersta		☐ Safety Zone	☐ Work Zone
Statute Description (include the	name of statute o	r ordinance): corr i	UPT ORGANI	ZATIONS	;	
Acts of the accused associated	with this Offense:	It shall be unlawful for	any person to	conspire t	o violate any of the provision	ns of paragraphs (1),
(2), or (3) of this subsection. To wit: ti (2), and/or (3).	ne defendant conspired	with other individuals to	o engage in a ρ	attern of	racketeering activity in Viola	tion of subsections (1),
(-),						
						į
		,	1			
Inchoate Attempt Offense 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nu	mber of \	/ictims Age 60 or Older	
		of the				
Lead? Offense# Section PennDOT Data Accident	Subsection dent	PA Statute (Grade NCIC Offense Cod	
(if applicable) Nun	nber — —		☐ Inters	tate	☐ Safety Zone	☐ Work Zone
Statute Description (include the	e name of statute o	r ordinance):				
Acts of the accused associated	I with this Offense:			··-		
	 .					

Docket Number:		OTN/LiveScan Number	Complaint/Incident Number
CR-434-22	1215122		IFS210061
	First:	Middle:	Last:
Defendant Name:	MP NOTARY	AND	TAGS .

- 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 filling 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.)

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date

(Signature of Affiant)

			today I 🗪 🖺	
Docket Number:	Date Filed:	OTN/LiveScar	Number	Complaint/Incident Number
CR-434-22	1215122			
	First:	Middle:	Last	
Defendant Name:	MP NOTARY	AND	TAG	S INC.

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

Your co-affiant, is Detective Lindsay Yetter, badge #213, a duly sworn police officer assigned to the Lehigh County Auto Theft Task Force, and designated as a Special County Detective of the Lehigh County District Attorney's Office pursuant to P.S. 16 section 1441, who specializes in the investigations of auto thefts, and vehicle identification. Your Affiant has completed 7 years of law enforcement / criminal investigative experience.

Your affiant, Rachel Story, has attended numerous insurance fraud trainings, trainings involving vehicle crimes, auto theft and related crimes from the Pennsylvania State Police, Carfax for Police and the International Association of Auto Theft Investigators (IAATI). Your affiant is a current regional director of the North East Association of Auto Theft Investigators.

Your co-affiant, Yetter, has conducted and assisted with investigations involving stolen vehicles, insurance fraud, fraudulent title applications, the re-VINing of stolen vehicles, theft by deception and other forms of vehicle fraud. Your affiant has received training in insuring, titling, and the transfer of motor vehicles into and out of Pennsylvania.

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.	Igor DRATCH	12.	Linda SANDOVAL-	21.	Juana BELEN-VALDEZ
2.	Oleg ZELENKO		MARTINEZ-HERERRA	22.	Juana BELEN-
3.	David MORRISON	13.	Eulid URENA		DEVANGELISTA
4.	Angel MENDEZ	14.	Adelaida GARCIA aka	23.	Rafael SANTIAGO-
5.	Jefferson LOOR VALET		Adelaida MENDOZA		PACHECO
6.	Maria PINEDA	15.	Edward SALDIVAR	24.	Jean AQUINO
7.	Indalecia VASQUEZ	16.	Alberto LUCIANO	25.	Aristeds AQUINO
8.	Somary (BETH Otanez De	17.	Mohamed KERDI	26.	Ahmed LOPEZ
	LOOR	18.	Muhammad ALKURDI	27.	Jessica ENGELKE
9.	Beaki Antonia PEREZ	19.	Edgar COLLADO	28.	Jimmy RODRIGEZ Sr.
10.	Charlie JIMINAN	20.	Osiris FERNANDEZ	29.	Nora RODRIGUEZ
11.	Margarete ALMSAHAQBEH		GONZALEZ	30.	Roberto GOMEZ



Docket Number:	Date Filed:	OTN/LiveScan	Number	Complaint/Incident Number
Defendant Name:	First: MP NOTARY	Middle: AND	Las	
31. Amatti Auto Sales LLC	38. MP Notary a	and Tags LLC	45. Jessica's	Auto Tags
32. Newroad Motors LLC	39. AMCO Auto	Sales	46. JM Moto	ors
33. Grig LLC	40. Charo's Auto	o Sales	47. Saldivar	Group
34. Santos Auto Gallery	41. A2Z Auto Ta	gs ·	48. Abby Au	to
35. Perfect Touch Auto Repair	42. Docuservice	es ·	49. Caria Ma	ittia LLC
and Sales LLC	43. Emma's Aut	o Tags and	50. G&G Aut	to Body and Auto
36. Pennsylvania Tag and Title	Multiservice	es, Inc.	Salvage	
37. J&J Car & Truck Sales LLC	44. Wilfredo Au	to Repair	51. Mendoz	a Auto Sales

Your afflants believe 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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

I, SA RACHEL A. STORY // DET. LINDSAY YETTER, 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.

	(Signature of Affiant)
Sworn to me and subscribed before me this day of Date My commission expires first Monday of January, 2021	December 2022 , Magisterial District Judge SEAL
AOPC 412A — Rev.12/21	Page of

Roy	:DAUPHIN rict Number: VID H. JUD Canal Stree valton, PA 1	12-2-03 Y, Esq. et .7057	3	JIA	DEFEND NEWROA First Name 32 N, 16	D TH ST	COM	MON\	NEALTH \			
Telephone: (71	.7) 234-0 94	9944-	-4463		LEBAON,	,						
□ 1-Felony Full			T E Salony	NC Pending Extra	IC Extraditio			anor Su	rounding St	doe		
2-Felony Limit	od.		-	_	idition Determ				Extradition	100	☐ Distance:	
3-Felony Surre			☐ A-Misden						iding Extrad	tlon		
4-Felony No E		_		reanor Limited	i				nding Extradi			
	95.3946 E 163	2 4 12 4 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1			TIDENTIFICA	~ .						
Docket Number	5-3-19-18-18-18-18-18-18-18-18-18-18-18-18-18-	Date	Filed	1	can Number		nplaint N		Incident	Number	Request Lab)
CX 43	3/22		5/2022	1	· · · · · · · · · · · · · · · · · · ·	1	FS2100			••••	Services?	□ №
GENDER	DOB /	7	POB				Add'l	ров	1.1		Co-Defendar	ot(s)
☐ Male	First	Name		· · · · · · · · · · · · · · · · · · ·	Middle N	ame			Last Name			Gen.
☐ Female	AKA											
RACE	White		☐ Asiar			Black			Native Americ	an	Unknown	
ETHNICITY				Non-Hispanio		Unkno						
☐ GRY Hair ☐] RED (Re	•	SDY (S		☐ BLU (F			E (Purple)		☐ BRO (Brown	n)
Color LIBLK		ONG (O	(angle)	☐ WHI (V	Vhile)	☐ xxx (I	Jnk./Bald)	∐ GR	(N (Green)		PNK (Pink)	
	(Blonde / Strawb		•									
Eye BLK] BLU (Blue)] MAR (Maroo		RÓ (Brown) NK (Pink)] Grn (Gi] Mul (Mi		l)		RY (Gray) XX (Unknown)	
DNA FBI Number	□ YE	S 🔲 NO	DNA L	ocation MNU Nun	nber					*******	WEIGHT	(lbs.)
Defendant Finge	rprinted	YES	□ №		,						Ft. HEI	GHT in.
Fingerprint Clas												
					DANT VEHICL				gggesggy.			(ACCOM)
Dietedi	\$		laz nat en	Registrati		Comm Ind.		Sch	ool Veh.	Oth, NC	C Veh. Code	Reg.
Plate#				cker (MM/YY)) /	nu.	L{	L				as Def.
VIN			Year	Make		Mode	ıl		Style		Color	
Office of the a	ttorney for th	ne Com	monwealt	h □ Appro	ved 🗆 Dis	approve	d becau	ıse:				
(The attorney for to filing. See Pa.I			require that	the complaint	, arrest warrar	it affidavit,	or both b	e approv	ed by the at	torney for th	he Commonwe	allh prìor
CDAG ROBERT	LABAR			RC	DBERT O	. LAB	AR				12/05/	2022
(Name of the attorne	y for the Commo	nwealth)		- (-	Signature of the	attorney to	the Comm	onwealth	}		(t	Oale)
1, RACHEL A						75	9307/3		-Assigned A	ffant IO Nu	mber & Badge :	#
	<u>-</u>	ffice of	f Attorne	v Genera			-	22240		, ,		
(Identify Depar	of Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box)											
1. ⊠ Laccus	e the above	named	defendan	t who lives	at the addr	ess set t	orth abo	ove				
□laccus	e the defend	lant wh	ose name	is unknow	n to me but	who is o	lescribe	ed as	¥4;:::1,:			
therefor	e the defende e designate ating the per	d as Joh	hn Doe or	Jane Doe	_		at [301]		Harris	burg City	vhom I have / Subdivision)	
in DAUP	HIN County		[22]	Codo	on or abo	out 201	B-PRES	ENT				

			3.404		OOKNIK MARIJAA
Docket Number:	Date Filed:	OTN/LiveScan Nu	nber	Complaint/Incident N IFS210061	umber
	First:	Middle:	Las		
Defendant Name:	NEWROAD	MOTORS	LL		
Section of the property was resident and the section of the sectio		1101010			
When there is more to (Set forth a brief summary without more, is not suffice The age of the victim at the	by the accused are described han one offense, each offer of the facts sufficient to advise lent. In a summery case, you must be time of the offense may be included an account must be established.	ense should be numbe the defendant of the nature ast cite the specific section(s luded if known, in addition, s	red chronologic of the offense(s) of and subsection(s ocial security num	Cally. harged. A citation to the status) of the statute(s) or ordinan nbers and financial information	te(s) allegedly violated,
Inchoate		☐ Conspiracy 18 903	N	lumber of Victims Age 60 o	· Older
☑ 01 911	(b)(1)	of the 18	i F	1000 3000	
Lead? Offense #	Section Subsection	PA Statute (Title)	Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Acadent Number		Interstate	☐ Safety Zone	☐ Work Zone
	nclude the name of statute	e or ordinance): consp i	RACY		
					1
from a pattern of racketee	associated with this Offens ring activity in which such persor in the acquisition of any interest firectly or indirectly, from a patte pad Motors LLC.	n participated as a principal, in, or the establishment or o	to use or invest, di	irectly or indirectly, any part on hterprise, to wit: the defendant	of such income, or the nt engaged in and
	. Lette u.v.				
Inchoate ☐ Attempt Offense 18 901 A		☐ Conspiracy 18 903	N	lumber of Victims Age 60 or	Older
□ 02 911	(b)(2)	t the 18	1 F		
Lead? Offense#	Section Subsection	PA Statute (Tille)	Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number		Interstate	☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (i	nclude the name of statute	or ordinance): corru	PT ORGANIZATI	ONS	L
		, , , , , , , , , , , , , , , , , , ,			1
maintain, directly or indire	associated with this Offens ctly, any interest in or control of control of Newroad Motors LLC.	e: It shall be unlawful for a any enterprise; to wit: the d	ny person through efendant through	a pattern of racketeering acti a pattern of racketeering acti	vity to acquire or vity maintained, directly
inchoate ☐ Atter Offense 18 90		Conspiracy 18 903	Number o	of Victims Age 60 or Older	
O3 91	1 (b)(3) Section Subsection	of the 18 PA Statute (Title	1 Counts	F1 Grade NCIC Offense Co	ode UCR/NIBRS Code
PennDOT Data	Accident	1 1/ Statute (Thie	☐ Interstate	Safety Zone	☐ Work Zone
(If applicable) Statute Description (in	Number nclude the name of statute	or ordinance): corru			
participate, directly or indir	issociated with this Offens rectly, in the conduct of such ent a vehicle dealership and condu	erprise's affairs through a pa	ittern of racketeer	ing activity, to wit: the defend	nterprise to conduct or lant was an operator

	POI	ICE	CRIMIN	ΔΙ	COMPL	ΔΙΝΊ
2.45	3 V.J.	-14		\neg	OCHIE L	\sim

Docket Number:	Date Filed:	OTN/LiveScan	Number	Complaint/Incident Nu IFS210061	mber		
TO THE PROPERTY OF THE PARTY OF	st:	Middle:	l l	ast:			
IV.	EWROAD	MOTORS	L	LC			
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903	Number	of Victims Age 60 or Older			
D 04 911		of the 18 PA Statute (T	1 (tle) Counts	F1 Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data A (if applicable) N	ocident umber ———		☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include	the name of statute	or ordinance): con	RUPT ORGANIZAT	TIONS			
Acts of the accused associ (2), or (3) of this subsection. To v (1), (2), and/or (3).	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).						
Inchoate	☐ Solicitation	☐ Conspiracy	Numbe	r of Victims Age 60 or Older			
Offense 18 901 A	18 902 A	18 903					
☐ 05 5111 Lead? Offense# Section	[S	of the 18 PA Statute (Title) Counts	F1 Grade NGIC Offense Cod	e UCR/NIBRS Code		
PennDOT Data /	ccident Subsection	PA Statute (☐ Interstate	☐ Safety Zone	☐ Work Zone		
(If applicable) Statute Description (include	7-45-28-28-28-28-28-28-28-28-28-28-28-28-28-	or ordinance): DEAL	LING IN PROCEED	S 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.							
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number	of Victims Age 60 or Older			
口 06 4101	1 7 7 1 18634	11ng 18	1	M3 F2	HOOMIDDO Ondo		
	Subsection cident: (mber)	PA Statute (Ti	(lle) Counts ☐ Interstate	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone		
Statute Description (include	the name of statute	or ordinance): FOR	GERY				
Acts of the accused associated is facilitating a fraud or injury to be (2) of this subsection, to wit: the complete be perpetrated by anyone, uttered	e perpretated by anyone, the fermant of the second of the	the actor utters any writ to defraud and/or injure	ting which he knows anyone, and/or wit	to be forged in a manner specifi th knowledge that he is facilitating	ed in paragraphs (1) or		

