

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):
ARISTEDES AQUINO
 First Name Middle Name Last Name
 7400 Claridge Street,
 Philadelphia, PA 19111

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-409-22	Date Filed 12/5/22	OTN/LiveScan Number R 396224-5	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 03/16/1972	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 checked="" 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 checked="" 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 checked="" 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 OLN 33510082			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:				5 11	

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 TO PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

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

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: 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"/>	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 did intentionally obtain or withhold property of another by deception; to wit: the defendant 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 which possessed the VIN numbers of stolen 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	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: 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: ARISTEDES	Middle:	Last: AQUINO

<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	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): **IDENTITY THEFT**

Acts of the accused associated with this Offense: A person 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 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	(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): **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?	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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-409-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 396226-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ARISTEDES	Middle:	Last: AQUINO

Inchoate Offense	<input type="checkbox"/> 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	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"/>	08	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 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"/>	09	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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-409-22	Date Filed: 12/5/22	OTN/LiveScan Number A 396226-5	Complaint/Incident Number IFS210061
Defendant Name:	First: ARISTEDES	Middle:	Last: AQUINO

<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	4911	(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): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

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 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	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): **CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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.

<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	911	(b)(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): **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 Charo Auto Sales.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-409-22	Date Filed: 12/15/22	OTN/LiveScan Number A 396226-5	Complaint Number IFS210061	Incident Number
Defendant Name	First: ARISTEDES	Middle:	Last: AQUINO	

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"/>	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 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 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 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: CR-409-22	Date Filed: 12/15/22	OTN/LiveScan Number R 394226-5	Complaint/Incident Number IFS210061
Defendant Name:	First: ARISTEDES	Middle:	Last: AQUINO

- 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)

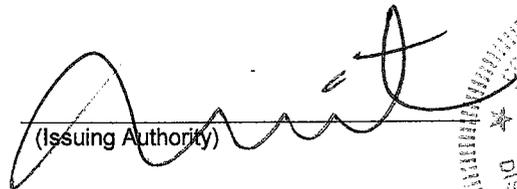
(Date) _____ (Year)

AND NOW, on this date December 5, 2022 I certify that the complaint has been properly completed and verified.

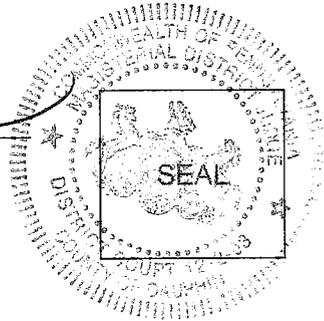
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CA-409-22	Date Filed: 12/15/22	OTN/LiveScan Number A 39 6226-5	Complaint/Incident Number IFS210061
Defendant Name:	First: ARISTEDES	Middle:	Last: AQUINO

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

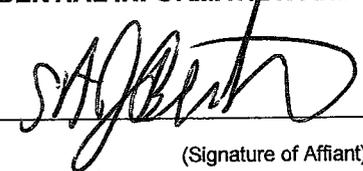
Docket Number: CR-409-22	Date Filed: 12/15/22	OTN/LiveScan Number: A 3962265	Complaint/Incident Number: IFS210061
Defendant Name:	First: ARISTEDES	Middle:	Last: AQUINO

- 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.

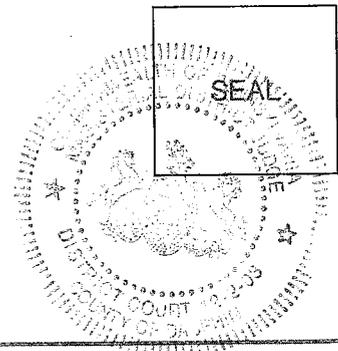
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



 (Signature of Affiant)

Sworn to me and subscribed before me this 5th day of December 2022
12/15/2022 Date _____, Magisterial District Judge

My commission expires first Monday of January,



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):
ROBERTO **GOMEZ-GOMEZ**
 First Name Middle Name Last Name
 221 E. Eleanor Street
 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 CV-405-22	Date Filed 12/15/22	OTN/LiveScan Number R396484	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 01/10/1970	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				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** OLN 25747957 **WEIGHT (lbs.)** 200

Defendant Fingerprinted YES NO **Ft. HEIGHT In.** 5 8

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 TO PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-40500	Date Filed: 12/15/22	OTN/LiveScan Number R 396148-4	Complaint/Incident Number IFS210061
Defendant Name:	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

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

Inchoate Offense	<input type="checkbox"/> 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 did intentionally obtain or withhold property of another by deception; to wit: the defendant 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 vehicle(s) that were to be exported and were never meant to be titled / registered in the United States.

Inchoate Offense	<input type="checkbox"/> 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			
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: 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: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

Inchoate Offense	<input type="checkbox"/> 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 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
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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"/>	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
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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: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

Inchoate Offense	<input type="checkbox"/> 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	(b)(3)	of the	18	1	F3 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): **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"/>	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: 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"/>	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, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 405-02</i>	Date Filed: <i>12/15/02</i>	OTN/LiveScan Number <i>R 396148-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

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 OFFENSES**

Acts of the accused associated with this Offense: The defendant, 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 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 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 Auto Body and 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"/>	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 through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a car dealership.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CV 405-22</i>	Date Filed: <i>12/15/20</i>	OTM Live Scan Number <i>K 396148-4</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ	

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"/>	13	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"/>	14	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:



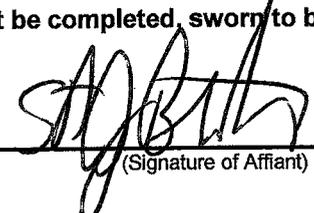
POLICE CRIMINAL COMPLAINT

Docket Number: <i>CI 405-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 596148-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

- 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) _____



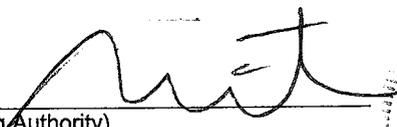
 (Signature of Affiant)

AND NOW, on this date *12-5-22* I certify that the complaint has been properly completed and verified.

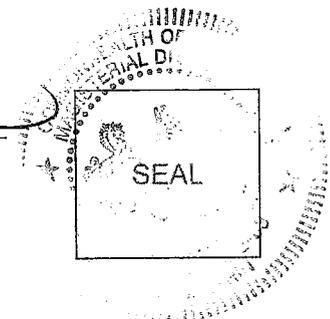
An affidavit of probable cause must be completed before a warrant can be issued.

122-03

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>W-405-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number: <i>R 396198 4</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

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>CP-203-20</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R396148-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

- 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.

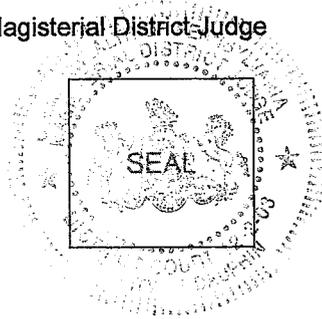
I, JEREMY BECKER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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 of Affiant)

Sworn to me and subscribed before me this *12/15/22* day of *December* *2022*
[Signature], Magisterial District Judge

My commission expires first Monday of January,



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):
AHMED **LOPEZ-ROMAN**
 First Name Middle Name Last Name
 1210 E. Venango Street
 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 CR-408-22	Date Filed 12/5/22	OTN/LiveScan Number R3961952	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 01/21/1972	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA					
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input 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 checked="" 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 checked="" 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 314044MA4	MNU Number OLN 27946315				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				FL. 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 TO PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AHMED	Middle:	Last: LOPEZ-ROMAN

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

Inchoate Offense	<input type="checkbox"/> 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 did intentionally obtain or withhold property of another by deception; to wit: the defendant did present or cause to present, false, incomplete or misleading information material to a fraudulent Pennsylvania Temporary Vehicle Registration Plate that was being depicted as an legitimate Temporary Registration Plate obtained from the Pennsylvania Department of Transportation (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: 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: AHMED	Middle:	Last: LOPEZ-ROMAN

Inchoate Offense	<input type="checkbox"/> 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	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): IDENTITY THEFT

Acts of the accused associated with this Offense: A person 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 was in possession of a fake Pennsylvania Temporary vehicle Registration Plate which possessed the Dealer Identification Number (DIN) of a dissolved business that expired in early 2000s.

Inchoate Offense	<input type="checkbox"/> 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	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 pertaining to a fraudulent Pennsylvania Temporary Registration Plate.

Inchoate Offense	<input type="checkbox"/> 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: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent: (3) has possession of, sells or attempts to sell, uses or displays a certificate of title, registration card or plate, driver's license, inspection certificate proof of financial responsibility or any other document issued by the department, knowing it to have been altered, forged or counterfeited; to wit: the defendant, with fraudulent intent, was in possession of a fake Temporary Pennsylvania Registration Plate.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: AHMED	Middle:	Last: LOPEZ-ROMAN

Inchoate Offense	<input type="checkbox"/> 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	4904	(b)	of the	18	1	MT 113		
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: 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:

Inchoate Offense	<input type="checkbox"/> 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	1	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 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 or causes to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information. to wit: the defendant 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"/>	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, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-408-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396195-2	Complaint/Incident Number IFS210061
Defendant Name:	First: AHMED	Middle:	Last: LOPEZ-ROMAN

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 ACTIVITY, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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 engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used income or proceeds of income derived from those activities to further the continued operations of his fake Pennsylvania Temporary Registrations Plates.

Inchoate Offense	<input type="checkbox"/> 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 through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of the issuance of fake Pennsylvania Temporary Registration Plates to individuals within this organization.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-408-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396195-2	Complaint Number IFS210061	Incident Number
Defendant Name	First: AHMED	Middle:	Last: LOPEZ-ROMAN	

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"/>	13	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.

<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)(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"/>				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-408-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 396195-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: AHMED	Middle:	Last: LOPEZ-ROMAN

- 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.)

Shah B. Baker

(Signature of Affiant)

(Date)

(Year)

AND NOW, on this date Dec. 5, 2022 I certify that the complaint has been properly completed and verified.

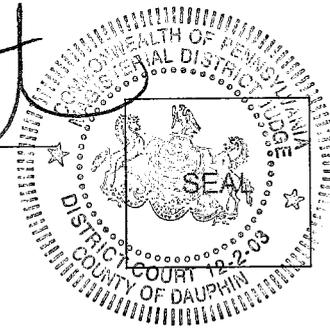
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

(Magisterial District Court Number)

[Handwritten Signature]

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-408-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>A 396195-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: AHMED	Middle:	Last: LOPEZ-ROMAN

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-408-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>A 396195-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: AHMED	Middle:	Last: LOPEZ-ROMAN

- 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.

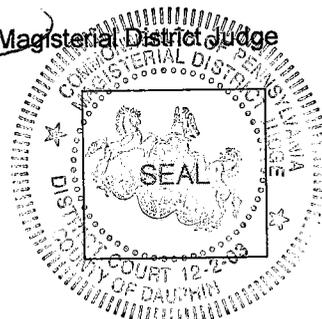
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *5th* day of *December* *2022*
12/5/2022 Date _____
 _____, 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: JEAN C. AQUINO-BELEN
First Name Middle Name Last Name
4076 Benner Street
Philadelphia, PA 19135

RECEIVED
DEC - 5 2022
DISTRICT COURT 12-2-03

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-40422</u>	Date Filed <u>12/15/22</u>	OTN/LiveScan Number <u>R396127-4</u>	Complaint Number <u>IFS210061</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>03/18/1995</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name <u>AKA AQUINO</u>	Middle Name	Last Name <u>BELEN</u>	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 <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
FBI Number <u>27675HF4</u>	MNU Number <u>OLN 32502881</u>	<u>230</u>
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		FL HEIGHT In.
Fingerprint Classification:		<u>5</u> <u>11</u>

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, <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 TO PRESENT (County Code)	



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JEAN	Middle: C.	Last: AQUINO-BELEN

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

Inchoate Offense	<input type="checkbox"/> 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 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, false, incomplete or misleading information material to out of state salvage vehicle(s) that were titled and never present within the state of Pennsylvania in addition to stolen vehicle(s) that were reVin'd and titled by deceptive means.

