#### **INTRODUCTION**

We, the members of the Fifty-Second Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code and the Pennsylvania Motor Vehicle Code, occurring in and around numerous counties in Pennsylvania including Lebanon, Dauphin, and Lancaster Counties pursuant to Notice of Submission of Investigation No. 17, do hereby make the following findings of fact and recommendation of charges.

#### FINDINGS OF FACT

#### I. SUMMARY OF INVESTIGATION

The Grand Jury conducted an investigation into allegations that Angel Vidal and his associates (herein referred to as the "Vidal Organization") engaged in an ongoing pattern of criminal activity from September 30, 2020, to November 8, 2023. The investigation revealed the Vidal Organization stole rental vehicles, procured stolen vehicles, used stolen identities to create fraudulent titles and registrations, generated fictitious Vehicle Identification Numbers ("VIN"), generated fake insurance policies, and engaged in vehicle "title-washing" through the Pennsylvania Department of Transportation ("PennDOT"). The Vidal Organization sold stolen vehicles to co-conspirators or unsuspecting victims for profit, resulting in losses exceeding \$500,000.00 for individuals, businesses, and state agencies.

The Grand Jury found that the Vidal Organization operated a racketeering organization that acquired stolen vehicles utilizing various points of contact in Pennsylvania, Virginia, New Jersey, Texas, and New York. The organization leased the majority of the vehicles using fictitious identities, stolen bank accounts, or fraudulent Western Union checks from rental agencies such as U-Haul, Avis, Hertz, and Enterprise, and never returned the leased vehicles. Rental agencies

typically provide a grace period for customers to return the vehicle after the rental contract expires. This delay allowed the Vidal Organization to alter the cars' VIN, fraudulently re-title the vehicles through PennDOT, make additional alterations, and sell them before the rental agencies reported the vehicles stolen.

The Grand Jury found the Vidal Organization fraudulently retitled vehicles through PennDOT by creating fictitious out-of-state titles, fictitious Manufacturer Certifications of Origin ("MCO"), and fictitious insurance information. This process, known as "title-washing," worked as follows: the Vidal Organization prepared the fraudulent documents and either delivered them directly to PennDOT headquarters, located at 1101 South Front Street, Harrisburg, PA 17104, or sent them by mail. Unaware of the fraud, PennDOT issued Pennsylvania vehicle titles. Additionally, the Vidal Organization replaced the vehicles' VINs with fictitious or cloned numbers, effectively giving stolen vehicles a "new identity." By fabricating insurance documents, driver's licenses, license plates, and registrations, the Vidal Organization created all the necessary paperwork to operate stolen vehicles in the Commonwealth.

The Grand Jury discovered that the Vidal Organization sold the "cleaned" vehicles to coconspirators and unsuspecting buyers, including auction houses. The Vidal Organization profited significantly from these sales, often selling the vehicles below market value to expedite transactions before the vehicles were reported stolen.

In addition, the Vidal Organization produced and sold fictitious documents, including, driver's licenses, insurance cards, Green Cards, Social Security cards, birth certificates, and other forms of identification. The head of the Vidal Organization, Angel Vidal, possessed a mobile phone that contained dark web packets with the names, addresses, Social Security numbers, and credit card information of numerous potential victims. Authorities discovered that the Vidal

Organization had printers, scanners, and other equipment used to create these fraudulent vehicle and personal documents at Vidal's residence, located at 1315 Brandywine Street, Lebanon City, Pennsylvania.

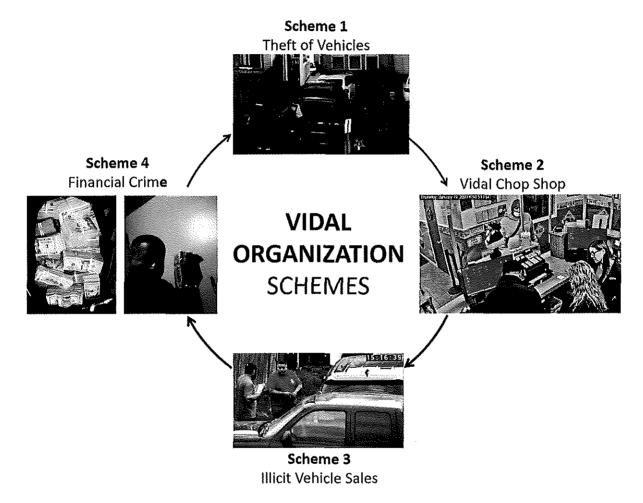
Regarding insurance policies, Angel Vidal and the Vidal Organization consistently presented fictitious and fraudulent insurance documents to PennDOT, alleging they were active, and provided liability protection to the public to hide stolen vehicles from the authorities.

The Grand Jury found that the Vidal Organization violated the Pennsylvania Criminal Code and Motor Vehicle Code in order to:

- 1) Obtain stolen vehicles to sell for profit to co-conspirators or to unsuspecting victims;
- 2) Obtain fraudulent Pennsylvania vehicle titles and registrations for vehicles by:
  - a. Submitting fraudulent out-of-state vehicle titles to misrepresent the true owner of a vehicle, thus obtaining "clean" titles that pass inspections for sale;
  - b. Using stolen identities, stamps, and/or forged signatures of a licensed notary public to deceive PennDOT and other regulatory agencies into believing that the documentation submitted to re-title vehicles had been examined and reviewed by a licensed notary public and that the documents contained true and accurate statements.
- 3) Commit insurance fraud by representing to state agencies that the vehicles were insured by using fraudulent insurance documents, when, in fact, they were not insured;
- 4) Commit forgery and identity theft by stealing vehicle information, bank information, and other identifying information to create fraudulent documents to further the scheme perpetrated by the Vidal Organization, including, creating fraudulent driver's licenses,

insurance cards, social security cards, birth certificates, and other forms of identification; and

5) Commit other thefts, forgery, and crimes as outlined specifically below.



The Grand Jury divided the Vidal Organization's criminal scheme into four distinct schemes. The **first scheme** involved procuring stolen vehicles through various methods, primarily by renting vehicles using fraudulent identifications. In the **second scheme**, the Vidal Organization operated a chop shop to fraudulently obtain titles and illicitly modify the vehicles for black market sales. The **third scheme** consisted of selling the stolen and altered vehicles to co-conspirators, a process referred to as "fencing," or to unsuspecting victims. Finally, the **fourth scheme** 

encompassed additional criminal activities to financially support the criminal enterprise, including bank fraud, check fraud, and the sale of fraudulent documents. The Vidal Organization used illicit income obtained in scheme four to sustain and expand vehicle theft operations in scheme one. This cycle allowed the organization to reinvest in its illegal operations, making it a self-sustaining criminal network across multiple jurisdictions.

### II. COMPOSITION OF THE VIDAL ORGANIZATION

The Grand Jury concluded, based on the evidence and testimony presented, that the Vidal Organization consists of various individuals and is directed and operated by Angel Vidal. Vidal acts as the primary broker and supplier of stolen vehicles for the organization and its co-conspirators. Among the individuals involved in the Vidal Organization are: Angel Vidal; Steven Rodriguez; Joseph Glover; Tina Henry; Ray Henry; Latisha Dipaola; Eddie Robinson; Javier Mejia; Toan Lam; Delux Um; Syrel Williams; and Rafael Hernandez Reyes.

The Grand Jury identified Vidal as the head of the Vidal Organization. The Grand Jury identified Steven Rodriguez and Joseph Glover as Vidal's chief business partners. Rodriguez, a New York resident, supplied the Vidal Organization with stolen vehicles. Rodriguez created fraudulent documentation used to title-wash or conceal stolen vehicles, including, counterfeit registration documents, titles, and insurance paperwork. He illicitly sold vehicles on behalf of himself and the Vidal Organization. Glover, a resident of Lebanon City, opened Exclusive Towing, a business based in Lebanon City, along with Vidal. Glover secured stolen vehicles for the organization and fraudulently titled vehicles in his name.

The Grand Jury identified Ray Henry ("R. Henry"), his sister, Tina Henry ("T. Henry"), and half-sister, Latisha Dipaola, as conspirators within the Vidal Organization. R. Henry aided

Vidal in the Vidal chop shop operations, including changing the VINs on vehicles and re-titling them.<sup>1</sup> R. Henry also conspired with Vidal to commit financial crimes to obtain illicit income, including bank fraud and identity theft.

Tina Henry, who is R. Henry's sister and Vidal's paramour, conspired with Vidal in the organization's chop shop operations, including turning their residence into a chop shop. T. Henry also conspired with Vidal to commit financial crimes to obtain illicit income, including through the theft of identity and financial information.

Dipaola, a Brooklyn, New York native, also conspired with the Vidal Organization, through Vidal, R. Henry, and T. Henry, to purchase Western Union checks, duplicate them, and cash them at check cashing locations in exchange for a fee.

The Grand Jury found that Eddie Robinson knowingly purchased stolen vehicles from Vidal, re-titled them with fraudulent documents, and sold them for significant profit.

The Grand Jury identified Javier Mejia, the owner of J&R Auto Repair & Towing, as a conspirator of the Vidal Organization. The Grand Jury concluded that Mejia knowingly purchased stolen vehicles from the Vidal Organization. He then sold the stolen vehicles for profit. He also played a role in facilitating the sale of stolen vehicles.

The Grand Jury identified Delux Um as a conspirator within the Vidal Organization. The Grand Jury concluded that Um knowingly purchased no less than ten stolen vehicles from the Vidal Organization with accompanying fraudulent documentation. Um swiftly "flipped" those vehicles through street-level sales.

<sup>&</sup>lt;sup>1</sup> The Grand Jury learned that criminals alter stolen vehicles by changing their Vehicle Identification Numbers to disguise their origin and make them harder to trace.

The Grand Jury identified Toan Lam, the owner of Lam Auto Sales, as a conspirator of the Vidal Organization. The Grand Jury determined that Lam knowingly purchased stolen vehicles from the Vidal Organization and quickly sold those vehicles to unsuspecting buyers. Lam also title-washed vehicles with fraudulent documentations through his business.

The Grand Jury identified Syrel Williams as a conspirator within the Vidal Organization.

The Grand Jury concluded that Williams knowingly title-washed vehicles and committed vehicle registration fraud in furtherance of the Vidal Organization. Williams went to notaries and passed fraudulent documentation to obtain vehicle titles for stolen vehicles.

The Grand Jury identified Rafael Hernandez Reyes, a customer of J&R Auto Repair & Towing, as a conspirator within the Vidal Organization. The Grand Jury found that Hernandez Reyes knowingly purchased stolen vehicles from Mejia, re-titled them with fraudulent documents, and sold them for significant profit.

#### III. SUMMARY OF CRIMINAL SCHEMES

The Grand Jury learned that the Pennsylvania Office of Attorney General's ("OAG") Insurance Fraud and Organized Crime Sections, based upon information provided by the Pennsylvania State Police ("PSP"), initiated an investigation into the Vidal Organization. Detective Leo Hannon ("Det. Hannon"), Task Force Officer, and Trooper Ramon Torres ("Trooper Torres") of the Pennsylvania State Police Auto Theft Unit explained that PSP began investigating multiple individuals and businesses in and around Lebanon County for crimes including theft, receiving stolen property, title-washing, chop shop operations, and others, spanning from September 30, 2020 to November 8, 2023.

Detective Hannon testified that on June 2021, he received a referral from the National Insurance Crime Bureau ("NICB") regarding several stolen rental vehicles that had been title-

washed in Pennsylvania using the previously described method. The vehicles had entered into the Lebanon County area from locations throughout the eastern United States. On November 15, 2022, Trooper Torres received a referral from Londonderry Township Police Department regarding a stolen rental vehicle recovered from a local dealership, whose vehicle title and VIN had been falsified. The joint investigation revealed these vehicles were just a small part of a larger criminal scheme carried out by the Vidal Organization, based in Lebanon City.

The Vidal Organization illicitly sold or moved twenty-eight stolen vehicles, with a combined value of \$640,000. It altered or cloned the Vehicle Identification Numbers of twenty vehicles. The Vidal Organization title-washed or caused twenty-five vehicles to be title-washed. Additionally, the Vidal Organization created or forged fourteen insurance policies to conceal the vehicles from law enforcement.

