

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

A2Z AUTO SALES
 First Name Middle Name Last Name

2915 N. 2nd Street
 Philadelphia, PA 19133

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-452-2022</i>	Date Filed <i>12/5/2022</i>	OTN/LiveScan Number _____	Complaint Number <i>JES210061</i>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
First Name		Middle Name		Last Name	
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)	Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number			Ft. HEIGHT In.	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR
 (Name of the attorney for the Commonwealth)

Robert G. LaBar
 (Signature of the attorney for the Commonwealth)

12/05/2022
 (Date)

I, <u>JEREMY BECKER</u> (Name of the Affiant)	<u>737643/BADGE # 736</u> (PSP/MPOETC - Assigned Affiant ID Number & Badge #)
of <u>Pennsylvania Office of Attorney General</u> (Identify Department or Agency Represented and Political Subdivision)	<u>PA0222400</u> (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] _____ Harrisburg City (Subdivision Code) (Place-Political Subdivision)	
in DAUPHIN County	[22] _____ on or about 2018 - PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-456-AZZ</i>	Date Filed: <i>121512002</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AZZ	Middle: AUTO	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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY									
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.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
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 defraud a State of local government agency, namely, PA Department 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, 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.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant by and through its agent and/or salesperson(s), did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplected or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent and/or salesperson(s), did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.									



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 452-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: SALES

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	<i>F3 M1</i>		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	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 (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR 452-2072	Date Filed: 12/15/2009	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: SALES

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4101	(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	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): FORGERY

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent and/or salesperson(s), with the intent to defraud or with knowledge that he is facilitating a fraud, uttered a writing which he knows to be forged in a manner specific in paragraph (2) of this section.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant, by and through its agent and/or salesperson(s), made a material false statement and/or concealed any other material fact in an application for a certificate of title.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), 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, by and through its agent and/or salesperson(s), with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.



POLICE CRIMINAL COMPLAINT

Docket Number: CR 452-2022	Date Filed: 12/15/2022	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: SALES

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4904	(b)	of the	18	1	M3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): UNSWORN FALSIFICATION TO AUTHORITIES

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), 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, 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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), 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 and/or salesperson(s), 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): 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 and/or salesperson(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 A2Z.



POLICE CRIMINAL COMPLAINT

Docket Number: CR 457-2022	Date Filed: 12 15 2022	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: SALES

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): 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 and/or salesperson(s) through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a car dealership.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent and/or salesperson(s), was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity..

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-457-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.


The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

 (Date) (Year) SAJ B...
(Signature of Affiant)

AND NOW, on this date December, 2022 I certify that the complaint has been properly completed and verified.

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

18-2-03 (Magisterial District Court Number) [Signature] (Issuing Authority) 



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-457-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: 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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-457-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: A2Z	Middle: AUTO	Last: 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.

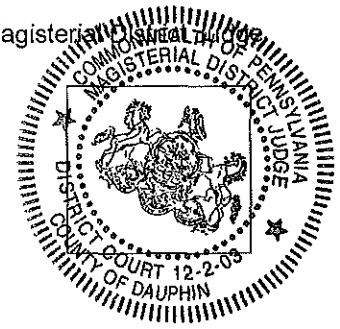
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *12/10/2022* day of *December* *2022*
12/10/2022 Date _____, Magisterial Judge

My commission expires first Monday of January *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 ABBY AUTO
 First Name Middle Name Last Name
 608 Torresdale Avenue
 Philadelphia, PA 19149

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-445-2022</i>	Date Filed <i>12/15/2022</i>	OTN/LiveScan Number _____	Complaint Number <i>IFS210061</i>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
First Name	Middle Name	Last Name	AKA		
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location				WEIGHT (lbs.)
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO					Ft. HEIGHT In.
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) *Robert G. LaBar* (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, JEREMY BECKER (Name of the Affiant) 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County [22] (County Code) on or about 2018-PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-445-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number _____	Complaint/Incident Number IFS210061
Defendant Name:	First: ABBY	Middle: AUTO	Last: _____

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1	_____	_____
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	_____		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, 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, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3	_____	_____
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	_____		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, did knowingly and with the intent to defraud a State of local government agency, namely, PA Department 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, Mohammad Alkurdi, 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.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3	_____	_____
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	_____		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Mohammad Alkurdi, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.									



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **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, Mohammad Alkurdi, 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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	F3 M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, 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, Mohammad Alkurdi, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	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 (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, 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, Mohammad Alkurdi, did present or cause to be presented false, incomplete or misleading information material to MV426B application and documents for out-of-state vehicle repairs which occurred without the vehicle being present within the Commonwealth of Pennsylvania during purported repairs and/or inspection.



POLICE CRIMINAL COMPLAINT

Docket Number: CR 445-2022	Date Filed: 12/15/2022	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: ABBY	Middle: AUTO	Last:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4101	(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	_____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): FORGERY

Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Mohammad Alkurdi, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	_____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	_____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS

Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Mohammad Alkurdi, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4904	(b)	of the	18	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, 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, Mohammad Alkurdi, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	5111	(a)(1)	of the	18	1	F1M1F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Mohammad Alkurdi, 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, Mohammad Alkurdi, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Mohammad Alkurdi, 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 Abby Auto.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 445-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: ABBY	Middle: AUTO	Last:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Mohammad Alkurdi, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Mohammad Alkurdi, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Mohammad Alkurdi, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 4415-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number _____	Complaint/Incident Number IFS210061
Defendant Name:	First: ABBY	Middle: AUTO	Last:

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

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

 (Date) (Year) *[Signature]*
(Signature of Affiant)

AND NOW, on this date *December 5, 2022* I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

12-203
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR 445-2022	Date Filed: 12/15/2022	OTN/LiveScan Number _____	Complaint/Incident Number IFS210061
Defendant Name:	First: ABBY	Middle: AUTO	Last:

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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 445-2022</i>	Date Filed: <i>12 15 2022</i>	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.

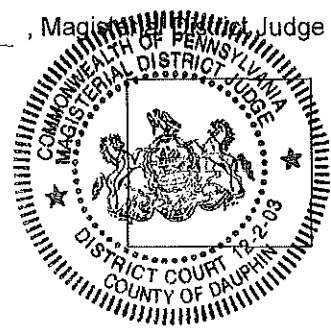
I, JEREMY BECKER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.

[Handwritten Signature]

(Signature of Affiant)

Sworn to me and subscribed before me this *12/16* day of *December*
12/16/2022 Date _____
My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-02-03
 MDJ: Hon. DAVID H. JUDY, ESQ.
 Address: 50 CANAL ST. ROYALTON, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 AMATTI AUTO SALES
 First Name Middle Name Last Name
 28 N. 16TH ST
 LEBANON, PA 17042

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-438-22</i>	Date Filed 12/05/2022	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name	Last Name		Gen.
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				FT. HEIGHT In.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT G. LABAR (Name of the attorney for the Commonwealth) ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, RACHEL A. STORY (Name of the Affiant) 759307/#583 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County [22] on or about 2018-PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-438-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AMATTI	Middle: AUTO	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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	911	(b)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate Amatti Auto Sales LLC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	911	(b)(2)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a car dealership.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	911	(b)(3)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CA-438-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AMATTI	Middle: AUTO	Last: SALES

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	4118		of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input checked="" type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **WASHING VEHICLE TITLES**

Acts of the accused associated with this Offense: A person commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: The defendant did knowingly and with the intent to defraud a State of local government agency, namely, PA Department 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, knowingly and with intent to defraud the PA Dept. of Transportation (PennDOT), submitted documents to PennDOT containing misleading information about the dealerships insurance information.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	4101	(a)(3)	of the	18	1	F2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: A person is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7121		of the	75	1	M2 M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	10	7122	(3)	of the	75	1	M1		
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **ALTERED, FORGED OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	11	4904	(b)	of the	18	1	M2 M3		
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: A person commits a misdemeanor of the third degree if he makes a written false statement which he does 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 made a written false statement to PennDOT 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 by law

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	12	4117	(a)(2)	of the	18	1	F3		
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The defendant did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	4117	(b)(4)	of the	18	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: A person 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 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	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 (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **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 an Insurance Company, false, incomplete or misleading information material to an application for insurance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number
Defendant Name:	First: AMATTI	Middle: AUTO	Last: 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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits, 204 PA.Code §§ 213.1 - 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	16	7121	of the	75	10	MI		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): CONSPIRACY/FALSE APPLICATION FOR CERTIFICATE OF TITLE, ETC.								

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Oleg Zelenko, David Morrison, Amatti Auto Sales LLC, Newroad Motors LLC, and/or Grig LLC), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>			of the					
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>			of the					
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-438-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number: <i>IFS210061</i>
Defendant Name:	First: <i>AMATTI</i>	Middle: <i>AUTO</i>	Last: <i>SALES</i>

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

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

SA Rachel A. Stuy
 (Signature of Affiant)

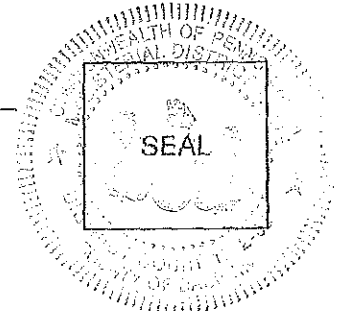
(Date) _____ (Year)

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.

D-2-03
 (Magisterial District Court Number)

[Handwritten Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-438-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AMATTI	Middle: AUTO	Last: SALES

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 | 18. Muhammad ALKURDI | 36. Pennsylvania Tag and Title |
| 2. Oleg ZELENKO | 19. Edgar COLLADO | 37. J&J Car & Truck Sales LLC |
| 3. David MORRISON | 20. Osiris FERNANDEZ GONZALEZ | 38. MP Notary and Tags LLC |
| 4. Angel MENDEZ | 21. Juana BELEN-VALDEZ | 39. AMCO Auto Sales |
| 5. Jefferson LOOR VALET | 22. Juana BELEN-DEVANGELISTA | 40. Chara's Auto Sales |
| 6. Maria PINEDA | 23. Rafael SANTIAGO-PACHECO | 41. A2Z Auto Tags |
| 7. Indalecia VASQUEZ | 24. Jean AQUINO | 42. Docuservices |
| 8. Somary IBETH Otanez De LOOR | 25. Aristeds AQUINO | 43. Emma's Auto Tags and
Multiservices, Inc. |
| 9. Beaki Antonia PEREZ | 26. Ahmed LOPEZ | 44. Wilfredo Auto Repair |
| 10. Charlie JIMINAN | 27. Jessica ENGELKE | 45. Jessica's Auto Tags |
| 11. Margarete ALMSAHAQBEH | 28. Jimmy RODRIGEZ Sr. | 46. JM Motors |
| 12. Linda SANDOVAL-MARTINEZ-
HERERRA | 29. Nora RODRIGUEZ | 47. Saldivar Group |
| 13. Eulid URENA | 30. Roberto GOMEZ | 48. Abby Auto |
| 14. Adelaida GARCIA aka 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 Salvage |
| 16. Alberto LUCIANO | 33. Grig LLC | 51. Mendoza Auto Sales |
| 17. Mohamed KERDI | 34. Santos Auto Gallery | |
| | 35. Perfect Touch Auto Repair and
Sales LLC | |

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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-438-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number <i>IFS210061</i>
Defendant Name:	First: <i>AMATTI</i>	Middle: <i>AUTO</i>	Last: <i>SALES</i>

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.