Inchoate Offense	<input type="checkbox"/> 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: 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: <i>CR-40422</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 396127-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JEAN	Middle: C.	Last: AQUINO-BELEN

<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	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: A person 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 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"/>	05	7121	(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): **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"/>	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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr-404-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R39627-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JEAN	Middle: C.	Last: AQUINO-BELEN

Inchoate Offense	<input type="checkbox"/> 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	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"/>	08	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 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"/>	09	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.



POLICE CRIMINAL COMPLAINT

Docket Number: CF-40422	Date Filed: 10/15/22	OTN/LiveScan Number R 396127-4	Complaint/Incident Number IFS210061
Defendant Name: JEAN		Middle: C.	Last: AQUINO-BELEN

Inchoate Offense	<input type="checkbox"/> 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	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, 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 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"/>	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, 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 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 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-404-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 39427-4</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: JEAN	Middle: C.	Last: AQUINO-BELEN	

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"/>	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
-------------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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"/>	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
-------------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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"/>	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
-------------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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).

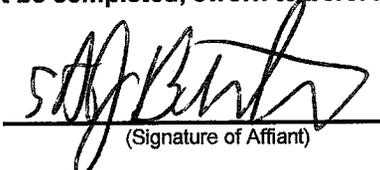


POLICE CRIMINAL COMPLAINT

Docket Number: <i>CJ-40122</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R396127-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JEAN	Middle: C.	Last: AQUINO-BELEN

- 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)

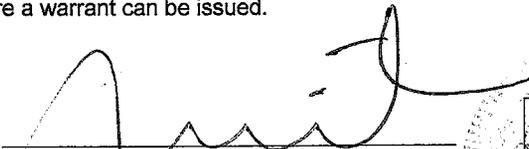
(Date) _____ (Year) _____

AND NOW, on this date 12-5-22 I certify that the complaint has been properly completed and verified.

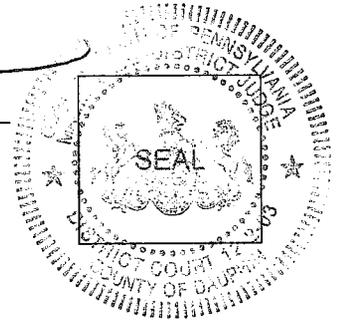
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr-305-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R396127-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JEAN	Middle: C.	Last: AQUINO-BELEN

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

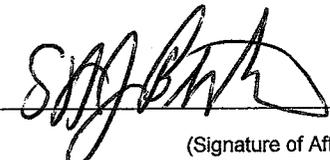
Docket Number: <i>CR-404-22</i>	Date Filed: <i>12/15/22</i>	QTN/LiveScan Number <i>R 39 6127-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JEAN	Middle: C.	Last: AQUINO-BELEN

- 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.

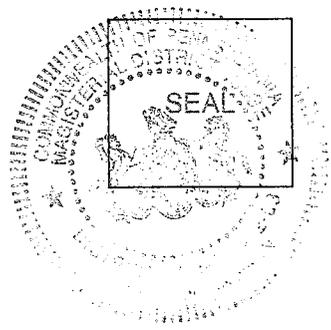
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



(Signature of Affiant)

Sworn to me and subscribed before me this *5th* day of *December* *2022*
12/15/22 Date _____, Magisterial District Judge

My commission expires first Monday of January,



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):
RAFAEL **SANTIAGO-**
 First Name Middle Name Last Name
 5900 Bennington Street, Apt 1
 Philadelphia, PA 19120

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CF-407-22 Date Filed: 1/15/22 OTN/LiveScan Number: R396199-6 Complaint Number: IFS210061 Incident Number: _____ Request Lab Services? YES NO

GENDER: Male Female DOB: 10/02/1975 POB: _____ Add'l DOB: / / Co-Defendant(s) 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: _____ WEIGHT (lbs.): 150

FBI Number: 645350EB6 MNU Number: OLN 27355765 Ft. HEIGHT In.: 5 10

Defendant Fingerprinted: YES NO

Fingerprint Classification: _____

DEFENDANT VEHICLE INFORMATION

Plate #: _____ State: _____ Haz mat: Registration: _____ Comm'l Veh. Ind.: School Veh.: Oth. NCIC Veh. Code: _____ Reg. same as Def.:

VIN: _____ Year: _____ Make: _____ Model: _____ Style: _____ Color: _____

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

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

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 TO PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 401-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396199-6</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

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

Inchoate Offense	<input type="checkbox"/> 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	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 intentionally obtain or withhold property of another by deception; to wit: the defendant 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) through his business, Carla Matia Auto Sales LLC. As a result of the defendant's deception, the fraudulent paperwork enabled Pennsylvania vehicle titles to be issued and/or obtained for the sale of vehicle(s), some of which, contained 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 _____					
<input type="checkbox"/>	03	3925	(a)	of the	18	1			
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): 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: Cr 207-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396199-6	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

<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	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	
Statute Description (include the name of statute or ordinance): IDENTITY THEFT								
Acts of the accused associated with this Offense: A person 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 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 _____				
<input type="checkbox"/>	05	7121	(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): 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 _____				
<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	
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.								



POLICE CRIMINAL COMPLAINT

Docket Number: <i>C-401-22</i>	Date Filed: <i>D15122</i>	OTN/LiveScan Number <i>R396199-6</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

<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	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): **DEPECTIVE 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 had knowledge of the submission of 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	M3	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): **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.

<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	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: 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 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>C-40125</i>	Date Filed: <i>01-19-22</i>	OTN/LiveScan Number <i>R396199-6</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

Inchoate Offense	<input type="checkbox"/> 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: 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"/>	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, 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 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, 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 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 40722</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396199</i>	Complaint Number <i>4FS210061</i>	Incident Number
Defendant Name	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO	

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 _____					
<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	
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 Carla 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 _____					
<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	
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.									

Inchoate Offense	<input type="checkbox"/> 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	
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-401-22</i>	Date Filed: <i>DIS 12</i>	OTN/ LiveScan Number <i>R 396/99-6</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO	

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 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:

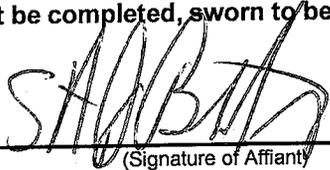


POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-707-22</u>	Date Filed: <u>12/15/22</u>	OTN/LiveScan Number <u>R396199-6</u>	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

- 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.)

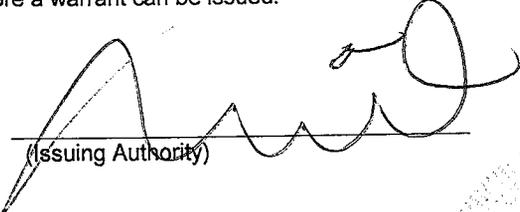

 (Signature of Affiant)

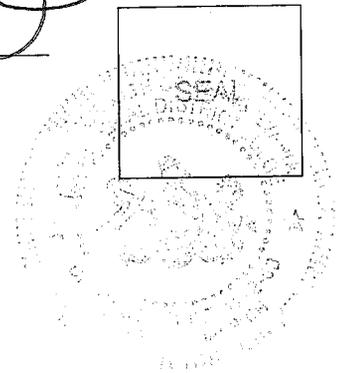
(Date) _____ (Year) _____

AND NOW, on this date 12-5-22 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)


 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CF-407-22	Date Filed: 12-15-22	OTN/LiveScan Number R3961996	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

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-407-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R3916976</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

- 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 *5th* day of *December* *2022*

12/15/22 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January,



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):
OSIRIS M. **FERNANDEZ-**
 First Name Middle Name Last Name
 3230 Birch Street
 Philadelphia, PA 19154

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-415-2022	Date Filed 12/15/2022	OTN/LiveScan Number R 3963610	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 10/16/1982	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 checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input checked="" 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)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number 2FJVJ09TV	MNU Number OLN 31848303			200	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:			Ft. HEIGHT In. 5 10	

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 TO PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-415-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396 3610	Complaint/Incident Number IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

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: 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"/>	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 did intentionally obtain or withhold property of another by deception; to wit: the defendant did present or cause to present, false, incomplete or misleading information material to the condition of vehicle(s) at the time of the sale, in which, the defendant obtained titles for those vehicle(s) that were never completely repaired to manufacturer standards and/or the vehicle(s) were never meant to remain within the United States and the branding "export only" was removed (i.e. washed), deceiving the buyer into the purchase of an unsafe vehicle.

<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	3925	(a)	of the	18	1			
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: 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: CR-415-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396361-0	Complaint/Incident Number IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

<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	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"/>	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
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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		
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: CR-415-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396361-0	Complaint/Incident Number IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

<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	(b)(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: 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"/>	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: 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.

<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, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-415-7002	Date Filed: 12/15/2002	OTN/LiveScan Number R 396 361-C	Complaint/Incident Number IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

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		
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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 checked="" 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 OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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		
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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 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 further the operation of his unlicensed dealership.

Inchoate Offense	<input type="checkbox"/> 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		
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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 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 the sale of his own vehicle(s) and the furtherance of other auto dealerships and/or businesses within this enterprise.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-415-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R396361-0	Complaint Number IFS210061	Incident Number
Defendant Name	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ	

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"/>	13	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"/>	14	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 _____
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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:



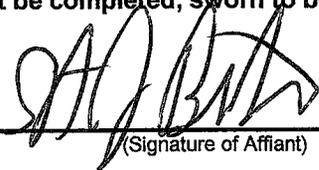
POLICE CRIMINAL COMPLAINT

Docket Number: CR-415-2022	Date Filed: 12/5/2022	OTN/LiveScan Number: R390301-0	Complaint/Incident Number: IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

- 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)

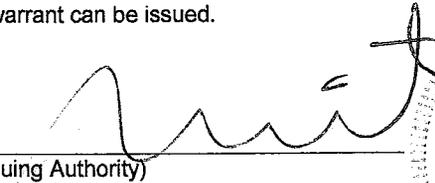
(Date) _____ (Year)

AND NOW, on this date December 5, 2022 I certify that the complaint has been properly completed and verified.

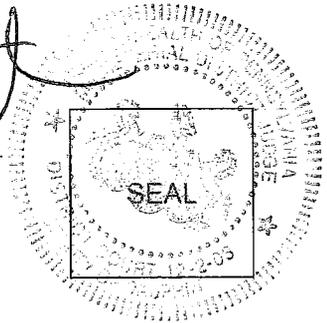
An affidavit of probable cause must be completed before a warrant can be issued.

12-8-03

(Magisterial District Court Number)



(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-415-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number: <i>R 396361-0</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

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

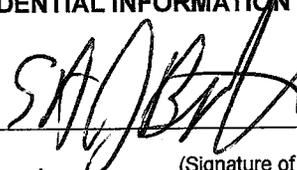
Docket Number: <i>CR-415-7082</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396361-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: OSIRIS	Middle: M.	Last: FERNANDEZ-GONZALEZ

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

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

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

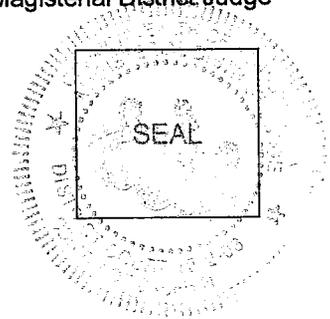
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



 (Signature of Affiant)

Sworn to me and subscribed before me this *5th* day of *December* *2022*
12/5/2022 Date _____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

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

DEFENDANT:
JUANA

(NAME and ADDRESS):
BELEN-DE

First Name

Middle Name

Last Name

5919 Saul Street
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 CR - 403-22	Date Filed 12/5/22	OTN/LiveScan Number R 396128-5	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 03/08/1986	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name		Last Name
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 **OLN 33005900**

Defendant Fingerprinted YES NO Ft. HEIGHT In.

Fingerprint Classification: 5 2

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 TO PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-DE EVANGELISTA

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: 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"/>	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 did intentionally obtain or withhold property of another by deception; to wit: the defendant 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 vehicles that were used for the sale of reVin'd and/or stolen 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	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: 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: JUANA	Middle:	Last: BELEN-DE EVANGELISTA

Inchoate Offense	<input type="checkbox"/> 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	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): IDENTITY THEFT

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



POLICE CRIMINAL COMPLAINT

Docket Number: CR-403-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396128-5	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-DE EVANGELISTA

Inchoate Offense	<input type="checkbox"/> 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	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 _____				
<input type="checkbox"/>	08	4904	(b)	of the	18	1	M3	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): 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 _____				
<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		
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.								