### IV. DETAILS OF CRIMINAL SCHEMES

# SCHEME 1

## Theft of Vehicles

The Grand Jury found that the Vidal Organization established a racketeering operation that obtained stolen vehicles through various points of contact in the states of Pennsylvania, Virginia, New Jersey, Texas, and New York. Most of the vehicles were leased using fictitious identities and fictitious bank accounts from rental agencies such as U-Haul, Avis, Hertz, or Enterprise.

The Grand Jury found that the Vidal Organization illicitly sold or moved twenty-eight stolen vehicles with a combined value of \$640,000:

### Stolen Vehicle List

#	VIN	Make /Model	Victim	Date of Theft	Date of Recovery	Recovery Agency	Estimated Value
1	1N4BL4CV6LC235882	2020 Nissan Altima	Hertz	06/17/21	06/18/21	Lower Paxton Township PD	\$20,000
2	WBA13BJ04MCF93856	2021 BMW 530 XI	Enterprise	05/06/21	06/12/21	Allentown PD	\$35,000
3	1C4HJXDN0LW198658	2020 Jeep Wrangler	Avis	04/28/21	06/18/21	Reading PD	\$30,000
4	2C3CDZBT6MH546661	2021 Dodge Challenger	Avis	05/28/21	06/11/21	Ontario PD	\$25,000
5	JN8AT3BB0MW209404	2021 Nissan Rogue	Hart Dealership	06/10/21	06/24/21	Lancaster PD	\$20,000
6	5UXTR9C53JLD68432	2018 BMW X3	BMW Dealership	UNK	06/24/21	PA State Police	\$20,000
7	3PCAJ5BBXMF1193 <u>0</u> 7	2021 Infiniti QX50	Hertz	05/01/21	06/22/21	Manor Twp PD  Northern Lancaster	\$25,000
8	3C4NJDCB4KT619276	2019 Jeep Compass	Hertz	01/27/21	09/23/21	PD Lancaster	\$15,000
9	SALWR2VF0FA622795	2015 Range Rover 2017 Mercedes-	Private	05/10/21	07/30/21	Henrico VA PD	\$15,000
10	WDDSJ4EB6HN480282	Benz 2019 Dodge	Private	06/28/21	05/16/24	PA State Police	\$20,000
11	1C4RDJDG2KC691543	Durango	Avis	09/30/20	12/16/20	Syracuse City PD	\$20,000
12	2C3CCABG8LH131427	2020 Chrysler 300S	Hertz	10/06/20	05/10/24	Chesapeake State Police	\$25,000
13	1HGCV1F49MA030596	2021 White Honda Accord	Private	07/01/22	04/21/23	New York PD	\$20,000
14	19UDE2F36KA006951	2019 Acura ILX 2022 Silver Kia	Private	12/27/21	02/02/23	Suffolk CO PD	\$20,000
15	3KPF24AD2NE466816	Forte 2022 White	Enterprise	11/15/22	01/20/23	PA State Police	\$20,000
16	3GCNAAED3NG580738	Chev. Silverado 2021 White	U-Haul	08/22/22	01/11/23	PA State Police	\$25,000
17	3GCNWAEF7MG251879		U-Haul	07/06/22	01/10/23	PA State Police	\$25,000
18	3GCNWAEF6MG280676	!	U-Haul	09/27/22	11/09/22	Londonberry PD	\$25,000
19	1GTW7AF72M1272713	Savana Van 2020 Chev.	U-Haul	10/09/22	10/25/22	NYSP PD	\$20,000
20	3GCNWAEF3LG267544	Silverado TK 2022 Chevy	U-Haul	12/15/21	10/20/22	California DMV	\$25,000
21	3GCNWAED3NG189056		U-Haul	08/06/22	11/29/22	Richmond PD	\$25,000
22	3GCNWAEF9MG279814	Silverado 1500	U-Haul	08/10/22	11/20/22	Richmond PD	\$25,000
23	5FBYF6H50LB044526	2020 Honda Pilot	Private	03/03/23	11/08/23	PA State Police	\$25,000

24	1HGVC1F16KA176618	2019 White Honda Accord	Private	03/21/23	06/22/23	New York PD	\$20,000
25	JN1EV7EL4JM392416	2018 Infiniti Q60 Coupe	Private	08/09/23	11/08/23	PA State Police	\$25,000
26	3GCNWAEF7MG390264	2021 Chevrolet Silverado	U-Haul	UNK	09/01/21	Lebanon PD	\$25,000
27	JN1FV7DRXPM590405	2023 Infiniti Q50	Hertz	08/26/23	01/24/24	New York PD	\$25,000
28	2C3CCABG3KH693931	2019 Chrysler 300	Hertz	09/19/23	05/28/24	New York PD	\$20,000
Total							\$640,000

The Grand Jury learned that the Vidal Organization primarily deals in stolen rental vehicles from companies such as Avis, Enterprise, Hertz and U-Haul. The vehicle rental companies do not have a mechanism to verify that the identities and bank accounts used to rent the vehicles are accurate and valid. As an example, three of the stolen rental vehicles were leased with three different identification cards, each with different names, but the same photo was imprinted on all three identifications.

The Grand Jury learned that it typically takes between ninety to one-hundred and twenty days for rental companies to realize that a customer will not return the vehicle. When a lessee fails to return the vehicle by the contract date, the rental companies give the lessee a set amount of time to either return the vehicle or extend the contract. Many jurisdictions, such as New York, initially treat the theft report as a civil matter, which further delays the reporting and recovery process. By the time the rental companies report the cars as stolen, the Vidal Organization has already washed the title, altered the VIN (or otherwise masked the vehicle's identity), and sold the vehicles through fraudulent means.

The Grand Jury reviewed documentation related to Vehicle #20 of the Stolen Vehicle List, a 2020 Chevy Silverado bearing VIN 6GCNWAEF3LG267544. U-Haul reported the vehicle stolen on December 15, 2021. The vehicle had been rented by M.D. When M.D. was interviewed

by Trooper Torres, he explained that Vidal convinced him to rent the vehicle on his behalf in exchange for \$200. Together, M.D. and Vidal went to U-Haul to rent the vehicle. Rental was initially denied due to M.D.'s credit, but Vidal provided other financial information and Vehicle #20 was rented under M.D.'s name. M.D. said he allowed Vidal to use the vehicle, but Vidal never returned it, and M.D. never saw the truck again. M.D. reported the vehicle stolen a few months later. Trooper Torres testified that on October 20, 2022, the Chevy Silverado was recovered in California after an individual attempted to register the vehicle at the local DMV.

As another representative example, Trooper Torres testified regarding Vehicle #15 of the Stolen Vehicle List,<sup>2</sup> a 2022 Silver Kia Forte bearing VIN 3KPF24AD2NE466816. On August 17, 2022, T.N. rented the Kia Forte from Enterprise in Lancaster County. On November 15, 2022, Enterprise reported the vehicle as stolen. T.N. told the Manheim Township Police Department that she had loaned the vehicle to Vidal, but he never returned it. At a later interview, Mejia admitted to purchasing the Kia Forte from Vidal at a significantly reduced price.

To further illustrate how the Vidal Organization stole or procured vehicles, Trooper Torres testified regarding four other vehicles stolen by the Vidal Organization from U-Haul. The Grand Jury heard evidence regarding Vehicle #18 of the Stolen Vehicle List, a 2021 White Chevrolet Silverado bearing VIN 3GCNWAEF6MG280676. The Grand Jury learned that on September 9, 2022, an individual utilizing a fraudulent identification under the name of Anthony Rivera leased the vehicle from U-Haul located in Lebanon County. The vehicle was funneled into the Vidal Organization and was reported stolen on October 17, 2022. Trooper Torres found the false identification used to rent the vehicle during a search of Vidal's phone. Robinson admitted to

<sup>&</sup>lt;sup>2</sup> Vehicle #15 of the Stolen Vehicle List is also Vehicle #11 of the Re-Title List, found below. As explained in further detail below, the stolen vehicle was fraudulently re-titled and re-sold as part of a larger conspiracy.

Trooper Torres he purchased the vehicle "off the street" for approximately \$11,000, which was less than half of its estimated market value of \$25,000.<sup>3</sup>

Next, the Grand Jury heard about **Vehicle #19 of the Stolen Vehicle List**, a 2021 White GMC Savana bearing VIN 1GTW7AF72M1272713. The Grand Jury learned that on September 9, 2022, an individual leased the vehicle from a U-Haul in New York using false identification, and it was funneled into the Vidal Organization. The vehicle was never returned and was reported as stolen on October 5, 2022. Robinson told Trooper Torres that he had purchased the GMC Savana from Vidal for \$6,000, a price significantly below its estimated market value of \$20,000.

Trooper Torres testified about Vehicle #21 of the Stolen Vehicle List, a 2022 Chevrolet Silverado bearing VIN 3GNWAED3NG189056, and Vehicle #22 of the Stolen Vehicle List, a 2021 Chevrolet Silverado bearing VIN 3GNWAEF9MG279814. On August 6, 2022, Vehicle #21 was rented from a U-Haul in Lehigh County using a fictitious identification, and funneled it into the Vidal Organization. On August 13, 2022, U-Haul reported the vehicle as stolen. Similarly, on August 3, 2022, an individual rented Vehicle #22 from a U-Haul in New Jersey using a fictitious identification. Trooper Torres testified that he found the picture and fraudulent driver's license used to rent the vehicle during the search of Vidal's phone. On August 10, 2022, U-Haul reported the vehicle stolen. Mejia told Trooper Torres he purchased Vehicle #21 and Vehicle #22 from Rodriguez for a total of \$15,000. The estimated value for both vehicles was \$50,000.

The Grand Jury also learned that the Vidal Organization purchased stolen vehicles from out-of-state contacts and altered them in its chop shop to prepare them for illicit sales. As an example, Trooper Torres showed the Grand Jury a picture of a Ford Expedition with a New York

<sup>&</sup>lt;sup>3</sup> Surveillance footage from a pole camera with view of 1315 Brandywine Street captured Robinson meeting with Vidal on multiple occasions and exchanging documents.

license plate taken from Vidal's phone on December 29, 2020, the same day that the vehicle had been reported stolen.

In the summer of 2021, when Detective Hannon arrested Vidal on an outstanding out-of-state warrant, Vidal was operating Vehicle #9 of the Stolen Vehicle List, a 2015 Range Rover bearing VIN SALWR2VF0FA622795. Additionally, during the November 8, 2023, search of Vidal's home, PSP recovered Vehicle #23 of the Stolen Vehicle List, a Honda Pilot bearing VIN 5FBYF6H50LB044526, which had previously been reported stolen.

Finally, Vehicle #24 of the Stolen Vehicle List, a 2019 White Honda Accord bearing VIN 7HGVC1F16KA176618, was reported stolen by a private owner on March 21, 2023, after an alleged carjacking. A few months later, while conducting surveillance on Vidal's residence at 1315 Brandywine Street, Vidal was seen operating the Honda Accord on a daily basis.

# SCHEME 2

# The Vidal Chop Shop

The Grand Jury learned from Trooper Torres that chop shops are locations where individuals or organizations store, dismantle, and disguise vehicles. A chop shop may also change the vehicle's VIN and reassemble the vehicle for monetary gain. Trooper Torres testified that the Vidal Organization used 1315 Brandywine Street, Lebanon City, PA, Vidal's residence, to conduct a chop shop, where they altered cars' VINs (known as "re-VINing" the vehicles), altered vehicle license plates, manufactured fraudulent documents to title-wash the vehicles, and created forged registrations, in an effort to alter stolen vehicles to make them appear legitimate. The Grand Jury

found that the Vidal Organization altered or cloned the VINs of twenty vehicles. Similarly, they found the Vidal Organization title-washed or caused twenty-five vehicles to be title-washed.