Docket Number:	Date Fil	led:	OTN/LiveScan Number			Complaint/Incident Number IFS210061		
Defendant Name:	First:	_	Middle:		Last:	<u> </u>		
Describant wante.	NEWRO	AD	MOTORS		LLC			
Inchoate		Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 or Older		
□ 07 7121		第33	the 75	1		MI		
Lead? Offense# PennDOT Data	Section Accident	Subsection	PA Statute		~~~ ~~~~	Grade NCIC Offense Code		
(if applicable)	Number				iterstate	☐ Safety Zone	☐ Work Zone	
Statute Description (Inc.	ude the na	ame or statute or	ordinance): FAL	SE APPLIC	ATION FOR	CERTIFICATE OF TITLE OF	REGISTRATION	
Acts of the accused ass name or address or makes a certificate of title or for a regi- certificate of title.	material false	statement, or falls t	o disclose a security	interest, or	conceals any	other material fact in an appl	ication for a	
			(
Inchoate		C-U-MoN (7 0	- F.				
Inchoate ☐ Attempt Offense 18 901 A		Solicitation [18 902 A	Conspiracy 18 903		Number of Vi	ictims Age 60 or Older		
□ 08 7122	- No. 1	(3) of t	he 75 PA Statute (1	1	M)	Lirade NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data	ection Accident	Subsection	PA Statute (1	Inte		☐ Safety Zone	☐ Work Zone	
(if applicable) Statute Description (incl	Number ude the na	me of statute or	ordinance): ALTI	ERED, FOR	GED OR COU			
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: the defendant, with fradulent intent, altered and/or forged any document issued or prepared for issue by the department.								
Inchoate Attempt Offense 18 901 A		Solicitation 18 902 A	Conspiracy		Number of \	/Ictims Age 60 or Older		
☐ 09 4904	Section	(b) 85	the 18	1	M	3 Grade NCIC Offense Code	UCR/NIBRS Code	
Lead? Offense# PennDOT Data ((frapplicable)	:Accident :Number		FA Statute		terstate	Safety Zone	☐ Work Zone	
Statute Description (incl		me of statute or	ordinance): UNS	WORN FAI	SIFICATION	N TO AUTHORITIES	.,	
Acts of the accused associated with this Offense: The defendant 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: the defendant engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.								

Docke O/	t Numbe		ite Filed: 4.5122	OTN/LiveScan	Numbe	r	Complaint/Incident Nu IFS210061	
Defend	dant Nan	ie: First	: VROAD	Middle: MOTORS		Last:		•
	\$4.500°\\	STATE OF THE PARTY	WOAD	INOTORS		LLU		
Incho Offen		Attempt 18 901 A	Solicitation 18 902 A	⊠ Conspiracy 18 903		Number of V	lictims Age 60 or Older	
	10	7121		of the 75		10		
42 40 10 10 20 20 20 20	Offense nnDOT D	ata Acci	Subsection dent	PA Statute		Counts C Interstate	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone
	applicab Descrip		nber ——— ne name of statute	or ordinance): con			ICATION FOR CERTIFICA	TE OF TITLE, ETC.
	·			•				
following	crimes: Fa	alse Application for	r Certificate of Title or P	tegistration, Unsworn F	alsification	to Authorities,	cilltating the commission of o did agree with such other pe	erson(s) and / or
business((es) that the	ley or one or more	e of them will engage in	conduct which constitu	utes such	crime(s) or an a	attempt or solicitation to com Morrison, Amatti Auto Sales	mit such crime(s); to
that one	of more w	ould engage in cor n overt act.	nduct that constitutes to	ne aforementioned crim	ie(s), or a	n attempt or so	licitation to commit such crim	e(s). One or more of
((ciri city		T OVER C deci						
VOCANIA UNIVERSA	-			Ima :		<u> </u>		
Incho Offen] Attempt 18 901 A	☐ Solicitation 18 902 A	Gonspiracy 18 903		Number of V	ictims Age 60 or Older	
				of the				
Lead?	Offenser		Subsection dent	PA Stalute	T(tia)	Counts (Grade NCIC Offense Code	UCR/NIBRS Code
(if	applicab	le) Nun	nber — —			Interstate	Safety Zone	☐ Work Zone
Statute	Descrip	tion (include th	e name of statute	or ordinance):				
Acts of	the accu	sed associate	d with this Offense	•				
ı				•				,
	-,							
Incho Offer		☐ Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 or Older _	-
				of the			No april 1985	
Lead? Pe	Offens nnDOT L		Subsection cident	PA Statute	1	Counts Interstate	Grade NCIC Offense Cot	UCR/NIBRS Code
	applicat Descrip		mber ——— ne name of statute	or ordinance):	<u> </u>	Inciscato	[] datety zone	La vion zono
Otatato	2000110		io (loggio di Otalogio)	o, o, a,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
Acts of	the accu	ised associate	d with this Offense					

Docket Number:	Date Filed; C	DTN/LiveScan Number		Complaint/Incident Number
C1433.22	1215127			IFS210061
	First:	Middle:	Last:	
Defendant Name:	NEWROAD	MOTORS	LLC	

- 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 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.)

		5/A-	hachea Stry
(Date)	(Year)		(Signature of Affiant)
AND NOW, on this date	12-6-22	certify that the complaint has be	een properly completed and verified.
An affidavit of probable caus	se must be completed befo	re a warrant can be issued.	
12-203		A July	138 WWW.
(Magisterial District Court Nu	umber)	(Issuing-Authority)	SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number IFS210061
	First:	Middle:	Last:	
Defendant Name:	NEWROAD	MOTORS	LLC	

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor	DRATCH
---------	--------

- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 6. Marla PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI

- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-
- DEVANGELISTA
 23. Rafael SANTIAGO-
- PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32, Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery

- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC
- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- 40. Charo's Auto Sales
- 41. A2Z Auto Tags
- 42. Docuservices
- 43. Emma's Auto Tags and Multiservices, Inc.
- 44. Wilfredo Auto Repair
- 45. Jessica's Auto Tags
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Mattia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

Docket Number: W 433-27	Date Filed:	OTN/LiveScan Number		Complaint/incident Number IFS210061
Defendant Name:	First:	Middle:	Last:	
Doroncant (Valle	NEWROAD	MOTORS	LLC	

I, RACHEL A. STORY, 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.

	Sp bachela Stry
r	(Signature of Affiant)
Sworn to me and subscribed before me this	Jaemse Jesz
12/6/22 Date	, Magisterial District Judge
My commission expires first Monday of January,	
d at	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF:DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): Address: 50 Canal Street PA TAG AND TITLE Royalton, PA 17057 First Name Middle Name Last Name Ge 1907 Pittston Avenue Scranton, PA 18505 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? CR 453-22 YES NO 12/05/2022 IFS210061 GENDER Co-Defendant(s) DOB POB Add'l DOB ☐ Male Middle Name Gen. First Name Last Name ☐ Female **AKA** RACE White Black Unknown Asian Native American Hispanic ETHNICITY Unknown Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair PNK (Pink) BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA WEIGHT (lbs.) ☐ YES ☐ NO **DNA Location** FBI Number **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth. NCIC Veh. Code Reg. State Registration Comm'l Veh. Haz Ind. same Plate # mat Sticker (MM/YY) as Def. Style VIN Year Make Model Color П 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). OBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) (Date) 759307/#583 RACHEL A. STORY (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (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] Harrisburg City (Place-Political Subdivision) in DAUPHIN County on or about 2018-PRESENT (County Code)



POLICE CRIMINAL COMPLAINT or | Complaint/Incident Number

	Number: -453	22		Date Filed: OTN/LiveScan Number Complaint/Incident Number IFS210061										
Defend	ant Name);	First:				Middle: TAG			Last: AND				And the second s
			•											
When t (Set forth without n The age	there is n h a <i>brief</i> su more, is not of the victi	nore t mmary t suffic m at th	han one of of the facts lent. In a sun	ffense, sufficier nmary ca offense	each c nt to advi ase, you may be i	offense sh se the defer must cite th ncluded if k	ould be nated and selection of the selection of the nated and selection of	umberen nature of t ection(s) a dition, soc	d chronole the offense(and subsections and security	ogically s) charge on(s) of numbers	, ed. A c the sta and f		tute(s) alle	egedly violated,
Inchoa Offens		ttemp 8 901 A	,		citation 02 A		onspiracy 8 903			Numb	er of \	/ictims Age 60	or Older	
	01	4118	3		<u></u>	of the	18		1	F3				
Lead?	Offense #		Section	Sub	section		PA Statu	e (Title)	Counts	Gra	de	NCIC Offense Code	UCR	/NIBRS Code
1	nDOT Dat pplicable		Accident N	umber		_			Interstate			Safety Zone		Work Zone
Statute	Descript	tion (i	nclude the	name	of stati	ute or ord	inance): v	/ASHING	VEHICLE	TITLES				
knowledg be made	ge that the an applicat	person tion for	is facilititing a certificate	a deceptof title f	otion to b for a mot	e perpretate or vehicle w	ed by anyon hich include	e concerni s material	ng the true ly false or fi	mileage cticious (of a m	the intent to dec otor vehile, the p ation to wit: with erially false or fic	erson ma intent to	kes/causes to deceive anyone,
Inchoat Offens	,	ttempt 8 901 A		☐ Soli 18 96	citation 02 A		onspiracy 3 903			Numb	er of \	/ictims Age 60 d	or Older	
Offens	,			18 90	02 A				1	Numb F3	er of \	/ictims Age 60 d	or Older	
Offens	ie 18	901 A 4107		18 90 (a)(02 A	18	3 903	e (Title)	1 Counts			/ictims Age 60 o		/NIBRS Code
Offens Lead? Penn (if a)	02 0ffense#	4107 4107	7 Section Accident No	18 90 (a)(Subsumber	(4)	of the	18 PA Statul		Counts	F3 Grad	de	NCIC Offense Code	UGR	/NIBRS Code
Offens Lead? Penn (if a)	02 0ffense#	4107 4107	7 Section	18 90 (a)(Subsumber	(4)	of the	18 PA Statul		Counts	F3 Grad	de	NCIC Offense Code	UGR	
Offens Lead? Penn (if a) Statute Acts of sale adult	offense# nDOT Dat pplicable Descript the accuterated or ret knowingly	4107 4107 a ion (iii	Section Accident Nonclude the associated ded commodi	(a)(Subsumber name with the ties, To	92 A 4) section of statu	of the or ordi	18 PA Statul nance): D efendant, in business, th	ECEPTIVE the cours defende	Counts Interstate E BUSINES e of busines ant engaged	F3 Grace Gra	tinuing	NCIC Offense Code	UCR	Work Zone r or expose for the care which the
Offens Lead? Penn (if a) Statute Acts of sale adult defendant (PennDO	offense# nDOT Dat pplicable Descript the accu terated or r t knowingly	4107 ta) tion (in seed a mislaber y and in	Section Accident Nanclude the associated led commodinatentionally s	(a)(Subsumber name with the ties, To	92 A 4) section of statu	of the ute or ordi	18 PA Statul nance): D efendant, in business, th	ECEPTIVE the cours defende	Counts Interstate E BUSINES e of busines ant engaged	F3 Grace Gra	tinuing	NCIC Offense Code Safety Zone S y and with intended	UCR	Work Zone r or expose for the care which the
Offens Lead? Penn (if a) Statute Acts of sale adult defendant	Offense# nDOT Dat pplicable Descript the accu terated or r tknowingly T).	4107 4107 a ion (iii	Section Accident Nanclude the associated ded commodintentionally support	18 90 (a)(Subsumber name with the ties. To ubmitted	92 A 4) section of statu	of the or ordi	18 PA Statul nance): D efendant, in business, th	ECEPTIVE the cours defende	Counts Interstate E BUSINES e of busines ant engaged d reconstruct	F3 Grad Grad Grad Grad Grad Grad Grad Grad	e :: CTICES owing tinuing cle title	NCIC Offense Code Safety Zone S y and with intended	UCR.	Work Zone r or expose for the care which the
Offens Lead? Penn (if a) Statute Acts of sale adult defendant (PennDO)	of the set	4107 (a) ion (ii) sed a mislabe y and ii I Atten 18 90	Section Accident Nonclude the associated ded commodintentionally section 1.4	18 90 (a)(Substitute of the state of the st	02 A (4) section of statu is Offe wit: in the diraction (102 A)(1)	of the or ordi	18 PA Statul nance): D efendant, in business, th ons for PA s	ECEPTIV the cours le defenda alvage an	Counts Interstate E BUSINES e of busines ant engaged d reconstruct	F3 Grades SS PRACES, did known in a contracted vehicle of Vice F3	owing tinuing cle title	NCIC Offense Code Safety Zone S y and with intend course of crimines to the PA Dep	t sell, offernal conduct. of Trans	r or expose for the sportation
Offens Lead? Penn (if a) Statute Acts of sale adult defendant (PennDO) Inchoa Offens Lead?	Offense# nDOT Dat pplicable Descript the accu terated or r tknowingly T).	4107 4107 ia) ion (ii sed a mislabe y and iii	Section Accident Nanclude the associated ded commodintentionally section 1.4	18 90 (a)(Substitute of the state of the st	02 A (4) section of statu is Offe wit: in the differentiation to the control of t	of the or ordinse: The doe course of ent application	PA Statul PA Statul nance): D efendant, in business, the ons for PA s conspiracy 8 903	the cours the defendation alwage and the cours are defended to the cou	Counts Interstate E BUSINES e of busines ant engaged d reconstruct Numb Counts	F3 Grade	owing tinuing cle title	NCIC Offense Code Safety Zone Safety Zone y and with intening course of crimines to the PA Dep Age 60 or Older NCIC Offense C	t sell, offenal conduct. of Trans	r or expose for the three sportation
Offens Lead? Penn (if a) Statute Acts of sale adult defendant (PennDO) Inchoa Offens Lead? Pen (if a)	offense# nDOT Dat pplicable Descript the accu terated or r at knowingly T). ate se 03 Offense#	4107 (a) ion (ii) sed a mislabe y and ii Atten 18 90 49:	Section Accident Nonclude the associated ded commodintentionally something of the section and section accidents accident accidents accidents accidents accidents accidents accident accidents accidents accidents accidents accidents accidents accident accidents accidents accidents accidents accidents accident accidents accidents accidents accidents accidents accidents accident accidents accident accident accident accidents accident ac	and the state of t	(4) section of statu is Offe wit; in the distribution (1) citation (1) (1) ubsection	of the or ordine course of ent application of the of the	18 PA Statul nance): D efendant, in business, th ons for PA s conspiracy 8 903 18 PA Statu	the cours the defendation of the cours the defendation of the defendat	Counts Interstate E BUSINES e of busines ant engaged d reconstruct Numb 1 Counts Interstate	F3 Grad Grad Grad Grad Grad Grad Grad Grad	etims A	NCIC Offense Code Safety Zone Safety Zone y and with intenion of course of crimines to the PA Dep Age 60 or Older NCIC Offense College Safety Zone	t sell, offernal conduct. of Trans	r or expose for the sportation
Offens Lead? Penn (if a) Statute Acts of sale adult defendant (PennDO) Inchoa Offens Lead? Pen (if a)	offense# nDOT Dat pplicable Descript the accu terated or r at knowingly T). ate se 03 Offense#	4107 (a) ion (ii) sed a mislabe y and ii Atten 18 90 49:	Section Accident Nonclude the associated ded commodintentionally something of the section and section accidents accident accidents accidents accidents accidents accidents accident accidents accidents accidents accidents accidents accidents accident accidents accidents accidents accidents accidents accident accidents accidents accidents accidents accidents accidents accident accidents accident accident accident accidents accident ac	and the state of t	(4) section of statu is Offe wit; in the distribution (1) citation (1) (1) ubsection	of the or ordine course of ent application of the of the	18 PA Statul nance): D efendant, in business, th ons for PA s conspiracy 8 903 18 PA Statu	the cours the defendation of the cours the defendation of the defendat	Counts Interstate E BUSINES e of busines ant engaged d reconstruct Numb 1 Counts Interstate	F3 Grad Grad Grad Grad Grad Grad Grad Grad	etims A	NCIC Offense Code Safety Zone Safety Zone y and with intening course of crimines to the PA Dep Age 60 or Older NCIC Offense C	t sell, offernal conduct. of Trans	r or expose for the three sportation