POLICE CRIMINAL COMPLAINT

Docket Number: CR-403-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396128-5	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-DE EVANGELISTA

<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	_____	_____
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): 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.

<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	_____	_____
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): TAMPERING WITH PUBLIC RECORDS OR INFORMATION

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 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	_____	_____
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): CRIMINAL CONSPIRACY - DEALING IN PROCEEDS OF UNLAWFUL ACTIVITIES, ETC

Acts of the accused associated with this Offense: The defendant, 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 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: CR-403-22	Date Filed: 12/5/22	OTN/LiveScan Number A 396128-5	Complaint Number IFS210061	Incident Number
Defendant Name	First: JUANA	Middle:	Last: BELEN-DE EVANGELISTA	

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"/>	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	
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 Carla Matia Auto 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 _____					
<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	
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 Carla Maita Auto 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 _____					
<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	
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: CR-403-22	Date Filed: 12/15/22	OTN/LiveScan Number A 396128-5	Complaint Number IFS210061	Incident Number
Defendant Name	First: JUANA	Middle:	Last: BELÉN - DE EVANGELISTA	

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
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:								

<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-403-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396128-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-DE EVANGELISTA

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

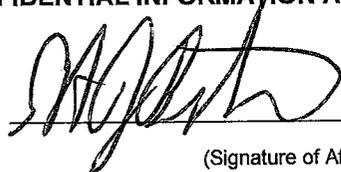
Docket Number: <i>CR-403-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>A 396128-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-DE EVANGELISTA

- 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.

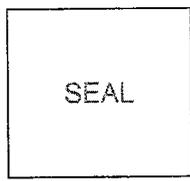


(Signature of Affiant)

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

_____ Date _____, Magisterial District Judge

My commission expires first Monday of January, _____



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):
JUANA **BELEN-VALDEZ**
 First Name Middle Name Last Name
 5923 Saul Street
 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 CR-406-22	Date Filed 12/5/22	OTN/LiveScan Number R 396149-5	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 06/28/1974	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name AKA JUANA	Middle Name	Last Name VALDEZ	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 WEIGHT (lbs.)

FBI Number **K7F045CPF** MNU Number **170**

Defendant Fingerprinted YES NO Ft. HEIGHT in.

Fingerprint Classification: **5 4**

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 TO PRESENT
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-VALDEZ

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

Inchoate Offense	<input type="checkbox"/> 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 did intentionally obtain or withhold property of another by deception; to wit: the defendant 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 vehicles and used for deceptive means.

Inchoate Offense	<input type="checkbox"/> 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: 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: JUANA	Middle:	Last: BELEN-VALDEZ

Inchoate Offense	<input type="checkbox"/> 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	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): **IDENTITY THEFT**

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



POLICE CRIMINAL COMPLAINT

Docket Number: CA-406-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396149-5	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-VALDEZ

<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): **DEPECTIVE 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).

<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	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.

<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 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: CR-406-22	Date Filed: 12/5/22	OTN/LiveScan Number R 396149-5	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-VALDEZ

Inchoate Offense	<input type="checkbox"/> 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		

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"/>	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		

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, 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 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		

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, 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 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-46-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>A 396149-5</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First JUANA	Middle:	Last: BELEN-VALDEZ	

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"/>	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 Carla Matia Auto 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"/>	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 a Carla Matia Auto 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"/>	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>CR-406-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number: <i>A 396149-5</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First JUANA	Middle:	Last: BELEN-VALDEZ	

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			

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



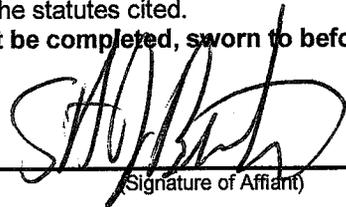
POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-406-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>A 396149-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-VALDEZ

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

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

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



(Signature of Affiant)

(Date)

(Year)

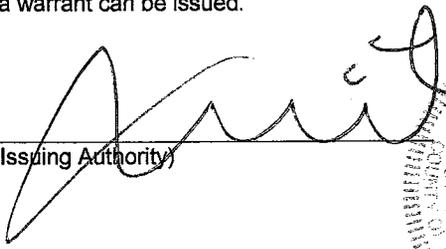
AND NOW, on this date

Dec. 5, 2022

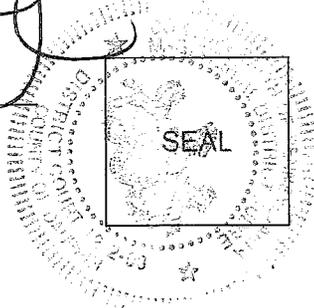
I certify that the complaint has been properly completed and verified.

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

12-2-03
(Magisterial District Court Number)



(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-406-22</i>	Date Filed: <i>12/17/22</i>	OTN/LiveScan Number <i>R 396149-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-VALDEZ

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
37. J&J Car & Truck Sales LLC



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-406-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 396149-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JUANA	Middle:	Last: BELEN-VALDEZ

- 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.

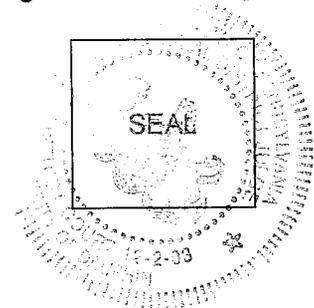
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *5th* day of *December* *2022*
12/5/2022 Date _____, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

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

DEFENDANT:
ALBERT
First Name

(NAME and ADDRESS):

LUCIANO
Last Name

Middle Name

2617 N. 8th 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 <i>Cf-421-22</i>	Date Filed <i>05/22</i>	OTN/LiveScan Number <i>R3967552</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 04/01/1998	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				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 WEIGHT (lbs.)

FBI Number MNU Number OLN 31698197

Defendant Fingerprinted YES NO FT. HEIGHT In.

Fingerprint Classification: 5 10

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>CP 421-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396755-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

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: 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"/>	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 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 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 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: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

Inchoate Offense	<input type="checkbox"/> 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 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
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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"/>	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 did intentionally obtain or withhold property of another by deception; to wit: the defendant did present or cause to present, false, incomplete or misleading information material to MV-426B vehicle title application(s) that were submitted to the Pennsylvania Department of Transportation (Penn DOT) for a vehicle(s) that was never repaired and /or restored to vehicle's original operating condition as designed by the vehicle manufacturer and must conform to the original manufacturer's specifications and appearance to the manufacture standards.



POLICE CRIMINAL COMPLAINT

Docket Number: CR 21-72	Date Filed: 12/15/22	OTN/LiveScan Number R 396752	Complaint/Incident Number IFS210061
Defendant Name:	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

<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	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		
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: On two (2) occasions 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 _____				
<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		
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 _____				
<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		
Statute Description (include the name of statute or ordinance): ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS								
Acts of the accused associated with this Offense: The defendant with fraudulent intent, have possession of, sell or attempt to sell, use or display a certificate of title, registration card or plate, driver's license, inspection certificate, proof of financial responsibility or any other document issued by the department, namely (MV426B Application(s)), knowing it to have been altered, forged or counterfeited, in violation of Section 7122(3) of the PA Vehicle Code								



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR42122</i>	Date Filed: <i>12-15-12</i>	OTN/LiveScan Number <i>R396755-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

<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	4904	(b)	of the	18	1	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: 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.

<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?	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 ACTIVITY , ETC**

Acts of the accused associated with this Offense: The defendant, 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 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.

<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	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 LSM Auto Mall Inc., and/or Abby Auto.



POLICE CRIMINAL COMPLAINT

Booklet Number: CR 72122	Date Filed: 12/5/22	OTN/LiveScan Number R 396753-2	Complaint Number IFS210061	Incident Number
Defendant Name	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ	

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"/>	13	911	(B)(2)	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)	<input type="checkbox"/> 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 LSM AUto Mall Inc and/or Abby Auto.

<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"/>	14	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)	<input type="checkbox"/> 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.

<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"/>	15	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)	<input type="checkbox"/> 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).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR42-22</i>	Date Filed: <i>12-15-22</i>	OTN/LiveScan Number <i>R 396755-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

- 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)

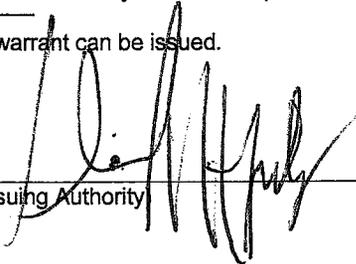
(Date) _____ (Year)

AND NOW, on this date *12-6-22* I certify that the complaint has been properly completed and verified.

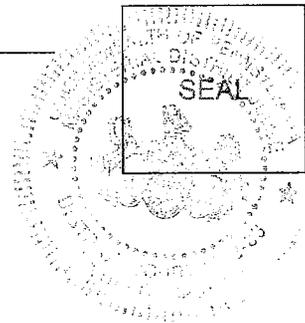
An affidavit of probable cause must be completed before a warrant can be issued.

18-203

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-40122</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R396755 2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

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>CP 421-22</i>	Date Filed: <i>12/19/22</i>	OTN/LiveScan Number: <i>R 3967 55-2</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: ALBERT	Middle:	Last: LUCIANO-RODRIGUEZ

- 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.

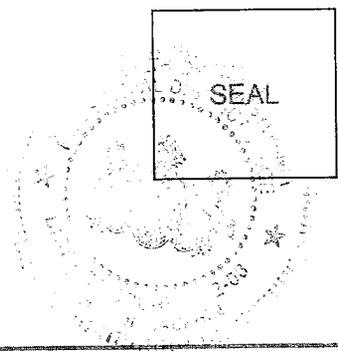
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *12/19/22* day of *December* *2022*
 _____, Magisterial District Judge

My commission expires first Monday of January, *2024*





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

RECEIVED
DEC - 5 2022
DISTRICT COURT 12-2-03

DEFENDANT: (NAME and ADDRESS):
MOHAMED KERDI
First Name Middle Name Last Name

3005 Ashley Court
Bensalem, PA 19020

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>CV-420-22</u>	Date Filed <u>12/15/22</u>	OTN/LiveScan Number <u>R3967434</u>	Complaint Number <u>IFS210061</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
--	--------------------------------------	---	---	------------------------	--

GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>08/21/1975</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
	First Name	Middle Name	Last Name	Gen.
	AKA			

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input 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 checked="" 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 checked="" 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 <u>OLN 29336915</u>	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT in.
Fingerprint Classification:		<u>6</u> <u>1</u>

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)

- 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)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>W-47022</i>	Date Filed: <i>12/15/20</i>	OTN/LiveScan Number <i>R396743-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI

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

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

Inchoate Offense	<input type="checkbox"/> 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 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 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 _____
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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
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

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



POLICE CRIMINAL COMPLAINT

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

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.

Inchoate Offense	<input type="checkbox"/> 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 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 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): **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"/>	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 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 false, incomplete or misleading information material to MV 426B title application(s) for out-of-state vehicles that were never present for an enhanced inspection within the Commonwealth of Pennsylvania as purported within the documentation submitted to Penn DOT.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>W-42022</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396743-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI

<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: 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 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.

<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: 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?	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**



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CV 420-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R3967434</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI

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"/>	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		

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 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 OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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**



POLICE CRIMINAL COMPLAINT

Docket Number: CV 42022	Date Filed: 12 SP2	OTN/LiveScan Number R396743-4	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI

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 further the operation of Charo's Auto Sales.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 420-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R396743-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI

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
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29. Nora RODRIGUEZ
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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 42022</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396743-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI

- 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.