#### A. 1315 Brandywine Street Chop Shop

The Grand Jury learned that the Pennsylvania State Police identified 1315 Brandywine Street, Lebanon City, Vidal's home, as a chop shop based on interviews, documentation, surveillance, and searches of the residence. Trooper Torres observed exchanges at the rear of the home that were consistent with illicit vehicle transactions. Additionally, Trooper Torres identified several stolen vehicles parked at the residence.

Trooper Torres testified that on April 3, 2023, PSP installed a surveillance camera on a public pole overlooking the rear of 1315 Brandywine Street. Video surveillance captured Vidal conducting illicit transactions involving vehicles, documentation, tags, adulteration of vehicles, and other behavior consistent with a chop shop operation.

For example, Trooper Torres presented the Grand Jury with surveillance footage from April 4, 2023, which showed Vidal exchanging a stack of documents with Glover. The transaction was consistent with many other titling transactions observed during the surveillance. The Grand Jury found Glover title-washed several vehicles for the Vidal Organization around that date. Trooper Torres also showed footage from April 5, 2023. The footage showed **Vehicle #23 of the Stolen Vehicle List,** a 2020 Honda Pilot bearing VIN 5FBYF6H50LB044526, parked in the rear of the residence. It also showed a Suzuki XL7 parked in the rear of the property, titled under T. Henry's name using counterfeit stamps in the title submission. T. Henry acknowledged the signature on the Suzuki XL7 title submission forms to PennDOT appeared to be hers. T. Henry operated both the Honda Pilot and the Suzuki XL7.

Through surveillance footage, Trooper Torres showed the Grand Jury an active title washing and a chop shop operation in progress. The trooper showed footage from April 17, 2023, from the rear of the Vidal residence. Williams picked Vidal up and the men traveled to a tag agency just outside of Lebanon City. At the tag agency, Williams submitted a title transfer using fraudulent documents for a Chevy truck. In that fraudulent titling paperwork, Williams alleged the vehicle was a gift from M.R. Minutes later, surveillance video showed Williams handing the newly obtained title to Vidal. About an hour later, M.R. met Vidal at the rear of Vidal's residence, driving the Chevy truck that had been fraudulently titled by Williams. Vidal provided M.R. with a Pennsylvania tag and the titling documents. Then Vidal and M.R. removed the Chevy truck's New York plates and replaced them with Pennsylvania plates obtained under Williams' name.

The Grand Jury also reviewed surveillance video from August 10, 2023, which captured R. Henry coming out of 1315 Brandywine with a black and gray backpack. Law enforcement recovered the same backpack during the November 8, 2023, search of the 1315 Brandywine Street residence, and it contained a large amount of title-washing and fraudulent documents, an electronic device to overwrite electronic vehicle keys, and other electronic devices known to be used in vehicle theft. Later that day, the surveillance camera captured Vidal and R. Henry changing plates on a vehicle, a tactic used to disguise it from law enforcement. Vidal and R. Henry returned the next day. R. Henry was captured driving Vehicle #25 of the Stolen Vehicle List, a stolen Infiniti Q60 bearing VIN JN1EV7EL4JM392416, which was later recovered by PSP. The pole camera later captured Vidal altering a part of Vehicle #25 from the driver's side dash area, where the public VIN is located. The Grand Jury reviewed footage of the same Infiniti Q60 a few days later, now bearing a license plate registered to Williams and a different vehicle.

The Grand Jury found that the pole surveillance camera captured illicit transactions involving Vidal and members of the Vidal Organization, including but not limited to Robinson, Williams, R. Henry, and Glover.

### B. July 30, 2021, Search of 1315 Brandywine Street

The Grand Jury learned from Trooper Torres that on July 30, 2021, T. Henry, gave PSP consent to search her and Vidal's residence located at 1315 Brandywine Street. PSP found numerous adulterated and fraudulent vehicle title templates, fraudulent template registration cards, and numerous fraudulent documents associated with PennDOT, including those in the name of Glover. Troopers also found label makers, printers, scanners, and other equipment. Trooper Torres testified that based on his experience and totality of the fraudulent documentation found in the residence, the equipment was used to create fraudulent paperwork in furtherance of the Vidal Organization's chop shop operation.

Trooper Torres testified that on the same day law enforcement observed Vidal leaving the residence while operating Vehicle #9 of the Stolen Vehicle List, a 2015 Range Rover bearing VIN SALWR2VF0FA622795. The Lebanon City Police conducted a traffic stop, during which Vidal, who had an active out-of-state warrant, identified himself as Luis Medina using counterfeit identification. Shortly thereafter, Glover came to the scene and alleged to be the registered owner of the Range Rover. The Grand Jury determined that this was untrue, and the vehicle had been stolen. PSP subsequently took Vidal into custody for the outstanding out-of-state warrant.

The Grand Jury learned that later that same day, Trooper Torres and Det. Hannon interviewed Vidal, who agreed to speak with investigators after having been advised of his Miranda rights. During the interview, Vidal identified Glover as his partner in the business of "flipping vehicles." He explained he sold vehicles at reduced prices for profit through a car lot

located at 409 East Cumberland Street in Lebanon County. The Grand Jury later learned that address is the operating address for Exclusive Towing, a company belonging to Vidal and Glover. However, the Grand Jury also discovered the Department of State had never sanctioned Exclusive Towing as a licensed dealership, nor did the business have any certified salespersons associated with it. Instead, Vidal admitted he engaged in street sales through word-of-mouth and social media advertising. He further explained that he frequently purchased vehicles without proper Certificates of Title. To facilitate transactions, Vidal admitted he created fictitious titles or adulterated legitimate ones to obtain clean titles through PennDOT. Vidal admitted he obtained fraudulent vehicle paperwork, including passports, Green Cards, and driver's licenses, from Rodriguez. Vidal noted that Rodriguez's fraudulent productions were sophisticated enough to pass law enforcement scrutiny.

Additionally, Vidal stated he had an association with a man from Virginia who provided him with vehicles, including those later sold to Um, a conspirator of the Vidal Organization. The Grand Jury discovered that Vidal, Glover, and Um picked up Vehicle #3 of the Stolen Vehicle List, a 2020 Jeep Wrangler bearing VIN 1C4HJXDN0LW198658, from Washington D.C, a vehicle originally stolen in Virginia. Vidal expressed frustration with his Virginia contacts, stating he was "pissed" at those "guys down south" because some rental vehicles had trackers. Although Vidal identified Um as an associate, he stated their relationship soured after he discovered that Um had bypassed him to broker transactions with his Virginia contact.

The Grand Jury heard that during the July 30, 2021 interview, Vidal consented to PSP searching the phone in his possession. Law enforcement extracted and analyzed the phone's contents, which contained images of stolen vehicles, counterfeit public VINs, blank counterfeit title documents, fake identification cards, and fraudulent insurance paperwork – materials

consistent with the document templates found during the search of 1315 Brandywine Street and chop shop operations. Additionally, the phone contained pictures of vehicles that had been reported stolen on the same day the pictures were taken. The phone search revealed extensive text conversations discussing the organization's criminal operations. These messages included discussions about acquiring stolen vehicles, producing fraudulent documentation, and conducting illicit vehicle sales. The Grand Jury found that Vidal had direct text communications with multiple individuals, including Glover and Rodriguez, concerning obtaining stolen vehicles and making unlawful alterations.

The Grand Jury also reviewed two pictures downloaded from Vidal's phone showing Um taking a picture of public VINs on two separate vehicles. The VINs were later sent to Vidal. As explained in detail below, Um admitted he never met any of the alleged owners listed on the fraudulent paperwork associated with the vehicles he brokered from Vidal.

#### C. November 8, 2023, Search of 1315 Brandywine Street

The Grand Jury heard that on November 8, 2023, PSP and the OAG executed a search warrant on 1315 Brandywine Street, Lebanon City, PA. Trooper Torres testified that PSP secured the residence that morning and found T. Henry, T. Henry's mother, and Vidal in the residence. During the search, law enforcement seized two stolen vehicles from the residence: Vehicle #25 of the Stolen Vehicle List, a blue 2018 Infiniti Q60 Coupe bearing VIN JN1EV7EL4JM392416, and Vehicle #23 of the Stolen Vehicle List, a black 2020 Honda Pilot bearing VIN 5FBYF6H50LB044526. Inside Vehicle #23, investigators discovered counterfeit Western Union checks and fraudulent insurance documentation. Additionally, the federal VIN labels on the Infiniti Q60 and the Honda Pilot had been altered, with fraudulent VINs taped over the originals. Law enforcement also seized a Chevy Cruze, which had been observed being operated by R. Henry and

Dipaola. Trooper Torres testified that he executed a search warrant on the Chevy Cruze, leading to the discovery of a stolen credit card belonging to a female victim and a vehicle packet for a Cadillac Escalade in the glove compartment.

Trooper Torres testified that law enforcement seized a large amount of counterfeit documents, templates for counterfeit documents, electronic devices used to produce fraudulent paperwork, and other evidence of a chop shop operation throughout the entire house, including the basement. In the front room of the first floor, investigators discovered an office space equipped with devices and equipment for producing identification cards. They also found a sheet accounting for money owed and earned, counterfeit documents, blank vehicle registration cards, and altered insurance documents in plain view. In the living room, Trooper Torres testified that investigators located check kits containing washed blank checks preprinted for dealerships in New York, along with forged Western Union checks. In the kitchen, hidden in the oven's bottom drawer wrapped in aluminum foil, investigators found a fraudulent stamp for the dealership High Street Auto, which law enforcement observed in the submission of fraudulent titles for vehicles associated with the Vidal Organization. Law enforcement also found stacks of counterfeit documents on top of the refrigerator and inside kitchen drawers, along with another fraudulent notary stamp and stolen credit cards. Law enforcement also found multiple counterfeit plates and multiple counterfeit VIN stickers strewn across the first floor. The Grand Jury observed photographs of the attic, which showed bags full of counterfeit documentation, including fraudulent insurance cards belonging to Vehicle #14 of the Insurance Policies List, infra., a 2020 Chrysler 300 bearing VIN 2C3CCaGG6LH154830 in the name of Johnny Holliday.

The Grand Jury also reviewed photographs of blank fraudulent MCOs found in the attic.

Trooper Torres testified that in the basement of the home, law enforcement discovered a black

Jansport backpack containing title-washing documents, an electronic device used to overwrite electronic keys for vehicles, and other electronic tools commonly used in vehicle theft. PSP also found R. Henry's identifying information and criminal court documents in the backpack. Trooper Torres testified that surveillance footage had previously captured R. Henry and Vidal carrying the same backpack. The Grand Jury reviewed photographs of the dining room, which depicted master documents of insurance policies, vehicle registrations, and out-of-state titles seized by law enforcement. Trooper Torres testified that chop shops utilize these "master copies" to produce fraudulent versions by falsifying the information for new vehicles. Several of the fraudulent vehicle registrations contained T. Henry's name.

The Grand Jury learned that Vidal requested to speak with investigators. PSP escorted Vidal to PSP's Jonestown barracks for a recorded interview. On his person, he had several debit and credit cards belonging to other individuals, as well as a counterfeit identification featuring his picture under the name of Luis Medina, one of Vidal's known aliases. During the interview, Vidal admitted that he was in the business of obtaining vehicles and selling them at an enormous profit. When confronted with the fact that the vehicles parked in his driveway were reported stolen, Vidal acknowledged he knew the Infiniti had "issues." He alleged that Rodriguez had supplied him with vehicles and that Rodriguez was conducting sales behind his back. Vidal also accused Rodriguez of scamming his neighbor, A.H., and claimed Rodriguez had stolen vehicles from U-Haul and sold them to various people in Lebanon. Trooper Torres testified that when he confronted Vidal with the devices found in his residence, Vidal attempted to blame R. Henry, whom he described as an electronics "mastermind." Vidal further accused R. Henry of being responsible for all the counterfeit documents and fraudulent Western Union fraudulent checks found in the home.

Trooper Torres told the Grand Jury that he subsequently interviewed R. Henry and presented him with the evidence found in the 1315 Brandywine Street address and allegations of stolen vehicles and title washing. R. Henry blamed Vidal.