Docket Number:	Date Filed:	OTN/LiveScan N		Complaint/Incident Number IFS210061			
Defendant Name:	First:	Middle:	Last				
	PA	TAG	J ANL	TITLE			
Acts of the accused ass record, documents or thing be information of the governmen or kept by PennDOT.	elonging to, or received or ke	pt by, the government for	information or record,	or required by law to be kep	t by others for		
Inchoate	Solicitation 18 902 A	· ☐ Conspiracy 18 903	Number of \	/ictims Age 60 or Older			
☐ 04 7121 Lead? Offense# Se	ection Subsection	of the 75 PA Statute (Tit	1 M	1 Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone		
(if applicable) Statute Description (incl		e or ordinance): FALS	E APPLICATION FOR	CERTIFICATE OF TITLE O	R REGISTRATION		
Acts of the accused ass name or address or makes a r certificate of title or for a regis certificate of title.	naterial false statement, or f	ails to disclose a security in	nterest, or conceals an	y other material fact in an app	olication for a		
Inchoate	☐ Solicitation	Conspiracy	Number of	Victims Age 60 or Older			
Offense 18 901 A	18 902 A	18 903					
□ 05 903	(a)(1)	of the 18	1 5	*MI			
Lead? Offense# S PennDOT Data	Section Subsection Accident	PA Statute (T	itle) Counts Interstate	Grade NC/C Offense Coo	le UCR/NIBRS Code		
(if applicable) Statute Description (incl	Number	a or ordinance): CRIM					
Acts of the accused ass- more of the following crimes: practices, washing vehicle title constitutes such crime(s) or at Gallery, Jorge Santos/Jorge Sa solicitation to commit such crit	ociated with this Offens False Application for Certifica es, did agree with such other n attempt or solicitation to co antos-Hernandez, that one of	Ge: Conspiracy: The defenate of Title or Registration, person(s) and / or busines ommit such crime(s); to wife more would engage in co	dant, with intent of pro tampering with public ss(es) that they or one t: the defendant did ag	omoting or facilitating the con records or information, dece or more of them will engage gree with one or more of the	nmission of one or otive business in conduct which following: Santos Auto		
		T 0	1				
Inchoate Attempt Offense 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of \	/ictims Age 60 or Older			
06 911 Lead? Offense# Se	(b)(3)	of the 18 PA Statute (Tit	1 F	L Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number —		☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (incl		e or ordinance): CORR	UPT ORGANIZATIO	NS			
Acts of the accused ass participate, directly or indirect and/or was associated with a	ly, in the conduct of such en	terprise's affairs through a	pattern of racketeering	g activity, to wit: the defenda			



Docket Number: CR - 453-22	Date Filed: /2/5/22_	01	N/LiveScan	Numbe	r	Complaint/Incident Number IFS210061			
Defendant Name:	First: PA		Middle: TAG			Last: AND	TITLE		
Inchoate Attemp			Conspiracy 8 903		Num	ber of V	/ictims /	Age 60 or Older _	
□ 07 911		(4) of the	18		1	F			
PennDOT Data (if applicable)	Section Su Accident Number —	bsection	PA Statute		Count Intersta		Grade L	NCIC Offense Cod Safety Zone	e UCR/NIBRS Code Work Zone
Statute Description (inc	I	f statute or ordi	inance): cor	RUPT O	RGANIZ	ATION	1		<u> </u>
Acts of the accused ass (2), or (3) of this subsection. (1), (2), and/or (3).									
Inchoate ☐ Attempt Offense 18 901 A	Solici	ı —	onspiracy		Numb	er of Vi	ctims A	ge 60 or Older	
Offense 18 901 A	10 902	of the	903						
	ection Subs	j (7497,749) section	PA Statute (T	itle)	Counts	Gı	rade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ——				☐ Interstate ☐ Safety Zone ☐ Work Zone				
Statute Description (incl	lude the name o	f statute or ordi	nance):						
Acts of the accused ass	ociated with this	Offense:							
			·······						
Inchoate			Conspiracy 8 903		Numl	per of V	ictims #	Age 60 or Older	
Offense 10 9017	1000	of the	0 903						
		section	PA Statute ((Title)	Counts		3rade	NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —				Interstat	e		Safety Zone	☐ Work Zone
Statute Description (incl	ude the name o	f statute or ordi	nance):						
Acts of the accused ass	ociated with this	Offense:		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
									ļ



Docket Number: CR - 453-22	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PA	Middle: TAG	Last: AND TITLE

- 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 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.)

		5	A hacked a shan
(Date)	(Year)		(Signature of Affiant)
AND NOW, on this date	12/6/22	I certify that the complaint has	s been properly completed and verified.
An affidavit of probable cause	must be completed before a wa	rrant can be issued.	MINISTER OF PENNING
ř		/ 1 /////	
12-2-	B	1 Jahl huy	
(Magisterial District Court Nur	mber) (Issui	ng Authority)	
		1	COURT SAIN WILL



Docket Number: CR - 453-22	Date Filed: 0'	ΓN/LiveScan Number	ľ	Complaint/Incident Number IFS210061
Defendant Mame:	First: PA	Middle: TAG	Last: AND	TITLE

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

Your affiant, Rachel Story, has attended numerous insurance fraud trainings, trainings involving vehicle crimes, auto theft and related crimes from the Pennsylvania State Police, Carfax for Police and the International Association of Auto Theft Investigators (IAATI). Your affiant is a current regional director of the North East Association of Auto Theft Investigators.

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.	Igor DRATCH	18. Muhammad ALKURDI	35. Perfect Touch Auto Repair
2.	Oleg ZELENKO	19. Edgar COLLADO	and Sales LLC
3.	David MORRISON	20. Osiris FERNANDEZ	36. Pennsylvania Tag and Title
4.	Angel MENDEZ	GONZALEZ	37. J&J Car & Truck Sales LLC
5.	Jefferson LOOR VALET	21. Juana BELEN-VALDEZ	38. MP Notary and Tags LLC
6.	Maria PINEDA	22. Juana BELEN-	39. AMCO Auto Sales
7.	Indalecia VASQUEZ	DEVANGELISTA	40. Charo's Auto Sales
8.	Somary IBETH Otanez De	23. Rafael SANTIAGO-	41. A2Z Auto Tags
	LOOR	PACHECO	42. Docuservices
9.	Beaki Antonia PEREZ	24. Jean AQUINO	43. Emma's Auto Tags and
10.	Charlie JIMINAN	25. Aristeds AQUINO	Multiservices, Inc.
11.	Margarete ALMSAHAQBEH	26. Ahmed LOPEZ	44. Wilfredo Auto Repair
12.	Linda SANDOVAL-	27. Jessica ENGELKE	45. Jessica's Auto Tags
	MARTINEZ-HERERRA	28. Jimmy RODRIGEZ Sr.	46. JM Motors
13.	Eulid URENA	29. Nora RODRIGUEZ	47. Saldívar Group
14.	Adelaida GARCIA aka	30. Roberto GOMEZ	48. Abby Auto
	Adelaida MENDOZA	31. Amatti Auto Sales LLC	49. Carla Mattia LLC
15.	Edward SALDIVAR	32. Newroad Motors LLC	50. G&G Auto Body and Auto

33. Grig LLC

34. Santos Auto Gallery

Salvage

51. Mendoza Auto Sales

16. Alberto LUCIANO 17. Mohamed KERDI



Docket Number: CR -453-22	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number IFS210061		
Defendant Name:	First: PA	Middle: TAG	Last:	TITLE		

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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

I, RACHEL A. STORY, 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.

	Str howchul a Stry
Sworn to me and subscribed before me/this	(Signature of Affiaht) December 20,22
12 (201) Date	, Magister and Figure 1
My commission expires first Monday of January, Δ'0\γ'γ	OR AND
	COCY COURT 12 20 COUNTY OF DAUPHILLING

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. MDJ: Hon, DAVID H. JUDY, Esq. (NAME and ADDRESS): DEFENDANT: Address: 50 Canal Street PERFECT TOUCH OTUA **REPAIR & SALES** Middle Name ... Last Name ... First Name Royalton, PA 17057 Go2101 N. 2NP STREET PHILADELPHIA, PA 19122 Telephone: (717)944-4463 NCIG Extradition Code Type X 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 6-Felony Pending Extradition Determ. 2-Felony Limited D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number Complaint Number Incident Number Services? ☐ YES ☐ NO 12/05/2022 IFS210061 Co-Defendant(s) GENDER DOB POB Add'I DOB ☐ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE . ☐ White Aslan Black Native American Unknown ETHNICITY Non-Hispanic Unknown RED (Red/Aubn.) GRY (Gray) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) WHI (White) XXX (Unk/Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye MAR (Maroon) Color HAZ (Hazel) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA **DNA Location** ☐ YES ☐ NO WEIGHT (lbs.) FBI Number MNU Number Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION: Comm'l Veh. Oth, NCIC Veh. Code State Haz Registration School Veh. Reg. mat Ind. Plate# same Sticker (MM/YY) as Def. VIN Make Wodel Year 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), CDAG ROBERT LABAR ROBERT G. LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Signature of the altorney for the Commonwealth) (Dale) I. RACHEL A. STORY 759307/#583 (Name of the Affiant) (PSP/MPOETC -Assigned Afflant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency OR! Number) do hereby state: (check appropriate box) 1. X 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 Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] in DAUPHIN County [22]on or about 2018-PRESENT (County Code)