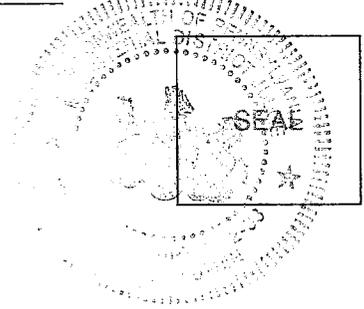
[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *16th* day of *December* *2022*
12/16/22 Date _____

My commission expires first Monday of January, *2024*

_____, Magisterial District Judge



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:
JIMMY

(NAME and ADDRESS):

RODRIGUEZ-

First Name

Middle Name

Last Name

Ge

4345 Potter Street
Philadelphia, PA 19124

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 CR-432-2022	Date Filed 12/15/2022	OTN/LiveScan Number R 3967703	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/17/1961	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 checked="" 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 checked="" 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 checked="" 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 625060VA9	MNU Number OLN 24262513	185
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Ft. HEIGHT In.	
Fingerprint Classification:	5	4

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"/>	Other NCIC Veh. Code RECEIVED	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color DEC 09 2022		

Office of the attorney for the Commonwealth Approved Disapproved because: DISTRICT COURT 12-2-03

(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 / BDG # 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-422-0022</i>	Date Filed: <i>1/21/10</i>	OTN/LiveScan Number <i>R 346770-3</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JIMMY	Middle:	Last: RODRIGUEZ-COSME

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	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 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.

Inchoate Offense	<input type="checkbox"/> 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)(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 _____
------------------	--	---	---	---

<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

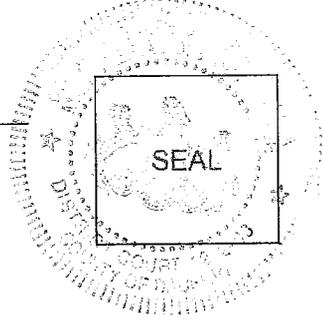
Docket Number: <i>CR-477-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number <i>R 396770-3</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JIMMY	Middle:	Last: RODRIGUEZ-COSME

- 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) *SAPK*
 (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) *[Signature]* (Issuing Authority) 



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-477-9023</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396770-3</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JIMMY	Middle:	Last: RODRIGUEZ-COSME

AFFIDAVIT of PROBABLE CAUSE

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

Your affiant has been conducting a criminal investigation into violations of the criminal laws of the Commonwealth of Pennsylvania. This investigation has used the resources of the Forty-Seventh Statewide Investigating Grand Jury. On November 15, 2022, the Forty-Seventh Statewide Investigating Grand Jury issued Presentment No. 18. On November 17, 2022 the Honorable Supervising Judge Lillian H. Ransom, First Judicial District, Philadelphia County, Pennsylvania, entered a court order accepting the Grand Jury's recommendation of charges and findings. The Presentment, attached and herein incorporated by reference, recommends that the Attorney General of Pennsylvania or his designee file the charges specified in this criminal complaint and Presentment No. 18 against the below listed individuals and corporations. Pursuant to 18 Pa. C.S.A. §307 (a)(3) – A corporation may be convicted of the commission of an offense if: (3) the commission of the offense was authorized, requested, commanded, performed or recklessly tolerated by the board of directors or a high managerial agent acting in behalf of the corporation within the scope of his office or employment.

1. Igor DRATCH
2. Oleg ZELENKO
3. David MORRISON
4. Angel MENDEZ
5. Jefferson LOOR VALET
6. Maria PINEDA
7. Indalecia VASQUEZ
8. Somary IBETH Otanez De LOOR
9. Beaki Antonia PEREZ
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 RODRIGUEZ 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-411-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396770-3</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JIMMY	Middle:	Last: RODRIGUEZ-COSME

- 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.

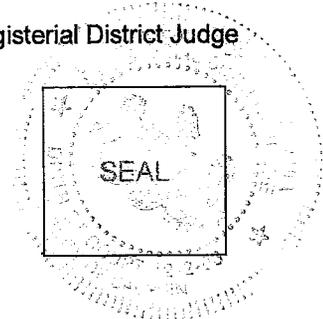
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

(Signature of Affiant)

Sworn to me and subscribed before me this *12/15* day of *December* *2022*
12/15/2022 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):

JESSICA

L.

ENGELKE

First Name

Middle Name

Last Name

Ge

321 Washington Avenue, Apt 2
Souderton, PA 18964

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>C-428-22</u>	Date Filed <u>12/5/22</u>	OTN/LiveScan Number <u>R396827-Y</u>	Complaint Number <u>IFS210061</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>02/08/1968</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>			
First Name <u>AKA JESSICA</u>		Middle Name <u>L.</u>		Last Name <u>WILCOX</u>			
Gen.							
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input 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 checked="" 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 checked="" type="checkbox"/> BLN (Blonde / Strawberry)							
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input checked="" 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 <u>OLN 21558370</u>						
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Fl. HEIGHT In.			
Fingerprint Classification:				<u>5</u>	<u>7</u>		
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

(Name of the Affiant)

737643 / BDG # 736

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

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

in DAUPHIN County

[22]

(County Code)

on or about 2018 - PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>C-428-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R396827-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

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: 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	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
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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 _____
---	---	--	--	---

<input type="checkbox"/>	03	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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: C-228-22	Date Filed: 12/15/22	OTN/LiveScan Number R 356827-4	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

<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	4904	(b)	of the	18	1	M3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

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

<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	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.

<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	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, 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.



POLICE CRIMINAL COMPLAINT

Rocket Number: C42822	Date Filed: 12/5/22	OTN/LiveScan Number R376527-4	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

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"/>	07	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 OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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 _____
-------------------------	---	--	--	--

<input type="checkbox"/>	08	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 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 further the operations of 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 _____
-------------------------	---	--	--	--

<input type="checkbox"/>	09	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 a car dealership.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>01-428-22</i>	Date Filed: <i>12/5/20</i>	OTN/LiveScan Number <i>R 396 527-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

<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?	10	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.

<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?	11	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 _____
---	---	--	--	---

<input type="checkbox"/> Lead?				of the					
	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: CJ 428-22	Date Filed: 12/5/22	OTN/LiveScan Number R 3768 27-4	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

- 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 of Affiant)

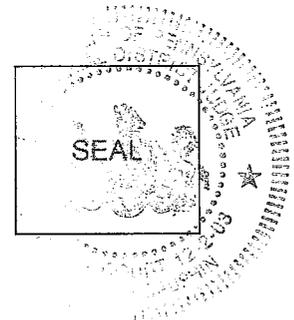
AND NOW, on this date 12-6-22 I certify that the complaint has been properly completed and verified.

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

12-203

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: Cr 428-02	Date Filed: 12/5/22	OTN/LiveScan Number R 396827-4	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

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

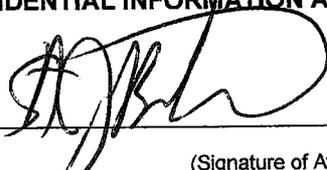
Docket Number: <i>CR 428-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R39 4827-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JESSICA	Middle: L.	Last: ENGELKE

- 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)

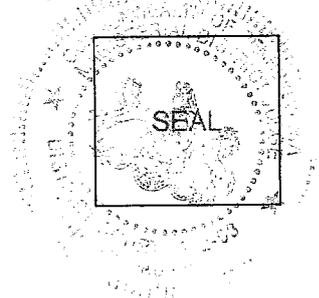
Sworn to me and subscribed before me this 8th day of

12/8/22 Date

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

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

DEFENDANT:
EDGAR

(NAME and ADDRESS):

COLLADO

First Name

Middle Name

Last Name

Ge
n

4601 Flatrock Road, Unit 604
Philadelphia, PA 19127

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 414-7022</u>	Date Filed <u>12/5/2022</u>	OTN/LiveScan Number <u>R 3967821</u>	Complaint Number <u>IFS210061</u>	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>02/04/1997</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
First Name		Middle Name		Last Name	
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 OLN 31330322

Defendant Fingerprinted YES NO Ft. HEIGHT In.

Fingerprint Classification: 5 10

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	<p style="text-align: center; font-size: 2em; opacity: 0.5;">RECEIVED</p> <p style="text-align: right;">DEC 05 2022</p>	

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). DISTRICT COURT 12-2-03

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 / BDG # 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: CR-474-7622	Date Filed: 12/15/2022	OTN/LiveScan Number R-396782-1	Complaint/Incident Number IFS210061
Defendant Name:	First: EDGAR	Middle:	Last: COLLADO

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	01	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 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.

<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)(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.

<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-474-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396-782-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: EDGAR	Middle:	Last: COLLADO

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 484-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396782-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: EDGAR	Middle:	Last: COLLADO

- 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]

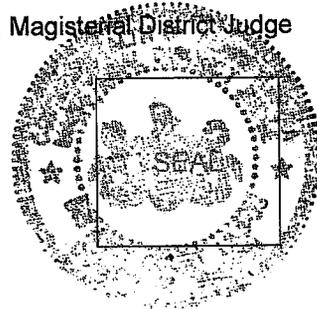
 (Signature of Affiant)

Sworn to me and subscribed before me this *12/6th* day of *DECEMBER* *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):
 NORA D. RODRIGUEZ
 First Name Middle Name Last Name
 4345 Potter Street
 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-419-2022</i>	Date Filed <i>12/5/2022</i>	OTN/LiveScan Number <i>R 396740-1</i>	Complaint Number IFS210061	Incident Number / /	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 03/10/1972	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>	
First Name AKA		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 checked="" 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 checked="" 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 checked="" 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 OLN 28872122				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:				5	4

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	RECEIVED DEC 05 2022	

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 / BDG # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

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

do hereby state: (check appropriate box)

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

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

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



POLICE CRIMINAL COMPLAINT

Docket Number: CR-419-2022	Date Filed: 121512022	OTN/LiveScan Number R 396740-1	Complaint/Incident Number IFS210061
Defendant Name:	First: NORA	Middle: D.	Last: RODRIGUEZ

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	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 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.

<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)(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.

<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-419-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396740-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: NORA	Middle: D.	Last: RODRIGUEZ

- 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.

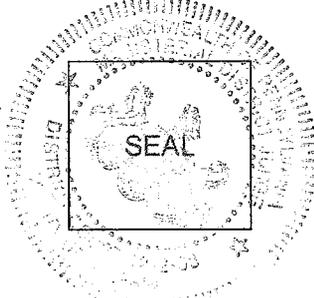
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(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) *S. Aguirre*
 (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) *[Signature]* (Issuing Authority) 



POLICE CRIMINAL COMPLAINT

Docket Number: CR-419-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396740-1	Complaint/Incident Number IFS210061
Defendant Name:	First: NORA	Middle: D.	Last: RODRIGUEZ

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>CK-414-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number: <i>R 396 740-1</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: NORA	Middle: D.	Last: RODRIGUEZ

- 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 _____ day of _____

December 2022

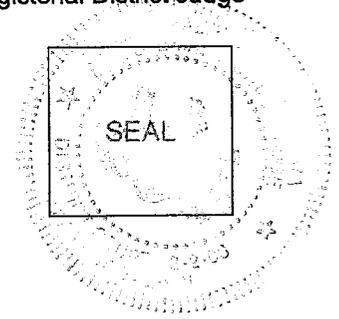
12/16/2022 Date

[Handwritten Signature]

 2024

_____, Magisterial District Judge

My commission expires first Monday of January, _____



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

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

DEFENDANT:
MOHAMMAD
First Name

(NAME and ADDRESS):

ALKURDI
Last Name

Middle Name

1000 Irvin Road
Huntingdon Valley, PA 19006

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 430-22</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number <i>R396844-0</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 01/10/1962	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 WEIGHT (lbs.)

FBI Number MNU Number OLN 23765999

Defendant Fingerprinted YES NO Ft. HEIGHT In.

Fingerprint Classification: 6 2

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>CR 430-22</i>	Date Filed: <i>12/15/22</i>	OTM/LiveScan Number <i>R 396844-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMMAD	Middle:	Last: ALKURDI

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: 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

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 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 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 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: MOHAMMAD	Middle:	Last: ALKURDI

<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	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.

<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		
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: 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 _____
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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 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 false, incomplete or misleading information material to an MV426B title application(s) that were submitted to the Pennsylvania Department of Transportation (Penn DOT).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 43072</i>	Date Filed: <i>12/15/20</i>	OTN/LiveScan Number <i>R 396544-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMMAD	Middle:	Last: ALKURDI

<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	NCIC Offense Code	UCR/NIBRS Code
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<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 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.