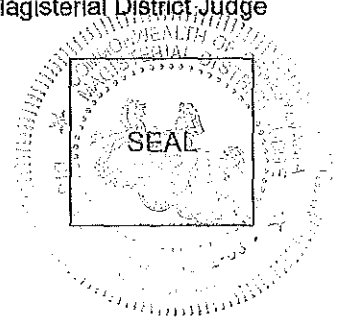
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

SA Rachel A Story

 (Signature of Affiant)

Sworn to me and subscribed before me this *15th* day of *December* *2022*
12/16/2022 Date _____, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-2-03
MDJ: Hon. DAVID H. JUDY, Esq.
Address: 50 Canal Street
Royalton, PA 17057
Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
AMCO MOTOR SALES
First Name Middle Name Last Name
2610 Frankford Avenue
Philadelphia, PA 19134

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR 451-2022</i>	Date Filed <i>12/15/2022</i>	OTN/LiveScan Number —	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
AKA	First Name	Middle Name	Last Name	Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)	
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		
DNA Location	MNU Number		WEIGHT (lbs.)		
FBI Number	Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT In.		
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, JEREMY BECKER (Name of the Affiant)	737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision)	PA0222400 (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Subdivision Code) (Place-Political Subdivision)	
in DAUPHIN County [22] (County Code)	on or about 2018-PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AMCO	Middle: MOTOR	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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	4118		of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, and/or salesperson(s), person commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	4107	(a)(4)	of the	18	1	F3 M2		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(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 and/or salesperson(s), engaged in a continuing course of criminal conduct in which the defendant by and through its agent and/or salesperson(s), knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	4911	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AMCO	Middle: MOTOR	Last: SALES

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant, by and through its agent and/or salesperson(s) made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by Penn DOT.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant, by and through its agent and/or salesperson(s) made a material false statement and/or concealed any other material fact in an application for a certificate of title.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	5111	(a)(1)	of the	18	1	EX 111 F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent and/or salesperson(s), 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 and/or salesperson(s), 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent and/or salesperson(s), was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-457-2022	Date Filed: 12/5/2022	OTN/LiveScan Number _____	Complaint/Incident Number IFS210061
Defendant Name:	First: AMCO	Middle: MOTOR	Last: SALES

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-451-0087</u>	Date Filed: <u>12/15/2022</u>	OTN/LiveScan Number _____	Complaint/Incident Number IFS210061
Defendant Name:	First: AMCO	Middle: MOTOR	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- 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.

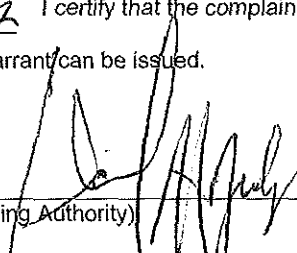
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) (Year) 
(Signature of Affiant)

AND NOW, on this date December 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 issued.

12-2-03
(Magisterial District Court Number)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-451-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <u> </u>	Complaint/Incident Number IFS210061
Defendant Name:	First: AMCO	Middle: MOTOR	Last: 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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-451-8082</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>---</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: AMCO	Middle: MOTOR	Last: 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

SJB

(Signature of Affiant)

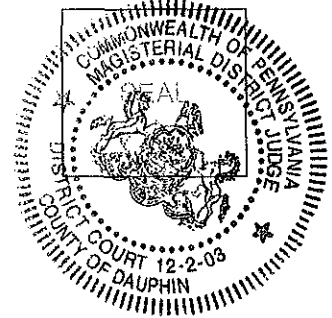
Sworn to me and subscribed before me this _____ day of _____

12/16/2022 Date _____

December 2022

_____, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
CARLA MATIA **AUTO SALES, INC.**
 First Name Middle Name Last Name
 3949 Kensington Avenue
 Philadelphia, PA 19124

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-44622</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number	Complaint Number JFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name	Middle Name	Last Name		Gen.	
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)	Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number			Ft. HEIGHT in.	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR _____ *Robert G. Labar* _____ 12/05/2022
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, **JEREMY BECKER** **737643/BADGE # 736**
 (Name of the Affiant) (PSP/MP/POETC -Assigned Affiant ID Number & 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
 I accuse the defendant whose name is unknown to me but who is described as _____

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

in DAUPHIN County [22] on or about 2018-PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, 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. 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS 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 said unlawful activity.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	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 (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant, by and through its agent(s), did intentionally obtain or withhold property of another by deception; to wit: the defendant, by and through its agent(s), did present or cause to present, false, incomplete or misleading information material to vehicle title application(s) to the Pennsylvania Department of Transportation (Penn DOT). As a result of the defendant's deception, the fraudulent paperwork enabled Pennsylvania vehicle titles to be obtained for reconstructed vehicles some of which possessed Vehicle Identification Numbers (VIN) for stolen vehicles.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	3925	(a)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>14-446-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, INC.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4120		of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent(s), commits the offense of identity theft of another person if he possesses or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose. to wit: the defendant, by and through its agent(s), committed identity theft of another person through the means of identifying information of another person / business without the consent of that other person / business to further any unlawful purpose.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	7121		of the	75	2	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent(s), 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent(s) with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4107	(a)(4)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DECEPTIVE BUSINESS PRACTICES**

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).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	4904	(b)	of the	18	1	M/M3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent(s), 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(s), 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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(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.



POLICE CRIMINAL COMPLAINT

Docket Number: C1-44622	Date Filed: 2/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	10	4118		of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **WASHING VEHICLE TITLES**

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 facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant, 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 fictitious information.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	11	4911	(a)(1)	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: The defendant, by and through its agent(s), did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant, by and through its agent(s) made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by Penn DOT.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	12	5111	(a)(1)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY -DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent(s), with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant, by and through its agent(s), 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CP-44622</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, INC.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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(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 Carlla Matia AUto Sales LLC.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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(s), 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent(s), was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-44622	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: 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
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

Docket Number: <i>Cr 44622</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CARLA MATIA	Middle:	Last: AUTO SALES, 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.

SAGBM

(Signature of Affiant)

Sworn to me and subscribed before me this *16th* day of *December* *2022*

12/16/22 Date

[Signature]

2024

_____, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)234-0949



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 CHARO AUTO SALES
 First Name Middle Name Last Name
 648 E. Erie Avenue
 Philadelphia, PA 19134

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-443-22</i>	Date Filed <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk/Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location				WEIGHT (lbs.)
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO					Ft. HEIGHT In.
Fingerprint Classification					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, JEREMY BECKER (Name of the Affiant) 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
 of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA022400 (Police Agency ORI Number)
 do hereby state: (check appropriate box)
 1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____
 I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Subdivision Code) (Place-Political Subdivision)
 in DAUPHIN County [22] (County Code) on or about 2018- PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-443-72</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number <i>IFS210061</i>
Defendant Name:	First: <i>CHARO</i>	Middle: <i>AUTO</i>	Last: <i>SALES</i>

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

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	<i>01</i>	<i>5111</i>	<i>(a)(1)</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F1</i>		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<i>02</i>	<i>4117</i>	<i>(a)(1)</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F3</i>		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, did knowingly and with the intent to defraud a State or local government agency, namely, PA Department 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, Jean Aquino, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<i>03</i>	<i>4117</i>	<i>(a)(2)</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F3</i>		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Jean Aquino, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	04	4117	(a)(3)	of the	18	1	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	05	4117	(b)(4)	of the	18	1	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, 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, Mohammad Alkurdi, 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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	06	3922	(a)(1)	of the	18	1	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, 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, Jean Aquino, did present or cause to be presented false, incomplete or misleading information material to vehicle title applications and documents for out-of-state and vehicle which possess Vehicle Identification Numbers (VIN) for stolen vehicles.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	3925	(a)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, 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 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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	4101	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Jean Aquino, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Jean Aquino, is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant, by and through its agent, Jean Aquino, made a material false statement and/or concealed any other material fact in an application for a certificate of title.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	10	7122	(3)	of the	75	1	M1 M3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Jean Aquino, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	11	4904	(b)	of the	18	1	M1 M3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	12	5111	(a)(1)	of the	18	1	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Jean Aquino, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant, by and through its agent, Jean Aquino, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-443-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: CHARO	Middle:	Last: 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(B)(1)	of this	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): 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, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(B)(2)	of this	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): 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, Jean Aquino, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(B)(3)	of this	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Jean Aquino, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-443-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: CHARO	Middle:	Last: 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>	16	911	(B)(4)	or the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> 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, Jean Aquino, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-443-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CHARO	Middle: AUTO	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

[Handwritten Signature]

 (Signature of Affiant)

(Date) _____ (Year) *12/5/22*

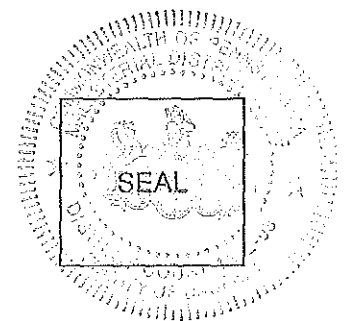
AND NOW, on this date 12/5/22 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

 (Magisterial District Court Number)

[Handwritten Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 443-72</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CHARO	Middle: AUTO	Last: 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



POLICE CRIMINAL COMPLAINT


Docket Number: CR-443-22	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: CHARO	Middle: AUTO	Last: 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



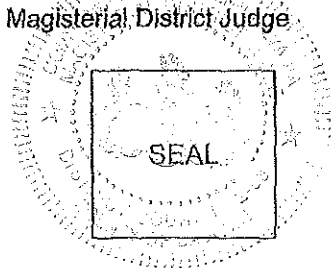
 (Signature of Affiant)

Sworn to me and subscribed before me this 15th day of December, 2022

12/16/22 Date _____


_____, Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
DOCUSERVICES
 First Name Middle Name Last Name Gen
 406 E. Wyoming Avenue
 Philadelphia, PA 19120

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-449-2022</i>	Date Filed <i>12/15/2022</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
First Name		Middle Name		Last Name	
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location		WEIGHT (lbs.)	
FBI Number		MNU Number			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT in.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR _____ *Robert G. LaBar* _____ 12/05/2022
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, **JEREMY BECKER** 737643/BADGE # 736
 (Name of the Affiant) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of **Pennsylvania Office of Attorney General** PA022400
 (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)

in DAUPHIN County [22] _____ on or about 2018 - PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CR 449-2022	Date Filed: 12/21/2022	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: DOCUSERVICES	Middle:	Last:

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY								
Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, 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, Margarete Almashaqbeh, 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	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD								
Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, did knowingly and with the intent to defraud a State of local government agency, namely, PA Department 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, Margarete Almashaqbeh, 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.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD								
Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Margarete Almashaqbeh, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.								