The Grand Jury heard how Vidal admitted to Trooper Torres that he became involved with selling stolen vehicles because it was "low-risk." Vidal stated the profit margin was significantly higher than gun or narcotics trade while carrying a lower risk of severe consequence. He explained that with just a \$2,000 down payment, one could obtain a vehicle, title-wash it, and resell it for \$25,000. Vidal claimed it was easy to make over \$100,000 per month, emphasizing that he viewed it as a safer operation since he was not "killing anyone," only messing up his or her credit.

#### D. Re-VINing Vehicles

The Grand Jury learned from Trooper Torres that the Vidal Organization used the residence at 1315 Brandywine Street, Lebanon City, to alter, destroy, remove, or replace the VINs in stolen vehicles. The Vidal Organization also "cloned" VINs, using the same identification number across multiple vehicles. Trooper Torres testified that the Vidal Organization altered or cloned the VINs of at least twenty vehicles.

The Grand Jury further learned that the VIN is a federally mandated identification method that assigns a unique 17-character number to each vehicle. Each character in the VIN series serves a specific purpose: the first three characters indicate the vehicle's country of origin, manufacturer, and the make; the tenth character designates the model year. Law enforcement can be trained to recognize the unique font used in VIN markings to identify fraudulent alterations. Trooper Torres described the placement of VINs on vehicles, explaining that each vehicle had a public VIN, typically visible on the driver's side near the windshield and inspection stickers. Additionally,

vehicles contain a federal VIN label, often located on the driver's door, which also displays the 17-character VIN.

The Vidal Organizations modified stolen vehicles by removing, changing, or disguising the public VIN located on the dashboard or windshield. As a representative example, Trooper Torres presented the Grand Jury with evidence related to Vehicle #24 of the Stolen Vehicle List, a 2019 Honda Accord bearing VIN 7HGVC1F16KA176618. Trooper Torres observed this vehicle parked on a public road outside of Vidal's home for weeks, during which Vidal operated the vehicle. The vehicle displayed another vehicle's registered plate, belonging to T. Henry. Additionally, Vehicle #24 displayed a public VIN with only sixteen (16) characters instead of the required seventeen (17) characters. PSP executed a search warrant on the vehicle, and Trooper Torres discovered it had been reported stolen in New York. Further inspection revealed the Honda Accord's public VIN was counterfeit, featuring an atypical font. The fraudulent VIN had been placed over the real VIN using black electrical tape.

The Grand Jury learned that the Vidal Organization also engaged in VIN "cloning" by copying legitimate VINs from legally owned vehicles and placing them onto stolen vehicles of similar makes and models. Trooper Torres told the Grand Jury that the Vidal Organization printed out a known 17-character VIN and affixed it to another vehicle to create the appearance of legitimacy. By way of example, Trooper Torres testified about Vehicle #17 of the Stolen Vehicle List, 2021 Chevy Silverado with the true VIN 3GCNWAEF7MG225187. The Vidal Organization stole this vehicle from U-Haul. Upon inspection, law enforcement discovered that the Silverado had a fraudulent VIN from a similar vehicle affixed to it. The fake VIN was affixed using a piece of cardboard and black tape, similar to the method observed in Vehicle #24 of the Stolen Vehicle List.

The Grand Jury also heard that Vidal Organization used the VIN for **Vehicle #22 of the Stole Vehicle List** on another stolen U-Haul 2021 Chevrolet Silverado, thus "cloning" the VIN.

#### E. Altering Vehicle Plates

The Grand Jury learned that the Vidal Organization altered or modified license plates to disguise stolen vehicles while on the road. Trooper Torres testified that the Vidal Organization frequently obtained license plates through unwitting notaries and affixed them to stolen vehicles. The Grand Jury heard that PennDOT issues license plates to a particular vehicle. By changing the plates, the Vidal Organization attempted to evade law enforcement detection.

As a representative example, Trooper Torres testified that PSP seized Vehicle #24 of the Stolen Vehicle List, a 2019 Honda Accord bearing VIN 7HGVC1F16KA176618, from Vidal's residence. Upon executing a search warrant on the vehicle, Trooper Torres discovered that the vehicle displayed a Pennsylvania temporary registration certificate issued for a Suzuki XL7 registered to T. Henry. Additionally, Trooper Torres found two fictitious New Jersey plates in the trunk of the Honda Accord. Surveillance footage showed Vidal and other conspirators swapping vehicle tags. The footage captured these vehicles being operated with either fraudulent tags or tags obtained with fraudulent documentation. The Grand Jury also reviewed video evidence of R. Henry and Vidal replacing a vehicle plate with a fraudulent one.

The Grand Jury reviewed multiple license plate reader photographs capturing stolen vehicles displaying different license plates that did not correspond to those vehicles. As an example, Trooper Torres presented the Grand Jury with a license plate reader photograph of a Chevy Cruz observed in the possession of R. Henry and Vidal. On August 11, 2023, the vehicle was seen displaying a license plate registered to Williams and a Chrysler 300. However, by

September 21, 2023, a license plate reader captured the same Chevy Cruz displaying a different license plate belonging to a Nissan Rogue.

#### F. Title-Washing Vehicles

The Grand Jury found that the Vidal Organization fraudulently re-identified stolen vehicles by obtaining valid titles from PennDOT through the submission of falsified documents. The Vidal Organization systematically submitted fraudulent paperwork to PennDOT, including fraudulent titles, fraudulent MCOs, fake lien releases, falsified insurance policies, and forged checks. These fraudulent submissions enabled the Vidal Organization to secure vehicle titles through notaries or directly from PennDOT. Trooper Torres testified that PennDOT unwittingly issued Pennsylvania titles. Trooper Torres identified multiple transactions completed directly at PennDOT's headquarters in Harrisburg, Pennsylvania, where counterfeit out-of-state titles were processed into a Pennsylvania title within a single business day.

On November 8, 2023, during the execution of a search warrant at Vidal's residence, law enforcement recovered multiple counterfeit notary stamps and business stamps, including those stamps that purported to belong to Copart Auto Auction and New York Title Agency.<sup>4</sup> These stamps had been used in the submission of counterfeit titles. Additionally, law enforcement discovered blank Michigan titles identical to those submitted by the Vidal Organization, as well as a significant amount of printing devices, scanners, and equipment used to alter titling documents.

The Grand Jury found that the Vidal Organization title-washed or caused to be title-washed twenty-five vehicles, as detailed in the **Re-Title List**. The Vidal Organization used the titles

<sup>&</sup>lt;sup>4</sup> As discussed in greater detail later, Copart Auto Auction and New York Title Agency confirmed that the stamps found by law enforcement at the Vidal residence were fraudulent, that they did not authorize the use of their likeness, and that they have no association with the vehicles subject to this investigation.

obtained through fraudulent means to give the stolen vehicles the appearance of legitimacy, facilitating illicit street sales.

## Re-Title List

#	VIN	Make /Model	Fraudulent State Title	Titling Person
1	WBA13BJ04MCF93856	2021 BMW 530 XI	Michigan	Toan N. Lam
2	3PCAJ5BBXMF119307	2021 Infiniti QX50	Michigan	Toan N. Lam
3	2C3CDZBT6MH546661	2021 Dodge Challenger	New Jersey	Toan N. Lam
4	1C4HJXDN0LW198658	2020 Jeep Wrangler	Michigan	Joseph Glover
5	5UXTR9C53JLD68432	2018 BMW X3	New York	Joseph Glover
6	5UXTR9C5XKLP95041	2019 BMW X3	New York	C. Q. [name redacted]
7	2C3CDXGJ4LH114614	2020 Dodge Charger	New York	C. Q. [name redacted]
8	WDDSJ4EB6HN480282	2017 Mercedes-Benz	New York	Kevin Thorne
9	19UDE2F70KA009475	2019 White Acura ILX	New York	Kevin Thorne
10	19UDE2F36KA006951	2019 Acura ILX	New York	Kevin Thorne
11	3KPF24AD2NE466816	2022 Silver Kia Forte	MCO	Rafael H. Reyes
12	1HGCV1F49MA030596	2021 White Honda Accord	МСО	Rafael H. Reyes
13	3GCNWAEF6MG280676	2021 White Chev. Silverado	New York	Eddie Robinson
14	1GTW7AF72M1272713	2021 GMC Savana Van	Michigan	Not Filed
15	3GCNWAED3NG189056	2022 Chevy Silverado 1500	мсо	J. C. (attempt) [name redacted]
16	3GCNWAEF9MG279814	2021 Chevy Silverado 1500	New York	J. C. (attempt) [name redacted]
17	1HGCV1F38LA15769 1HGCV1F38LA151769 (F)	2019 White Honda Accord	New York	Not Filed
J :	JN1EV7EL4JM392416 JN1EV7EL3HM553171 (F)	2016 Inifinti Q60 Coupe	Michigan	Ray Henry
19	5FNRL384X8B414178	2008 Gold Honda Odyssey	New York	B. V. [name redacted]
20	JS3TX92V664101150	2006 Suzuki XL-7	Pennsylvania	Tina Henry
21	5FBYF6H50LB044526 5FNYF6H59LB057517 (F)	2020 Honda Pilot	New York	Syrel Williams
22	2GCEK19B951161002	2005 Chevrolet Silverado	New York	Syrel Williams
23	SHHFK8G72KU204114	2019 Honda Civic Type R	New York	Syrel Williams (Attempt)

24	19UDE2F81KA002026	2019 Acura ILX	МСО	A.H. [name redacted]
25	1GNSCNKD2MR119903	2021 Chevrolet Tahoe	HVICT)	A.H. (attempt) [name redacted]

Trooper Torres testified that the Vidal Organization systematically created fraudulent outof-state titles to obtain Pennsylvania vehicle titles through PennDOT. The Grand Jury reviewed multiple examples of counterfeit out-of-state titles that the Vidal Organization submitted to PennDOT and various unwitting notaries across the Commonwealth.

For example, Trooper Torres presented the Grand Jury two fraudulent out-of-state titles recovered from Vidal's phone. The first was a counterfeit New York State title for Vehicle #9 of the Re-Title List, a 2019 Acura IXL bearing VIN 19UDE2F70KA009475, which Vidal submitted to PennDOT. The second was a counterfeit New York State title for Vehicle #21 of the Re-Title List, a 2020 Honda Pilot bearing VIN 5FNYF6H59LB057517, which Williams submitted to PennDOT. Both fraudulent titles listed Kevin Thorne as the owner, another known alias of Vidal. PennDOT processed both vehicles and unwittingly issued true Pennsylvania titles. However, the New York Department of Motor Vehicles confirmed that New York titles were never issued for the listed vehicles.

Trooper Torres also presented the Grand Jury with two fraudulent Michigan titles submitted to PennDOT by the Vidal Organization, displaying striking similarities. The Grand Jury reviewed a counterfeit Michigan title submitted by Lam for Vehicle #1 of the Re-Title List (also Vehicle #2 of the Stolen Vehicle List), a 2021 BMW 530i bearing VIN WBA13BJ04MCF93856. The fraudulent title contained several known identifiers of the Vidal Organization, including a Copart Inc. stamp and owner information for Credit Acceptance Corporation. Additionally, the Grand Jury examined a second fraudulent Michigan title submitted by Glover for Vehicle #4 of the Re-Title List, a 2020 Jeep Wrangler bearing VIN 1C4HJXDN0LW1986586. The fraudulent

Michigan title also misrepresented that Glover purchased a vehicle from Michigan Auto Title Services for \$5,200. The Grand Jury reviewed the true vehicle title, which showed a lien on the vehicle from the Bank of New York Mellon Trust. When Glover title-washed the vehicle, the lien on the vehicle was fraudulently erased. Notably, this fraudulent Michigan title had identical information from the halfway point down as the title for **Vehicle #1 of the Re-Title List**, including the same Copart Inc. stamp and owner information for Credit Acceptance Corporation. The Grand Jury heard how Copart Inc. confirmed they never transacted those vehicles. PennDOT unwittingly processed both counterfeit titles and issued Pennsylvania titles.