<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	NCIC Offense Code	UCR/NIBRS Code
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<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 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?	09	7122	(3)	of the	75	1	M1	NCIC Offense Code	UCR/NIBRS Code
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<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): **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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr 43022</i>	Date Filed: <i>12/1/20</i>	OTN/LiveScan Number <i>R 3968440</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMMAD	Middle:	Last: ALKURDI

<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	4904	(b)	of the	18	1	M3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Section	Subsection	PA Statute (Title)	Counts	Grade	<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 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.

<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?	11	5111	(a)(1)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Section	Subsection	PA Statute (Title)	Counts	Grade	<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 OF UNLAWFUL ACTIVITIES, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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.

<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	911	(b)(1)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Section	Subsection	PA Statute (Title)	Counts	Grade	<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 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: C1430-22	Date Filed: 12/5/22	OTN/LiveScan Number R396844-0	Complaint Number IFS210061	Incident Number
Defendant Name	First: MOHAMMAD	Middle:	Last: ALKURDI	

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"/>	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			
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 _____					
<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			
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 _____					
<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			
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).									



POLICE CRIMINAL COMPLAINT

Docket Number: <i>01-150-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R308 R3968842</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMMAD	Middle:	Last: ALKURDI

- 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)

(Date) _____ (Year)

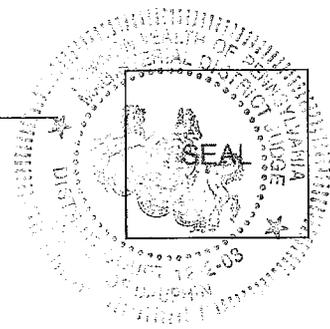
AND NOW, on this date *12-6-22* I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

 (Magisterial District Court Number)

[Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: C 430-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396844-0	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMMAD	Middle:	Last: ALKURDI

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

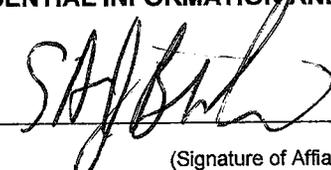
Booklet Number: C1430-22	Date Filed: 12/15/22	OTN/LiveScan Number R396844-0	Complaint/Incident Number IFS210061
Defendant Name:	First: MOHAMMAD	Middle:	Last: ALKURDI

- 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.

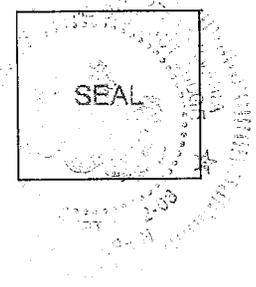
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



 (Signature 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



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

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

DEFENDANT:
EDWARD
First Name

(NAME and ADDRESS):
SALDIVAR
Middle Name Last Name

2730 Stevens Street
Philadelphia, PA 19149

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>CF 42300</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number <i>R396773-6</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 04/30/1978	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 <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) 195
FBI Number 576237FE4	MNU Number OLN 25867069	

Defendant Fingerprinted YES NO

Fingerprint Classification: _____

FL HEIGHT In. 5 8

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: C1 423-22	Date Filed: 12/13/20	OTN/LiveScan Number R 396 773 -6	Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD	Middle:	Last: SALDIVAR

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: 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"/>	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 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 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 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 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: EDWARD	Middle:	Last: SALDIVAR

Inchoate Offense	<input type="checkbox"/> 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 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 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): **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"/>	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 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 false, incomplete or misleading information material to MV 426B title application(s) for out-of-state vehicles that were never present for an enhanced inspection within the Commonwealth of Pennsylvania as purported within the documentation submitted to Penn DOT.



POLICE CRIMINAL COMPLAINT

Docket Number: Cr 403-02	Date Filed: 12 SEP 2012	OTM/LiveScan Number R396713-8	Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD	Middle:	Last: SALDIVAR

<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 Offense#	4101 Section	(a)(3) Subsection	of the 18 PA Statute (Title)	1 Counts	M1 Grade	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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"/> Lead?	08 Offense#	7121 Section	of the 75 PA Statute (Title)	1 Counts	M1 Grade	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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?	09 Offense#	7122 Section	(3) Subsection	of the 75 PA Statute (Title)	1 Counts	M1 Grade	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CP 123720</i>	Date Filed: <i>05/22</i>	OTN/LiveScan Number <i>R3967756</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD	Middle:	Last: SALDIVAR

<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	4904	(b)	of the	18	1	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		

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.

<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?	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		

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, 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 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.

<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	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		

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 Saldivar Group.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>U 42322</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396773-6</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: EDWARD	Middle:	Last: SALDIVAR	

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"/>	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	
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 _____					
<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	
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 _____					
<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	
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).									

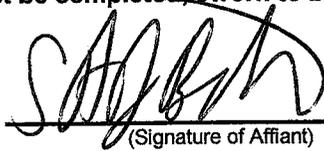


POLICE CRIMINAL COMPLAINT

Docket Number: <u>Cr 423-20</u>	Date Filed: <u>12/12/20</u>	OTN/LiveScan Number <u>R 396773-6</u>	Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD	Middle:	Last: SALDIVAR

- 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)

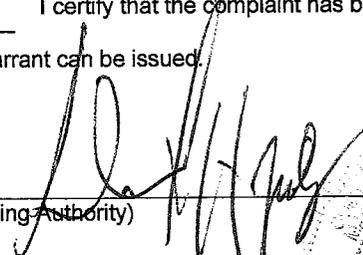
(Year)

AND NOW, on this date 12-6-20 I certify that the complaint has been properly completed and verified.

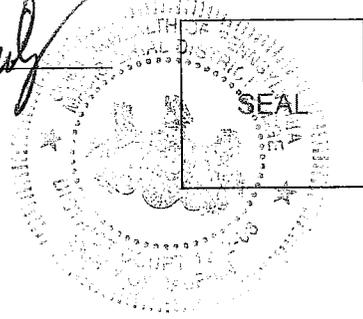
An affidavit of probable cause must be completed before a warrant can be issued.

12-203

 (Magisterial District Court Number)



 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr 423-20</i>	Date Filed: <i>12/15/20</i>	OTN/LiveScan Number <i>R 396 773-6</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD	Middle:	Last: SALDIVAR

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

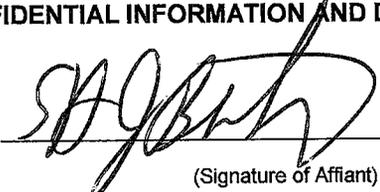
Docket Number: <i>C1423-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R396773-6</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD	Middle:	Last: SALDIVAR

- 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 *6th* day of *DECEMBER* *2022*
12/6/22 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):

ADELAIDA

MIRELIS

MENDOZA

First Name

Middle Name

Last Name

Ge

2816 N 11th 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 426-72</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number <i>R3968031</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 08/19/1972	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name AKA ADELAIDA		Middle Name	Last Name GARCIA	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 WEIGHT (lbs.)

FBI Number 794897FBO MNU Number OLN 26852517

Defendant Fingerprinted YES NO Ft. HEIGHT In.

Fingerprint Classification: 5 3

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 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 426 22</i>	Date Filed: <i>12-15-2022</i>	OTN/LiveScan Number <i>R396803-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA

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: 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"/>	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 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 applications and documents 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 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: 01 446 22	Date Filed: 12/5/22	OTN/Live Scan Number: R3968037	Complaint/Incident Number: IFS210061
Defendant Name:	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA

<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
	<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 _____
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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
	<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 _____
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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
	<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 the Pennsylvania Department of Transportation (Penn DOT), application(s) and/or titles for vehicles that were false, incomplete or misleading information material to a scheme of illegally titling vehicle within Pennsylvania and Massachusetts.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CV 20622</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396803-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA

Inchoate Offense	<input type="checkbox"/> 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: 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 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: 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"/>	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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>U 426.22</i>	Date Filed: <i>12/13/20</i>	OTN/LiveScan Number <i>L396803-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA

<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	4904	(b)	of the	18	1	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: 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.

<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?	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 ACITIVITES, ETC**

Acts of the accused associated with this Offense: The defendant, 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 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.

<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	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 JM Auto Sales and/or Jessica Auto Tags



POLICE CRIMINAL COMPLAINT

Docket Number: C142622	Date Filed: 12/15/22	OTN/LiveScan Number R 3768031	Complaint Number IFS210061	Incident Number
Defendant Name	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA	

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"/>	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 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 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 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 42622</u>	Date Filed: <u>12/5/22</u>	OTN/LiveScan Number <u>R 396803-1</u>	Complaint/Incident Number <u>IFS210061</u>
Defendant Name:	First: <u>ADELAIDA</u>	Middle: <u>MIRELIS</u>	Last: <u>MENDOZA</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.

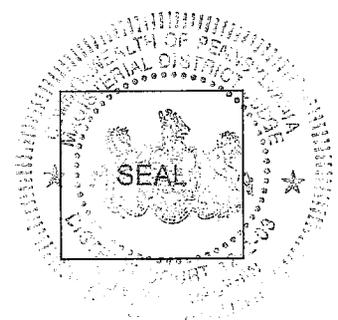
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be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

 (Date) (Year) SAG B...
(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.

12-203
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Pocket Number: C-726-22	Date Filed: 12/15/22	OTN/LiveScan Number: R-396803-1	Complaint/Incident Number: IFS210061
Defendant Name:	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA

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-42622</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396803-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ADELAIDA	Middle: MIRELIS	Last: MENDOZA

- 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 *16th* day of

December 2022

12/16/22 Date *[Signature]*

_____, Magisterial District Judge

My commission expires first Monday of January, *2024*



SEAL

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):
 ELIUD URENA-RECIO
 First Name Middle Name Last Name
 1102 Longshore Avenue
 Philadelphia, PA 19111

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>CF 425-20</i>	Date Filed <i>12/5/22</i>	OTN/LiveScan Number <i>R396789-1</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 06/16/1989	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** OLN 31522837

Defendant Fingerprinted YES NO **Ft. HEIGHT In.**

Fingerprint Classification: 5 1

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: <i>Cr 425-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396789-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ELIUD	Middle:	Last: URENA-RECIO

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: 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"/>	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 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 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 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: ELIUD	Middle:	Last: URENA-RECIO

<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 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	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): **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 _____
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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 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 present false, incomplete or misleading information material to an application for insurance.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 25-25</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396 789-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ELIUD	Middle:	Last: URENA-RECIO

Inchoate Offense	<input type="checkbox"/> 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: 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"/>	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: 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"/>	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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: C1425-22	Date Filed: 2/15/22	OTN/LiveScan Number R396789-1	Complaint/Incident Number IFS210061
Defendant Name:	First: ELIUD	Middle:	Last: URENA-RECIO

<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	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.

<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	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, 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 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.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	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 Wilfredo's Auto Repair and Tags.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>U 90502</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 3167891</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: ELIUD	Middle:	Last: URENA-RECIO	

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"/>	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	
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 _____				
<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	
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 _____				
<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	
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).								



POLICE CRIMINAL COMPLAINT

Docket Number: <i>Cr 425-22</i>	Date Filed: <i>12-5-22</i>	OTN/LiveScan Number: <i>R396789-1</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: ELIUD	Middle:	Last: URENA-RECIO

- 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)

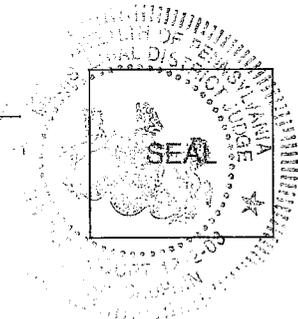
(Date) _____ (Year) _____

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)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CV 425-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R396789-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ELIUD	Middle:	Last: URENA-RECIO

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>924522</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396789-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ELIUD	Middle:	Last: URENA-RECIO

- 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.

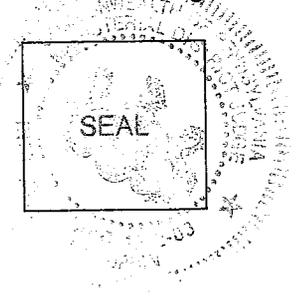
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this *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 Street
Royalton, PA 17057

Telephone: (717)944-4463



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:
MARGARETE ROSE

(NAME and ADDRESS):

First Name

Middle Name

Last Name

2139 E. Letterly Street
Philadelphia, PA 19125

Ge
n

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-477-2022	Date Filed 12/5/2022	OTN/LiveScan Number R 396804-2	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 06/20/1967	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name AKA		Middle Name	Last Name		Gen.