Docket Number:			45.			<u>COMPLAINT</u>
C1-100-23	Date Filed:	OTN/LiveScan	Number		plaint/Incident N 210061	lumber
Defendant Name:	First:	Middle:		Last:		
Delendant wille.	PERFECT TOUCH	AUTO		REPAIR &	SALES LLC	· · · · · · · · · · · · · · · · · · ·
The acts committed by When there is more that Set forth a brief summary of without more, is not sufficien for age of the victim at the tipe listed, if the identity of an	an one offense, each f the facts sufficient to ad nt. In a summary case, yo Ime of the offense may be	offense should be null vise the defendant of the na u must cite the specific sec a included if known, in addit	mbered chrond ture of the offens tion(s) and subse- ton, social securi	ologically. e(s) charged. A ction(s) of the st ly numbers and	citation to the statu atute(s) or ordinan financial informatio	ite(s) allegedly violated, ce(s) allegedly violated.
Inchoate	☐ Solicitation 18 902 A		,		Victims Age 60 or	· Older
☑ 01 4118		orthe 18	18 N 1 N 1	F3		
. #	ection Subsection	PA Statute	(Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Interstate		Safety Zone	☐ Work Zone
e made an application for a ne defendant made/caused	to be made application(s)	for a certificate of title for a		nich included ma	terially false or ficti	iclous information.
Inchoate	☐ Solicitatio			Number of	Victims Age 60 or	r Older
25. (95.54) 43. (3.51.65) 43. (3.51.65) 43. (4.51.65) 43. (4.51.65) 43. (4.51.65) 43. (4.51.65) 43. (4.51.65)	18 902 A	18 903				
56.99596.44.55E48740010091	(a)(4)	78 903	1	F3		
Offense 18 901 A □ 02 4107 ead? Offense# Se		Isom-oversember		F3	NCIC Offense Code	UCR/NIBRS Code
Offense 18 901 A Offense# Se RennDOT Data (If.applicable)	(a)(4) setton Subsection Accident Number	80/the 18 PA Statute	(Title) Counts □ Interstate	F3 Grade	NCIC Offense Code Safety Zone	
Offense 18 901 A O2 4107 ead? Offense# Se RennDOT Data (if applicable) Statute Description (includes of the accused assuate adulterated or mislabeled defendant knowingly and interpretations.	(a)(4) Subsection Accident Number Stude the name of states Sociated with this Office commodities. To wit: In	PA Statute atute or ordinance): DE	(Title) Counts Interstate CEPTIVE BUSIN The course of busing defendant engage	Grade Grade ESS PRACTICE tess, did knowing ed in a continuir	NCIC Offense Code Safety Zone S gly and with intent g course of crimina	UCR/NIBRS Code
Offense 18 901 A Offense 18 901 A Offense# Se RennDOT Data (If applicable) Statute Description (Inc.) Acts of the accused assale adulterated or mislabeled defendant knowingly and interpennDOT). Inchoate	(a)(4) action Subsection Accident Number Situde the name of states Sociated with this Off d commodities. To wit: In entionally submitted frauct A Solicitation 18 902 A	PA Statute PA Statute atute or ordinance): DE fense: The defendant, in the course of business, the fulent applications for PA sales. Descriptions of the part	(Title) Counts Interstate CEPTIVE BUSIN The course of busin defendant engagivage and reconst	Grade Grade Grade ESS PRACTICE Tess, did knowing ed in a continuir ructed vehicle the continuir ructed vehicle the continuir ructed vehicle the continuir ructed vehicle the continuit ruc	NCIC Offense Code Safety Zone S gly and with intent g course of crimina	UCR/NIBRS Code Work Zone Sell, offer or expose for al conduct in which the
Offense 18 901 A Offense 18 901 A Offense# Se RennDOT Data (if applicable) Statute Description (included as a lead of the accused as a lead of	(a)(4) solion Subsection Accident Number stude the name of states sociated with this Off d commodities. To wit: In entionally submitted frauct A Solicitation 18 902 A	PA Statute PA Statute atute or ordinance): DE fense: The defendant, in the course of business, the lutent applications for PA saluent appli	(Title) Counts Interstate CEPTIVE BUSIN ne course of busin defendant engag vage and reconst	F3 Grade Grade ESS PRACTICE Tess, did knowing ed in a continuir ructed vehicle till The property of Victims F3	NCIC Offense Code Safety Zone S gly and with intent g course of crimina iles to the PA Dept. Age 69 or Older	UCR/NIBRS Code Work Zone Sell, offer or expose for al conduct in which the of Transportation
Offense 18 901 A Offense 18 901 A Offense# Se PennDOT Data (If applicable) Statute Description (Inc.) Acts of the accused assale adulterated or mislabeled defendant knowingly and interpennDOT). Inchoate	(a)(4) action Subsection Accident Number Stude the name of states Sociated with this Off d commodities. To wit: In the actionally submitted fraudate to the sociated with this Off d commodities. To wit: In the actionally submitted fraudate to the sociated with this Off d commodities. To wit: In the actionally submitted fraudate to the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the sociated with this Off d commodities. To wit: In the action of the social	PA Statute PA Statute atute or ordinance): DE fense: The defendant, in the course of business, the lutent applications for PA saluent appli	(Title) Counts Interstate CEPTIVE BUSIN ne course of busin defendant engag vage and reconst	F3 Grade Grade Grade ESS PRACTICE Tess, did knowing ed in a continuir ructed vehicle till enter of Victims F3 Tess Grade Grade	NCIC Offense Code Safety Zone S S S S S S S S S S S S S S S S S S S	UCR/NIBRS Code Work Zone sell, offer or expose for all conduct in which the of Transportation
Offense 18 901 A Offense 18 901 A Offense# Se RennDOT Data (If applicable) Statute Description (incomplete incomplete	(a)(4) action Subsection Accident Number Stude the name of states Sociated with this Off d commodities. To wit: In the entionally submitted fraudate the sociated with this Off d commodities. To wit: In the entionally submitted fraudate the sociated with this Off d commodities. To wit: In the entionally submitted fraudate the sociated with this Off d commodities. To wit: In the entionally submitted fraudate the sociated with this Off d commodities. To wit: In the entionally submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with this Off d commodities. To wit: In the entional submitted fraudate the sociated with the entire the sociated with the entire the sociated with the entire th	PA Statute PA Statute atute or ordinance): DE fense: The defendant, in the course of business, the fullent applications for PA salutent applications for PA sa	(Title) Counts Interstate CEPTIVE BUSIN The course of busing defendant engage and reconst leading and reconst leading leading to the country of the countr	F3 Grade Grade ESS PRACTICE less, did knowing ed in a continuir ructed vehicle till mber of Victims F3 less Grade ate	NCIC Offense Code Safety Zone Safety Zone Safety Zone Safety Zone NCIC Offense Company Safety Zone	UCR/NIBRS Code Work Zone Sell, offer or expose for all conduct in which the of Transportation Ode UCR/NIBRS Code Work Zone

Mary .

•			AND P	OLICE	CRIMINAL	COMPLAINT			
Docket Number:	Date Filed:	OTN/LiveScar	n Number		plaint/incident N 210061	umber			
	First:	Middle:	1	Last:					
Defendant Name:	PERFECT TOUCH	AUTO	1	REPAIR &	SALES LLC				
record, documents or thing b	sociated with this Offens elonging to, or received or ke nt; To wit: the defendant mad	pt by, the government	for information or rec	ord, or requi	red by law to be kep	ot by others for			
Andrews town towns to have a			·····						
Inchoate ☐ Attempt Offense 18 901 A		☐ Conspiracy 18 903	Number	of Victims A	\ge 60 or Older	*************************************			
□ 04 7121		of the 75	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	M1					
Lead? Offense# S PennDOT Data	Section Subsection Accident	PA Statute		Grade	NCIC Offense Cod				
(if applicable)	Number ——		☐ Interstate] Safety Zone	☐ Work Zone			
Statute Description (inc	lude the name of statute	e or ordinance): FAI	LSE APPLICATION	FOR CERTII	FICATE OF TITLE (OR REGISTRATION			
name or address or makes a	Acts of the accused associated with this Offense: A person is guility of a misdemeanor of the first degree if the person uses a false or ficticious name or address or makes a material false statement, or falls to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title.								
-25p/w-1/0.51/10/00/00/00/00/00	,		·····						
Inchoate		Conspiracy 18 903	Numbe	r of Victims	Age 60 or Older _				
□ 05 903	(a)(1)	of the 18	1	FX M	NCIC Offense Co	do HCBMIDDS Code			
PennDOT Data	Accident	PA Statute	(Title) Counts		Safety Zone	de UCR/NIBRS Code			
(if applicable) Statute Description (inc	Number lude the name of statute	or ordinance): cr		.,	*				
Acts of the accused ass following crimes: Washing Ve or Registration, did agree with crime(s) or an attempt or soil Santos/Santos-Hernandez and or solicitation to commit such	hicle Titles, Deceptive Busines h such other person(s) and / c citation to commit such crime d/or Santos Auto Gallery), tha	ss Practices, Tampering or business(es) that the (s); to wit: the defenda t one of more would en	with Public Records on one or more of the or more of the oreast and agree with one or gage in conduct that	or Informatio hem will eng e or more ind	n, False Application age in conduct whic ividuals (of the follow	for Certificate of Title h constitutes such wing: Jorge			
Inchoate	☐ Solicitation	☐ Conspiracy	Number	of Victims A	ge 60 or Older				
Offense 18 901 A	18 902 A	18 903	<u> </u>		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1				
Lead? Offense# S	ection Subsection	of the 18	Title) Counts	F1 Grade	NCIC Offense Code	UCR/NIBRS Code			
PennDOT Data (if applicable)	Accident Subsection	I A Olding	☐ Interstate		Safety Zone	☐ Work Zone			
Statute Description (inc Acts of the accused ass participate, directly or indirect and/or was associated with a	lude the name of statute sociated with this Offens tly, in the conduct of such ent	e: It shall be unlawful erprise's affairs through	for any person emplo n a pattern of rackete	yed by or assering activity	, to wit: the defenda	terprise to conduct or ant was an operator			

Docket	Docket Number: Date Filed:					OTN/LiveScan Number			Gomplaint/Incident Number			
	42(4)WEE	Maria da Assari	First:	,,,,,,	1	∕ilddle:	- -	Las		(000)		
Detend	ant Nan	10:	PERFE	CT TOUCH		AUTO		REPAIR & SA		SALES LLC		
	25042002183						· · · · · · · · · · · · · · · · · · ·			44444		···
Inchd Offer		☐ Attemp 18 901 A		Solicitation 18 902 A		nspiracy 903		Number o	f Victims	Age 60 or Older		
Lead?	07 Offens	911	Section	(b)(4) Subsection	of the	18 PA Statute (Title)	1 Counts	F1 Grade	NCIC Offense Co	de UCR/NIBR	S Code
	nnDOT applica		Accide Numbi					Interstate	Ī.] Safety Zone	☐ Work Z	one
			ret with playing it just the	name of statut	te or ordin	ance): con	RUPT O	RGANIZATIO	אַכ			
(2), or (3)	the acc) of this: and/or (3	subsection.	oclated To wit: the	with this Offen a defendant consp	se; It shall ired with oth	be unlawful fo er individuals	r any pe to enga	erson to conspl ge in a patterr	re to viola of racket	te any of the provis eering activity in vio	ilons of paragraph plation of subsecti	ns (1), ions
Incho] Attempt	. []	☐ Solicitation		spiracy	7	Number of	Victims A	ge 60 or Older _		
Offen	se	18 901 A		18 902 A	189	03						
[] Lead?	Offense	* S	ection	Subsection	of the	PA Statute (Ti	itle)	Counts	Grade	NCIC Offense Cod	e UCR/NIBRS	Code
	nDOT L applicat)ata 💮 💮	Acciden Number					Interstate		Safety Zone	☐ Work Zo	one
				name of statut	te or ordin	ance):			- ' -	• • • • • • • • • • • • • • • • • • • •	 	
Acts of	the acc	sused ass	sociated	with this Offen	se:							
Incho Offer		☐ Attempt		Solicitation		nspiracy 903		Number o	f Victims	Age 60 or Older		
Lead?	Offens	P#	Section	Subsection	ofthe	PA Statule (Tilie	Counts	Grade	NCIC Offense Co	ode UCR/NIBR	S Code
Pei	nnDOT applica	Data	Acolde Numb	nt	***************************************	THE CHARLES		Interstate	1	☐ Safety Zone	☐ Work Z	
			T. LINE COLUMN TO CO. IN. I. S.	name of statul	te or ordin	ance):	•					
Acts of	the acc	used ass	ociated	with this Offen	se:						34.000000000000000000000000000000000000	
										•		
					·							

Docket Number:	Date Filed: /2/5/27	OTN/LiveScan Number	Complaint/Incident Number IES210061
	First:	Middle:	Last:
Defendant Name:	PERFECT TOUCH	AUTO	REPAIR & SALES LLC

- 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 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.)

(Before a warrant of arreissuing authority, and a		avit of probable cause must be completed, swo	rn to before the
		sn huche a	stry
(Date)	(Year)	(Signature of	Affiant) U
AND NOW, on this date	126-22	I certify that the complaint has been properly com	pleted and verified.
An affidavit of probable caus / 2 (Magisterial District Court No	e must be completed before a	suing Arthority)	EAL STATE OF THE S

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number
C143600	- 12/5/02		IFS210061
	First:	Middle:	Last:
Defendant Name:	PERFECT TOUCH	AUTO	REPAIR & SALES LLC

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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	•	Igor DRATCH
2		Oleg ZELENKO
3		David MORRISON
4		Angel MENDEZ
5		Jefferson LOOR VALET
6	•	Maria PINEDA
7		Indalecia VASQUEZ
8	•	Somary IBETH Otanez De
		LOOR
9		Beaki Antonia PEREZ
1	0,	Charlie JIMINAN
1	1.	Margarete ALMSAHAQBEH
1	2,	Linda SANDOVAL-
		A A A D'TINUTZ LIEDEDD A

10,	Charlie JIMINAN
11.	Margarete ALMSAHAQB
12.	Linda SANDOVAL-
	MARTINEZ-HERERRA
13.	Eulid URENA
14.	Adelaida GARCIA aka
	Adelaida MENDOZA
15,	Edward SALDIVAR
16.	Alberto LUCIANO
17.	Mohamed KERDI

18. Muhammad ALKURDI	35. Perfect Touch Auto Repair
19. Edgar COLLADO	and Sales LLC
20. Osiris FERNANDEZ	36. Pennsylvania Tag and Title
GONZALEZ	37. J&J Car & Truck Sales LLC
21. Juana BELEN-VALDEZ	38. MP Notary and Tags LLC
22. Juana BELEN-	39. AMCO Auto Sales
DEVANGELISTA	40. Charo's Auto Sales
23. Rafael SANTIAGO-	41. A2Z Auto Tags
PACHECO	42. Docuservices
24. Jean AQUINO	43. Emma's Auto Tags and
25. Aristeds AQUINO	Multiservices, Inc.
26. Ahmed LOPEZ	44. Wilfredo Auto Repair
27. Jessica ENGELKE	45. Jessica's Auto Tags
28, Jimmy RODRIGEZ Sr.	46. JM Motors
29. Nora RODRIGUEZ	47. Saldivar Group
30. Roberto GOMEZ	48. Abby Auto
31. Amatti Auto Sales LLC	49. Carla Mattla LLC
32. Newroad Motors LLC	50. G&G Auto Body and Auto
33. Grig LLC	Salvage

51. Mendoza Auto Sales

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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

34. Santos Auto Gallery

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number. IFS210061
	First:	Middle;	Last:
Defendant Name:	PERFECT TOUCH	AUTO	REPAIR & SALES LLC

I, RACHEL A. STORY, 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.