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Margarete Almashaqbeh, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	E3/M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Margarete Almashaqbeh, 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, Margarete Almashaqbeh, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	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 (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-449-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number -	Complaint/Incident Number IFS210061
Defendant Name:	First: DOCUSERVICES	Middle:	Last:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4101	(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	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Margarete Almashaqbeh, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Margarete Almashaqbeh, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	10	4904	(b)	of the	18	1	MM3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, 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, Margarete Almashaqbeh, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	11	5111	(a)(1)	of the	18	1	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Margarete Almashaqbeh, 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, Margarete Almashaqbeh, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	12	911	(b)(1)	of the	18	1	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Margarete Almashaqbeh, 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 DocuserVICES.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 40/9 1022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: DOCUSERVICES	Middle:	Last:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Margarete Almashaqbeh, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Margarete Almashaqbeh, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Margarete Almashaqbeh, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 444-2022</i>	Date Filed: <i>11/5/2022</i>	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: DOCUSERVICES	Middle:	Last:

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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 449-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number —	Complaint/Incident Number IFS210061
Defendant Name:	First: DOCUSERVICES	Middle:	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.

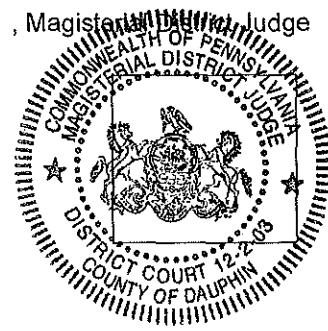
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *12th* day of *December* *2022*
12/16/2022 Date

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)234-0949



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 EMMA AUTO TAG AND MULTISERVICES,
 First Name Middle Name Last Name
 4261 Frankford Avenue
 Philadelphia, PA 19124

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>C-444-22</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name	Last Name		Gen.
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown		ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)		Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number			FL. HEIGHT In.	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification				

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR *Robert G. LaBar* 12/05/2022
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, JEREMY BECKER 737643/BADGE # 736
 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & 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
 I accuse the defendant whose name is unknown to me but who is described as _____

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

In DAUPHIN County [22] on or about 2018 - PRESENT
 (County Code)

 **POLICE CRIMINAL COMPLAINT**

Docket Number: <i>CR-444-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number FS210061
Defendant Name:	First: EMMA AUTO TAG	Middle: 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. 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 Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera-Martinez, 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, Linda Sandoval Herrera-Martinez, 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	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **INSURANCE FRAUD**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera-Martinez, did knowingly and with the intent to defraud a State of local government agency, namely, PA Department 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, Linda Sandoval Herrera-Martinez, 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.

Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **INSURANCE FRAUD**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera-Martinez, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Linda Sandoval Herrera-Martinez, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	04	4117	(a)(3)	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Linda Sandoval Herrera Martinez, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	05	4117	(b)(4)	of the	18	1	FS M1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera-Martinez, 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, Linda Sandoval Herrera Martinez, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	06	3922	(a)(1)	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera-Martinez, 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, Linda Sandoval Herrera Martinez and/or its employee(s), 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, Linda Sandoval Herrera Martinez, submitted to Penn DOT.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	07	3925	(a)	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: A person 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, Linda Sandoval Herrera Martinez, 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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	08	4101	(a)(3)	of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera Martinez, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Linda Sandoval Herrera Martinez, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	09	7121		of the	75	1	M1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera Martinez, is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant, by and through its agent, Linda Sandoval Herrera Martinez, made a material false statement and/or concealed any other material fact in an application for a certificate of title.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	10	7122	(3)	of the	75	1	M1		
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera Martinez, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Linda Sandoval Herrera Martinez, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	11	4904	(b)	of the	18	1	M1M3		
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Linda Sandoval Herrera Martinez, 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, Linda Sandoval Herrera Martinez, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	12	5111	(a)(1)	of the	18	1	F1		
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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 or facilitating the commission of one or more of the following crimes: Dealing In Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant, by and through its agent, Linda Sandoval Herrera Martinez, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 44422</i>	Date Filed: <i>12/3/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: EMMA AUTO TAG	Middle: 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> Lead?	13	911	(B)(1) of the	18	1	F1		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): 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, 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.								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> Lead?	14	911	(B)(2) of the	18	1	F1		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): 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.								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> Lead?	15	911	(B)(3) of the	18	1	F1		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS		
Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, 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.								



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CV 444-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: EMMA AUTO TAG	Middle: 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.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	16	911	(B)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): <i>CORRUPT ORGANIZATIONS</i>									
Acts of the accused associated with this Offense: <i>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).</i>									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/>	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):									
Acts of the accused associated with this Offense:									

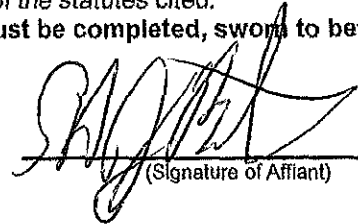


POLICE CRIMINAL COMPLAINT

Docket Number: <u>07-44428</u>	Date Filed: <u>12/5/22</u>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: EMMA AUTO TAG	Middle: AND	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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



 (Signature of Affiant)

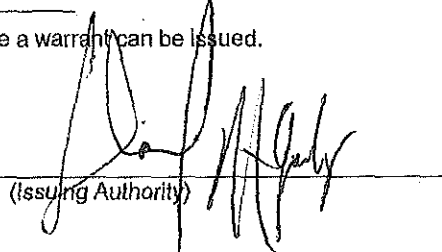
(Date) _____ (Year)

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.

12-203

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: C1444-22	Date Filed: 12/5/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: EMMA AUTO TAG	Middle: AND	Last: 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 DRATICH
2. Oleg ZELENKO
3. David MORRISON
4. Angel MENDEZ
5. Jefferson LOOR VALET
6. Maria PINEDA
7. Indalecia VASQUEZ
8. Somary IBETH Ofanez 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

Docket Number: <i>CR 44422</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: EMMA AUTO TAG	Middle: AND	Last: 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. Willfredo 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.

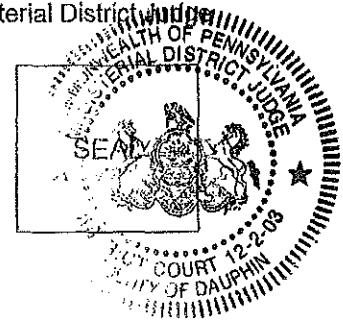
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *15th* day of *December* *2022*
 _____, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 12-2-03
MDJ: Hon. DAVID H. JUDY, Esq.
Address: 50 Canal Street
Royalton, PA 17057

DEFENDANT: (NAME and ADDRESS):
G & G AUTO BODY AND AUTO SALVAGE
First Name Middle Name Last Name Ge
325 W. Glenwood Avenue
Philadelphia, PA 19140

Telephone: (717)944-4463

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-441-22</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number	Complaint Number <i>IFS210061</i>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
	First Name	Middle Name	Last Name	Gen.
	AKA			

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic Unknown

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

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

DNA YES NO DNA Location WEIGHT (lbs.)

FBI Number MNU Number

Defendant Fingerprinted YES NO Ft. HEIGHT in.

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

CDAG ROBERT LABAR
(Name of the attorney for the Commonwealth)

Robert G. LaBar
(Signature of the attorney for the Commonwealth)

12/05/2022
(Date)

I, JEREMY BECKER *737643/BADGE # 736*
(Name of the Affiant) (PSP/MPOETC - Assigned Affiant ID Number & 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
 I accuse the defendant whose name is unknown to me but who is described as _____

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

in DAUPHIN County *[22]* on or about *2018 - PRESENT*
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: G & G AUTO BODY	Middle: AND	Last: AUTO SALVAGE

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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, Roberto Gomez Gomez Sr, 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	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	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 (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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, Roberto Gomez Gomez Sr, did present or cause to be presented false, incomplete or misleading information material to application and documents for vehicles submitted to Penn DOT.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	3925	(a)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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, Roberto Gomez Gomez Sr, 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.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	04	4120		of the	18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, commits the offense of identity theft of another person if he possesses or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose. to wit: the defendant, by and through its agent, Roberto Gomez, Gomez Sr, committed identity theft of another person through the means of identifying information of another person / business without the consent of that other person / business to further any unlawful purpose.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	05	7121		of the	75	2	M1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	06	7122	(3)	of the	75	1	M1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Roberto Gomez Gomez Sr, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number JFS210061
Defendant Name:	First: G & G AUTO BODY	Middle: AND	Last: AUTO SALVAGE

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	07	4107	(a)(4)	of the	18	1	F3		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **DECEPTIVE BUSINESS PRACTICES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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, Roberto Gomez Gomez Sr, 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).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	08	4904	(b)	of the	18	1	M1 M3		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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, Roberto Gomez Gomez Sr, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	09	4117	(a)(3)	of the	18	1	F3		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description (include the name of statute or ordinance): **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, Roberto Gomez Gomez Sr, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr 44-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number: IFS210061
Defendant Name:	First: G & G AUTO BODY	Middle: AND	Last: AUTO SALVAGE

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4118		of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **WASHING VEHICLE TITLES**

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 facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant, by and through its agent, Roberto Gomez Gomez Sr, made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	4911	(a)(1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant, by and through its agent, Roberto Gomez Gomez Sr, made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by Penn DOT.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Roberto Gomez Gomez Sr, 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, Roberto Gomez Gomez Sr, 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.



POLICE CRIMINAL COMPLAINT

Rocket Number: C1-441-22	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: G & G AUTO BODY	Middle: AND	Last: AUTO SALVAGE

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Roberto Gomez Gomez Sr, 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 G&G.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Roberto Gomez Gomez Sr, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Roberto Gomez Gomez Sr, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr-441-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: G & G AUTO BODY	Middle: AND	Last: AUTO SALVAGE	

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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	16	911	(B)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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, 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).

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR 44-22</u>	Date Filed: <u>12/5/22</u>	OTN/LiveScan Number	Complaint/Incident Number: <u>IFS210061</u>
Defendant Name:	First: <u>G & G AUTO BODY</u>	Middle: <u>AND</u>	Last: <u>AUTO SALVAGE</u>

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

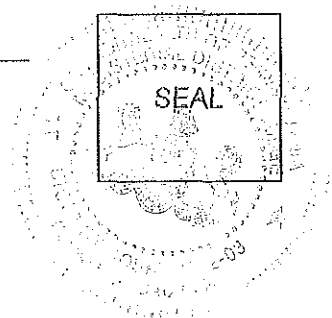
[Signature]
(Signature of Affiant)

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.

12-2-03
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CV-441-22	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: G & G AUTO BODY	Middle: AND	Last: 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
2. Oleg ZELENGO
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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr 441-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: G & G AUTO BODY	Middle: AND	Last: AUTO SALVAGE

- 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

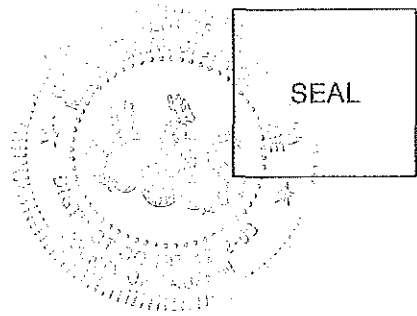
(Signature of Affiant)

Sworn to me and subscribed before me this *12/6/22* day of *December* 2022

2022

, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)234-0949



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT:
 GRIG LLC

(NAME and ADDRESS):

First Name Middle Name Last Name Gen
 30 N. 16TH ST.
 LEBANON, PA 17042

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-431-22</i>	Date Filed 12/05/2022	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	<input type="checkbox"/> Asian		<input type="checkbox"/> Unknown		
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number			Ft. HEIGHT In.	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO					
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR
 (Name of the attorney for the Commonwealth)

ROBERT G. LABAR
 (Signature of the attorney for the Commonwealth)

12/05/2022
 (Date)

I, <u>RACHEL A. STORY</u> (Name of the Affiant)	<u>759307/#583</u> (PSP/MP/OTC - Assigned Affiant ID Number & Badge #)
of <u>Pennsylvania Office of Attorney General</u> (Identify Department or Agency Represented and Political Subdivision)	<u>PA0222400</u> (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe	
with violating the penal laws of the Commonwealth of Pennsylvania at [301] <u>Harrisburg City</u> (Subdivision Code) (Place-Political Subdivision)	
in DAUPHIN County	[22] on or about 2018-PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CI 2431-22	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: GRIG LLC	Middle:	Last:

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input checked="" type="checkbox"/>	01	911	(b)(1)	of the	18	1	F1	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): CONSPIRACY								
Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate Newroad Motors LLC.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	02	911	(b)(2)	of the	18	1	F1	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS								
Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of Newroad Motors LLC.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	03	911	(b)(3)	of the	18	1	F1	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS								
Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.								