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input 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 checked="" 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 OLN 22330040	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT in.
Fingerprint Classification:		5 5

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	DEC 05 2022	

RECEIVED
DEC 05 2022

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. <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: CR 4873032	Date Filed: 121518030	OTN/LiveScan Number R 396809-2	Complaint/Incident Number IFS210061
Defendant Name:	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH

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: 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"/>	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 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 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 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: CR-407-0022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396804-2	Complaint/Incident Number IFS210061
Defendant Name:	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH

Inchoate Offense	<input type="checkbox"/> 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 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		
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: 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"/>	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 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 false, incomplete or misleading information material to applications of application for insurance.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-487-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396804-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH

Inchoate Offense	<input type="checkbox"/> 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: 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 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: 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"/>	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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-487-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396809-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH

Inchoate Offense	<input type="checkbox"/> 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	M3	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): **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 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	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input checked="" 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, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Washing Vehicle Titles, Deceptive Business Practices, Tampering with Public Records or Information, False Application for Certificate of Title or Registration, and Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit; the defendant did agree with one or more 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	NCIC Offense Code	UCR/NIBRS Code
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PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: It shall be unlawful for any person 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 DocuServices.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 477-8022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396804-2</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH	

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)(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.

Inchoate Offense	<input type="checkbox"/> 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 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 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-487-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396804-2</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH

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-427-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396804-2	Complaint/Incident Number IFS210061
Defendant Name:	First: MARGARETE	Middle: ROSE	Last: ALMASHAQBEH

- 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.

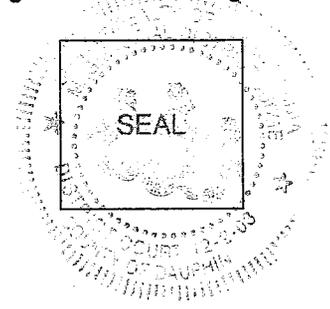
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

[Handwritten Signature]

 (Signature of Affiant)

Sworn to me and subscribed before me this 12/15/2022 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 ST.
 ROYALTON, PA 17057
 Telephone: (717)944-4463


POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.
 DEFENDANT: (NAME and ADDRESS):
 INDALECIA VASQUEZ
 703 BLUE HERON DRIVE
 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 <i>CR-410-2022</i>	Date Filed 12/05/2022	OTN/LiveScan Number <i>R 396-308-3</i>	Complaint Number	Incident Number IFS210061	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 08/14/1998	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>	
First Name AKA		Middle Name	Last Name		Gen.
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Half 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)
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)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number : OLN 32490834				
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) 7593071/#583 // 43799/#13 (PSP/MPOETC - Assigned Affiant ID Number & Badge #)
 of Lehigh County Detectives
 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 / PA 0391900 (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-410-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R3910308-3	Complaint/Incident Number IFS210061
Defendant Name	First: INDALECIA	Middle:	Last: VAZQUEZ

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	NGIC Offense 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 _____
---	---	--	--	---

<input type="checkbox"/>	02	3922	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NGIC Offense 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"/>	03	3925	(a)	of the	18	1			
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NGIC Offense 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**



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-410-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396308-3</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: INDALECTIA	Middle:	Last: VAZQUEZ

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 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"/> 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 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"/> Lead?	05	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: 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 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 type="checkbox"/> Lead?	06	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: 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, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more of the following: Jefferson Loo Valet and/or J&J Car and 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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-40-2022	Date Filed: 12/15/2022	OTN/LiveScan Number: R 3 96 308.3	Complaint/Incident Number: IFS210061
Defendant Name:	First: INDALECIA	Middle:	Last: VAZQUEZ

Inchoate Offense	<input type="checkbox"/> 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	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 J&J Car and 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"/> Lead?	08	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 J&J Car and 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"/> Lead?	09	911	(b)(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): **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: CR-410-7002	Date Filed: 12/15/2002	OTN/LiveScan Number: R 396 308 3	Complaint Number IFS210061	Incident Number
Defendant Name	First: INDALECIA	Middle:	Last: VASQUEZ	

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 _____						
<input type="checkbox"/>	10	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"/>								<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).										

Inchoate Offense	<input type="checkbox"/> 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"/>								<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		
<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

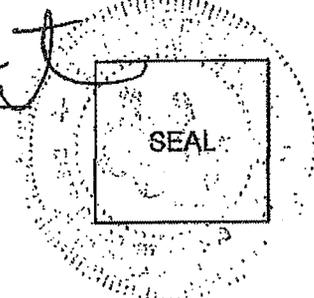
Docket Number: <i>CR-410-3092</i>	Date Filed: <i>12/15/2002</i>	OTN/LiveScan Number: <i>R396308-3</i>	Complaint/Incident Number: <i>IFS210061</i>
Defendant Name: First: INDALECIA	Middle:	Last: VAZQUEZ	

- 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) _____ *SA Rachel Strong*
 (Signature of Affiant)

AND NOW, on this date *December 5, 2002* 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.

12-303 _____ (Magisterial District Court Number)
 _____ (Issuing Authority) 



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-410-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number: <i>R 396308-3</i>	Complaint/Incident Number
Defendant Name:	First: INDALECIA	Middle:	Last: VASQUEZ

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. Adefalda GARCIA aka | 23. Rafael SANTIAGO- |
| 5. Jefferson LOOR VALET | Adefalda 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: <i>CR 410-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number: <i>R 390308-3</i>	Complaint/Incident Number
Defendant Name	First: INDALECIA	Middle:	Last: VASQUEZ

- | | | |
|---|--|------------------------------------|
| 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.

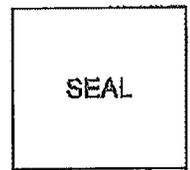
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

SA Rachel A Story

 (Signature of Affiant)

Sworn to me and subscribed before me this *5th* day of *December* *2022*
12/5/2022 Date _____, Magisterial District Judge

My commission expires first Monday of January,



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):

BEAKI ANTONIA PEREZ
First Name Middle Name Last Name Gen
445 W. LIBERTY ST.
ALLENTOWN, PA 18102

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-413-2022 Date Filed 12/05/2022 OTN/ LiveScan Number R 396341-1 Complaint Number _____ Incident Number IFS210061 Request Lab Services? YES NO

GENDER Female Male DOB: 01/01/1997 POB _____ Add'l DOB: _____ Co-Defendant(s)
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 _____ WEIGHT (lbs.) _____

FBI Number _____ MNU Number OLN 29211447

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).

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

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

of 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 nicknames 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-413-0082	Date Filed: 12/15/2022	OTN/LiveScan Number R 396 341-1	Complaint/Incident Number: IFS210061
Defendant Name:	First: BEAKI	Middle: ANTONIA	Last: PEREZ

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	

PermDOT 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.

<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	3922	(a)(1)	of the	18	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PermDOT 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 PermDOT, false, incomplete or misleading information material to an application for motor vehicle titling/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 _____
---	---	--	--	---

<input type="checkbox"/>	03	3925	(a)	of the	18	1			
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PermDOT 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**



POLICE CRIMINAL COMPLAINT

Docket Number: CR-413-2022	Date Filed: 12/5/2022	OTM/LiveScan Number R 3910 341-1	Complaint/Incident Number IFS210061
Defendant Name:	First: BEAKI	Middle: ANTONIA	Last: PEREZ

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 _____
---	---	--	--	---

<input type="checkbox"/> Lead?	04	7121	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
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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 _____
---	---	--	--	---

<input type="checkbox"/> Lead?	05	7122	(3)	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: 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?	06	903	(a)(1)	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: Dealin In Proceeds of Unlawful Activity, Theft by Deception, Receiving Stolen Property, False Application for Certificate of Title or Registration, Altered, Forced, or Counterfeit Documents, 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 Looor Valet and/or J&J Car & Truck Sales, LLC), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.

POLICE CRIMINAL COMPLAINT

Docket Number: <i>CP-413-2002</i>	Date Filed: <i>12/15/2002</i>	OTN/LiveScan Number <i>R 3910 341-1</i>	Complaint/Incident Number <i>IFS210061</i>
Defendant Name: First: BEAKI		Middle: ANTONIA	Last: PEREZ

<input type="checkbox"/> Indicate Offense	<input type="checkbox"/> 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)(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.

<input type="checkbox"/> Indicate Offense	<input type="checkbox"/> 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"/>	08	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.

<input type="checkbox"/> Indicate Offense	<input type="checkbox"/> 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"/>	09	911	(b)(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): 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-413-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number: <i>R 390.341-1</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: BEAKI	Middle: ANTONIA	Last: PEREZ

- 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.

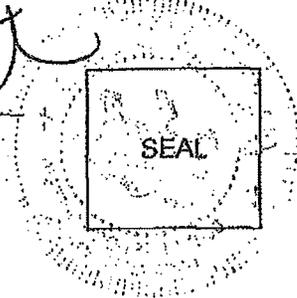
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
 (Before a warrant of arrest can be issued, an affidavit of probable cause must be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

(Date) _____ (Year) _____ *SA Rachel Struy*
 (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.

12-2-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR-413-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 3963411	Complaint/Incident Number
Defendant Name:	First: BEAKI	Middle: ANTONIA	Last: PEREZ

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 |

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):
 MARIA PINEDA Gen
 First Name Middle Name Last Name
 843 WHITTIER DR.
 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-417-2022	Date Filed 12/05/2022	OTN/LiveScan Number R 396789-4	Complaint Number	Incident Number IFS210061	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER	DOB 10/20/1981	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
<input type="checkbox"/> Male	First Name	Middle Name	Last Name	Gen.
<input checked="" type="checkbox"/> Female	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

FBI Number

MNU Number **OLN 30987789**

RECEIVED
 DISTRICT COURT 12-2-03
 DEC 05 2022

Defendant Fingerprinted YES 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 <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/POETC - Assigned Affiant ID Number & Badge #)
 of Lehigh County Detectives
 (Identify Department or Agency Represented and Political Subdivision)
 do hereby state: (check appropriate box)

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

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

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



POLICE CRIMINAL COMPLAINT

Docket Number: CR-417-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396729-4	Complaint/Incident Number IFS210061
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

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: 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	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 PennDOT false, incomplete or misleading information material to MOTOR VEHICLE TITLING/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"/> 03	3925	(a)	of the 18	1				
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: 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: <i>CR 417-2007</i>	Date Filed: <i>12/5/2007</i>	OTN/LiveScan Number <i>R 396789-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

<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	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: 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?	06	4904	(b)	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): **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: <i>CR-417-3022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number <i>R 396724-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

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	NCIC Offense Code	UCR/NIBRS Code
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade				

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, Dealing in Proceeds of Unlawful Activity, Theft by Deception, Receiving Stolen Property, 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, Jorge Santos/Santos-Hernandez, J&J Car&Truck Sales LLC, Newroad Motors LLC, Santos Auto Gallery), 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"/> Lead?	08	911	(b)(1)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade				

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 and Tags 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"/> Lead?	09	911	(b)(2)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade				

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 and Tags Inc.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 417-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396729-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

<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
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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.

<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"/>	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
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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"/>				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 417A022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number <i>R.396789-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

- 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.

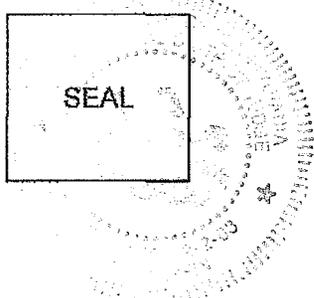
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be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

(Date) _____ (Year) _____ *Dorcas Jeter*
 (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.