	SA Puche a stry	
Sworn to me and subscribed before me this	(Signature of Afflant) ay of NEEMBEL 2012	
My commission expires first Monday of January, 2024	, Magisterial Elistrica Juitse	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): DEFENDANT: MDJ: Hon. DAVID H. JUDY, Esq. **GROUP** INC. SALDIVAR : Address: 50 Canal Street Middle Name Last Name Ge First Name Royalton, PA 17057 4061 Ashland Street Philadelphia, PA 19124 Telephone: (717)944-4463 NCIC Extradition Code Type □ C-Misdemeanor Surrounding States 1-Felony Full 5-Felony Pending Extradition Distance: ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Docket Number Date Filed OTN/LiveScan Number **Complaint Number** Incident Number Services? CR-442-2022 ☐ YES 121513032 ΠNO IFS210061 Co-Defendant(s) GENDER DOB POB Add'l DOB Gen. First Name Middle Name Last Name ☐ Male ☐ Female ΔΚΔ ☐ White ☐ Hispanic Unknown RACE Black ☐ Native American Asian ETHNICITY Non-Hispanic Unknown RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) GRY (Gray) Hair PNK (Pink) XXX (Unk./Bald) GRN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color MAR (Maroon) PNK (Pink) XXX (Unknown) HAZ (Hazel) MUL (Multicolored) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number **MNU Number** Ft. HEIGHT In. ☐ YES ☐ NO **Defendant Fingerprinted** Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Comm'i Veh. Reg. State Registration Haz same Ind. mat Plate # Sticker (MM/YY) as Def. Color VIN Year Make Model Style 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). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. X I accuse the above named defendant who lives at the address set forth above I 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 (Place-Political Subdivision) (Subdivision Code)

on or about 2018-PRESENT

in DAUPHIN County

[22] (County Code)



			P(OLICE CRIMINAL	COMPLAINT
Docket Number: 0R-442-303 2	Date Filed: / 2/5/3/2	OTN/LiveScan Nu	mber	Complaint/Incident N IFS210061	
		Middle:		.ast:	
Defendant Name:	SALDIVAR	GROUP	I	NC.	
When there is more that (Set forth a brief summary of without more, is not sufficient	n one offense, each off the facts sufficient to advise t. In a summary case, you m me of the offense may be inc	ense should be numbe the defendant of the nature ust cite the specific section(cluded if known. In addition,	ered chronolog of the offense(s) s) and subsectio social security n	charged. A citation to the statuness; of the statute(s) or ordinan- umbers and financial information	ite(s) allegedly violated, ce(s) allegedly violated.
Inchoate	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Victims Age 60 or	r Older
⊠ 01 5111	(a)(1)	of the 18	1	F1	
Lead? Offense Se	ction Subsection	PA Statute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data / (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
	lude the name of statut	e or ordinance): DEALI	NG IN PROCEE	DS OF UNLAWFUL ACTIVITY	
Edward Saldivar, repeatedly of intent to promote the carrying line in th	engaged in financial transacting on of said unlawful activity.	ons with knowledge that the	property involve	To wit: the defendant, by and to depresented the proceeds of t	unlawful activity with the
Offense 18 901 A	18 902 A	18 903		Number of Victims Age 00 0	
□ 02 4117	(a)(1)	of the 18	1	F3	
Lead? Offense# Se	ction Subsection	PA Statute (Title	e) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statut	e or ordinance): INSUR	ANCE FRAUD		
defraud a State of local gove government agency a docum approving or disapproving a or filed in response to an age	rnment agency, namely, PA E ent that contained false, inco motor vehicle insurance rate ency's request; to wit: the def	Deptartment of Transportation Implete or misleading inform filing, a motor vehicle insura fendant, by and through its	on (PennDOT), fil nation concerning ince transaction c agent, Edward Sa	t, Edward Saldivar, did knowingle, present or cause to be filed of a fact or thing material to the approximation process and information presented facts and information process.	r presented to the agency's determination in action which is required at to defraud the PA
Inchoate	I —	Conspiracy 18 903	Numbe	er of Victims Age 60 or Older	
□ 03 4117	7 (a)(2)	of the 18	1	F3	
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Tit		Grade NCIC Offense C	
(if applicable)	Number	o or ordinance): Theur	Interstate	☐ Safety Zone	☐ Work Zone
defraud an insurer, did preser incompleted or misleading inf	sociated with this Offens at or cause to be presented to formation concerning a fact o	Se: The defendant, by and on insurer a statement for a thing material to the insurer as the insu	through its agent ming a part of, or ance claim; to wi	t, Edward Saldivar, did, knowing In support of, an insurance clai It: the defendant, by and throug It to be made in support of an ins	m that contained false, h its agent, Edward



Docket Nu		1027		Filed:	O.	TN/LiveScan	Number		Comp	laint/incident Nu 10061	
Defendant			First: SALDI			Middle: GROUP			ast: VC.		
	<u> 10,960 (717</u>		SALUI	. V/u\		<u> </u>			101		
	~l						_				
inchoate Offense		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 8 903		Number	of Victims A	ge 60 or Older	
	1	4117		(a)(3)	of the	18		1	F3		
Lead? Off	ense#		ection Accide	Subsection		PA Statute (1		Counts	Grade	NCIC Offense Code	
(if app	licable	9)	Numbe	er	1	11		nterstate		Safety Zone	☐ Work Zone
Statute De	script	ion (inci	ude the	name or sta	tute or ord	linance): INS	URANCE	FRAUD			
conspires with claim that con or supports a knowingly and	h anoth ntains a n amou d with	ner to prep any false, unt claime the intent	pare or m incomple ed in exce to defra	nake any statem te or misleading ss of the actual ud an insurer, m	ent that is in information loss sustaine ade material	tended to be pre concerning any ed by the claima	esented to fact or th nt to wit: otended to	o any insure ing materia the defenda	r or self-insu I to the claim ant, by and t	red in connection w , including informat hrough its agent, Ec	ts, abets, solicits or ith, or in support of, a ion which documents lward Saldivar, did vith and/or in support
Inchoate Offense		Attemp 18 901 /		Solicitation 18 902 A	on 🗆	Conspiracy 18 903		Number	of Victims	Age 60 or Older	-
)5	4117		(b)(4)	of the	18	1 1 1 2	1	F3		
PennD	a see that the property	ıta	Section Accid	that are 20 ft.	on	PA Statute		Counts Interstate	Grade [NCIC Offense Co	de UCR/NIBRS Cade Work Zone
(if app Statute De	script	e) ion (inc	Numl lude the		tute or ord	linance): INS	URANCE	FRAUD			
defraud any i	insuran formati	ce compa	ny, self-ir rning anv	nsured or other fact material th	person file a ereto: to wit	n application for the defendant.	insurance by and t	e containing hrough its a	any false in gent, Edwar	formation or concea d Saldivar, knowingl	ingly and with intent to I for the purpose of y and with intent to erial to the insurance
Inchoate Offense		Attempt 18 901 A		Solicitation		Conspiracy 8 903		Number	of Victims A	Age 60 or Older	
	6	3922	: · · · · · · · · · · · · · · · · · · ·	(a)(1)	of the	18		1	F3		
Lead? Of PennD	fense#	S	ection Accide	Subsection	10.000000000000000000000000000000000000	PA Statute (Counts	Grade	NCIC Offense Cod	
(if app	licable	e)	Numb	er	11	1!		Interstate		Safety Zone	☐ Work Zone
Statute De	escript	ion (inc	iude the	e name of sta	itute or or	dinance): THE	:FT BY D	ECEPTION			1
obtain or with state of mind information r	hhold p l; to wi nateria	roperty o t: the def I to MV42	f another endant, b 6B applic	by deception, o	reated or re is agent, Edv nents for out	inforced a false vard Saldivar, di -of-state vehicle	impression d present	on, including or cause to	false impres be presente	divar, did knowingly ssions as to law, val d false, incomplete ne vehicle being pre	and with the intent to ue, intention or other or misleading sent within the



Docket Number: CR-442-3022	Date Filed:	QTN/LiveScan Numb	er J	Complaint/Incident Num IFS210061	ber	
Defendant Name:	First:	Middle:	Last:			
	SALDIVAR	GROUP	INC.			
Inchoate		☐ Conspiracy 18 903	Number of Vi	ctims Age 60 or Older		
□ 07 4101	(a)(3)	fithe 18	1 M1			
	ection Subsection	PA Statute (Title)	Counts Gr	ade NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data Accident Interstate Safety Zone Work Zone						
Statute Description (inc	lude the name of statute	or ordinance): FORGERY				
defraud or injure anyone, or be forged in a manner specifi	sociated with this Offense with knowledge that he is facilit ed in paragraphs (1) or (2) of the the is facilitating a fraud, utten is section.	ating a fraud or injury to be pe his subsection, to wit: the defe	erpretated by anyondant, by and thro	ne, the actor utters any writing ough its agent, Edward Saldiva	g which he knows to ir, with the intent to	
Inchoate		Conspiracy 18 903	Number of V	lictims Age 60 or Older		
□ 08 71 21		of the 75	1 M	1		
Lead? Offense#	Section Subsection	PA Statute (Title)		Grade NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident ————] Interstate	☐ Safety Zone	☐ Work Zone	
	lude the name of statute	or ordinance): FALSE APP	LICATION FOR	CERTIFICATE OF TITLE OR	REGISTRATION	
degree if the person uses a fa material fact in an application	sociated with this Offense alse or ficticious name or addres a for a certificate of title or for a aled any other material fact in a	ss or makes a material false st registration, to wit: the defen	atement, or fails to dant, by and throu	disclose a security interest, o	r conceals any other	
Inchoate		Conspiracy 18 903	Number of Vi	ctims Age 60 or Older		
□ 09 7122	- 1 (-)	f the 75	1 M1		110041107000	
Lead? Offense# S PennDOT Data	Section Subsection Accident	PA Statute (Title)	Counts G Interstate	rade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone	
(if applicable)	Number lude the name of statute				L. VYORK ZORIC	
Statute Description (Inc	nuue the name of statute	or orumanocy. ALTERED,	ORGED, OR CO	OMIEKLETI DOCUMENIS		
degree if the person, with fra certificate of title or any othe	sociated with this Offense adulent intent, alters or forges r document issued or prepared d Saldivar, with fradulent intent	an assignment of a certificate for issue by the Pennsylvania	of title, or an assig Department of Tra	nment or release of a security nsportation (Penn DOT). to w	interest on a it: the defendant, by	



Docket Number:	Date Filed: 12 15 12022	OTN/LiveScan N	umber	Complaint/Incident Nu IFS210061	mber
Defendant Name:	First:	Middle:		ast:	·
	SALDIVAR	GROUP	<u> 1</u>	NC.	
Inchoate		☐ Conspiracy 18 903	Numbe	r of Victims Age 60 or Older	
☐ 10 4904 Lead? Offense#	(b) Section Subsection	of the 18	1 Counts	M1 Grade NCIC Offense Cod	e UCR/NBRS Code
PennDOT Data (if applicable)	Accident Number ———	r A Setule (1	☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (incl	ude the name of statu	te or ordinance): unsv	VORN FALSIFICA	TION TO AUTHORITIES	
he did not believe to be true, wit: the defendant, by and the	on or pursuant to a form be rough its agent, Edward Sal ation (PennDOT)) forms the	earing notice, authorized by divar, engaged in a continue	law, to the effect to ous course of crimin	Edward Saldivar, made a written hat false statements made therein hal conduct, in which he knowingle e did not believe to be true, on fo	n are punishable; To ly and intentionally
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A	⊠ Conspiracy 18 903	Number	of Victims Age 60 or Older	
	(a)(1)	of the 18	1	F1 N0/0 0/5	LIODANDO Codo
Lead? Offense# So PennDOT Data (if applicable)	Accident Subsection Number	PA Statute (Tit	le) Counts [Interstate	Grade NCIC Offense Code	UCR/NIBRS Code
	ude the name of statu	te or ordinance): crɪ м	INAL CONSPIRA	CY - DEALING IN PROCEEDS	OF UNALWFUL
the commission of one or mor Tampering with Public Record such other person(s) and / or solicitation to commit such crit	e of the following crimes: D s or Information, False Appl business(es) that they or or me(s); to wit; the defendan constitutes the aforementic	ealing in Proceeds of Unlaw lication for Certificate of Tith ne or more of them will eng t, by and through its agent,	rful Activity, Washir e or Registration, a age in conduct whi Edward Saldivar, o	Edward Saldivar, with intent of page Vehicle Titles, Deceptive Busing Unsworn Falsification to Author Constitutes such crime(s) or all did agree with one or more individually such crime(s). One or more incommit such crime(s).	ess Practices, prities, did agree with n attempt or duals, that one or more
Inchoate		☐ Conspiracy 18 903	Numbe	r of Victims Age 60 or Older	
□ 12 911	(b)(1)	of the 18	1	F1	LION NICHOLOGICA
Lead? Offense# S PennDOT Data (if applicable)	Section Subsection Accident Number	PA Statute (T	itle) Counts Interstate	Grade NCIC Offense Cod	le UCR/NIBRS Code ☐ Work Zone
Statute Description (incl	ude the name of statu	te or ordinance): cor	UPT ORGANIZAT	TIONS	
from a pattern of racketeering proceeds of such income, in the agent, Mohammad Alkurdi, en indirectly, any part of this inco- enterprise to conduct or partic	activity in which such pers ne acquisition of any interes gaged in and received inco ome and/or its proceeds to cipate, directly or indirectly,	on participated as a princip it in, or the establishment o me derived, directly or indir operate Saldivar GroupIt sh in the conduct of such ente	al, to use or invest, r operation of, any ectly, from a patter all be unlawful for a erprise's affairs thro	as received any income derived, of directly or indirectly, any part of enterprise, to wit: the defendant of racketeering activity and use any person employed by or assocuted a pattern of racketeering act a vehicle dealership and conducted	such income, or the , by and through its ed, directly or iated with any ivity, to wit: the