The Grand Jury heard that during the November 8, 2023, search of Vidal's home, PSP recovered the Copart Inc. stamp used in the fraudulent title submitted for Vehicle #1 of the Re-Title List and Vehicle #4 of the Re-Title List. Law enforcement also found blank Michigan title forms matching those submitted to PennDOT. Additionally, the Grand Jury reviewed a photograph retrieved from Vidal's phone showing Vehicle #4 of the Re-Title List and its public VIN. The metadata from the image revealed that it was taken on April 29, 2021. The next day, on April 30, 2021, the vehicle was title-washed through PennDOT.

The Grand Jury found that the out-of-state fraudulent titles used to title-wash the vehicles listed in the Re-Title List, share several identifying characteristics. These include, the same forged stamps, seller information, and general formatting that matches the blank out-of-state vehicle titles found in Vidal's phone and at Vidal's residence. For example, Trooper Torres presented the Grand Jury the fraudulent title for Vehicle #18 of the Re-Title List (also Vehicle #25 of the Stolen Vehicle List), an Infiniti bearing VIN JN1EV7EL4JM392416. On November 8, 2023, law enforcement seized the yehicle from Vidal's residence during the execution of a search warrant.

Trooper Torres testified that **Vehicle #13 of the Re-Title List** was fraudulently titled in Pennsylvania using a fake New York title by Robinson, a known conspirator of the Vidal Organization. Robinson titled the vehicle using a fraudulent New York title, listing the name of Kevin Thorne, an alias of Vidal, as the owner. The title transfer included counterfeit stamps, which investigators later found in Vidal's residence. Robinson submitted to PennDOT a bill of sale, falsely claiming to have purchased the vehicle on August 20, 2022, through Copart Auto Auction for \$2,500. However, the Grand Jury heard testimony that Copart Auto Auction later confirmed the bill of sale was fraudulent and Copart Auto Auction never sold **Vehicle #18**.

Trooper Torres told the Grand Jury that, with the assistance of PennDOT, he identified multiple transactions linked to the Vidal Organization in which counterfeit documents were submitted through a local notary. These unwitting notaries would then process and facilitate the transfer of vehicle titles. As an example, the Grand Jury reviewed surveillance footage from Sunrise Notary, located in Lebanon, PA, recorded on January 19, 2023, at 1847 hours showing an attempted title transfer by the Vidal Organization. On that date, Williams was observed entering Sunrise Notary and approaching the counter to process a title transfer. According to the employees at Sunrise Notary, Williams provided a fraudulent New York title that had the known forged Copart stamp used by the Vidal Organization. The transaction raised red flags because Williams attempted to transfer the title for a reconstructed 2019 Honda Civic Type R without an enhanced inspection. Due to these inconsistencies, Sunrise Notary refused to process the transaction. Sunrise Notary retained a copy of the fraudulent title and later provided it to Trooper Torres. The Grand Jury learned that Williams had previously completed other fraudulent title transactions at Sunrise Notary.

The Grand Jury found that the Vidal Organization frequently used fraudulent MCOs to obtain valid titles from PennDOT. The MCOs, often referred to as the "birth certificate" of the vehicle, is issued exclusively from the manufacturer to an authorized dealership. The Vidal Organization routinely submitted counterfeit MCOs to PennDOT on used or stolen vehicles. By using these fraudulent documents, the Vidal Organization was able to obtain lien-free vehicle titles.

Trooper Torres testified that for multiple stolen vehicles, including **Vehicle #15 of the Re- Title List**, which was stolen from U-Haul, the Vidal Organization submitted fraudulent MCOs to secure legitimate vehicle titles. Vidal sold **Vehicle #15 of the Re-Title List** to Mejia, who in turn sold it to El Fuerte Auto Sales, who eventually sold it to an unsuspecting victim.

As an example, the Grand Jury reviewed evidence regarding Vehicle #11 of the Re-Title List, a 2022 Silver Kia Forte sold to Rafael Hernandez Reyes by Mejia with fraudulent titling paperwork. Documentation from PennDOT showed Hernandez Reyes titled the vehicle in Pennsylvania using a fraudulent MCO, which matched others found in Vidal's residence.

## SCHEME 3

# Illegal Sale of Stolen Vehicles

The Grand Jury learned that once the stolen vehicles were altered to disguise their origin and make them harder to trace, the Vidal Organization, through Vidal and Rodriguez, actively sought potential buyers, including unsuspecting victims and co-conspirators. They sold these

<sup>&</sup>lt;sup>5</sup> Vehicle #15 of the Re-Title, the Chevy Silverado bearing VIN 3GCNWAED3NG189056, is also Vehicle #21 of the Stolen Vehicle List.

vehicles at an enormous profit, pricing them well below market value to facilitate quick sales typical of black-market transactions. Trooper Torres testified these vehicles frequently changed hands multiple times before ending up in the possession of an unwitting buyer. Additionally, the Vidal Organization retained some of these stolen vehicles for personal use.

The Grand Jury heard that the Vidal Organization produced fraudulent Copart Auction invoices to give the appearance of legitimacy to the sale of the stolen vehicles. Copart Auction is a legitimate business that sells repairable salvage vehicles to the public. Trooper Torres testified that Vidal misled potential victims by falsely claiming that the vehicles originated from Copart Auction. To bolster this deception, the Vidal Organization created fraudulent stamps bearing the Copart Auction insignia and used a counterfeit Copart email to fabricate supporting communications. Copart Auction representatives have confirmed that the stamps and invoices used by the Vidal Organization in vehicle transactions, including submissions to PennDOT, were fraudulent and the vehicles had no legitimate connection to their business.

Dipaola testified that Vidal and R. Henry obtained vehicles from dealerships by making down payments using fraudulent Western Union money orders or stolen credit card information with no intention of paying the loans. This testimony was consistent with Vidal's November 8, 2023, interview. Dipaola recounted witnessing such a transaction in the fall of 2023 while Vidal and R. Henry were cashing fraudulent Western Union money orders in Harrisburg. She further explained to the Grand Jury that after acquiring these vehicles, Vidal and R. Henry re-VINed and re-titled the vehicles to prepare them for street sales. Dipaola testified that once the vehicles were "cleaned," they were sold either directly to unsuspecting buyers or to an "in-between" conspirator.

The Grand Jury learned that an "in-between" conspirator facilitated the sale of the stolen vehicles. For example, Mejia purchased at least five vehicles from Vidal, Rodriguez, and

Robinson, and quickly resold them. The titling documentation that Mejia transferred to buyers was fraudulent. During an interview conducted on January 10, 2023, Mejia admitted to purchasing multiple vehicles from Vidal and/or Rodriguez. Mejia stated:

- he purchased **Vehicle #14 of the Stolen Vehicle List**, a 2019 Acura ILX bearing VIN 19UDE2F36KA006951, with an estimated value of \$20,000, from Vidal for \$4,000 and quickly resold it to Hernandez Reyes for \$15,000.
- he purchased Vehicle #13 of the Stolen Vehicle List, a 2021 Honda Accord bearing VIN 1HGCV1F49MA030596, valued at \$20,000, from Vidal for \$5,000, then selling it to Hernandez Reyes for \$17,000, who in turn sold it to a local dealership for \$22,500.
- he purchased Vehicle #15 of the Stolen Vehicle List, a 2022 Kia Forte bearing VIN 3KPF24AD2NE466816, with an estimated value of \$20,000, from Vidal for \$4,000 and quickly resold it to Hernandez Reyes for \$14,000, who later sold it to a local dealership for \$17,000.

Both Mejia and Hernandez Reyes admitted they never met the original owners listed in the titling documents. As was previously explained, the Grand Jury learned that the street purchase of vehicles significantly below market value, the rapid resale process, and the exchange of documents listing unknown owners were all consistent with black-market sales of stolen vehicles.

Trooper Torres testified the above transactions were examples of "fencing" stolen vehicles. This process allowed Vidal and Rodriguez to create distance between themselves and the theft by quickly selling the vehicle at a low price to conspirators. These "fencers" then resell the stolen vehicle with forged documents, making a significant profit while disguising the vehicle's illicit origins.

#### A. Vehicles Sold to Robinson, Mejia, & El Fuerte Auto Sales

The Grand Jury found that the Vidal Organization, through Vidal, sold four stolen U-Haul vehicles to Robinson and Mejia that ended up in a dealership. The vehicles were re-titled and altered by the Vidal Organization before being resold. Robinson and Mejia subsequently sold the

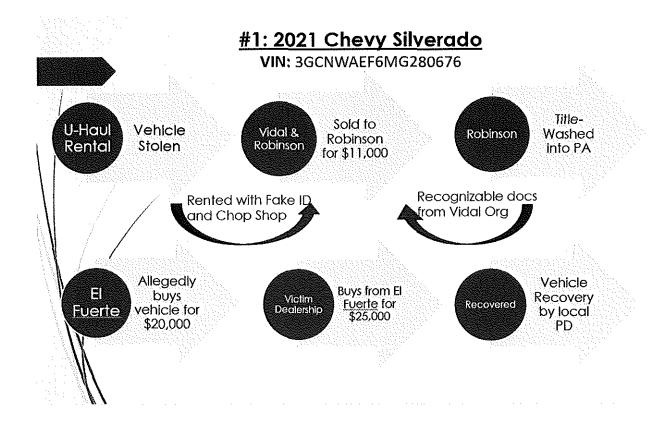
vehicles to El Fuerte Auto Sales LLC ("El Fuerte"),<sup>6</sup> a dealership located at 1120 Maple Street, Lebanon City, Lebanon County, through salesperson Yonathan Peguero-Rodriguez or Ismael Vargas.

#### 1) Vehicle #18: 2021 White Chevy Silverado (VIN 3GCNWAEF6MG280676)

As is discussed in greater detail above, **Vehicle #18 of the Stolen Vehicle List**, a 2021 White Chevrolet Silverado bearing VIN 3GCNWAEF6MG280676, was stolen from U-Haul in Lebanon County. The false identification used to rent the vehicle was found on Vidal's phone.

Trooper Torres told the Grand Jury that he interviewed Robinson about the purchase and sale of **Vehicle #18.** Robinson stated he purchased the vehicle from Vidal for approximately \$11,000, significantly below its estimated market value of \$25,000. Robinson later sold the vehicle to Peguero-Rodriguez of El Fuerte for \$15,000, along with the accompanying fraudulent titling paperwork, despite not having a salesman license. Robinson also admitted he never met any of the alleged owners documented in the paperwork. Trooper Torres confirmed the sale with El Fuerte through its owner, Peguero-Rodriguez. Subsequently, on October 19, 2022, the Londonderry Township Police Department recovered **Vehicle #18** from a local dealership, which consequently lost its investment on the vehicle.

<sup>&</sup>lt;sup>6</sup> El Fuerte Auto Sales LLC, its owner, and co-conspirators are subject of a separate presentment and face charges distinct from those listed in the current document.

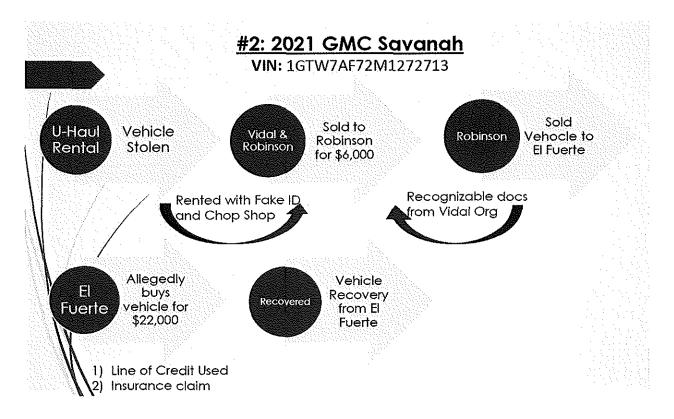


### 2) <u>Vehicle #19:</u> 2021 White GMC Savana (VIN 1GTW7AF72M1272713)

As is discussed in greater detail above, Vehicle #19 of the Stolen Vehicle List, a 2021 White GMC Savana bearing VIN 1GTW7AF72M1272713, was stolen from U-Haul in New York.