12-8-03
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-417-2022</i>	Date Filed: <i>12/31/22</i>	OTN/LiveScan Number <i>R 396729-4</i>	Complaint/Incident Number
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

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. EuId 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: <i>CR 417 3002</i>	Date Filed: <i>12/16/2022</i>	OTN/LiveScan Number <i>R 396 729-4</i>	Complaint/Incident Number
Defendant Name:	First: MARIA	Middle:	Last: PINEDA

- | | | |
|---|--|------------------------------------|
| 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 THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Lindsay Yetter

(Signature of Affiant)

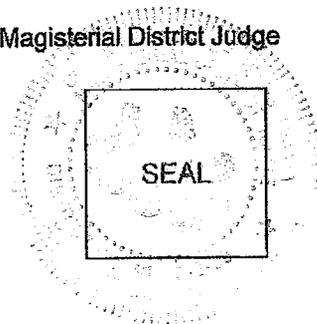
December 2022

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

12/16/2022 Date

, Magisterial District Judge

My commission expires first Monday of January, *2024*



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

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

DEFENDANT:

(NAME and ADDRESS):

LINDA M. SANDOVAL
First Name Middle Name Last Name

1334 Glenview Street
Philadelphia, PA 19111

Telephone: (717)944-4463

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-402-22</i>	Date Filed <i>12/15/22</i>	OTN/LiveScan Number <i>R 396109-0</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 06/07/1986	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name AKA LINDA		Middle Name		Last Name DOMINGUEZ	

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 OLN 27869341

Defendant Fingerprinted YES NO Ft. HEIGHT in. _____

Fingerprint Classification: _____ 5 6

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 TO PRESENT (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-402-22</i>	Date Filed: <i>12 15 22</i>	OTN/LiveScan Number <i>A 39 6109-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

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

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

<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): **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: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

<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	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 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	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): **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"/>	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 did intentionally obtain or withhold property of another by deception; to wit: the defendant 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 which possessed the VIN numbers of stolen vehicles. In furtherance, the defendant submitted paperwork to Penn DOT listed a grossly reduced sales price, which significantly reduced the sales tax to be paid.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-402-92	Date Filed: 12 15 22	OTN/LiveScan Number A 396 109-0	Complaint/Incident Number IFS210061
Defendant Name:	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

<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: 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 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.

<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: 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 _____
---	---	--	--	---

<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: 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-407-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396109-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

Inchoate Offense	<input type="checkbox"/> 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 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 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, 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 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 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's Auto Tags and Multiservices, Inc.



POLICE CRIMINAL COMPLAINT

Docket Number: CB-402-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396109-0	Complaint Number IFS210061	Incident Number
Defendant Name	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA	

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"/>	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 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 _____
--	---	--	--	--

<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 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 _____
--	---	--	--	--

<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 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-402-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>A 396109-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

- 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)

AND NOW, on this date Dec. 5, 2022 I certify that the complaint has been properly completed and verified.

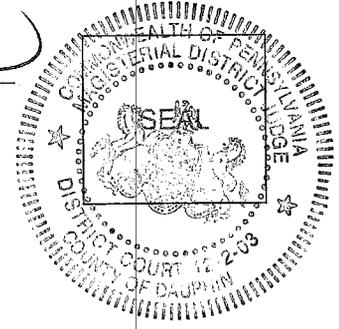
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

(Magisterial District Court Number)

[Handwritten Signature]

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-402-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 396109-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

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-402-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>R 396109-0</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: LINDA	Middle: M.	Last: SANDOVAL MARTINEZ-HERRERA

- 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)

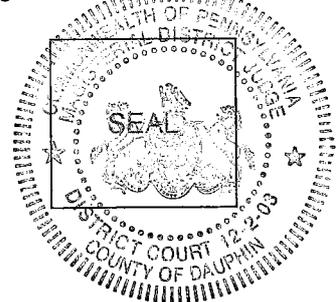
Sworn to me and subscribed before me this *5th* day of *December* *2022*

12/5/2022 Date

[Handwritten Signature]

, Magisterial District Judge

My commission expires first Monday of January,



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):
 SOMARY IBETH OTANEZ-DELOOR
First Name Middle Name Last Name Gen
 703 BLUE HERON DRIVE
 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-412-22	Date Filed 12/05/2022	OTN/ Live Scan Number R 396291-0	Complaint Number	Incident Number IFS210061	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 09/11/1993	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRV (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 (Blonda / 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"/> GRV (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 OLN 33220938				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO					FL 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 759307/#583 // 43799/#13
(Name of the Affiant) (PSP/MPO/ETC - Assigned Affiant ID Number & Badge #)
 of Lehigh County Detectives
(Identify Department or Agency Represented and Political Subdivision)
 do hereby state: (check appropriate box)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____
 I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] 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: SOMARY	Middle: IBETH	Last: OTANEZ-DELOOR

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: 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. 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.

Inchoate Offense	<input type="checkbox"/> 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 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 an application for a motor vehicle title/registration.

Inchoate Offense	<input type="checkbox"/> 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	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): **RECEIVING STOLEN PROPERTY**



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SOMARY	Middle: IBETH	Last: OTANEZ-DELOOR

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"/> Lead?	04	7121		of the	75	1	M1		
	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 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	7122	(3)	of the	75	1	M1		
	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): **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?	06	903	(a)(1)	of the	18	1	F1		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance): **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: Dealin In Proceeds of Unlawful Activity, Theft by Deception, Receiving Stolen Property, False Application for Certificate of Title or Registration, Altered, Forced, or Counterfeit Documents, 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 Loor 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.

 **POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: SOMARY	Middle: IBETH	Last: OTANEZ-DELOOR

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

<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	911	(b)(2)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
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 J&J Car & 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"/>	09	911	(b)(3)	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
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>CA-412-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>K396291-0</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: SOMARY	Middle: IBETH	Last: OTANEZ-DELOOR	

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.)

Indicate Offense	<input type="checkbox"/> 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"/>	10	911	(B)(4)	or 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).									

Indicate Offense	<input type="checkbox"/> 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"/>				or 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:									

Indicate Offense	<input type="checkbox"/> 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"/>				or 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:									

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):

ANGEL MENDEZ
First Name Middle Name Last Name

7423 LAWDALE AVE.
PHILADELPHIA, PA 19111

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-440-2022</i>	Date Filed 12/05/2022	OTN/LiveScan Number <i>R 396937-4</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 01/19/1980	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"/>
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 759307/#583
(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: CR 440-2022	Date Filed: 12/15/2022	OTN/LiveScan Number: R 396932-4	Complaint/Incident Number: IFS210061
Defendant Name:	First: ANGEL	Middle:	Last: MENDEZ

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	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 FALISIFICATION 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"/>	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: <i>CR-440-2022</i>	Date Filed: <i>12 15 2022</i>	OTN/LiveScan Number <i>R 396932-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ANGEL	Middle:	Last: MENDEZ

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		
PennDOT Data (if applicable)	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 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		
PennDOT Data (if applicable)	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): **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: Jorge Santos/Santos-Hernandez and/or Santos Auto Gallery), 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?	06	911	(b)(3)	of the	18	1	F1		
PennDOT Data (if applicable)	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): **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: CR 140 2032	Date Filed: 12/15/2022	OTN/LiveScan Number R 396932-4	Complaint/Incident Number IFS210061
Defendant Name:	First: ANGEL	Middle:	Last: MENDEZ

<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 _____
---	---	--	--	---

<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: <i>CR-440-1082</i>	Date Filed: <i>12/5/2002</i>	OTN/LiveScan Number <i>R 396932-4</i>	Complaint/Incident Number <i>IFS210061</i>
Defendant Name:	First: <i>ANGEL</i>	Middle:	Last: <i>MENDEZ</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)

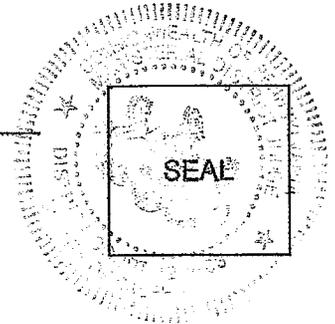
SA Nichola Stroy
 (Signature of Affiant)

AND NOW, on this date *December 6, 2002* 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 440-2022</i>	Date Filed: <i>12 15 2022</i>	OTN/LiveScan Number <i>R 396 932-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ANGEL	Middle:	Last: MENDEZ

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: <i>CR-440-2022</i>	Date Filed: <i>121512022</i>	OTN/LiveScan Number <i>R 396432-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: ANGEL	Middle:	Last: MENDEZ

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

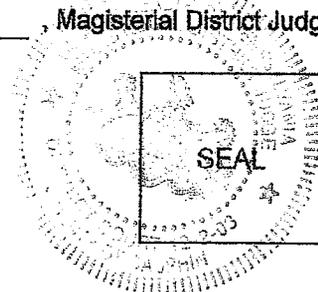
12/6/2022 Date

[Signature]

 2024

Magisterial District Judge

My commission expires first Monday of January, _____



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):

CHARLIE

JIMINAN

First Name

Middle Name

Last Name

Gen.

117 N. GILBERT ST.
SHENANDOAH, PA 17976

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 Detern.	<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-416-22	Date Filed 12/05/2022	OTN/LiveScan Number R396372-4	Complaint Number	Incident Number IFS210061	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/28/1985	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input 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 OLN 28683336				
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. 607).

ROBERT G. LABAR

ROBERT G. LABAR

12/05/2022

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, SA RACHEL A. STORY // DET. LINDSAY YETTER 759307/#583 // 43799/#13
(Name of the Affiant) (PSP/MPOETC Assigned Affiant ID Number & Badge #)
of Lehigh County Detectives
Pennsylvania Office of Attorney General PA0222400 MO 31900
(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]

(County Code)

on or about 2018- PRESENT



POLICE CRIMINAL COMPLAINT

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

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	3922	(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): 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 **perndot**, 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 _____					
<input type="checkbox"/>	03	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			
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: CHARLIE	Middle:	Last: JIMINIAN

<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	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: 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?	06	4904	(b) of the	18	1	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: 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: CK-416-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396372-4	Complaint/Incident Number IFS210061
Defendant Name	First: CHARLIE	Middle:	Last: JIMINIAN

Inchoate Offense	<input type="checkbox"/> 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	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		

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 Valey 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.

Inchoate Offense	<input type="checkbox"/> 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	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 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.

Inchoate Offense	<input type="checkbox"/> 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	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 J&J Car & Truck Sales LLC.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-416-22	Date Filed: 12/15/22	OTN/LiveScan Number R 396 372-4	Complaint/Incident Number IFS210061
Defendant Name:	First: CHARLIE	Middle:	Last: JIMINIAN

<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

<input type="checkbox"/> PennDOT Data (if applicable)	<input type="checkbox"/> 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.

<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"/>	11	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)	<input type="checkbox"/> 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)	<input type="checkbox"/> 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-416-22</i>	Date Filed: <i>12/5/22</i>	OTN/LiveScan Number <i>19396372-4</i>	Complaint/Incident Number <i>IFS210061</i>
Defendant Name:	First: <i>CHARLIE</i>	Middle:	Last: <i>JIMINIAN</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 Archel A. Stry

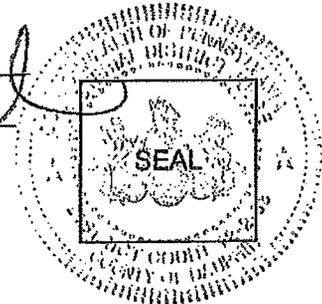
 (Signature of Affiant)

(Date) _____ (Year) _____
 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.

 (Magisterial District Court Number)

[Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR-46-22	Date Filed: 12/15/22	OTN/iveScan Number R 396372-4	Complaint/Incident Number
Defendant Name:	First: CHARLIE	Middle:	Last: JIMINAN

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 |

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):

JEFFERSON

LOOR-VALET

First Name

Middle Name

Last Name

Gen

703 BLUE HERON DRIVE
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

Booklet Number <u>CR-411-22</u>	Date Filed <u>12/05/2022</u>	OTNLiveScan Number <u>R398105</u>	Complaint Number	Incident Number <u>IFS210061</u>	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>09/12/1985</u>	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>	Gen.
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	First Name	Middle Name	Last Name	AKA	
ETHNICITY <input checked="" 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 <u>983309FC8</u>	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	MNU Number <u>OLN 28183745</u>	FL HEIGHT (ft.)		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 759307/#583 // 43799/#13
(Name of the Affiant) Lehigh County Detectives (PSP/PMOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400 PA 0391900
(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]

(County Code)

on or about 2018- PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CF-41122</i>	Date Filed: <i>12/15/22</i>	Complaint/Incident Number: <i>R3963105</i>	Complaint/Incident Number: IFS210061
Defendant Name:	First: JEFFERSON	Middle:	Last: LOOR-VALET

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

Inchoate Offense	<input type="checkbox"/> 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)	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 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.								