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/> Lead?	04	911	(b)(4)	of the	18	1	F1		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/> Lead?	05	5111	(a)(1)	of the	18	1	F1		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	---	---

<input type="checkbox"/> Lead?	06	5111	(a)(1)	of the	18	5	F1		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Igor Dratch, Oleg Zelenko, David Morrison, Amatti Auto Sales LLC, and/or Newroad LLC), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR431-22</u>	Date Filed: <u>12/5/22</u>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: GRIG LLC	Middle:	Last:

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

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

SA Rachel A. Smy
 (Signature of Affiant)

(Date)

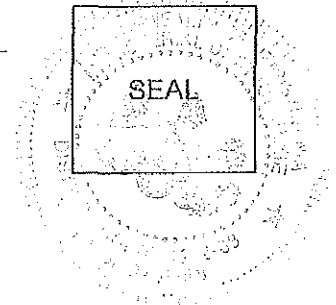
(Year)

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.

122-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: OC43122	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: GRIG LLC	Middle:	Last:

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 | 18. Muhammad ALKURDI | 35. Perfect Touch Auto Repair and Sales LLC |
| 2. Oleg ZELENKO | 19. Edgar COLLADO | 36. Pennsylvania Tag and Title |
| 3. David MORRISON | 20. Osiris FERNANDEZ | 37. J&J Car & Truck Sales LLC |
| 4. Angel MENDEZ | GONZALEZ | 38. MP Notary and Tags LLC |
| 5. Jefferson LOOR VALET | 21. Juana BELEN-VALDEZ | 39. AMCO Auto Sales |
| 6. Maria PINEDA | 22. Juana BELEN- | 40. Charo's Auto Sales |
| 7. Indalecia VASQUEZ | DEVANGELISTA | 41. A2Z Auto Tags |
| 8. Somary IBETH Otanez De LOOR | 23. Rafael SANTIAGO-PACHECO | 42. Docuservices |
| 9. Beaki Antonia PEREZ | 24. Jean AQUINO | 43. Emma's Auto Tags and Multiservices, Inc. |
| 10. Charlie JIMINAN | 25. Aristeds AQUINO | 44. Wilfredo Auto Repair |
| 11. Margarete ALMSAHAQBEH | 26. Ahmed LOPEZ | 45. Jessica's Auto Tags |
| 12. Linda SANDOVAL-MARTINEZ-HERERRA | 27. Jessica ENGELKE | 46. JM Motors |
| 13. Eulid URENA | 28. Jimmy RODRIGEZ Sr. | 47. Saldivar Group |
| 14. Adelaida GARCIA aka Adelaida MENDOZA | 29. Nora RODRIGUEZ | 48. Abby Auto |
| 15. Edward SALDIVAR | 30. Roberto GOMEZ | 49. Carla Mattia LLC |
| 16. Alberto LUCIANO | 31. Amatti Auto Sales LLC | 50. G&G Auto Body and Auto Salvage |
| 17. Mohamed KERDI | 32. Newroad Motors LLC | 51. Mendoza Auto Sales |
| | 33. Grig LLC | |
| | 34. Santos Auto Gallery | |

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 COMPLAINT

Docket Number: <u>CF431-22</u>	Date Filed: <u>12/16/22</u>	OTN/LiveScan Number	Complaint/Incident Number: <u>IFS210061</u>
Defendant Name:	First: <u>GRIG LLC</u>	Middle:	Last:

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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

SA Rachel A. Story

(Signature of Affiant)

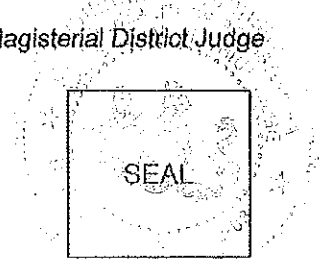
Sworn to me and subscribed before me this 16th day of

December 2022

12/16/22 Date

, Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, ESQ.
 Address: 50 CANAL ST.
 ROYALTON, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 J&J CAR AND TRUCK SALES, LLC
 1815B SOUTH 4TH STREET
 ALLENTOWN, PA 18103

NCIC Extradition Code Type:

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR-414-22 Date Filed: 12/05/2022 OTN/Live Scan Number: ✓ Complaint Number: _____ Incident Number: IFS210061 Request Lab Services? YES NO

GENDER: Male Female DOB: / / POB: / / Add'l DOB: / / Co-Defendant(s) Gen.

First Name: _____ Middle Name: _____ Last Name: _____

RACE: White Asian Black Native American Unknown

ETHNICITY: Hispanic Non-Hispanic Unknown

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

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

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

FBI Number: _____ MNU Number: _____

Defendant Fingerprinted: YES NO FT. HEIGHT in: _____

Fingerprint Classification: _____

DEFENDANT VEHICLE INFORMATION

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

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

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

ROBERT G. LABAR (Name of the attorney for the Commonwealth) ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, SA RACHEL A. STORY // DET. LINDSAY YETTER 759307/#583 // 43799/#13
 (Name of the Affiant) (PSP/MP/OTC -Assigned Affiant ID Number & Badge #)
 of Lehigh County Detectives Pennsylvania Office of Attorney General PA0222400 PA0391900
 (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)

In DAUPHIN County [22] on or about 2018- PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: J & J CAR AND	Middle: AND	Last: 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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number: _____		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY									
Acts of the accused associated with this Offense: A person commits a felony of the first degree if the person conducts a financial transaction with knowledge that the property involved, including stolen or illegally obtained property, represents the proceeds of unlawful activity, the person acts with the intent to promote the carrying on of the unlawful activity. To wit: the defendant repeatedly engaged in financial transactions with knowledge that the property involved represented the proceeds of unlawful activity with the intent to promote the carrying on of said unlawful activity.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number: _____		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant did knowingly and with the intent to defraud a State or local government agency, namely, PA Department 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, knowingly and with intent to defraud the PA Dept. of Transportation (PennDOT), submitted documents to PennDOT containing misleading information about the dealerships insurance information.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number: _____		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: J & J CAR AND	Middle: AND	Last: TRUCK SALES, LLC

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/> Lead?	04	4117	(a)(3)	of the	18	1	F3		
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/> Lead?	05	4117	(b)(4)	of the	18	1	M1		
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

Acts of the accused associated with this Offense: A person 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 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/> Lead?	06	3922	(a)(1)	of the	18	1	F3		
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **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 an Insurance Company, false, incomplete or misleading information material to an application for insurance.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: J & J CAR AND	Middle: AND	Last: TRUCK SALES, LLC

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 07	3925	(a)	of the 18	1	M3			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: A person 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 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 08	4101	(a)(3)	of the 18	1	F3			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 09	7121		of the 75	1	M1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: J & J CAR AND	Middle: AND	Last: TRUCK SALES, LLC

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	4904	(b)	of the	18	1	M3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: 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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	903	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT ABOVE OFFENSES**

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Jefferson Loo Valet, Marla Pineda, Indalecia Vasquez, Somary Ibeth Otanez De Loo, Beaki Antonia Perez, Jorge Santos/Santos-Hernandez, Charlie Jiminan, MP Notary and Tags Inc, Santos Auto Gallery, Newroad Motors LLC), 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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-414-22	Date Filed: 12/17/22	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: J & J CAR	Middle: AND	Last: 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 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 13	911	(B)(1)	of the 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: *It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate J&J Car & Truck Sales, LLC.*

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 14	911	(B)(2)	of the 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: *It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of J&J Car & Truck Sales, LLC.*

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/> 15	911	(B)(3)	of the 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: *It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.*



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CA-414-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: J & J CAR	Middle: AND	Last: 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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	16	911	(B)(4)	of the 18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS								
Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>								
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>								
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								



POLICE CRIMINAL COMPLAINT

Docket Number: CR-414-22	Date Filed: 12/5/22	OTN/LiveScan Number	Complaint/Incident Number
Defendant Name:	First: J&J CAR AND	Middle:	Last: TRUCK 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

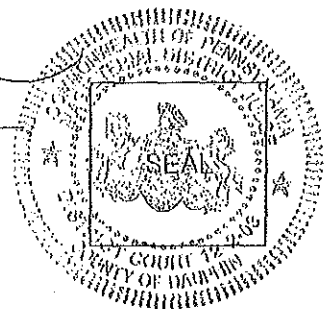
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be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

[Signature]
 (Signature of Affiant)

AND NOW, on this date 12/5/22 (Date) 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)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CA-414-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number		Complaint/Incident Number
Defendant Name:	First: <i>J&J CAR AND</i>	Middle:	Last: <i>TRUCK SALES, LLC</i>	

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. Adelalda GARCIA aka | 23. Rafael SANTIAGO- |
| 5. Jefferson LOOR VALET | Adelalda MENDOZA | PACHECO |
| 6. Maria PINEDA | 15. Edward SALDIVAR | 24. Jean AQUINO |
| 7. Indalecia VASQUEZ | 16. Alberto LUCIANO | 25. Aristeds AQUINO |
| 8. Somary IBETH Otanez De | 17. Mohamed KERDI | 26. Ahmed LOPEZ |
| LOOR | 18. Muhammad ALKURDI | 27. Jessica ENGELKE |
| 9. Beakl 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 |



POLICE CRIMINAL COMI

Docket Number: <i>CA-414-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number		Complaint/Incident Number
Defendant Name	First: J&J CAR AND	Middle:	Last: TRUCK SALES, LLC	

- | | | |
|---|--|------------------------------------|
| 31. Amattl Auto Sales LLC | 38. MP Notary and Tags LLC | 45. Jessica's Auto Tags |
| 32. Newroad Motors LLC | 39. AMCO Auto Sales | 46. JM Motors |
| 33. Grig LLC | 40. Charo's Auto Sales | 47. Saldívar Group |
| 34. Santos Auto Gallery | 41. A2Z Auto Tags | 48. Abby Auto |
| 35. Perfect Touch Auto Repair and Sales LLC | 42. Docuservices | 49. Carla Mattia LLC |
| 36. Pennsylvania Tag and Title | 43. Emma's Auto Tags and Multiservices, Inc. | 50. G&G Auto Body and Auto Salvage |
| 37. J&J Car & Truck Sales LLC | 44. Wilfredo Auto Repair | 51. Mendoza 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.