Trooper Torres testified that during an interview, Robinson admitted he had purchased the Vehicle #19 from Vidal for \$6,000, a price significantly below its estimated market value of \$20,000. Robinson said he received a Michigan title - later determined to be fraudulent - from Vidal. Similar to Vehicle #18, this vehicle's fraudulent title had the same format and fake stamps associated with the Vidal Organization and found in Vidal's home. Robinson confirmed that he later sold the vehicle to Peguero-Rodriguez of El Fuerte for \$8,000, despite not having a salesman license. Robinson also conceded he never met any of the alleged owners documented in the paperwork. Trooper Torres confirmed the sale with El Fuerte through its owner, Peguero-

Rodriguez. Trooper Torres seized the stolen vehicle from El Fuerte's lot before the vehicle was sold.



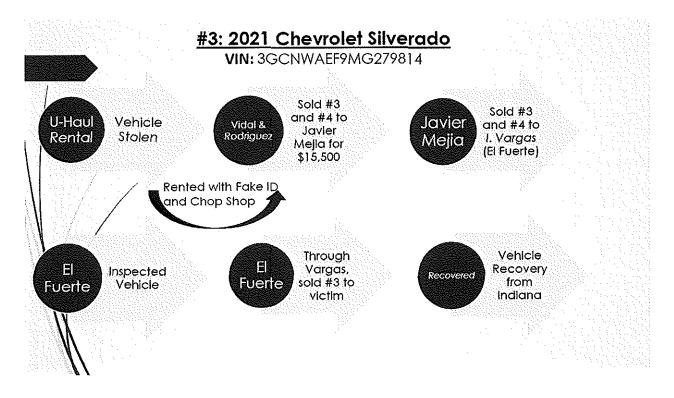
# 3) <u>Vehicle #22:</u> 2021 Chevrolet Silverado (VIN 3GNWAEF9MG279814) & <u>Vehicle #21:</u> 2022 Chevrolet Silverado (VIN 3GCNWAED3NG189056)

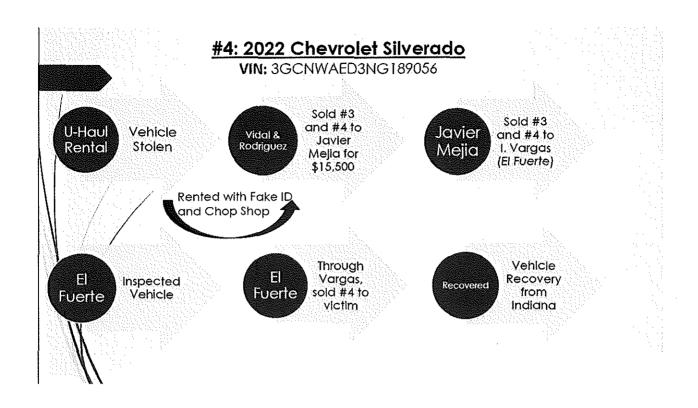
As is discussed in greater detail above, Vehicle #22 of the Stolen Vehicle List, was stolen from a U-Haul in New Jersey and Vehicle #21 of the Stolen Vehicle List was stolen from a U-Haul in Lehigh County, PA

Mejia stated he had purchased **Vehicle #21** and **Vehicle #22** from Rodriguez for a total of \$15,000. Mejia stated he received all the vehicle documentation, including the title documents - later determined to be title-washed with a known MCO from the Vidal Organization. In the same interview, Mejia acknowledged he never met with any of the people listed on the titling documentation. Mejia noted he sold **Vehicle #21** and **Vehicle #22** as a "package deal" to El Fuerte, through salesperson Vargas, for \$12,000 (\$6,000 per vehicle). The estimated value of **Vehicle #22** 

alone is \$25,000. Mejia gave the fraudulent title and documentation to Vargas. Mejia is not a licensed vehicle salesperson.

The Grand Jury found that on August 18, 2022, a father and son from Indiana purchased Vehicle #21 and Vehicle #22 from El Fuerte for \$40,000 for their pizza business. The Grand Jury heard that the victims encountered issues with the title when attempting to register the vehicles at their local DMV. The Grand Jury learned that the titling documentation provided, originally from the Vidal Organization, was fraudulent. Trooper Torres testified that when he confronted Vargas about the title issues, he stated he returned to Mejia and paid him \$1,000 to obtain new title documentation. On November 29, 2022, Vehicle #21 and Vehicle #22 were recovered in Indiana from the father-son victims.





### B. Vehicles Sold to Lam Auto Sales Through Um

The Grand Jury learned that on June 18, 2021, the NICB, through Agent Shawn Conrad ("Agent Conrad"), reported several vehicles in Dauphin County suspected of being stolen and title-washed. Det. Hannon testified he responded to a local dealership in Dauphin County in reference to Vehicle #1 of the Stolen Vehicle List, a 2020 Nissan Altima bearing VIN IN4BL4CV6LC235882, which had been stolen from a rental agency in Virginia. Det. Hannon impounded the vehicle after he discovered it had been reported stolen and re-titled with fraudulent documents. Similarly, Detective Chad Wasserman from the Lehigh County Auto Theft Task Force recovered Vehicle #2 of the Stolen Vehicle List, a BMW 530 XI bearing VIN WBA13BJ04MCF93856, from a local dealership in Allentown, which had been stolen from Enterprise. According to the documents provided by the local dealership, the BMW 530 XI was brought in and fraudulently titled by Lam Auto Sales.

The Grand Jury learned that on July 12, 2021, Det. Hannon and Agent Conrad conducted an interview with Lam at the State Police barracks in Lancaster, Pennsylvania. Lam was the owner and sole licensed car salesperson for Lam Auto Sales dealership. Lam stated he purchased the Vehicle #2 of the Stolen Vehicle List, the BMW 530 XI, and eight other vehicles from Um, a former coworker. Lam subsequently sold seven of the nine stolen vehicles to a local vehicle auction for resale, flipping them in quick fashion. Um purchased the stolen vehicles from Vidal. The Grand Jury learned that Lam purchased the vehicles "off the street" without ever meeting the owners listed in the title documentation. Lam further admitted that he was aware Um could procure fraudulent documentation, including driver's licenses, Green Cards, and GED certificates, from a known associate confirmed to be Vidal.

The Grand Jury learned that on August 2, 2021, Det. Hannon and Agent Conrad conducted an interview of Um at his residence located 1317 Brandywine Street, Lebanon, which is next door to Vidal's residence, discussed previously. When the investigators asked Um if he knew why they were there, Um made a head movement towards Vidal's home and said "I'm in trouble." Um spoke to investigators at the Lebanon County Courthouse, where Um identified Vidal as an associate that supplied him the vehicles he sold to Lam. Um said he paid Vidal a "kickback" when he profited from a sale. Um provided the investigators with vehicle documentation, which he ultimately stated was "made up," that illustrated the vehicles he purchased from Vidal and subsequently sold to Lam. However, the Grand Jury learned that the Copart documentation Um provided was fraudulent.

Det. Hannon testified that the bills of sale provided by Um illustrated that he purchased **Vehicle #1 of the Stolen Vehicle List**, a 2020 Nissan Altima bearing VIN 1N4BL4C6LC235882 with an estimated value of \$20,000, from Vidal for \$7,000. Um subsequently sold the vehicle to

Lam with a fraudulent out of state title for approximately \$14,000. Det. Hannon testified that Lam stated he later sold the 2020 Nissan Altima to a dealership in Cumberland County for \$18,900.

Um also purchased a 2019 Nissan Frontier bearing VIN 1N6AD0ER9KN719458 from Vidal for approximately \$7,000, and sold it to Lam for approximately \$17,500. Um provided a \$2,000 kickback to Vidal after the sale.

According to Um, he purchased Vehicle #4 of the Stolen Vehicle List (also Vehicle #4 of the Re-Title List), 2021 Dodge Challenger bearing VIN 2C3CDZBT6MH546661, with an estimated value of \$25,000, from Vidal for \$12,000. He then sold the vehicle to Lam for \$25,000. Um stated he provided a \$2,000 to \$3,000 "kickback" to Vidal. Det. Hannon testified that Lam stated he later sold the 2021 Dodge Challenger to a local dealership for \$33,800.

The next vehicle was **Vehicle #2 of the Stolen Vehicle List** (also **Vehicle #1 of the Re-Title List**), 2021 BMW 530i bearing VIN WBA13BJ04MCF93856, with an estimated value of \$35,000, Um purchased from Vidal for \$12,000. He then sold the vehicle to Lam for \$35,000. Um stated he provided a \$10,000 "kickback" to Vidal.

Um purchased **Vehicle # 8 of the Stolen Vehicle List**, a 2020 Jeep Compass bearing VIN 3C4NJDCB4KT619276, with an estimated value of \$15,000, from Vidal for \$6,500. He then sold the vehicle to Lam for \$15,000. Um stated he provided Vidal a \$1,000 to \$2,000 "kickback."

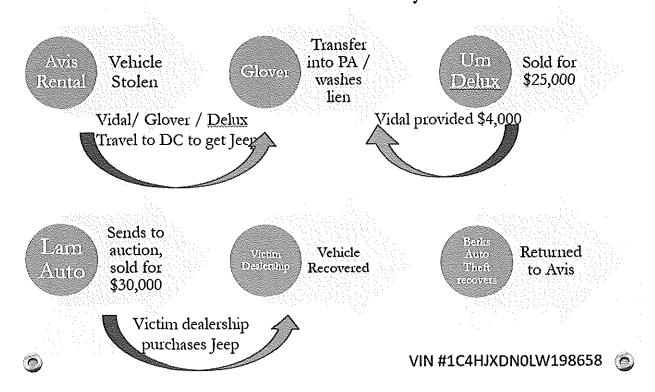
In this manner, Um admitted to purchasing no less than ten vehicles from Vidal and selling them to Lam. Um admitted that due to the manner in which vehicles were presented and sold, he knew something was wrong with the process. He stated he had been paying Lam back because he knew the transactions were not legitimate.

During his November 8, 2023, interview, Vidal admitted to selling several vehicles to Um before Um began to broker deals directly with Rodriguez, cutting Vidal out.

Trooper Torres presented the Grand Jury with evidence regarding Vehicle #3 of the Stolen Vehicle List (also Vehicle #4 of the Re-Title List), a stolen 2020 Jeep Wrangler bearing VIN 1C4HJXDN0LW198658 originally stolen from Avis Rental in Virginia. Trooper Torres testified that on June 22, 2021, Detective Whitmoyer of Berks County recovered the vehicle from a dealership located in Berks County. The dealership provided a sales jacket confirming they purchased the vehicle from an auto auction in Lancaster County. The Grand Jury reviewed a second sales jacket dated June 2, 2021, detailing that the auction purchased the vehicle at auction from Lam Auto Sales for \$30,000. During his interview with investigators, Lam identified the 2020 Jeep Wrangler at issue as one of the vehicles he purchased from Um for \$25,000. In turn, Um identified the same Jeep Wrangler as one of the vehicles he purchased off the street from Vidal for \$7,000 and paid him a \$4,000 to \$5,000 kickback for the vehicle. During his interview with investigators, Um said that he traveled to D.C. with Vidal and Glover to recover the vehicle. Um sold the stolen vehicle to Lam for \$25,000. Lam subsequently sold the stolen vehicle to an auto auction for \$30,000. The auto auction then sold the vehicle to a victim dealership, who lost the investment on the vehicle when Detective Whitmoyer recovered the vehicle from its lot.

# 2020 Jeep Wrangler Transaction History

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The Grand Jury reviewed documentation pertaining to Vehicle #7 on the Stolen Vehicle List (also Vehicle #2 of the Re-Title List), a 2021 Infiniti QX50 bearing VIN 3PCAJ5BBXMD119307 originally stolen from Hertz. The Grand Jury heard evidence that Vidal sold the stolen vehicle to Um for \$9,000. Um admitted that he sold the vehicle to Lam and paid Vidal a "kickback" of \$5,000 after the sale. Shortly after purchasing the vehicle, Lam sent the vehicle to auction, turning a profit. An unwitting victim purchased the vehicle at auction. On June 22, 2021, less than three months from the theft, Sgt. Geyer of the Manor Township Police Department recovered the 2021 Infiniti at a nail salon.

