COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

POLICE CRIMINAL COMPLAINT

COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number 12-2-06	**DEFENDANT:** *(NAME and ADDRESS)*
MDJ Hon. ZOZOS, PAUL T	ADAM (First Name) K (Middle Name) RICHARDSON (Last Name) (Gen)
Address: 1300 ROLLESTON ST HARRISBURG, PA 17104	1334 N 60TH ST, APT 2 PHILADELPHIA, PA 19151
Telephone (717) 234-0949	(347) 527-3549

NCIC Extradition Code Type

NCIC Extradition Code Type 3 - FELONY SURROUNDING STATES	Distance

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number	Request Lab Services?
CM-71-26	3-11-26	S10175696	Q2A6BKV18A	PA 2024-638861	NO

Gender	Date of Birth	POB	Add'l DOB	Co-Defendant?
M	01/11/1986	PA - USA		YES

Defendant Also Known As	Defendant's First Name	Middle Name	Last Name	Suffix

Race: BLACK - B	Ethnicity: NOT OF HISPANIC ORIGIN - N
Hair Color: BLACK - BLK	Eye Color: BROWN - BRO

DNA	DNA Location	Weight
NO		150 LBS

FBI Number	MNU Number	Height
779955MC4		5' 11"

Defendant Fingerprinted	Fingerprint Classification
NO	

DEFENDANT VEHICLE INFORMATION

Plate #	State	HazMat	Registration Sticker (MM/YY)	Commercial Vehicle?	School Veh	Oth NCIC Veh Code	Reg same as Def.
							NO

VIN	Year	Make	Model	Style	Color

Office of the Attorney of the Commonwealth Approved Disapproved because

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

(Name of Attorney for Commonwealth - Please Print or Type) (Signature of Attorney for Commonwealth) (Date)

I, TPR. RANDALL HECKMAN / SA Jeremy Becker 818893/10212
(Name of Affiant - Please Print or Type) (PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of PENNSYLVANIA STATE POLICE, TROOP G, AUTO THEFT EAST UNIT PAPSP1A00
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

CO-AFFIANT AGENT JEREMY BECKER
PA OFFICE OF ATTORNEY GENERAL
BADGE # 736

do hereby state: (check appropriate box)

1. ☐ I accuse the above named defendant who lives at the address set forth above
   ☐ I accuse the defendant whose name is unknown to me but who is described as
   ☐ I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe or Jane Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at: 301 (Subdivision Code) 1101 S FRONT STREET, HARRISBURG CITY (Place-Political Subdivision)

in DAUPHIN County 22 (County Code) on or about 09/19/2023 AT APPROX. 00:01 HRS - 08/17/2024 AT APPROX. 23:59 HRS (Offense Date)

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	S101756860	Q2A6BKV18A	PA 2024-638861

Defendant Name	First	Middle	Last
	ADAM	K	RICHARDSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	1	911	B3	18	1	F1	2699	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
CORRUPT ORGANIZATIONS - EMPLOYEE

Acts of the accused associated with this Offense:

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant, being associated with a criminal enterprise, conducted or participated directly or indirectly in the conduct of such enterprise's affairs through a pattern of racketeering activity while engaged in commerce; to wit, Adam Richardson, through Richardson Family Enterprises LLC, fraudulently registered or titled sixty-five stolen vehicles through the Pennsylvania Department of Motor Vehicles

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	2	5111	A1	18	1	F1	0101	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
DEAL IN PROC UNL ACT/INTENT TO PROMOTE

Acts of the accused associated with this Offense

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, Adam Richardson, through Richardson Family Enterprises LLC, conducted a financial transaction with knowledge that the property involved represented the proceeds of unlawful activity and acted with the intent to promote the carrying on of the unlawful activity; to wit, Adam Richardson, through Richardson Family Enterprises LLC, conducted financial transactions with the Pennsylvania Department of Motor Vehicles with knowledge that the proceeds and/or vehicles involved were stolen and did so with the intent to promote the unlawful activity

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	S101756286	Q2A6BKV18A	PA 2024-638861

Defendant Name	First	Middle	Last
	ADAM	K	RICHARDSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	3	7611	A1	18	1	F3	2699	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
UNLAW. USE OF COMPUTER - ACCESS TO DISRUPT FUNCT.

Acts of the accused associated with this Offense

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant accessed any computer, computer program, World Wide Web site, or telecommunication device with the intent to devise or execute any scheme to defraud or deceive or control property or services by means of false or fraudulent pretenses; to wit, Adam Richardson, through Richardson Family Enterprises LLC, used a computer to access PennDOT Dealer Track or other software to fraudulently register or title sixty-five stolen vehicles through the Pennsylvania Department of Motor Vehicles.

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	4	4107	A2	18	1	F3	2699	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
DEC BUS PRACT - SALE LESS THAN QUANT

Acts of the accused associated with this Offense

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant, in the course of business, sold, offered, or exposed for sale, or delivered adulterated or mislabeled commodities; to wit, Adam Richardson, through Richardson Family Enterprises LLC, fraudulently registered or titled sixty-five stolen vehicles through Pennsylvania Department of Motor Vehicles.