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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Lindsay Yetter

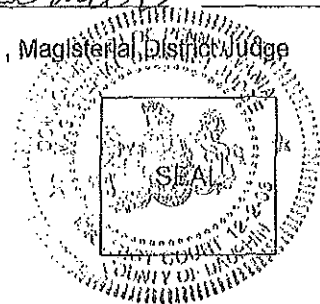
(Signature of Affiant)

Sworn to me and subscribed before me this 5th day of December, 2022

Date

[Signature], Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 12-2-03
MDJ: Hon. DAVID H. JUDY, Esq.
Address: 50 Canal Street
Royalton, PA 17057

DEFENDANT: (NAME and ADDRESS):
JESSICA AUTO AND MULTISERVICES,
First Name Middle Name Last Name
2805 N. 5th Street
Philadelphia, PA 19133

Telephone: (717)944-4463

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-447-22</u>	Date Filed <u>12/5/22</u>	OTN/LiveScan Number	Complaint Number <u>IFS210061</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
AKA	First Name	Middle Name	Last Name	Gen.

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic Unknown

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

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

DNA YES NO DNA Location

FBI Number MNU Number

Defendant Fingerprinted YES NO Ft. HEIGHT: In.

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR
(Name of the attorney for the Commonwealth)

Robert G. Labar
(Signature of the attorney for the Commonwealth)

12/05/2022
(Date)

I, JEREMY BECKER 737643/BADGE # 736
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & 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
 I accuse the defendant whose name is unknown to me but who is described as _____

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

in DAUPHIN County [22] on or about 2018- PRESENT
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CP 477-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA AUTO TAGS	Middle: 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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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, Adelaida Garcia Mendoza, repeatedly engaged in financial transactions with knowledge that the property involved represented the proceeds of unlawful activity with the intent to promote the carrying on of said unlawful activity.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
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 Department 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.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.									



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **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, Adelaida Garcia Mendoza, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	F3 M1		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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, Adelaida Garcia Mendoza, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	3922	(a)(1)	of the	18	1	F3		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

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 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, Linda Sandoval Herrera Martinez and/or its employee(s), 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, Adelaida Garcia Mendoza, fraudulently misrepresented facts and information pertaining to out-of-state vehicle and counterfeit inspection stickers submitted to Penn DOT.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CF 47-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA AUTO TAGS	Middle: AND	Last: MULTISERVICES, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	07	4101	(a)(3)	of the	18	1	M1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	08	7121		of the	75	1	M1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	09	7122	(3)	of the	75	1	M1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4904	(b)	of the	18	1	MIM3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	_____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): UNSWORN FALSIFICATION TO AUTHORITIES

Acts of the accused associated with this Offense: 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	_____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adealida Garcia Menodza, 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, Adelaida Garcia Mendoza, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	_____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): 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, Adelaida Garcia Mendoza, 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 Jessica Auto Tags.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr-447-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA AUTO TAGS	Middle: AND	Last: MULTISERVICES, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	13	911	(b)(2)	of the	18	1	F1		
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PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: It shall be unlawful for any person 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, Adelaida Garcia Mendoza, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	14	911	(b)(3)	of the	18	1	F1		
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PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: It shall be unlawful for any person 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, Adelaida Garcia Mendoza, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	15	911	(b)(4)	of the	18	1	F1		
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PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR247-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA AUTO TAGS	Middle: AND	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

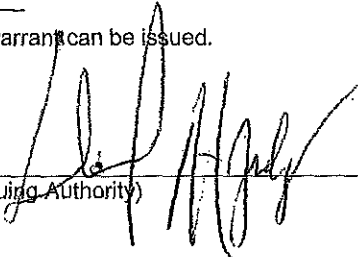

 (Signature of Affiant)

(Date) _____ (Year)

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.

12-2-03
 (Magisterial District Court Number)


 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR 247-22	Date Filed: 12/5/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA AUTO TAGS	Middle: AND	Last: 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
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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-447-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number		Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA AUTO TAGS	Middle: AND	Last: 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.

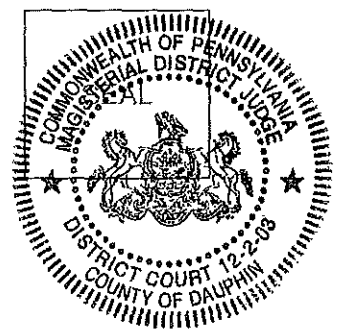
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *17th* day of *December* *2022*
12/16/22 Date _____, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 JM AUTO SALES, INC.
 First Name Middle Name Last Name
 2801 N. 5th Street
 Philadelphia, PA 19133

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-448-22</i>	Date Filed <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name	Last Name		Gen.
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown		ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SOY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)		Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, JEREMY BECKER (Name of the Affiant) 737643/BADGE # 736 (PSP/MP/POETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County [22] _____ on or about 2018-PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-448-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JM	Middle: AUTO	Last: SALES, 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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input checked="" type="checkbox"/> PennDOT Data (if applicable)	Accident Number _____				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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, Adelaida Garcia Mendoza, repeatedly engaged in financial transactions with knowledge that the property involved represented the proceeds of unlawful activity with the intent to promote the carrying on of said unlawful activity.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number _____				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
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 Department 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.									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number _____				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD									
Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.									



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	F3 M		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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, Adelaida Garcia Mendoza, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	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 (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

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 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, Linda Sandoval Herrera Martinez and/or its employee(s), 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, Adelaida Garcia Mendoza, fraudulently misrepresented facts and information pertaining to out-of-state vehicle and counterfeit inspection stickers submitted to Penn DOT .



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-448-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JM	Middle: AUTO	Last: SALES, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4101	(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		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adelaida Garcia Mendoza, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4904	(b)	of the	18	1	M193		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS TO UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Adealida Garcia Menodza, 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, Adelaida Garcia Mendoza, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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, Adelaida Garcia Mendoza, 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 Jessica Auto Tags.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-448-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JM	Middle: AUTO	Last: SALES, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Adelaida Garcia Mendoza, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	14	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Adelaida Garcia Mendoza, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	15	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Adelaida Garcia Mendoza, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-448-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number		Complaint/Incident Number <i>IFS210061</i>
Defendant Name:	First: <i>JM</i>	Middle: <i>AUTO</i>	Last: <i>SALES, INC.</i>	

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

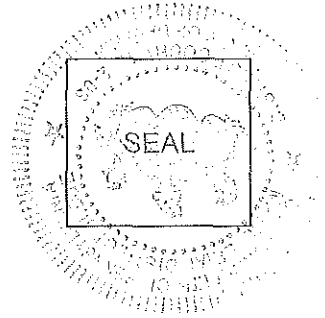
 (Date) (Year) *[Signature]*
Signature of Affiant

AND NOW, on this date 12/16/22 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.

12-2-63
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-448-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JM	Middle: AUTO	Last: 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
7. Indalecia VASQUEZ
8. Somary IBETH Otanez De LOOR
9. Beaki Antonia PEREZ
10. Charlie JIMINAN
11. Margarete ALMSAHAQBEBH
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



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Defendant Name:	First: JM	Middle: AUTO	Last: 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
- 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.

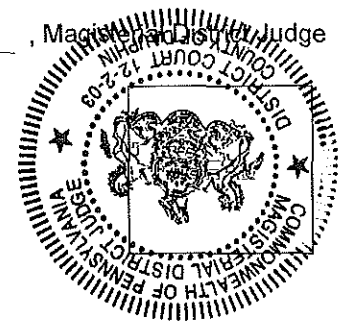
I, JEREMY BECKER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *15th* day of *December* *2022*
 _____ Date _____
 My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
MENDOZA **AUTO** **SALE, INC.**
First Name Middle Name Last Name
 422 W. Luray Stret
 Philadelphia, PA 19140

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-450-22	Date Filed 12/15/22	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB 1/1	POB	Add'l DOB 1/1	Co-Defendant(s) <input type="checkbox"/>	Gen.
First Name		Middle Name		Last Name	
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location		WEIGHT (lbs.)	
FBI Number		MNU Number			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT in.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, **JEREMY BECKER** (Name of the Affiant) **737643/BADGE # 736** (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
 of **Pennsylvania Office of Attorney General** (Identify Department or Agency Represented and Political Subdivision) **PA0222400** (Police Agency ORI Number)
 do hereby state: (check appropriate box)
 1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____
 I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe
 with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City
(Subdivision Code) (Place-Political Subdivision)
 in DAUPHIN County [22] on or about 2018-PRESENT
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MENDOZA	Middle: AUTO	Last: SALE, 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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
Lead?	Offense # 01	Section 5111	Subsection (a)(1)	of the 1	Counts 1	Grade F1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY			
Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, 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, 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.								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
Lead?	Offense # 02	Section 3922	Subsection (a)(1)	of the 18	Counts 1	Grade F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION			
Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, 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, did present or cause to be presented false, incomplete or misleading information material to MV426B application and documents for out-of-state vehicle repairs which occurred without the vehicle being present within the Commonwealth of Pennsylvania during purported repairs and/or inspection.								

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
Lead?	Offense # 03	Section 3925	Subsection (a)	of the 18	Counts 1	Grade F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	Statute Description (include the name of statute or ordinance): RECEIVING STOLEN PROPERTY			
Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, 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, Patria Laureano, 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.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MENDOZA	Middle: AUTO	Last: SALE, INC.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Patria Laureano, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	4904	(b)	of the	18	1	M1 M3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, 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, Patria Laureano, 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.

 **POLICE CRIMINAL COMPLAINT**

Docket Number: <i>CR-450-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MENDOZA	Middle: AUTO	Last: SALE, INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Patria Laureano, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	4118	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **WASHING VEHICLE TITLES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant, by and through its agent, Roberto Gomez Gomez Sr, made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	4911	(a)(1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Patria Laureano, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant, by and through its agent, Patria Laureano, made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by Penn DOT.



POLICE CRIMINAL COMPLAINT

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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	911	(b)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: <i>MENDOZA</i>	Middle: <i>AUTO</i>	Last: <i>SALES</i>	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<i>13</i>	<i>911</i>	<i>(B)(3)</i>	of the	<i>18</i>	<i>1</i>	<i>F1</i>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Patria Laureano, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	<i>14</i>	<i>911</i>	<i>(B)(4)</i>	of the	<i>18</i>	<i>1</i>	<i>F1</i>		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-450-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MENDOZA	Middle: AUTO	Last: SALE, 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Year)

[Handwritten Signature]

(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.