The Grand Jury found that Um purchased no less than ten stolen vehicles from Vidal, with accompanying fraudulent documentation. Um swiftly "flipped" those vehicles through street-level sales to Lam, who quickly re-sold the vehicles to an auto auction in Lancaster County.

#### C. Vehicles Sold to A.H.

Trooper Torres testified that on December 1, 2023, he and Special Agent Michael Matthews conducted an interview with A.H. at the State Police Jonestown Barracks regarding his vehicle purchases from Vidal. A.H. stated that in late 2021 and 2022, Vidal approached him and falsely claimed he had an account with Copart Auction that allowed him to obtain vehicles at discounted prices.

A.H. testified that Vidal first presented him with a 2020 Toyota Camry. A.H. provided a \$1,500 check written out to T. Henry for the vehicle. At Vidal's request, A.H. provided a second check for \$8,000, made out to Glover, for the Camry. In total, A.H. paid Vidal \$9,500 for the vehicle. Vidal provided A.H. with a MCO for the vehicle, later found to be fraudulent. However, when A.H. tried to title the vehicle with PennDOT, it was flagged. A.H. stated that he returned the vehicle and the accompanying documentations to Vidal, but Vidal never reimbursed him.

Trooper Torres testified that A.H. further stated that Vidal presented him with a second vehicle, Vehicle #25 of the Re-Title List, a 2021 Chevy Tahoe bearing VIN 1GNSCNKD2MR119903. A.H. provided T. Henry a check for \$9,600 and an additional check for \$5,300 to Vidal, for a total payment of \$14,900 for the Chevy Tahoe. However, A.H. never received the vehicle. Instead, Vidal gave him a fraudulent MCO and a Copart bill of sale. The Copart bill of sale listed an address associated with Exclusive Towing, the towing business owned by Vidal and Glover.

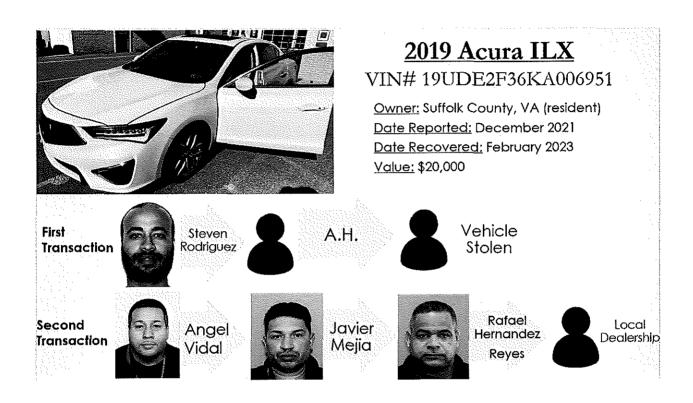
The Grand Jury learned that shortly after the issues with the Toyota Camry and the Chevy Tahoe, Vidal introduced Rodriguez to A.H. as "Roger Thompson." A.H. presented Trooper Torres with a Pennsylvania identification card that Rodriguez gave him. Rodriguez claimed to be Roger Thompson, a representative of Copart Auctions. The identification card, which bore Rodriguez's likeness, was later confirmed to be fraudulent.

The Grand Jury learned that Rodriguez delivered Vehicle #14 of the Stolen Vehicle List, an Acura ILX bearing VIN 19UDE2F36KA006951, to A.H. to replace the two previously mentioned vehicles. The Acura ILX had been stolen from Suffolk, Virginia. A.H. received another MCO, which later turned out to be fraudulent. He submitted the MCO to PennDOT and received a legitimate Pennsylvania title.

At the end of 2022, A.H. left the Acura ILX at one of his properties, where it was stolen a few weeks later. He reported the theft to the Lebanon Police Department. The Grand Jury later learned from Trooper Torres that a few weeks later, Vidal sold the vehicle with a newly assigned fraudulent cloned VIN 19UDE2F70KA009475 to Mejia. Mejia confirmed he resold the vehicle to Hernandez Reyes. Trooper Torres presented the titling documentation used in the transaction to the Grand Jury. Hernandez Reyes had titled the vehicle with a fraudulent New York state title, which bore the signature font and stamps commonly used by the Vidal Organization. The listed owner on the fraudulent title was Kevin Thorne, a known alias of Vidal. After successfully title washing the vehicle, Hernandez Reyes sold the Acura to a local dealership.

The Grand Jury found that the Vidal Organization engaged in "double-dipping" by first selling the stolen vehicle to an unsuspecting buyer and then stealing the vehicle back. The Vidal Organization resold the same vehicle to known conspirators within the organization with a new

VIN. This tactic not only maximized their illicit profits but also further obscured the vehicle's history, making it more difficult for authorities to track and recover.



The Grand Jury learned that in late 2022, Rodriguez arrived at A.H.'s residence with Vehicle #26 of the Stolen Vehicle List, a 2021 Chevy Silverado bearing an original VIN 3GCNWAEF7MG390264. Rodriguez intended to compensate him for the issues with the first three vehicles. However, A.H. soon realized the Silverado's VIN did not match the title documents provided by Rodriguez. Rodriguez was scheduled to return the next day for a \$1,500 delivery fee for the vehicle. Concerned about the discrepancies, A.H. contacted Detective Mong of the Lebanon Police Department to report the issue and requested assistance from the Lebanon Police Department for his next meeting with Rodriguez. On September 10, 2022, several police officers arrived at A.H.'s property. Upon seeing the officers, Rodriguez fled on foot, abandoning the Silverado. The Lebanon Police seized the vehicle, which they confirmed to be a stolen U-Haul

truck with an altered VIN that originally belonged to **Vehicle #22 of the Stolen Vehicle List**, a 2021 Chevy Silverado bearing VIN 3GCNWAEF9MG279814, previously stolen and sold by the Vidal Organization.

The Grand Jury found that A.H. had paid approximately \$25,900 to the Vidal organization, through Vidal, T. Henry, Glover, and Rodriguez for the vehicles.

Trooper Torres testified that A.H. noted that Vidal referred Rodriguez as his primary contact in New York for acquiring vehicles. Rodriguez was identified as a key supplier of vehicles trafficked by the Vidal Organization moved in 2021. In several instances, Rodriguez personally delivered the stolen vehicle and collected payments.

# SCHEME 4

# Other Criminal Activity

#### A. Creation & Sale of Fraudulent Documents

The Grand Jury found that the Vidal Organization actively created fictitious identities both for the organization's own use and for sale. Trooper Torres testified these fraudulent identifications were used to rent vehicles, which were funneled into the Vidal Organization, often in exchange for monetary compensation. On multiple documented occasions, the Vidal Organization collected personal information from buyers, fabricated counterfeit documents using that data, and sold that counterfeit documentation.

On July 30, 2021, Vidal consented to a download and search a phone he had in his possession. The Grand Jury viewed images recovered from Vidal's phone, which showed

templates for identifications cards, birth certificates, Social Security cards, and other fraudulent documents. Trooper Torres explained that Vidal took an individual's photograph and shared it with co-conspirators, who manipulated the image and imposed it onto a fraudulent identification card – such as a Virginia, New York, or Pennsylvania identification card. As an example, Trooper Torres noted that Vidal's phone contained multiple identification cards featuring Vidal's picture but listing fraudulent identifying information, including the alias Kevin Thorne, a known pseudonym of Vidal.

Trooper Torres presented the Grand Jury with two sets of pictures downloaded from Vidal's phone. The images revealed the same point-of-view photographs found on the device had later been used to create fraudulent driver's licenses. Phone logs indicated that just days after receiving the original pictures, Vidal received text messages from co-conspirators containing newly fabricated IDs ready for sale. Trooper Torres explained that, based on his experience, possessing the type of printing devices found at Vidal's residence would allow an individual to produce these counterfeit IDs with ease.

Trooper Torres further testified that PSP discovered numerous fraudulent identifications associated with the Vidal Organization on Vidal's phone. He presented the Grand Jury with three images showing the same photograph on three different identifications, each with distinct biographical details. Trooper Torres explained that these fraudulent identifications were used to rent vehicles, including Vehicle #22 of the Stolen Vehicle List, a 2021 Chevy Silverado bearing VIN 3GCNWAEF9MG279814 and Vehicle #19 of the stolen Vehicle List, a 2021 GMC Savana bearing VIN 1GTW7AF72M1272713 from U-Haul, which were funneled into the Vidal Organization, title-washed, and resold.

During the consensual search of Vidal's phone, law enforcement uncovered a significant number of blank templates for Social Security Cards, birth certificates, state title documents, and insurance cards. Trooper Torres testified that the phone contained a clear progression from raw photographs to completed counterfeit documents, with the original images manipulated and imposed onto fraudulent paperwork. He stated that many of the counterfeit documents and identifications were created with stolen identities taken from public websites where information was illicitly sold.

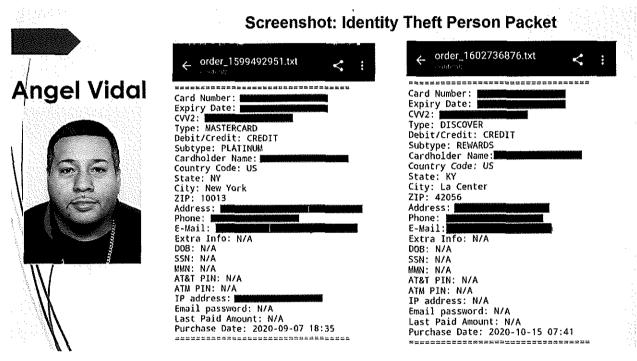
Trooper Torres testified that during his July 30, 2021 interview, Vidal admitted to actively participating in the procurement of counterfeit identification for individuals.

## B. Identity Theft & Credit Card Fraud

The Grand Jury found that Vidal engaged in identify theft and credit card fraud, including obtaining "identity packets," to support himself and the Vidal Organization. Trooper Torres explained that identity packets contain a person's name, address, email, and credit card details. Illicit websites and applications on the dark web offer these identity packets for sale. Trooper Torres elaborated that such stolen information can be used to open lines of credit, create bank accounts, load prepaid cards with funds, or make unauthorized purchases using victims' credit information. The Grand Jury reviewed content found on Vidal's phone which displayed numerous "identity packets" containing credit card details from unsuspecting victims. Trooper Torres testified that text message records show Vidal distributed these identity packets to individuals within the organization whenever funds were needed.

The Grand Jury heard from Dipaola, the half-sister of R. Henry and T. Henry, and determined she conspired with the Vidal Organization through Vidal, R. Henry, and T. Henry from August 2023 to November 2023. She testified that Vidal possessed multiple Apple iPhones, which

he used for criminal activity. She stated that she personally witnessed Vidal utilizing an application to purchase personal and financial information from unsuspecting victims, including credit and banking details. Dipaola explained that this application listed stolen credit card information from business, personal, and corporate accounts for sale using Bitcoin. She testified that both Vidal and T. Henry used this stolen financial information to cover everyday expenses, such as rent, Target purchases, and other daily necessities.



(Note: Sensitive information hidden)

As an example, Special Agent Matthews presented the Grand Jury with a fraudulent Pennsylvania Driver's License originally belonging to a victim, C.C., which was found on Vidal's phone and was used to fraudulently create an insurance policy. The license contained the victim's information but contained Vidal's photograph. When Trooper Torres interviewed the victim, he denied ever giving consent to anyone to use his personal information. C.C. stated he never had any policies with GEICO insurance. Upon being presented with the forged Pennsylvania Driver's

License bearing his name and Vidal's picture, C.C. stated he did not recognize the individual in the photo.