	t Numbe		Date	Filed:	OTN/Lives	Scan Numbe	r		plaint/Incident Nu 210061	ımber
	dant Na	internation	First:		Middle		1	ast:		
			SALDI	VAR	GROL	JP		VC.		
Incho Offen		☐ Attempt 18 901 A		☐ Solicitation 18 902 A	Conspirac	:У	Number	of Victims	Age 60 or Older	
	13	911		(b)(2)	of the 18		1	F1		
Lead? Per	Offenson Offenson		ection Accider	Subsection It	PA St	atute (Title)	Counts Interstate	Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code ☐ Work Zone
	applical		Numbe		e or ordinance):				- Calcty 2016	
Statute	Descrip	ption (incit	ude me	name or statut	e or orumance).	CORROPIO	KGANIZATI	ONS		
racketeer	ing activi	ty maintaine	d, directly	or indirectly, inte	rest in or control of	fraudulent veh	icle title appli	cation and	documents to individ	ar, through a pattern of uals both out of state
Incho Offen	3.07 400 400	☐ Attempt 18 901 A		Solicitation 18 902 A	☐ Conspirac	э у	Number	of Victims /	Age 60 or Older	
	14	911		(b)(3)	of the 18		1	F1.		
Lead?	Offense on DOT I		ection Accider	Subsection	PA St	atute (Title)	Counts	Grade	NCIC Offense Code	
	applica		Numbe	95 40.1 L			Interstate] Safety Zone	☐ Work Zone
Acts of	the acc e, directl lward Sal	cused asso y or indirectl divar, was a	ociated v	with this Offen	terprise's affairs thr	vful for any pe	rson employe	ed by or assing activity,	ociated with any ent to wit: the defendar se's affairs through a	erprise to conduct or nt, by and through its n pattern of
Incha		☐ Attemp		Solicitation	Conspira	асу	Number	of Victims	Age 60 or Older _	
Offer				(b)(4)	of the 18		1	F1		
	15	911			\$ 1000 miles (1000		Counts	Grade	NCIC Offense Co	de UCR/NIBRS Code
Offer Lead?	Offen	se#	Section	Subsection	PA:	Statute (Title)	Counts	Jiddo		T SOMMENTO COLO
Offer Lead? Pei	Offen nnDOT	se# Data	Section Accide Numb	Subsection ent	PA S		Interstate		☐ Safety Zone	☐ Work Zone
Offer Lead? Per	Offen nnDOT applica	se# Data (ble)	- Accide Numb	Subsection ent ———	PA: e or ordinance):] Interstate			



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-442-3032	1215 12027		JFS210061
	First:	Middle:	Last:
Defendant Name:	SALDIVAR	GROUP	INC.

- 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 $\underline{}$.
- 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.

information and docu	, ,	mation and documents differently that non-confidential
of Pennsylvania and we	ere contrary to the Act(s) of the Assen rrest can be issued, an affidavit of	were against the peace and dignity of the Commonwealth nbly, or in violation of the statutes cited. probable cause must be completed sworn to before the
		20101
(Date)	(Year)	U(Signature of Affiant)
AND NOW, on this date	Docember 6, 30221	certify that the complaint has been properly completed and verified.
An affidavit of probable ca	ause must be completed before a warrant	; /1
12-3-	03	Jahluh Toman

(Magisterial District Court Number)

(Issuing Authority)



Docket Number: CR-441-3032	Date Filed: 12/5/1 303.2	OTN/LiveScan Number		Complaint/Incident Number IFS210061
	First:	Middle:	Last:	***************************************
Defendant Name:	SALDIVAR	GROUP	INC.	

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.

- Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- Somary IBETH Otanez De LOOR
- Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH
- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33. Grig LLC
- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- J&J Car & Truck Sales LLC

Docket Number: CR 44/ A - 2082	Date Filed: 12/5/3/2	OTN/LiveScan Number	_	Complaint/Incident Number IFS210061
	First:	Middle:	Last:	
Defendant Name:	SALDIVAR	GROUP	INC.	

- 38. MP Notary and Tags LLC
- 39. AMCO Auto Sales
- Charo's Auto Sales 40.
- A2Z Auto Tags 41.
- Docuservices 42.
- Emma's Auto Tags and Multiservices, Inc. 43.
- Wilfredo Auto Repair 44.
- Jessica's Auto Tags 45.
- JM Motors 46.
- Saldivar Group 47.
- Abby Auto 48.
- Carla Matia LLC 49.
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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-CONFIDENT/AL INFORMATION/AND DOCUMENTS.

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

Magisterial District Judge

COMMONW COUNTY OF Magisterial Dist MDJ: Hon. DAV	:12 rict Number: 1	2-2-03	VANIA	DEFEN	DANT:			NEALTH	OF PEI 'S.	OMPLAIN NNSYLVAN ESS):	
	Canal Street			SANTOS			AUT		GALL		
Roy	alton, PA 17	057	1	First Name			Middle	e Name	Last N	ame	Ge
Telephone: (71	.7)944-4463		500 Warner 18 18 18 18 18 18 18 18 18 18 18 18 18	9 S. Key Taylor, I	PA 185	L7.					
1-Felony Full	2-3624 EEV (7-19A-7/808)	☐ 5-F	elony Pending Ex	NCIC Extraditi tradition			anor Sur	rounding Sta	iles	☐ Distance:	
2-Felony Limit			elony Pending Ex	tradition Deterr	n. 🔲 I	D-Misdeme	anor No	Extradition		D Diotolicoi "	
3-Felony Surro			lisdemeanor Full					nding Extradi			
4-Felony No E	xtradition	∏ B-N	lisdemeanor Limi		D-4			iding Extradi	lion		DETANGED VOCAL CONT.
				ANT IDENTIFIC				1		Request Lab	
Docket Number	4 .	Date Filed		eScan Number	, 60	mplaint N		Incident	Number	Services?	- No
(K 45)	2022	12/05/20)22	<u></u>		IFS2100)61			YES] NO
GENDER	DOB / /	P	ОВ			Add'l	DOB	/ /		Co-Defendan	t(s) 🗌
☐ Male	First N	ame		Middle	Name			Last Name			Gen.
☐ Female	AKA										
RACE	☐ White ☐ Hispanic		Aslan Non-Hispani	io	Blac			Native Americ	an	Unknown	
□GRY		RED (Red/Aubn		(Sandy)	BLU		☐ PLI	E (Purple)		BRO (Brown)
Hair BLK	(Black)	ONG (Orange)	□ wh	l (White)	□ xxx	(Unk./Bald)	GR	N (Green)		PNK (Plnk)	
	(Blonde / Strawberr	у)	·								
Eye ☐ BLK(Color ☐ HAZ(☐ BLU (☐ MAR		BRO (Brown) PNK (Pink)		GRN (GI)		GRY (Gray) (XX (Unknown)	
DNA	☐ YES	□ NO □	NA Location							WEIGHT ((lbs.)
FBI Number			WWNW	umber							
Defendant Finge		YES N	0							Ft. HEIG	HT in.
Fingerprint Class							······································				
<u> </u>	Sta	ite Haz	DEFE Registra	NDANT VEHIC ation		m'i Veh.	Schoo	ol Veh.		C Veh. Code	Reg.
Plate#		mat	Sticker (MM/Y			d. 🗆					same
VIN			Year Make		Mod	iel	<u> L.</u>	Style	· · · · · ·	Color	as Def.
Office of the at	ttorney for the	Commonv	vealth	roved 🗆 D	isappro\	ed becau	use:				
(The attorney for t to filing, See Pa.F		lth may requir	e that the compla	Int, arrest warra	ant affidav	lt, or both b	e approv	ved by the at	torney for t	he Commonwea	lth prior
CDAG ROBERT		vealth)		ROBERT (Signature of the	G. LA	BAR or the Comm	nonwealth)		12/05/2	2022 ale)
		•								, (r).	
I, RACHEL A (Name of the A					7	59307/3 (PSP/M		-Assigned Al	fiant ID Nu	mber & Badge #	:
(Identify Depar	D										
_	•		ndant who live	es at the add	ress se	forth abo	ove				İ
			ame is unkno								<u></u>
therefore	e designated	as John Do	ame and pop be or Jane Do e Commonwe	е		a at [301]	are un	Harris	burg City	•	
in 12 Co	unty	[2]	2]	on or ab	out 20	18-PRES	ENT				

				黎 P(DLICE (CRIMINAL	. COMPLAINT
Docket Number:	Date Filed: 12/5/2082	OTN/LI	veScan Numb	er	Comp IFS2	laint/incident N 10061	lumber
	First:	Mid			ast:		
Defendant Name:	SANTOS	AU	TO	G	ALLERY		
The acts committed by When there is more that (Set forth a brief summary of without more, is not sufficient he age of the victim at the tibe listed. If the identity of an	in one offense, ea the facts sufficient to it. In a summary case, lime of the offense may	ch offense should advise the defendant you must alte the spe	be numbered of the nature of ti cific section(s) at . In addition, soc	l chronolog ne offense(s) nd subsection al security nu	ically. charged. A c i(s) of the sta imbers and fi	itation to the statu itute(s) or ordinan inancial informatic	ite(s) allegedly violated, ce(s) allegedly violated.
Inchoate	☐ Solicita 18 902 /				Number of \	/ictims Age 60 o	r Older
		of the 18		1	F3		
Lead? Offense Se	ction Subsect	ion P	A Statule (Tille)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Accident Number			interstate		Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of	statute or ordinan	ce): Washing	VEHICLE TI	TLES		
Acts of the accused ass knowledge that the person is be made an application for a the defendant made/caused in	facilititing a deception certificate of title for a	to be perpretated by motor vehicle which i	anyone concerni ncludes materiali	ng the true mi y false or fiction	leage of a m clous informa	otor vehile, the pention to wit: with i	erson makes/causes to ntent to deceive anyone,
Inchoate	☐ Solicita 18 902 /				Number of \	/ictims Age 60 o	r Older
□ 02 4107	(a)(4)	of the 18		1	F3		
	ollon Subsect	lon P.	A Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code .
(if applicable)	Accident Number	*		Interstate		Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of	statute or ordinan	ce): DECEPTIV	E BUSINESS	PRACTICES	S	
Acts of the accused assale adulterated or mislabeled defendant knowlingly and integrandor).	d commodities. To wit	: In the course of busin	ness, the defenda	nt engaged in	a continuing	course of crimina	al conduct in which the
Inchoate		,		Number	of Victims	Age 60 or Older	
□ 03 4911			* * * * * * * * * * * * * * * * * * * *	1	F3		
Penn DOT Data	Accident	ection	PA Statute (Tille)	Counts Interstate	Grade	NCIC Offense C Safety Zone	ode UCR/NIBRS Code
(if applicable) Statute Description (inc	Number ————————————————————————————————————	statute or ordinan					
Cardio Dosonphon (Mo	iado tilo fidillo Of	Carato or ordinality	oo, markinin		115441		

Docket Number:	Date Filed;	OTN/LiveScan Numl		Complaint/Incident Nur	
Defendant Name:	First: SANTOS	Middle: AUTO	Last: GAL	LERY	
record, documents or thing be	elonging to, or received or k	se: The defendant, did knowing ept by, the government for infor de false entries in, and/or false	nation or record,	or required by law to be kept I	by others for
Inchoate	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of V	lctims Age 60 or Older	
☐ 04 7121 Lead? Offense# S	ection Subsection	of the 75 PA Stalute (Title)	1 M.	1 Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ———		Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	ude the name of statut	e or ordinance): FALSE API	PLICATION FOR	CERTIFICATE OF TITLE OF	REGISTRATION
name or address or makes a i	naterial false statement, or t	se: A person is gullity of a misd falls to disclose a security interes nt made a material false stateme	t, or conceals any	other material fact in an appli	Ication for a
	150 t. t. t.				
Inchoate		Conspiracy 18 903	Number of \	Victims Age 60 or Older	
□ 05 903 Lead? Offense#	(a)(1) Section Subsection	of the 18 PA Statute (Title)	1 F	1 Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —] Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (incl	ude the name of statut	e or ordinance): CRIMINAL	CONSPIRACY T	O COMMIT THE ABOVE OF	FENSES
following crimes: False Applica business(es) that they or one wit: the defendant did agree v Perfect Touch Auto Repair & S participate, directly or indirect	ation for Certificate of Title o or more of them will engage vith one or more individuals iales LLC, and/or Grig LLCIt ly, in the conduct of such en	se: The defendant, with intent r Registration, Unsworn Falsifica in conduct which constitutes su (of the following: Igor Dratch, C shall be unlawful for any person terprise's affairs through a pattencted the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise's affairs through the enterprise is affairs through the enterprise is a fair and the ente	tion to Authorities ch crime(s) or an leg Zelenko, Ange employed by or a rn of racketeering	, did agree with such other pe attempt or solicitation to comr il Mendez, Amatti Auto Sales L ssociated with any enterprise activity, to wit: the defendant	erson(s) and / or mit such crime(s); to LC, Newroad Motors, to conduct or t was an operator
Inchoate ☐ Attempt Offense 18 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903	Number of V	ictims Age 60 or Older	
□ 06 911 Lead? Offense# Se	(b)(3)	of the 18 PA Statute (Title)	1 F1	rade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		Interstate	☐ Safety Zone	☐ Work Zone
Acts of the accused ass	ociated with this Offens ly, in the conduct of such en	e or ordinance): CORRUPT Se: It shall be unlawful for any laterprise's affairs through a patter acted the enterprise's affairs through a patter acted the enterprise affairs through a patter acted to the enterprise affairs through a patter acted to the enterprise affairs through a patter acted to the enterprise act	person employed b	by or associated with any ente activity, to wit: the defendant	rprise to conduct or t was an operator