12-2-03
(Magisterial District Court Number)

[Handwritten Signature]

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-40-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MENDOZA	Middle: AUTO	Last: SALE, 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
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

Docket Number: <i>CR-450-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MENDOZA	Middle: AUTO	Last: 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

(Signature of Affiant)

Sworn to me and subscribed before me this *6th* day of *December* *2022*

12/6/2022 Date *[Signature]*

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, ESQ.
 Address: 50 CANAL ST.
 ROYALTON, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA

VS.
 DEFENDANT: (NAME and ADDRESS):
 MP NOTARY AND TAGS INC.
 First Name Middle Name Last Name Gen
 144 HAMILTON STREET
 ALLENTOWN, PA 18103

NGIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-434-22	Date Filed 12/05/2022	OTN/LiveScan Number	Complaint Number	Incident Number IFS210061	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	<input type="checkbox"/> Asian	<input type="checkbox"/> Hispanic		<input type="checkbox"/> Non-Hispanic	
ETHNICITY		Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

ROBERT G. LABAR (Name of the attorney for the Commonwealth) ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, SA RACHEL A. STORY // DET. LINDSAY YETTER (Name of the Affiant) 759307/#583 // 43799/#13 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
 of Lehigh County Detectives (Identify Department or Agency Represented and Political Subdivision) PA0222400 PA0391900 (Police Agency ORI Number)
 do hereby state: (check appropriate box)
 1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____
 I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Subdivision Code) (Place-Political Subdivision)
 in DAUPHIN County [22] on or about 2018- PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MP NOTARY	Middle: AND	Last: TAGS

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

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/> Lead?	01	5111	(a)(1)	of the	18	1	F1		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number: _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	02	3922	(a)(1)	of the	18	1	F3		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	03	3925	(a)	of the	18	1	F3		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: A person 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 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.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MP NOTARY	Middle: AND	Last: TAGS

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIG Offense Code	UCR/NIBRS Code	

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIG Offense Code	UCR/NIBRS Code	

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	4904	(b)	of the	18	1	M1 M3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIG Offense Code	UCR/NIBRS Code	

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: 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.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MP NOTARY	Middle: AND	Last: TAGS

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	07	903	(a)(1)	of the	18	1	F1 M3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT THE ABOVE OFFENSES**

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Theft by Deception, Receiving Stolen Property, False Application for Certificate of Title or Registration, Altered Forged, or Counterfeit Documents, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Jefferson Loo Valet and/or J&J Car & Truck Sales LLC), 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	08	911	(b)(1)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate MP Notary & Tags, Inc.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	09	911	(b)(2)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of MP Notary & Tags Inc.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-434-22	Date Filed: 12/5/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MP NOTARY	Middle: AND	Last: TAGS

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-434-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: MP NOTARY	Middle: AND	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

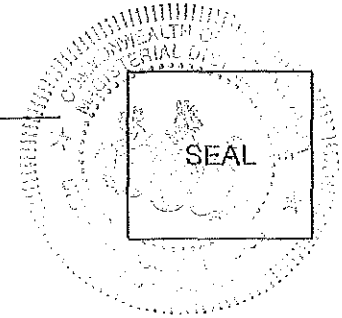
Andrew Yetter
 (Signature of Affiant)

(Date) _____ (Year)

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.

12-2-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-434-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number
Defendant Name:	First: MP NOTARY	Middle: AND	Last: TAGS 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 IBETH 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 |



POLICE CRIMINAL COMI

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
Defendant Name:	First: MP NOTARY	Middle: AND	Last: TAGS INC.	

- | | | |
|--|---|---------------------------------------|
| 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 Motors |
| 33. Grig LLC | 40. Charo's Auto Sales | 47. Saldivar Group |
| 34. Santos Auto Gallery | 41. A2Z Auto Tags | 48. Abby Auto |
| 35. Perfect Touch Auto Repair
and Sales LLC | 42. DocuserVICES | 49. Carla Mattia LLC |
| 36. Pennsylvania Tag and Title | 43. Emma's Auto Tags and
Multiservices, Inc. | 50. G&G Auto Body and Auto
Salvage |
| 37. J&J Car & Truck Sales LLC | 44. Wilfredo Auto Repair | 51. Mendoza 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.

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.

Lindsay Yetter

(Signature of Affiant)

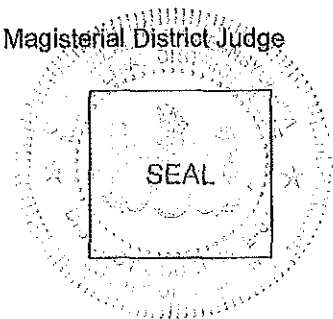
Sworn to me and subscribed before me this 16th day of December 2022

12/6/2022 Date

[Signature]

, Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717) ~~234-0949~~ 944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 NEWROAD MOTORS LLC
 First Name Middle Name Last Name
 32 N. 16TH ST.
 LEBAON, PA 17042

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR 433-22</i>	Date Filed 12/05/2022	OTN/LiveScan Number <i>f</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk/Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT in.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR _____ ROBERT G. LABAR _____ 12/05/2022
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, RACHEL A. STORY 759307/#583
 (Name of the Affiant) (PSP/MPPOETC - Assigned Affiant ID Number & 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
 I accuse the defendant whose name is unknown to me but who is described as _____

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

in DAUPHIN County [22] on or about 2018-PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CF-433-22	Date Filed: 12/9/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: NEWROAD	Middle: MOTORS	Last: 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 citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	911	(b)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate Newroad Motors LLC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	911	(b)(2)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of Newroad Motors LLC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	911	(b)(3)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	04	911	(b)(4)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	05	5111	(a)(1)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	06	4101	(a)(3)	of the	18	1	M3 F2		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

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



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	7121		of the	75	1	MI		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fraudulent intent, altered and/or forged any document issued or prepared for issue by the department.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	4904	(b)	of the	18	1	M3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: 01-433-22	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number: IFS210061
Defendant Name:	First: NEWROAD	Middle: MOTORS	Last: LLC

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	7121		of the	75	10			
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CONSPIRACY/FALSE APPLICATION FOR CERTIFICATE OF TITLE, ETC.**

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Igor Dratch, Oleg Zelenko, David Morrison, Amatti Auto Sales LLC, and/or Grig LLC), 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.

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>0143322</u>	Date Filed: <u>12/15/22</u>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: NEWROAD	Middle: MOTORS	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

SA Rachael Stroy
(Signature of Affiant)

(Date)

(Year)

AND NOW, on this date 12-16-22 I certify that the complaint has been properly completed and verified.

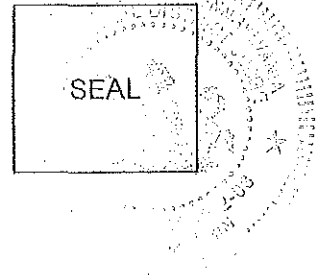
An affidavit of probable cause must be completed before a warrant can be issued.

12-203

(Magisterial District Court Number)

(Issuing Authority)

[Signature]





POLICE CRIMINAL COMPLAINT

Docket Number: CP 433 22	Date Filed: 12/15/22	OTN/LiveScan Number		Complaint/Incident Number IFS210061
Defendant Name:	First: NEWROAD	Middle: MOTORS	Last: 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 | 18. Muhammad ALKURDI | 35. Perfect Touch Auto Repair and Sales LLC |
| 2. Oleg ZELENGO | 19. Edgar COLLADO | 36. Pennsylvania Tag and Title |
| 3. David MORRISON | 20. Osiris FERNANDEZ GONZALEZ | 37. J&J Car & Truck Sales LLC |
| 4. Angel MENDEZ | 21. Juana BELEN-VALDEZ | 38. MP Notary and Tags LLC |
| 5. Jefferson LOOR VALET | 22. Juana BELEN-DEVANGELISTA | 39. AMCO Auto Sales |
| 6. Marla PINEDA | 23. Rafael SANTIAGO-PACHECO | 40. Charo's Auto Sales |
| 7. Indalecia VASQUEZ | 24. Jean AQUINO | 41. A2Z Auto Tags |
| 8. Somary IBETH Otanez De LOOR | 25. Aristeds AQUINO | 42. Docuservices |
| 9. Beaki Antonia PEREZ | 26. Ahmed LOPEZ | 43. Emma's Auto Tags and Multiservices, Inc. |
| 10. Charlie JIMINAN | 27. Jessica ENGELKE | 44. Wilfredo Auto Repair |
| 11. Margarete ALMSAHAQBEH | 28. Jimmy RODRIGEZ Sr. | 45. Jessica's Auto Tags |
| 12. Linda SANDOVAL-MARTINEZ-HERERRA | 29. Nora RODRIGUEZ | 46. JM Motors |
| 13. Euilid URENA | 30. Roberto GOMEZ | 47. Saldivar Group |
| 14. Adelaída GARCIA aka Adelaída MENDOZA | 31. Amatti Auto Sales LLC | 48. Abby Auto |
| 15. Edward SALDIVAR | 32. Newroad Motors LLC | 49. Carla Mattia LLC |
| 16. Alberto LUCIANO | 33. Grig LLC | 50. G&G Auto Body and Auto Salvage |
| 17. Mohamed KERDI | 34. Santos Auto Gallery | 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 COMPLAINT

Docket Number: <i>CV 433-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: NEWROAD	Middle: MOTORS	Last: 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.

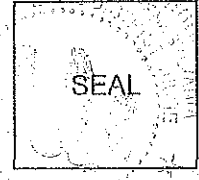
SA Rachel A Story

(Signature of Affiant)

Sworn to me and subscribed before me this *12/16* day of *December* *2022*

12/16/22 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 PA TAG AND TITLE
 First Name Middle Name Last Name
 1907 Pittston Avenue
 Scranton, PA 18505

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR 453-22</i>	Date Filed 12/05/2022	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER Male Female

DOB / / POB Add'l DOB / / Co-Defendant(s)

First Name Middle Name Last Name Gen.

AKA

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic Unknown

Hair Color

<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> PLE (Purple)	<input type="checkbox"/> BRO (Brown)
<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
<input type="checkbox"/> BLN (Blonde / Strawberry)					

Eye Color

<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> XXX (Unknown)

DNA YES NO **DNA Location** **WEIGHT (lbs.)**

FBI Number **MNU Number**

Defendant Fingerprinted YES NO **Ft. HEIGHT In.**

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, RACHEL A. STORY (Name of the Affiant) 759307/#583 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County [22] (County Code) on or about 2018-PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-453-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PA	Middle: TAG	Last: AND TITLE

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	4118		of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: A person commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	4107	(a)(4)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **DECEPTIVE BUSINESS PRACTICES**

Acts of the accused associated with this Offense: The defendant, 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 engaged in a continuing course of criminal conduct in which the defendant knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	4911	(a)(1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**



POLICE CRIMINAL COMPLAINT

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

Acts of the accused associated with this Offense: The defendant, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	--	---

<input type="checkbox"/>	05	903	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT THE ABOVE OFFENSES**

Acts of the accused associated with this Offense: Conspiracy: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, tampering with public records or information, deceptive business practices, washing vehicle titles, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more of the following: Santos Auto Gallery, Jorge Santos/Jorge Santos-Hernandez, that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	911	(b)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-453-22</i>	Date Filed: <i>1/21/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PA	Middle: TAG	Last: AND TITLE

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>	07	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-453-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PA	Middle: TAG	Last: AND TITLE

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

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

SA Rachel A. Stutz
 (Signature of Affiant)

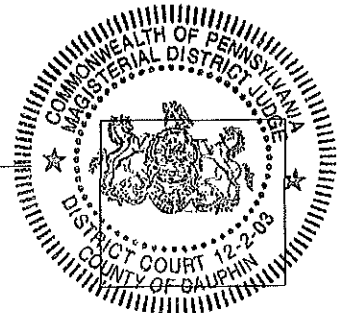
(Date) _____ (Year)

AND NOW, on this date *12/16/22* 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.