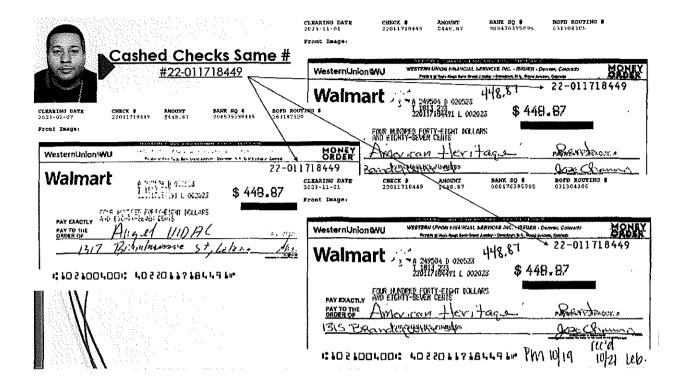
Trooper Torres testified that he uncovered several counterfeit identifications associated with J.G., a known homeless man in the Lebanon area. PennDOT confirmed that J.G.'s name had been used to title or register several vehicles with counterfeit title, which were found in Vidal's home. In March 2024, Trooper Torres interviewed J.G., who revealed that he met Vidal while living in the streets of Lebanon City. He identified Vidal as "Lou" and Glover as "Bo," categorizing them as "partners." J.G. stated that he had become friendly with Vidal after being given a vehicle to live in. Shortly thereafter, Vidal and Glover began asking him to pick up vehicles for them; including renting out-of-state U-Haul vehicles and transporting them back to Lebanon. J.G. confirmed he was unaware that Vidal used his information to title and register vehicles. As an example, Trooper Torres presented J.G. with Vehicle #10 of the Stolen Vehicle List (also Vehicle #8 of the Re-Title List), a 2017 Mercedes Benz bearing VIN WDDSJ4EB6HN480282. The vehicle was stolen on June 28, 2021, and was recovered by PSP on May 16, 2024. The vehicle had been title-washed through PennDOT using a fraudulent New York title under the name of Kevin Thorne, an alias of Vidal. J.G. denied using his personal information for the title transfer.

#### C. Western Union Scheme & Bank Fraud

The Grand Jury determined that the Vidal Organization, through Vidal, used fraudulent Western Union money orders to fund day-to-day operations of the organization. The Vidal Organization purchased legitimate money orders from Western Union, before cloning and reprinting them at Vidal's residence. The Vidal Organization used these fraudulent money orders to pay for rent, utility bills, and other everyday bills, until Western Union identified the fraud and put a stop to the payments. The Vidal Organization altered the recipient of the check but kept the

amount, serial number, and other identifying information intact. The checks were electronically deposited into banks rapidly to avoid detection. The Grand Jury heard that the Vidal Organization used the identity packets found on Vidal's phone to purchase Western Union money orders. Trooper Torres testified that, in essence, the Vidal Organization was "printing money."

The Grand Jury reviewed several Western Union checks that law enforcement seized during the November 8, 2023, search of Vidal's home. Trooper Torres testified that after consulting with Western Union, he confirmed that Western Union check # 47-050928154, originally purchased for \$420.00, had been cloned and cashed eight times, resulting in a loss of at least \$2,940.00 for Western Union. The Grand Jury also examined a cloned Western Union check #22-011718449, which PSP found blank. As another example, Trooper Torres showed the Grand Jury a Western Union check #22-040934388 found in Vidal's residence, which was stored alongside a Walmart receipt dated September 20, 2023, for the same check. Additionally, the Grand Jury reviewed Western Union check #19-401899994 for \$500.00, which was cashed at least three separate times. Law enforcement discovered copies of the same check multiple times in Vidal's residence, made out to J.H., A.S., and for rent of the 1315 Brandywine address. Furthermore, law enforcement found Western Union check # 22-011718449 for \$448.87, which the Vidal Organization cloned with different recipients, including American Heritage, Ally Auto Process, Dennis Baum and Co., and Vidal himself. The cloned checks cleared one after another, with at least five instances of the organization cashing checks for \$448.87. Trooper Torres testified he traced one of these checks, which had been passed at Dennis Baum and Co., a notary in Lebanon County, and discovered the Vidal Organization had used it to pay for a fraudulent title transfer for Vehicle #18 of the Re-Title List (also Vehicle #25 of the Stolen Vehicle List), 2018 Infiniti Q60 bearing VIN GN1EV7EL4JM392416.



The Grand Jury found that Dipaola conspired with Vidal and the Vidal Organization to purchase Western Union checks, duplicate them, and cash them at various cash-checking locations. Dipaola told the Grand Jury that during a barbecue at her house on August 2023, Vidal approached her with an offer to pay her to purchase money orders, which they could later duplicate and cash. She explained that she observed Vidal duplicate the checks with a laser printer and other equipment in the living room of his residence. Dipaola testified that in or around October 2023, she purchased a \$1,000 Western Union money order from Walmart. She handed it over to Vidal to duplicate and cash. Dipaola stated that she returned the original Western Union check and got her money back. The Grand Jury also learned that around the same time, Vidal and R. Henry drove Dipaola around Harrisburg with approximately fifteen copies of a \$350.00 Western Union check. She explained that the plan was to cash these checks at different check-cashing establishment. Dipaola testified that Vidal paid her \$50.00 to cash one fraudulent \$350.00 check.

The Grand Jury discovered that Vidal was making upwards of \$15,000 during Western Union check runs, travelling along the East Coast. Dipaola further explained that Vidal recruited people "from the street" - those on probation, homeless, or drug addicted - to cash the duplicate money orders and shield himself from liability. As an example, Trooper Torres recounted his interview with J.G., a homeless man from Lebanon City, who stated that Vidal had paid him to cash Western Union checks. The Grand Jury found that the Vidal Organization made no less than \$10,000 from the duplicated Western Union checks.

The Grand Jury found the Vidal Organization used blank checks to perpetrate their financial scheme. Trooper Torres told the Grand Jury that during the November 8, 2023, search warrant, PSP found stacks of altered check starter kits made to appear legitimate. For example, Trooper Torres showed the Grand Jury blank checks found during the search that had an altered SunTrust Bank logo.

## D. Insurance Fraud and Misrepresentations

The Grand Jury found that the Vidal Organization created, produced, or supplied fraudulent insurance policies to disguise the stolen vehicles while they were on the road. The organization would either alter existing insurance policies or completely fabricate insurance cards with stolen identities. These fraudulent insurance cards were made to appear legitimate, ensuring that they would pass scrutiny from any police officer during a routine traffic stop. Additionally, the Grand Jury discovered that the Vidal Organization utilized these fraudulent insurance cards to complete the documentation required for title transfers.

Special Agent Matthews presented the Grand Jury with **Insurance Policy List**, which detailed the insurance policies associated with the Vidal Organization.

### **Insurance Policy List**

#	VIN	Make/Model	Insurance Policy Holder	Insurance Company	Policy Number	The state of the s	Actual Policy
	IN4BL4C	2020 Nissan	J.G.				
1	V6LC235882	Altima	[name redacted]	GEICO	6041-17-61-70	Y	N
		2020 Jeep	J.H.				
2	1C4HJXDN0LW198658	Wrangler	[name redacted]	GEICO	6030-80-84-11	Unk	N
		2021 Dodge	J.G.				
3	2C3CDZBT6MH546661	Challenger	[name redacted]	GEICO	6041-17-61-70	Y	N
			J.G.				
4	5UXTR9C53JLD68432	2018 BMW X3	[name redacted]	GEICO	6053-65-22-25	Y	<u>Y</u>
			J.G.				
5	SALWR2VF0FA622795	2015 Land Rover	[name redacted]	GEICO	6053-65-22-25	Y	Y
			K.L.		l		
6	5UXTR9C5XKLP95041		[name redacted]	GEICO	4560-15-83-64	N	N
L		2019 Dodge	W.S.		A06-288-	.,	
7		Durango	[name redacted]	Liberty Mutual		N	N
8		2016 BMW 325i	Kelvin Lopez	GEICO	4560-15-83-64	N	N
_		2019 Jeep	J.G.				
9		Compass	[name redacted]	GEICO	6053-65-2225	Y	Y
		2018 Chrysler	J.G.	CETAGO	60.50 65.0005	.,	٧, ا
10	2C4RC1BG1JR112182	Pacifica	[name redacted]	GEICO	6053-65-2225	Y	Y
١		2022 1 1 72	C.C.	OFFICE	(10(011004	7.7	,,
11	5FNYF6H59LB057517	2020 Honda Pilot	[name redacted]	GEICO	6126011284	Y	Y
			1 4 7 7	First	2406247		
12	TALLENGER 2104552171		M.H. [name redacted]	Acceptance /	240634 / 000326570	Y	Y
112	JN1EV7EL3HM553171	2017 Infiniti Q60 2004 Honda	[mame redacted]	Hugo	1000320370	Į I	
12	1HGCM56364A117289	Accord	Angel Vidal	GEICO	6041-17-61-70	Y	N
13	111001110011111207	r rocord	J.H. /	GDICO	6041-17-61-70		1
			W.B.	GEICO /	A06-288-		
14	2C3CCAGG6LH154830	2020 Chrysler 300	.,	Liberty Mutual		Y	Y

Agent Matthews informed the Grand Jury he received policy information for the aforementioned policies from the insurers. He explained that insurers sent notifications regarding payments, due dates, potential cancellations, new insurance cards, and other policy communications to Vidal's email address. Agent Matthews testified that law enforcement discovered insurance policy templates at Vidal's residence during the search conducted on November 8, 2023. The Grand Jury determined that the Vidal Organization had created ten out of the fourteen insurance policies using stolen identification.

The Grand Jury reviewed a Progressive Insurance Identification card found in Vidal's phone for Vehicle #13 in the Insurance Policy List, a 2004 Honda Accord bearing VIN 1HGCM56364A117289. That vehicle had been reported stolen in August 2020. The fraudulent policy found in Vidal's phone had an effective date of March 6, 2021, less than a year after the vehicle had been stolen. The insurance card was in the name of Vidal, but the policy address was from South Carolina, matching a fraudulent South Carolina identification in Vidal's name.

Agent Matthews showed the Grand Jury a fraudulent GEICO insurance identification card found in Vidal's home for Vehicle #8 in the Insurance Policy List, a 2016 BMW 325i bearing VIN BAVB13596PT07189. The fraudulent insurance card was in the name of Kelvin Lopez, a known alias of Vidal. Additionally, the font used in creating the card matched the font the Vidal Organization had used on falsified titles. GEICO confirmed the policy existed, but not in Vidal's name. GEICO had issued the vehicle policy to S.J. from New York for a 2002 Nissan Altima. Agent Matthews explained the Vidal Organization had copied the legitimate policy number and altered the information with fraudulent data. During the search of Vidal's phone, law enforcement found blank insurance policy documents for GEICO insurance.

The Grand Jury reviewed a forged New York vehicle title found in Vidal's home for Vehicle #6 of the Re-Title List, a 2019 BMW X3 bearing VIN 5UXTR9C5XKLP95041. Agent Matthews testified that law enforcement found a fraudulent GEICO insurance card for that vehicle in Vidal's home, listed as #6 of the Insurance Policy List. GEICO confirmed the policy was fraudulent. Agent Matthews explained that the Vidal Organization used the forged insurance documentation when submitting the fraudulent title to PennDOT.

Agent Matthews presented the Grand Jury with a fraudulent identification found in Vidal's phone, in the name of a victim, C.C. This identification matched a GEICO policy document the

Pennsylvania State Police found during the search of Vidal's home for Vehicle #11 of the Insurance Policy List, a 2020 Honda Pilot bearing VIN 5FNY6H59LB057517. GEICO confirmed the policy existed, but not in the name of C.C. The 2020 Honda Pilot was a stolen vehicle that had been in operation by Vidal and T. Henry. Williams fraudulently re-titled the vehicle through PennDOT, categorized as Vehicle #21 of the Re-Title List.

The Grand Jury reviewed additional insurance documentation found in Vidal's home or phone that were either fraudulent, copied, or the result of identity theft. Ultimately, the Grand Jury concluded that the Vidal Organization, through Vidal, was creating packets of insurance documents with either stolen or fraudulent information to legitimize the stolen vehicles moving through the organization. This documentation gave the street-level sales and title submissions a false appearance of legitimacy.