Docket Number:	Date Filed:	OTN/LiveScan Nu	mber	Complaint/Incident Nur IFS210061	nber
	First:	Middle:	Last:		
Defendant Name:	SANTOS	AUTO	GAL	LERY	
			•		
Inchoate		Conspiracy 18 903	Number of \	/ictims Age 60 or Older	
☐ 07 911 Lead? Offense#	(b)(4) Section Subsection	of the 18	1 F.	1 Grade NCIC Offense Code	UCR/NIBRS Code
PennUOT Data (if applicable)	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone
	lude the name of sta	tute or ordinance): corr u	IPT ORGANIZATION		
		ense: It shall be unlawful for a nspired with other individuals to			
Inchoate		Conspiracy 18 903	Number of V	ctims Age 60 or Older	
Lead? Offense# S	Section Subsection	of the PA Statute (Title)	Counts G	rade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (Inc		tute or ordinance):			
Acts of the accused ass	sociated with this Off	ense:		,	
					·
Inchoate ☐ Attemp Offense 18 901 /		n Conspiracy 18 903	Number of \	/ictims Age 60 or Older	
Offense 18 901 /	4 18 902 A	18 903			
Offense 18 901 / Lead? Offense# PennDOT Data	A 18 902 A Section Subsection Accident	18 903			
Offense 18 901 /	A 18 902 A Section Subsection Accident Number	18 903	e) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
Offense 18 901 / Lead? Offense# PennDOT Data (if applicable)	Section Subsection Accident Number Indeed the name of sta	18 903 orfine PA Stelute (Title tute or ordinance):	e) Counts	Grade NCIC Offense Code	UCR/NIBRS Code

		· · · · · · · · · · · · · · · · · · ·	
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	1.1		IFS210061
	First:	Middle:	Last;
Defendant Name:	SANTOS	AUTO	GALLERY

- 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 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.)

		ξ	SA hachel a stry
(Date)	(Year)	_	(Signature of Affiant)
AND NOW, on this date	12/4/22	I certify that the complaint h	nas been properly completed and verified.
An affidavit of probable caus	e must be completed before	a warrant can be ssued.	•
(Magisterial District Court Nu	mber)	(Issuing Authority)	SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number
m samanan marakatan marakatan da malah banda saha saha sama			IFS210061
	First:	Middle:	Last:
Defendant Name:	SANTOS	AUTO	GALLERY

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Rachel Story of the Pennsylvania Office of Attorney General (PA OAG), being duly sworn, deposes and says;

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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.

18. Muhammad ALKURDI	35. Perfect Touch Auto Repair
19. Edgar COLLADO	and Sales LLC
20. Osiris FERNANDEZ	36. Pennsylvania Tag and Title
GONZALEZ	37. J&J Car & Truck Sales LLC
21. Juana BELEN-VALDEZ	38. MP Notary and Tags LLC
22. Juana BELEN-	39. AMCO Auto Sales
DEVANGELISTA	40. Charo's Auto Sales
23. Rafael SANTIAGO-	41. A2Z Auto Tags
PACHECO	42. Docuservices
24. Jean AQUINO	43. Emma's Auto Tags and
25. Aristeds AQUINO	Multiservices, Inc.
26. Ahmed LOPEZ	44. Wilfredo Auto Repair
27. Jessica ENGELKE	45. Jessica's Auto Tags
28. Jimmy RODRIGEZ Sr.	46. JM Motors
29. Nora RODRIGUEZ	47. Saldivar Group
30. Roberto GOMEZ	48. Abby Auto
31. Amatti Auto Sales LLC	49. Carla Mattia LLC
32. Newroad Motors LLC	50. G&G Auto Body and Auto
33. Grig LLC	Salvage
34. Santos Auto Gallery	51. Mendoza Auto Sales
	 Edgar COLLADO Osiris FERNANDEZ GONZALEZ Juana BELEN-VALDEZ Juana BELEN- DEVANGELISTA Rafael SANTIAGO- PACHECO Jean AQUINO Aristeds AQUINO Ahmed LOPEZ Jessica ENGELKE Jimmy RODRIGEZ Sr. Nora RODRIGUEZ Roberto GOMEZ Amatti Auto Sales LLC Newroad Motors LLC GONZALE

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 warrant for the above-named parties so that they be brought before this Court to answer to the charges set forth herein.

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	SANTOS	AUTO	GALLERY

I, RACHEL A. STORY, 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.

A	SA hacke a-st	ny
10 /	(Signatur	re of Affiant)
Sworn to me and subscribed before me thisday of	December	2022
My commission expires first Monday of January,	, Magisteriat	District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon, DAVID H, JUDY, Esq. (NAME and ADDRESS): NATE OF THE PAUTO AND THE PAUT Address: 50 Canal Street WILFREDO REPAIR First Name Middle Name Last Name Royalton, PA 17057 426 W. Glenwood Avenue Philadelphia, PA 19140 Telephone: (717)234-0949 NCIC Extradition Code Type I-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition B-Misdemeanor Limited ☐ F-MIsdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Docket Number Date Filed OTN/LiveScan Number Complaint Number Incident Number Services? 1215122 ☐ YES □ NO IFS210061 GENDER Co-Defendant(s) DOB POB Add'I DOB ☐ Male First Name Middle Name Last Name Gen. ☐ Female AKA ☐ White ☐ Hispanic RACE □ Black □ Unknown Asian Native American Unknown ETHNICITY (1977) Nол-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BRO (Brown) BLU (Blue) PLE (Purple) Hair ... BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color. BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA PARAMETERS YES NO DNA Location WEIGHT (lbs.) FBI Number MNU Number Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION: State Haz School Veh. Oth, NCtC Veh, Code Registration Comm'l Veh. Reg. ind. mat Plate# same Sticker (MM/YY) as Def. VIN Year Make Model Style Color П 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). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 (Place-Political Subdivision) (Subdivision Code) in DAUPHIN County [22] on or about 2018- PRESENT

(County Code)

							P P	OLICE (CRIMINAL	COMPLAINT
Docke	t Number:	9-22 P2	te Filed: 15122	OT	N/LiveSca	ın Numl	oer	Comp IF\$2	olaint/Incident N 10061	umber
Defen	dant Name:	First			Middle:		1	ast:	3. 3. 3. 3. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4.	
		WIL	FREDO		AUTO			REPAIR		
When (Set for without The age	there is mo th a brief sum more, is not s of the victim	ore than one mary of the fac sufficient. In a s at the time of t	offense, each offe its sufficient to advise t summary case, you mu	ense she the defen st cite the uded if kr	ould be no dant of the r specific se sown, in add	umbere nature of ection(s) a lition, so	d chronolog the offense(s) and subsection and security n	gically.) charged. A c in(s) of the sta numbers and f	illation to the statu atute(s) or ordinan inancial informatio	ated, if appropriate. te(s) allegedly violated, ce(s) allegedly violated. n (e.g. PINs) should not
Incho Offen	China (China Maria	empt 901 A	Solicitation 18 902 A		onspiracy 903			Number of	Victims Age 60 or	Older
\boxtimes	01 8	5111	(a)(1)	filhe	18	17011 (100) 100 (100)	1	F1		
Lead?	Offense #	Section	Subsection		PA Statut	e (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nnDOT Data applicable)	Acciden	t Number				Interstate		Safety Zone	☐ Work Zone
		on (include t	he name of statute	or ordi	nance): D	EALING	IN PROCEE	DS OF UNLA	WFUL ACTIVITY	
of unlay Urena-R	vful activity, ti Recio, repeated	ne person acts dly engaged in	with the intent to prom financial transactions w said unlawful activity.	ote the c	arrying on o	f the unla	wful activity.	To wit: the d	efendant, by and t	represents the proceeds hrough its agent, Ellud wful activity with the
Incho Offen	***********	empt 901 A	Solicitation 18 902 A		onspiracy 1903			Number of	Victims Age 60 or	Older
	02	1117	(a)(1)	fthe	18		1.1	F3.		
Lead?	Offense#	Section	Subsection		PA Statut	e (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	inDOT Data applicable)	Acciden	l Number		•		Interstate		Safety Zone	☐ Work Zone
		on (include t	he name of statute	or ordi	nance): II	NSURAN	CE FRAUD			
defraud governr approvi	l a State of loc ment agency a ng or disappro in response to	al government document tha ving a motor v an agency's re	agency, namely, PA Date on tained false. Income	eptartmer nplete or ling, a mo endant, by	nt of Transpo misleading in otor vehicle in otor and through	ortation (nformatio Insurance In Its age	PennDOT), fil on concerning transaction on ont, Eliud Uren	e, present or a fact or thin or other moto a-Recio, knov	cause to be filed o g material to the a r vehicle insurance vingly and with into	gency's determination in action which is required ent to defraud the PA
Inch Offe		Attempt 18 901 A	Solicitation 18 902 A		onspiracy 3 903		Numbe	er of Victims	Age 60 or Older	
	03	4117	(a)(2)	of the	18		1110	F3		
Lead?	Offense# ennDOT Dat	Section A Acc	Subsection cident		PA Stali	1	Counts	Grade	NCIC Offense Co	ode UCR/NIBRS Code
1) a 41	f applicable) Nu	mber ——— he name of statute	or ordi	nancal, m		Interstate		Safety Zone	LI VVOIK Z.OHO
Otatut	e nescribilo	n (moidde t	ne name or statute	or ordi	nancej. Il	VIANUEF	AE LUMOD			
defraud	l an Insurer,dic leted or mislea	l present or ca ding information	ed with this Offens use to be presented to on concerning a fact or omplete, or misleading	an insure thing ma	r a stateme terial to the	nt formin insuranc	g a part of, or a claim; to wi	r in support of t; the defenda	f, an insurance clai ant, by and througi	m that contained false, h its agent, Eliud Urena-

EL-CA-CE					
DE STATE OF	DOI	ICE	CRIMINAL		AINIT
1000000	P () (11.7	CRIMINAL	LALMUIPI	AIIV

Docket Number:	Date Filed:	OTN/LiveScal	n Number		Complaint/Incident Nu IFS210061	
Defendant Name:	First: WILFREDO	Middle: AUTO		Last:		
- Committee of the Comm						
Inchoate	☐ Solicit 18 902		N	umber of V	latims Age 60 or Older	a
□ 04 4117				F		UCR/NIBRS Code
PennDOT Data	ection Subsi Accident Number	ection PA Statute	(11µe) Co ☐ Inter		Rade NCIC Offense Code ☐ Safety Zone	☐ Work Zone
	The state of the s	statute or ordinance): IN	SURANCE FR	AUD		
conspires with another to pre claim that contains any false, or supports an amount claime knowingly and with the intent	pare or make any sta incomplete or mislea ed in excess of the ac to defraud aninsure	Offense: Knowingly and with itement that is Intended to be particular of the concerning and itual loss sustained by the claim r, made material statement(s) is complete and/or misleading informaticular of the concerning informat	oresented to an my fact or thing mant to wit: the ntended to be p	/ insurer or material to defendant,	self-insured in connection wi the claim, including informati by and through its agent, Elii	th, or in support of, a on which documents udd Urena-Recio, did
Inchoate ☐ Attempt Offense 18 901 A			ı	lumber of '	Victims Age 60 or Older _	
□ 05 4117		4) of the 18 section PA Statute	e (Title) C	····	Grade NCIC Offense Cod	B UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Inte	rstate	☐ Safety Zone	☐ Work Zone
	ude the name of	statute or ordinance): IN	SURANCE FRA	NUD		T. S.
to defraud any insurance com misleading information concer	pany, self-insured or ning any fact materi	Offense: The defendant, by a other person file an application of the defendant of the defendant for insurance containing false	for insurance of the following	containing a gh Its ageni	any false information or conce t, Eliud Urena-Reciol, knowing	al for the purpose of ly and with intent to
Inchoate	Solicita 18 902		Nu	ımber of V	ictims Age 60 or Older	
□ 06 3922	(a)(1) of the 18	1	F3		
PennDOT Data	Accident Subse	ction PA Statute	(∏lle) Cor ☐ Inter		rade NGIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
(If applicable) Statute Description (Incl	Number —— ude the name of	statute or ordinance): TH			I	
obtain or withhold property of state of mind; to wit; the defe	another by deception dente by and through the and through the application and do	Offense: The defendant, by a n, created or reinforced a false gh its agent, Ellud Urena-Recio, cuments for out-of-state vehicle epairs and/or inspection.	Impression, in did present or	cluding false cause to be	e impressions as to law, value e presented false, incomplete	e, Intention or other or misleading