12-2-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-453-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	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 and Sales LLC |
| 2. Oleg ZELENKO | 19. Edgar COLLADO | 36. Pennsylvania Tag and Title |
| 3. David MORRISON | 20. Osiris FERNANDEZ GONZALEZ | 37. J&J Car & Truck Sales LLC |
| 4. Angel MENDEZ | 21. Juana BELEN-VALDEZ | 38. MP Notary and Tags LLC |
| 5. Jefferson LOOR VALET | 22. Juana BELEN-DEVANGELISTA | 39. AMCO Auto Sales |
| 6. Maria PINEDA | 23. Rafael SANTIAGO-PACHECO | 40. Charo's Auto Sales |
| 7. Indalecia VASQUEZ | 24. Jean AQUINO | 41. A2Z Auto Tags |
| 8. Somary IBETH Otanez De LOOR | 25. Aristeds AQUINO | 42. DocuserVICES |
| 9. Beaki Antonia PEREZ | 26. Ahmed LOPEZ | 43. Emma's Auto Tags and Multiservices, Inc. |
| 10. Charlie JIMINAN | 27. Jessica ENGELKE | 44. Wilfredo Auto Repair |
| 11. Margarete ALMSAHAQBEH | 28. Jimmy RODRIGEZ Sr. | 45. Jessica's Auto Tags |
| 12. Linda SANDOVAL-MARTINEZ-HERERRA | 29. Nora RODRIGUEZ | 46. JM Motors |
| 13. Eulid URENA | 30. Roberto GOMEZ | 47. Saldivar Group |
| 14. Adelaida GARCIA aka Adelaida MENDOZA | 31. Amatti Auto Sales LLC | 48. Abby Auto |
| 15. Edward SALDIVAR | 32. Newroad Motors LLC | 49. Carla Mattia LLC |
| 16. Alberto LUCIANO | 33. Grig LLC | 50. G&G Auto Body and Auto Salvage |
| 17. Mohamed KERDI | 34. Santos Auto Gallery | 51. Mendoza Auto Sales |



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-453-22</i>	Date Filed: <i>11</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PA	Middle: TAG	Last: AND 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.

SA Rachel A Story

(Signature of Affiant)

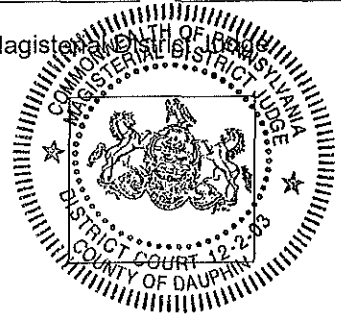
Sworn to me and subscribed before me this *16th* day of *December* *2022*

12/16/2022 Date

[Signature]

, Magistera District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
PERFECT TOUCH AUTO REPAIR & SALES
 First Name Middle Name Last Name
 2101 N. 2ND STREET
 PHILADELPHIA, PA 19122

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determin.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-436-22</i>	Date Filed 12/05/2022	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA	<input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number		MNU Number			
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 807).

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, RACHEL A. STORY (Name of the Affiant) 759307/#583 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County [22] on or about 2018-PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-40022</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number <i>IFS210061</i>
Defendant Name:	First: <i>PERFECT TOUCH</i>	Middle: <i>AUTO</i>	Last: <i>REPAIR & SALES LLC</i>

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	<i>01</i>	<i>4118</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F3</i>		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **WASHING VEHICLE TITLES**

Acts of the accused associated with this Offense: A person commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	<i>02</i>	<i>4107</i>	<i>(a)(4)</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F3</i>	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **DECEPTIVE BUSINESS PRACTICES**

Acts of the accused associated with this Offense: The defendant, 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 engaged in a continuing course of criminal conduct in which the defendant knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	--	---	---	---

<input type="checkbox"/>	<i>03</i>	<i>4911</i>	<i>(a)(1)</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F3</i>	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**



POLICE CRIMINAL COMPLAINT

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

Acts of the accused associated with this Offense: The defendant, did knowingly and with Intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	04	7121	of the 75	1	M1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								

PennDOT Data (if applicable) _____
 Interstate Safety Zone Work Zone

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

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	05	903	(a)(1) of the 18	1	EX M1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								

PennDOT Data (if applicable) _____
 Interstate Safety Zone Work Zone

Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT THE ABOVE OFFENSES**

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Jorge Santos/Santos-Hernandez and/or Santos Auto Gallery), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	06	911	(b)(3) of the 18	1	F1			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>								

PennDOT Data (if applicable) _____
 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 employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-436-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PERFECT TOUCH	Middle: AUTO	Last: REPAIR & SALES LLC

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>	07	911	(b)(4)	of the	18	1	F1		
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Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				of the				
--------------------------	--	--	--	--------	--	--	--	--

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

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

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>				of the				
--------------------------	--	--	--	--------	--	--	--	--

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 436-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PERFECT TOUCH	Middle: AUTO	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

SA Rachel A. Struy

 (Signature of Affiant)

(Date) _____ (Year) _____

AND NOW, on this date *12-6-22* I certify that the complaint has been properly completed and verified.

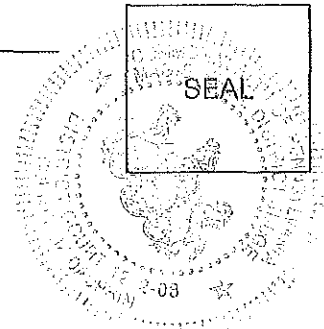
An affidavit of probable cause must be completed before a warrant can be issued.

12-2003

 (Magisterial District Court Number)

[Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 436022</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PERFECT TOUCH	Middle: AUTO	Last: 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 | 18. Muhammad ALKURDI | 35. Perfect Touch Auto Repair and Sales LLC |
| 2. Oleg ZELENKO | 19. Edgar COLLADO | 36. Pennsylvania Tag and Title |
| 3. David MORRISON | 20. Osiris FERNANDEZ GONZALEZ | 37. J&J Car & Truck Sales LLC |
| 4. Angel MENDEZ | 21. Juana BELEN-VALDEZ | 38. MP Notary and Tags LLC |
| 5. Jefferson LOOR VALET | 22. Juana BELEN-DEVANGELISTA | 39. AMCO Auto Sales |
| 6. Maria PINEDA | 23. Rafael SANTIAGO-PACHECO | 40. Charo's Auto Sales |
| 7. Indalecia VASQUEZ | 24. Jean AQUINO | 41. A2Z Auto Tags |
| 8. Somary IBETH Otanez De LOOR | 25. Aristeds AQUINO | 42. Docuservices |
| 9. Beaki Antonia PEREZ | 26. Ahmed LOPEZ | 43. Emma's Auto Tags and Multiservices, Inc. |
| 10. Charlie JIMINAN | 27. Jessica ENGELKE | 44. Wilfredo Auto Repair |
| 11. Margarete ALMSAHAQBEH | 28. Jimmy RODRIGEZ Sr. | 45. Jessica's Auto Tags |
| 12. Linda SANDOVAL-MARTINEZ-HERERRA | 29. Nora RODRIGUEZ | 46. JM Motors |
| 13. Eulid URENA | 30. Roberto GOMEZ | 47. Saldivar Group |
| 14. Adelaida GARCIA aka Adelaida MENDOZA | 31. Amatti Auto Sales LLC | 48. Abby Auto |
| 15. Edward SALDIVAR | 32. Newroad Motors LLC | 49. Carla Mattia LLC |
| 16. Alberto LUCIANO | 33. Grig LLC | 50. G&G Auto Body and Auto Salvage |
| 17. Mohamed KERDI | 34. Santos Auto Gallery | 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 COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: PERFECT TOUCH	Middle: AUTO	Last: 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 Rachel A Story

(Signature of Affiant)

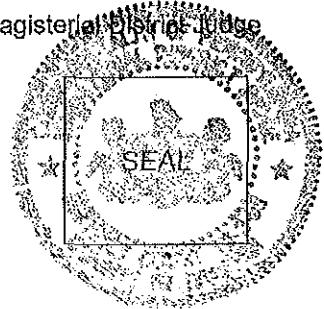
Sworn to me and subscribed before me this 6th day of NOVEMBER, 2022

12/6/2022 Date

[Handwritten Signature]

Magisterial District Judge

My commission expires first Monday of January, 2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: SALDIVAR (NAME and ADDRESS):
 4061 Ashland Street
 Philadelphia, PA 19124
 GROUP INC.
 First Name Middle Name Last Name

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pending Extradition	<input type="checkbox"/> C-Misdemeanor Surrounding States	<input type="checkbox"/> Distance: _____
<input type="checkbox"/> 2-Felony Limited	<input type="checkbox"/> 6-Felony Pending Extradition Determ.	<input type="checkbox"/> D-Misdemeanor No Extradition	
<input type="checkbox"/> 3-Felony Surrounding States	<input type="checkbox"/> A-Misdemeanor Full	<input type="checkbox"/> E-Misdemeanor Pending Extradition	
<input type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-442-2022</u>	Date Filed <u>12/5/2022</u>	OTN/LiveScan Number <u>-</u>	Complaint Number <u>IFS210061</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / / <u>AKA</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
First Name		Middle Name		Last Name	
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown)					
<input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)					
<input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray)					
<input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO		DNA Location		WEIGHT (lbs.)	
FBI Number		MNU Number			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, JEREMY BECKER (Name of the Affiant) 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County [22] (County Code) on or about 2018-PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>OR-442-7022</i>	Date Filed: <i>1/21/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: 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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, 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, Edward Saldivar, repeatedly engaged in financial transactions with knowledge that the property involved represented the proceeds of unlawful activity with the intent to promote the carrying on of said unlawful activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Edward Saldivar, did knowingly and with the intent to defraud a State of local government agency, namely, PA Department 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, Edward Saldivar, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Edward Saldivar, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Edward Saldivar, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 4147-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **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, Edward Saldivar, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, 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, Edward Saldivar, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	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 (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, 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, Edward Saldivar, did present or cause to be presented false, incomplete or misleading information material to MV426B application and documents for out-of-state vehicle repairs which occurred without the vehicle being present within the Commonwealth of Pennsylvania during purported repairs and/or inspection.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-448-2022</i>	Date Filed: <i>12/15/2022</i>	QTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: INC.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	4101	(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	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Edward Saldivar, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	08	7121		of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	09	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Edward Saldivar, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 447-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: INC.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4904	(b)	of the	18	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, 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, Edward Saldivar, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Edward Saldivar, 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, Edward Saldivar, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	911	(b)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Mohammad Alkurdi, 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 Saldivar Group. 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, Mohammad Alkurdi, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 442-2022</i>	Date Filed: <i>12/2/2022</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: INC.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	13	911	(b)(2)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Edward Saldivar, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	---	--	--	---

<input type="checkbox"/> Lead?	14	911	(b)(3)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Edward Saldivar, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	15	911	(b)(4)	of the	18	1	F1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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, Edward Saldivar, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

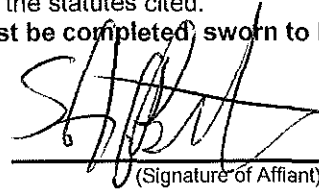


POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-448-2022</u>	Date Filed: <u>12/15/2022</u>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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



 (Signature of Affiant)

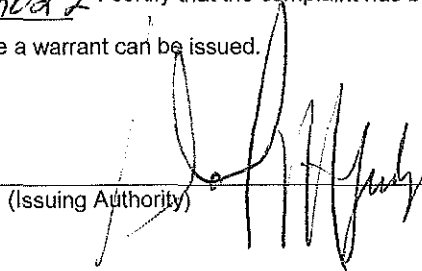
 (Date) (Year)

AND NOW, on this date December 6, 2022 I certify that the complaint has been properly completed and verified.