Inchoate Offense	<input type="checkbox"/> 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)	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 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: JEFFERSON	Middle:	Last: LOOR-VALET

<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	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			

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 _____
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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	
<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: 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 _____
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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	
<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): **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: <i>CR-411-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396310.5</i>	Complaint/Incident Number <i>IFS210061</i>
Derendant Name:	First: <i>JEFFERSON</i>	Middle:	Last: <i>LOOR-VALET</i>

Indicate Offense	<input type="checkbox"/> 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?	<i>07</i>	<i>3925</i>	<i>(a)</i>	<i>18</i>	<i>1</i>	<i>F3</i>		
	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

Indicate Offense	<input type="checkbox"/> 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?	<i>08</i>	<i>4101</i>	<i>(a)(3)</i>	<i>18</i>	<i>1</i>	<i>M1</i>		
	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.

Indicate Offense	<input type="checkbox"/> 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?	<i>09</i>	<i>7121</i>		<i>75</i>	<i>1</i>	<i>M1</i>		
	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.

 **POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First: JEFFERSON	Middle:	Last: LOOR-VALET

Inchoate Offense	<input type="checkbox"/> 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	NCIC Offense Code	UCR/NIBRS Code
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			

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, ORGED, 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	NCIC Offense Code	UCR/NIBRS Code
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			

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	NCIC Offense Code	UCR/NIBRS Code
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			

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/ UNSWORN FALSIFICATION TO AUTHORITIES

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, Dealing in Proceeds of Unlawful Activity, Insurance Fraud, Theft by Deception, Receiving Stolen Property, Forgery, Altered, Forged, or Counterfeit Documents 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: Maria Pineda, J&J Car & Truck Sales LLC, Indalecia Vasquez, Somary Ibeth Otanez De Loor, Beaki Antonia Perez, MP Notary & Tags, Inc, and/or Charlie Jiminan), 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: <i>CR 411-22</i>	Date Filed: <i>1/15/22</i>	OTN/LiveScan Number <i>R 39163105</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First JEFFERSON	Middle:	Last: LOOR-VALET	

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 _____					
<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 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 _____					
<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 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"/> 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 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-411-20</i>	Date Filed: <i>12/15/20</i>	OTN/LiveScan Number <i>123963/05</i>	Complaint Number IFS210061	Incident Number
Defendant Name	First: JEFFERSON	Middle:	Last: LOOR-VALET	

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 _____				
<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 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 _____				
<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>CC-911-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>12 396 310-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: JEFFERSON	Middle:	Last: LOOR-VALET

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

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

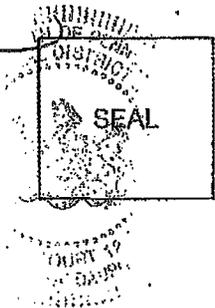
(Date) _____ (Year) _____ *Dunbar Catta*
 (Signature of Affiant)

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.

12-203
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-411-22</i>	Date Filed: <i>12/15/22</i>	OTN/LiveScan Number <i>R 396310-5</i>	Complaint/Incident Number
Defendant Name	First: JEFFERSON	Middle:	Last: LOOR-VALET

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. Osliris FERNANDEZ | 29. Nora RODRIGUEZ |
| 11. Margarete ALMSAHAQBEH | GONZALEZ | 30. Roberto GOMEZ |

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
Royaltown, PA 17057

DEFENDANT: (NAME and ADDRESS):
OLEG ZELENKO
First Name Middle Name Last Name
209 LIBERTY DR.
LANGHORNE, PA 19047

Telephone: (717)234-0949

NCIO 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-437-2022</i>	Date Filed 12/05/2022	OTN/LiveScan Number <i>R396901-1</i>	Complaint Number IFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 07/22/1981	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"/>
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 #583
(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: <i>R-437-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number <i>R 396901-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: OLEG	Middle:	Last: ZELENKO

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 911	Subsection (B)(1) of the	PA Statute (Title) 18	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): 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 _____				
Lead?	Offense# 02	Section 911	Subsection (b)(3) of the	PA Statute (Title) 18	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): 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 _____				
Lead?	Offense# 03	Section 911	Subsection (b)(4) of the	PA Statute (Title) 18	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): 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).								

 **POLICE CRIMINAL COMPLAINT**

Docket Number: CK-437-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R 396901-1	Complaint/Incident Number IFS210061
Defendant Name:	First: OLEG	Middle:	Last: ZELENKO

Inchoate Offense	<input type="checkbox"/> 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)(1)	of the	18	1	F3		
<small>Lead?</small>	<small>Offense#</small>	<small>Section</small>	<small>Subsection</small>	<small>PA Statute (Title)</small>	<small>Counts</small>	<small>Grade</small>	<small>NCIC Offense Code</small>	<small>UCR/NIBRS Code</small>	

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"/>	05	4117	(a)(2)	of the	18	1	F3		
<small>Lead?</small>	<small>Offense#</small>	<small>Section</small>	<small>Subsection</small>	<small>PA Statute (Title)</small>	<small>Counts</small>	<small>Grade</small>	<small>NCIC Offense Code</small>	<small>UCR/NIBRS Code</small>	

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 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.

Inchoate Offense	<input type="checkbox"/> 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	4117	(a)(3)	of the	18	1	F3		
<small>Lead?</small>	<small>Offense#</small>	<small>Section</small>	<small>Subsection</small>	<small>PA Statute (Title)</small>	<small>Counts</small>	<small>Grade</small>	<small>NCIC Offense Code</small>	<small>UCR/NIBRS Code</small>	

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 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: CR 437-9072	Date Filed: 12/15/2022	OTN/LiveScan Number R 396901-1	Complaint/Incident Number IFS210061
Defendant Name:	First: OLEG	Middle:	Last: ZELENKO

Inchoate Offense	<input type="checkbox"/> 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	(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
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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"/>	08	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 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.

Inchoate Offense	<input type="checkbox"/> 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: 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: <i>CR-437-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R396901-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: OLEG	Middle:	Last: ZELENKO

<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	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): **ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS**

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.

<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	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
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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

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, Amatti Auto Sales 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.

<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"/>	12	7121		of the	75	10	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): **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: Igor Dratch, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-437-2022	Date Filed: 12/5/2022	OTN/LiveScan Number R 396901-1	Complaint/Incident Number IFS210061
Defendant Name:	First: OLEG	Middle:	Last: ZELENKO

- 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)

SA Rachel A. Stuy
 (Signature of Affiant)

AND NOW, on this date December 6, 2022 I certify that the complaint has been properly completed and verified.

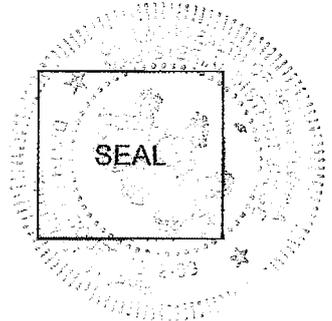
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-03

(Magisterial District Court Number)

(Issuing Authority)

[Signature]





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-437-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number <i>R 396901-1</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: OLEG	Middle:	Last: ZELENKO

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 *10th* day of *December* *2022*
12/6/2022 Date _____, Magisterial District Judge

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):
 DAVID MORRISON
 First Name Middle Name Last Name
 542 Newport Cir.
 Feasterville Trevoese, PA 19053

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 6-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-432-2022</i>	Date Filed 12/05/2022	OTN/LiveScan Number <i>R396869-4</i>	Complaint Number TFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 08/23/1973	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name	Last Name		Gen.
AKA					
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" 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 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-433-1022</i>	Date Filed: <i>1215 12/22</i>	OTN/LiveScan Number <i>R 396869-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

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 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: <i>CR-432-7022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396869-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

Inchoate Offense	<input type="checkbox"/> 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).

Inchoate Offense	<input type="checkbox"/> 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	4904	(b)	of the	18	1	M2 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"/>	06	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: <i>CR-432 2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396869-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

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"/>	07	7121		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): **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 of the following: Igor Dratch, Oleg Zelenko, Amatti Auto Sales 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 _____
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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: <i>CR-432-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 3968094</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

- 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.

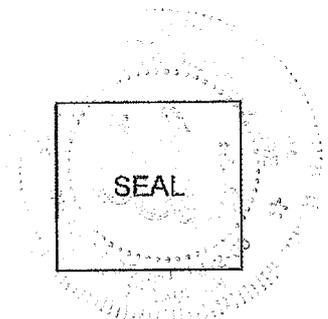
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be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

SA Rachaela Strij
 (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)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-432-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396809-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

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. Charo'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-432-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396869-4</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

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

[Signature]

Magisterial District Judge

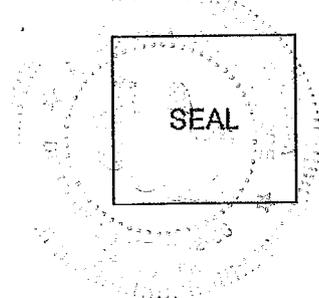
day of

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: 12-02-03
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):

IGOR A. DRATCH
First Name Middle Name Last Name
9760 Cowden St.
Philadelphia, PA 19115

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 429-3022</i>	Date Filed 12/05/2022	OTN/LiveScan Number <i>R 396871-5</i>	Complaint Number JFS210061	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/17/1973	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				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 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. as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color	DEC 05 2022	

Office of the attorney for the Commonwealth Approved Disapproved because:

DISTRICT COURT 12-2-03

(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, <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] <u>Harrisburg City</u> (Subdivision Code) (Place-Political Subdivision)	
in DAUPHIN County [22] (County Code)	on or about 2018-PRESENT



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 474-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R396821-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

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 Grig 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: CR-424-2022	Date Filed: 12/15/2022	OTN/LiveScan Number R390821-5	Complaint/Incident Number IFS210061
Defendant Name: IGOR	First: A.	Middle: A.	Last: DRATCH

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

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	05	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): **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"/> Lead?	06	4118		of the	18	1	F3		
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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: <i>CR-479-1002</i>	Date Filed: <i>12/15/02</i>	OTN/LiveScan Number <i>R 396821-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

<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)(1)	of the	18	1			
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 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 _____
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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.

<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	<i>M2 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): **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: <i>CR-429-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R396821-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

<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	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.

<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	4904	(b)	of the	18	1	M2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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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: 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"/>	12	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 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: <i>CR-479-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 3968915</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

<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	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 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?	14	4117	(b)(4)	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): **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 _____
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<input type="checkbox"/> Lead?	15	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 an Insurance Company, false, incomplete or misleading information material to an application for insurance.

POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-474-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R 396821-5</i>	Complaint/Incident Number
Defendant Name:	First: IGOR	Middle:	Last: DRATCH

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	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): **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
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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 _____				
<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 429-2022</i>	Date Filed: <i>12.15.2022</i>	OTN/LiveScan Number <i>R 396825</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

- 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.)

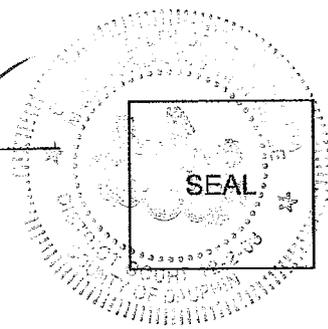
SA Rachel A. Shroy
 (Signature of Affiant)

(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)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-474-2022</i>	Date Filed: <i>12/5/2022</i>	OTN/LiveScan Number <i>R 396821-5</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

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. Charo'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-429-2022</i>	Date Filed: <i>12/15/2022</i>	OTN/LiveScan Number <i>R3968715</i>	Complaint/Incident Number IFS210061
Defendant Name:	First: IGOR	Middle: A.	Last: DRATCH

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

day of

December

2022

12/6/2022 Date

[Signature], Magisterial District Judge

My commission expires first Monday of January,

2024