				.	&L		,
Docket Number:	Date Filed:		OTN/LiveScan	Number	数 POL	Complaint/incident No	
			57.10	· · · · · · · · · · · · · · · · · · ·		IFS210061	
Defendant Name:	First: WILFREDO		Middle:		Last:		
- C. C. C. C. C. C. C. C. C. C. C. C. C.	33000 3 30000						
Californ many strains batteria.							
Inchoate		licitation 902 A	Conspiracy 18 903		Number of \	/latims Age 60 or Older _	
□ 0 7 3925	(a) 0	the 18		i	-3	
Lead? Offense#	Section	Subsection	PA Statule	(Tille)		Grade NCIC Offense Co	te UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number -	·		ات	nterstate	☐ Safety Zone	☐ Work Zone
Statute Description (Inc.	ude the name	of statute or	r ordinance): REC	EIVING S	TOLEN PROP	ERTY	
A /		- 1- OFF		1.44	1 -11	127 - 20 - 1	
Acts of the accused ass receives, retains, or disposes	of movable prope	rty of another k	nowing that it has b	een stolen,	or believing th	at it has probably been stol	en, unless the property
is received, retained, or dispo- receive, retain or dispose of n	sed with intent to	restore it to the	e owner: to wit: The	defendant.	by and through	in its agent. Ellud Urena-Re	cio, did intentionally
believing that it had probably	been stolen, and	the property sto	olen is an automobile	e, alrplane,	motorcycle, m	otorboat, or other motor pro	opelled vehicle in
violation of Section 3925(a) o	r the PA Crimes C	ode.				**************************************	
Inchoate		citation 02 A	Conspiracy		Number of Vi	ctims Age 60 or Older	
					ABOVE ES		
□ 08 4101 Lead? Olfense# Se)(3) ot4	PA Statute (F3	rade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number —				erstate	☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (incl	7	of statute or	ordinance): FO	GERY			VIIIIIIV
			,				Ì
Acts of the accused ass							
defraud or injure anyone, or v be forged in a manner specific	ed in paragraphs	(1) or (2) of this	s subsection, to wit:	the defenda	ant, by and thr	ough its agent, Eliud Urena-	Recio, with the intent
to defraud and/or knowledge specific in paragraph (2) of th		ng a fraud, utte	ered a writing (vehic	e applicatio	ns and docum	ents) which he knows to be	forged in a manner
specific in paragraph (2) or as	a sactoti						

Inchoate		licitation	☐ Conspiracy		Number of V	/ictims Age 60 or Older _	
Offense 18 901 A	18	902 A	18 903			T	
□ 09 7 121		1998	the 75				
Lead? Offense# 5 PennDOT Data	Section S Accident	Subsection	PA Statute		Counts (Grade NCIC Offense Coo	le UCR/NIBRS Code ☐ Work Zone
(if applicable)	Number -			{} //	nersial6	☐ Safety Zone	LJ VVOIK ZUITE

Statute Description (include the name of statute or ordinance): FALSE APPLICATION OF TITLE OR REGISTRATION

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Recto, is guility of a misdemeanor of the first degree if the person uses a false or ficticious name or address or makes a material false statement, or falls to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant, by and through its agent, Eliud Urena-Recto, made a material false statement and/or concealed any other material fact in an application for a certificate of title.

dech	DOI	ICE	CRIMINAL	COMPI	AINIT
F. 17303-15	-111		4 'LE HALLING TO THE		441141

Docket Number:	Date Filed:	OTN/LiveS	Scan Number		Complaint/Incident Null IFS210061	nber
Defendant Name:	First: WILFREDO	Middle:		Last; REPA	AIR	
777111						
Inchoate	☐ Solicii 18 902		y	Number of Vi	ctims Age 60 or Older	
□ 10 7122	(3)	of the 75	I	Mı		
PennDOT Data	ection Subs Accident Number	ection PA Sta		Counts G terstate	rade NCIC Offense Code	UCR/NIBRS Code Work Zone
Statute Description (inclu		statute or ordinance):	ALTERED, FOR	GED, OR COU	NTERFEIT DOCUMENTS	
Acts of the accused asso degree if the person, with fraud certificate of title or any other of and through its agent, Mohamn	iulent intent, afters d document issued or	or forges an assignment of a prepared for issue by the Pe	a certificate of tit ennsylvania Depa	le, or an assigr rtment of Tran	nment or release of a security sportation (Penn DOT). to w	Interest on a lit: the defendant, by
Inchoate	☐ Solicit		<u> </u>	Number of VI	ctims Age 60 or Older	
□ 11 4904	(b)	of the 18	1		M3 NCIC Offense Code	UCR/NjBRS Code
PennDOT/Data	Accident Subs	ection PA Sta		Counts Gr terstate	Safety Zone	☐ Work Zone
Statute Description (inclu		statute or ordinance): (UNSWORN FAL	SIFICATION	TO AUTHORITIES	•
Acts of the accused asso he did not believe to be true, o wit: the defendant, by and thro signed (PA Dept. of Transporta false statements were punishal	n or pursuant to a fo ugh Its agent, Eliud tion (PennDOT)) fon	rm bearing notice, authorize Urena-Recio, engaged in a c	ed by law, to the continuous cours	effect that false se of criminal co	se statements made therein a onduct, in which he knowing!	ere punishable; To y and intentionally
Inchoate ☐ Attempt Offense 18 901 A			;y	Number of V	ictims Age 60 or Older	
[12 5111 Lead? Offense#	·		latule (Title)	Counts C	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Acoldent Number —	— PA G		nterstate	☐ Safety Zone	☐ Work Zone
Statute Description (inclu		statute or ordinance): •	CRIMINAL CON	ISPIRACY - D	EALING IN PROCEEDS OF	UNALWFUL
Acts of the accused asso facilitating the commission of or Tampering with Public Records such other person(s) and / or b to commit such crime(s); to with engage in conduct that constitution over the act in pursuance of the commitment of the commi	ne or more of the fo or Information, Fals usiness(es) that the ; the defendant, by tes the aforemention	lowing crimes: Dealing in Presented to Application for Certificate of them will and through its agent, Eliud	roceeds of Unlaw of Title or Regist ill engage in cond Urena-Reclo, di	oful Activity, Wa ration, and Uns duct which con d agree with or	ashing Vehicle Titles, Decepti sworn Falsification to Authori stitutes such crime(s) or an a ne or more individuals, that o	ve Business Practices, ties, did agree with attempt or solicitation ne or more would
					,	



					is the same					OWPLAIN
Docket Num	iber: 9-22	Date Filed:	OTN/LiveS	ican Numbe	r	Comp IFS21	laint Nu .0061	mber I	Incident	Number
Defendant N	Earthainn	First:	i i	viiddle;			Last:			
		WILFREDO		AUTO			REPAIR	<u> </u>		
appropriate	. When there is efsummary of the f out more, is not suffi	accused are descr more than one offe acts sufficient to advis- cient. In a summary ca	ense, each o e the defendant	offense show t of the nature	uld be no	ımber ense(s)	ed chroi charged.	nologically. A citation to t	ihe statut	a(s) allegedly
Inchoate Offense	Attempt 18 901 A	☐ Solicitati 18 902 A	lon	☐ Conspir 18 903	acy		Numb	er of Victims	Age 60	or Older
□ 1 3	911	(B)(1)	of the 18		1		- 1			
Lead? Offens		Subsection	PA	Statule (Title)	Cou	nts	Grade	NCIC Offer	nse Code	UCR/NIBRS Code
PennDO (if applic	Control of the contro	dent tber			☐ Inters	ate		Safety Zone	∍	☐ Work Zone
	7	the name of statu	te or ordinar	ice): CORRU	PT ORGAN	IZATIO	NS		<u></u>	
from a pattern proceeds of su agent, Eliud Ui	of racketeering acti ch income, in the ac rena-Recio, engaged	ated with this Offer vity in which such pers equisition of any interes I in and received incom and/or its proceeds to o	on participated it in, or the esta e derived, direc	as a principal ablishment or ctly or indirect	, to use or operation ly, from a	invest, of, any	directly or enterprise	indirectly, a	ny part of defendant	such income, or the t, by and through its
St. 1 3						 1	r	ok de man melanada (V) (Timora)		
Inchoate Offense	☐ Attempt 18 901 A	Solicitati 18 902 A	on	☐ Conspir 18 903	acy		Numbe	er of Victims	Age 60	or Older
□ 1 4	911		of the 18		1	F1				
Lead? Offens	Data Acci	Subsection dent	PA S	Statute (Title)	Counts			NGIC Offense		UCR/NIBRS Code Work Zone
(if applic		the name of statu	to or ordinar	100); CODBU	Interst			Safety Zone	-	7 Moty Zoue
Acts of the a	accused associatly or indirectly, any	ated with this Offer Interest in or control o Intained, directly or ind	ISO: It shall be If any enterprise	unlawful for a	ny persor defendant,	throug by and	h a patter through (ts agent, Eliu	ıd Urena-I	Recio, through a
Inchoate Offense										
□ 15	911	(B)(3)	of the 18		1	F1				
Lead? Offens PennDO		Subsection dent	PA S	Statule (Tille)	Counts		.	NCIC Offense	T	UCR/NIBRS Gode
(if applic	able) Nun	nber =	1		☐ Interst			Safety Zone	€	☐ Work Zone
Statute Des	cription (include	the name of statu	te or ordinar	nce): CORRU	PT ORGAN	ILZ I ION	5			
or participate, through its age	directly or indirectly	ated with this Offer , in the conduct of such lo, was an operator and	n enterprise's af	ffairs through	a pattern	of racke	teering ac	tivity, to wit:	the defer	ndant, by and

of



		\$ 6	POLICE	CRIMINAL	COMPLAIN
Docket Number:	Date Filed: 12_151>>>	OTN/LiveScan Number	Complaint No IFS210061	umber Incide	ent Number
	First:	Middle;	Last:		
Defendant Name	WILFREDO	AUTO	REPA	IR.	
appropriate. When there is	more than one offer	bed below with each Act of Anse, each offense should be the defendant of the nature of the se, you must cite the specific section.	numbered chro	nologically. A citation to the sta	tute(s) allegedly
Inchoate	☐ Solicitation 18 902 A	on Gonspiracy 18 903	Num	per of Victims Age (60 or Older
☐ 1 6 911	(B)(4)	of the 18 1	F1		
Lead? Offenseff Section	Subsection	PA Statute (Title) C	ounts Grade	NCIG Offense Co	de UCR/NIBRS Code
	ident	☐ Inte	rstate [☐ Safety Zone	☐ Work Zone
		e or ordinance): CORRUPT ORG	ANIZATIONS		
Acts of the accused association, (2), or (3) of this subsection, of racketeering activity in violation	To wit: the defendant, by	Se: It shall be unlawful for any pers by and through Its agent, Ellud Uren and/or (3).	on to conspire to v a-Recio, conspired	dolate any of the pro with other Individual:	visions of paragraphs s to engage in a pattern
		77			
Inchoate	☐ Solicitatio 18 902 A	on Gonspiracy 18 903	Numl	per of Victims Age (00 or Older
		of the			
Lead? Offense# Section	Subsection	PA Statute (Title) Coun	ls Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data Acol (if applicable) Nun	dent	│ ☐ Inte	rstate [☐ Safely Zone	☐ Work Zone
Statute Description (include		e or ordinance):			
1 (,			
Acts of the accused associa	ited with this Offens	se:			
Tion of the addition addonic	non Mar and Ondie	ru.			
Inchoate ☐ Attempt Offense 18 901 A	☐ Solicitatio 18 902 A	on Gonspiracy 18 903	Numl	per of Victims Age 6	00 or Older
	- I	of the		<u> </u>	
Lead? Offense# Section	Subsection	PA Statute (Title) Coun	ls Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data Acci (if applicable) Num	dent.	☐ Inte	rstate [☐ Safety Zone	☐ Work Zone
Statute Description (include		e or ordinance):			
Same and a serie farming		1			
Acts of the accused associa	ated with this Offens	se:		**************************************	
The second with the control of the second se	The state of the section 1	• • • •			

Docket Number:	Date Filed: 12-15 / 2-2-	OTN/LiveScan Number	Complaint/Incident Number
	First:	Middle:	Last:
Defendant Name:	WILFREDO	AUTO	REPAIR

- 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 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.)

		SINIM		
(Date)	(Year)	(Signature of Affiant)		
AND NOW, on this date	12-6-22	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: Date Filed: OTN/LiveScan Number | Complaint/Incident Number | IFS210061 | Defendant Name: WILFREDO | AUTO | REPAIR

AFFIDAVIT of PROBABLE CAUSE

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

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 November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 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. 18 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. Igor DRATCH
- Oleg ZELENKO
- David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- Charlie JIMINAN
- Margarete ALMSAHAQBEH
- Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18, Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ
- 21. Juana BELEN-VALDEZ
- Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- Jean AQUINO
- Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ
- 31. Amatti Auto Sales LLC
- 32. Newroad Motors LLC
- 33, Grig LLC
- Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC

				POLICE CRIMINAL COMPLAINT
Doo	ket Number: 435-20	Date Filed: (2/5/02)	OTN/LiveScan Number	Complaint/incident Number IFS210061
Def	endant Name:	First: WILFREDO	Middle: ' AUTO	Last: REPAIR
38. 39.	MP Notary and Ta AMCO Auto Sale			
40.	Charo's Auto Sal	9S		
41.	A2Z Auto Tags			
42.	Docuservices			

- 43. Emma's Auto Tags and Multiservices, Inc.
- Wilfredo Auto Repair 44.
- Jessica's Auto Tags 45.
- 46. JM Motors
- 47. Saldivar Group
- 48. Abby Auto
- 49. Carla Matia LLC
- 50. G&G Auto Body and Auto Salvage
- 51. Mendoza Auto Sales

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

My commission expires first Monday of January

(Signature of Affiant)

Magisterial District Judge