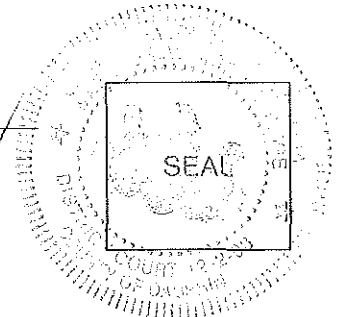
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR 411A-2022	Date Filed: 12/15/2022	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: 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
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

Docket Number: <i>CR-442-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <u> </u>	Complaint/Incident Number IFS210061
Defendant Name:	First: SALDIVAR	Middle: GROUP	Last: 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

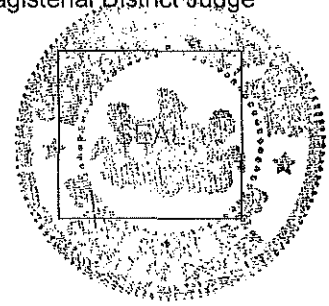
[Handwritten Signature]

(Signature of Affiant)

Sworn to me and subscribed before me this *12/16/2022* day of *DECEMBER* *2022*

[Handwritten Signature], Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: 12
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 SANTOS AUTO GALLERY
 First Name Middle Name Last Name
 9 S. Keyser Avenue
 Taylor, PA 18517

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CR-435-2022</i>	Date Filed 12/05/2022	OTN/LiveScan Number —	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
	First Name	Middle Name	Last Name	Gen.	
	AKA				
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT in.	
Fingerprint Classification					

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, <u>RACHEL A. STORY</u> (Name of the Affiant)	<u>759307/#583</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of <u>Pennsylvania Office of Attorney General</u> (Identify Department or Agency Represented and Political Subdivision)	<u>PA0222400</u> (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] _____ Harrisburg City (Subdivision Code) (Place-Political Subdivision)	
in 12 County _____ [22] _____ on or about 2018-PRESENT (County Code)	



POLICE CRIMINAL COMPLAINT

Docket Number: CR-435-2022	Date Filed: 12/15/2022	OTN/LiveScan Number -	Complaint/Incident Number IFS210061
Defendant Name:	First: SANTOS	Middle: AUTO	Last: GALLERY

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	4118		of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: A person commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information to wit: with intent to deceive anyone, the defendant made/caused to be made application(s) for a certificate of title for a motor vehicle which included materially false or fictitious information.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	4107	(a)(4)	of this	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, 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 engaged in a continuing course of criminal conduct in which the defendant knowingly and intentionally submitted fraudulent applications for PA salvage and reconstructed vehicle titles to the PA Dept. of Transportation (PennDOT).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	4911	(a)(1)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number: _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**



POLICE CRIMINAL COMPLAINT

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

Acts of the accused associated with this Offense: The defendant, did knowingly and with Intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	04	7121	of the	75	1	M1		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION**

Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person uses a false or fictitious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	05	903	(a)(1)	of the	18	1	F1	
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY TO COMMIT THE ABOVE OFFENSES**

Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Igor Dratch, Oleg Zelenko, Angel Mendez, Amatti Auto Sales LLC, Newroad Motors, Perfect Touch Auto Repair & Sales LLC, and/or Grig LLC) it shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.) that one of more would

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	06	911	(b)(3)	of the	18	1	F1	
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	07	911	(b)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: *It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).*

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SANTOS	Middle: AUTO	Last: 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.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through .
- I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

SA Rachel A. Stary
(Signature of Affiant)

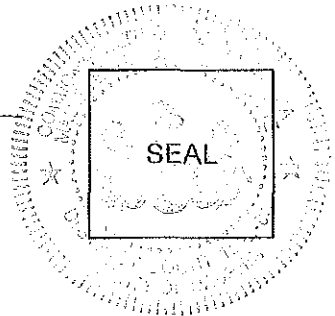
(Date) _____ (Year)

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.

12-2-03
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

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

- | | | |
|--|-----------------------------|--|
| 1. Igor DRATCH | 18. Muhammad ALKURDI | 35. Perfect Touch Auto Repair and Sales LLC |
| 2. Oleg ZELENKO | 19. Edgar COLLADO | 36. Pennsylvania Tag and Title |
| 3. David MORRISON | 20. Osiris FERNANDEZ | 37. J&J Car & Truck Sales LLC |
| 4. Angel MENDEZ | GONZALEZ | 38. MP Notary and Tags LLC |
| 5. Jefferson LOOR VALET | 21. Juana BELEN-VALDEZ | 39. AMCO Auto Sales |
| 6. Maria PINEDA | 22. Juana BELEN- | 40. Charo's Auto Sales |
| 7. Indalecia VASQUEZ | DEVANGELISTA | 41. A2Z Auto Tags |
| 8. Somary IBETH Otanez De LOOR | 23. Rafael SANTIAGO-PACHECO | 42. DocuserVICES |
| 9. Beaki Antonia PEREZ | 24. Jean AQUINO | 43. Emma's Auto Tags and Multiservices, Inc. |
| 10. Charlie JIMINAN | 25. Aristeds AQUINO | 44. Wilfredo Auto Repair |
| 11. Margarete ALMSAHAQBEH | 26. Ahmed LOPEZ | 45. Jessica's Auto Tags |
| 12. Linda SANDOVAL-MARTINEZ-HERERRA | 27. Jessica ENGELKE | 46. JM Motors |
| 13. Eulid URENA | 28. Jimmy RODRIGEZ Sr. | 47. Saldivar Group |
| 14. Adelaida GARCIA aka Adelaida MENDOZA | 29. Nora RODRIGUEZ | 48. Abby Auto |
| 15. Edward SALDIVAR | 30. Roberto GOMEZ | 49. Carla Mattia LLC |
| 16. Alberto LUCIANO | 31. Amatti Auto Sales LLC | 50. G&G Auto Body and Auto Salvage |
| 17. Mohamed KERDI | 32. Newroad Motors LLC | 51. Mendoza Auto Sales |
| | 33. Grig LLC | |
| | 34. Santos Auto Gallery | |

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 COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SANTOS	Middle: AUTO	Last: 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

SA Rachel A. Story

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

December

2022

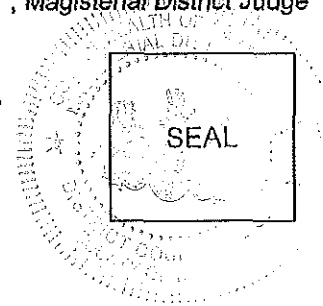
12/6/2022 Date

[Handwritten Signature]

, Magisterial District Judge

My commission expires first Monday of January,

2024



COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-03
 MDJ: Hon. DAVID H. JUDY, Esq.
 Address: 50 Canal Street
 Royalton, PA 17057
 Telephone: (717)234-0949



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
 WILFREDO AUTO REPAIR
 First Name Middle Name Last Name
 426 W. Glenwood Avenue
 Philadelphia, PA 19140

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number C-439-22	Date Filed 12/5/22	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB / /	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number			Ft. HEIGHT In.	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

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

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

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

CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 (Date)

I, JEREMY BECKER (Name of the Affiant)	737643/BADGE # 736 (PSP/MPOETC - Assigned Affiant ID Number & Badge #)
of Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision)	PA0222400 (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above	
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Subdivision Code) (Place-Political Subdivision)	
in DAUPHIN County [22] (County Code)	on or about 2018- PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-439-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: WILFREDO	Middle: AUTO	Last: REPAIR

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

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Reico, 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, Eliud Urena-Reico, repeatedly engaged in financial transactions with knowledge that the property involved represented the proceeds of unlawful activity with the intent to promote the carrying on of said unlawful activity.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	02	4117	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Eliud Urena-Reico, did knowingly and with the intent to defraud a State of local government agency, namely, PA Department 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, Eliud Urena-Reico, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	03	4117	(a)(2)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Eliud-Urena-Reico, did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant, by and through its agent, Eliud Urena-Reico, did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	04	4117	(a)(3)	of the	18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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, Eliudd Urena-Recio, 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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	05	4117	(b)(4)	of the	18	1	ISM		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Recio, 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, Eliud Urena-Recio, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	06	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 (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Recio, 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, Eliud Urena-Recio, did present or cause to be presented false, incomplete or misleading information material to MV426B application and documents for out-of-state vehicle repairs which occurred without the vehicle being present within the Commonwealth of Pennsylvania during purported repairs and/or inspection.



POLICE CRIMINAL COMPLAINT

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	07	3925	(a)	of the	18	1	F3		
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Reclo, 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, Eliud Urena-Reclo, 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	08	4101	(a)(3)	of the	18	1	F3		
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Reclo, is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, by and through its agent, Eliud Urena-Reclo, with the intent to defraud and/or knowledge that he is facilitating a fraud, uttered a writing (vehicle applications and documents) which he knows to be forged in a manner specific in paragraph (2) of this section.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	09	7121		of the	75	1	M1		
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

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



POLICE CRIMINAL COMPLAINT

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	7122	(3)	of the	75	1	M1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Recio, 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 Pennsylvania Department of Transportation (Penn DOT). to wit: the defendant, by and through its agent, Mohammad Alkurdi, with fraudulent intent, altered and/or forged any document issued or prepared for issue by Penn DOT.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	4904	(b)	of the	18	1	M3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Recio, 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, Eliud Urena-Recio, 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 Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, by and through its agent, Eliud Urena-Recio, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant, by and through its agent, Eliud Urena-Recio, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 434-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: WILFREDO	Middle: AUTO	Last: REPAIR	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	13	911	(B)(1)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input checked="" type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
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, Eliud Urena-Reco, 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 Wilfredo Auto Repair.									

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	14	911	(B)(2)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input checked="" type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
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, Eliud Urena-Reco, 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.									

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	15	911	(B)(3)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
<input checked="" type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS									
Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant, by and through its agent, Eliud Urena-Reco, was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.									



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-439-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number	Complaint Number IFS210061	Incident Number
Defendant Name	First: WILFREDO	Middle: AUTO	Last: REPAIR	

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	16	911	(B)(4)	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): 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, Ellud Urena-Reclo, conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>Cv-439-22</u>	Date Filed: <u>12/5/22</u>	OTN/LiveScan Number	Complaint/Incident Number <u>IFS210061</u>
Defendant Name:	First: <u>WILFREDO</u>	Middle: <u>AUTO</u>	Last: <u>REPAIR</u>

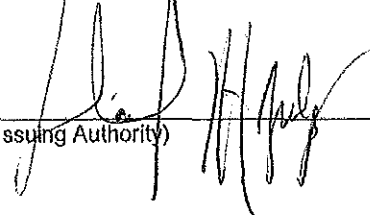
- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties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


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

 (Date) (Year) 12-6-22 
 (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.

12-2-03
 (Magisterial District Court Number)


 (Issuing Authority)


 SEAL



POLICE CRIMINAL COMPLAINT

Docket Number: Cr 439-22	Date Filed: 12/15/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: WILFREDO	Middle: AUTO	Last: 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
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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CI-437-22</i>	Date Filed: <i>12/12/22</i>	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: WILFREDO	Middle: AUTO	Last: REPAIR

- 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.

[Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *16th* day of *December* *2022*
12/16/22 Date _____, Magisterial District Judge

My commission expires first Monday of January, *2024*