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	5101756826	Q2A6BKV18A	PA 2024-638861

Defendant Name	First	Middle	Last
	ADAM	K	RICHARDSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated if appropriate When there is more than one offense, each offense should be numbered chronologically

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	5	4118		18	3	F3	2699	

PennDOT DATA (If applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

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

Acts of the accused associated with this Offense:

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant, with intent to deceive anyone or with knowledge that the person is facilitating a deception to be perpetrated by anyone concerning the true mileage of a motor vehicle, he made or caused to be made an application for a certificate of title for a motor vehicle which includes materially false or fictitious information, to wit: Adam Richardson, through Richardson Family Enterprises LLC, facilitated deception to the Pennsylvania Department of Transportation by providing or aiding in the submission of materially false and forged vehicle titles in the application of same

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	6	4101	A2	18	3	F3	2589	

PennDOT DATA (If applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
FORGERY - UNAUTHORIZED ACT IN WRITING

Acts of the accused associated with this Offense

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant did, with intent to defraud, made, completed, authenticated, or issued any writing so that it purports to be the act of another who did not authorize that act, to wit: the Adam Richardson, through Richardson Family Enterprises LCC, forged and/or altered and/or submitted forged documentation, including state vehicle, titles to defraud the public, including the Pennsylvania Department of Motor Vehicles, regarding the true identity of stolen vehicles.

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	S1017 5686	Q2A6BKV18A	PA 2024-638861

Defendant Name	First	Middle	Last
	ADAM	K	RICHARDSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate When there is more than one offense, each offense should be numbered chronologically

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	7	4911	A1	18	3	F3	2699	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance):
TAMPER WITH PUBLIC RECORD/INFORMATION

Acts of the accused associated with this Offense

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant knowingly made a false entry in any records, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; to wit, Adam Richardson, through Richardson Family Enterprises LLC, fraudulently registered or titled sixty-five stolen vehicles through Pennsylvania Department of Motor Vehicles.

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	8	4117	A1	18	3	F3	2699	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
FRAUD DOCUMENT - INSURANCE RATE DETERM

Acts of the accused associated with this Offense:

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant knowingly and with intent to defraud a State or local government agency files, presents, or causes to be filed with the government agency a document that contains false, incomplete, or misleading information concerning any fact or thing material to the agency's determination in approving or disapproving a motor vehicle insurance transaction or other motor vehicle insurance action which is required or filed in response to an agency's request; to wit, Adam Richardson, through Richardson Family Enterprises LLC, fraudulently registered or titled sixty-five stolen vehicles through the Pennsylvania Department of Motor Vehicles with missing or fraudulent insurance information.

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	5101756 86	Q2A6BKV18A	PA 2024-638861

Defendant Name	First	Middle	Last
	ADAM	K	RICHARDSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate When there is more than one offense, each offense should be numbered chronologically

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	9	7111		75	3	M1	2599	

PennDOT DATA (If applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
DEALING IN TITLES AND PLATES FOR STOLEN VEHICLES

Acts of the accused associated with this Offense

On or about September 19, 2023, through August 17, 2024, in or around Dauphin County, the defendant, with fraudulent intent, procured or attempted to procure, a certificate of title or registration plate for a vehicle, or passed a certificate of title or an assignment to a vehicle, knowing or having reason to believe that the vehicle has been stolen; to wit, Adam Richardson, through Richardson Family Enterprises LLC, fraudulently registered or titled sixty-five stolen vehicles through Pennsylvania Department of Motor Vehicles.

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	10	4904	A1	18	1	M2	2607	

PennDOT DATA (If applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

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

Acts of the accused associated with this Offense

On or about October 12, 2022, in or around Dauphin County, the defendant, with intent to mislead a public servant in performing his/her official function, he made a written false statement which he did not believe to be true; to wit, Adam Richardson made a written false statement regarding his prior criminal history when he applied to the Department of State seeking reappointment as a notary public

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	S101256860	Q2A6BKV18A	PA 2024-638861

Defendant Name	First	Middle	Last
	ADAM	K	RICHARDSON

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated if appropriate. When there is more than one offense, each offense should be numbered chronologically

Inchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older

Lead?	Offense #	Section	Subsection	PA Statute (Title)	Count	Grade	NCIC Offense Code	UCR/NIBRS
NO	11	6308	D	75	1	M3	2699	

PennDOT DATA (if applicable)	Accident Number	Interstate Indicator	Safety Zone	Work Zone
		NO	NO	NO

Statute Description (include the name of statute or ordinance)
INVESTIGATION BY POLICE OFFICERS - RECORDS

Acts of the accused associated with this Offense:

On or about November 26, 2024, in or around Dauphin County, the defendant, being a miscellaneous motor vehicle business, did not keep accurate records of the disposition of vehicles as required under sections 1103.1 (relating to application for certificate of title), 1111 (relating to transfer of ownership of vehicle), 1114 (relating to transfer of vehicle by operation of law), 1119 (relating to application for certificate of title by agent), 1161 (relating to certificate of salvage required), and other required records under Title 75 of the Vehicle Code; to wit, Adam Richardson, through Richardson Family Enterprises LLC, failed to maintain accurate records as mandated by the Vehicle Code regarding the titling of sixty-five stolen vehicles.

POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/Live Scan Number	Complaint Number	Incident Number
CR-91-26	3-11-26	5101756 86	Q2A6BKV18A	PA 2024-638861

Defendant Name	Defendant's First Name	Middle Name	Last Name
	ADAM	K	RICHARDSON

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

3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa C S.§4904) relating to unsworn falsification to authorities

4. This complaint consists of the preceding page(s) numbered 1 through 8

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

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

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

3/6/26 SA Jeremy Becker

(Date) (Signature of Affiant)

AND NOW, on this date, 3-11-26 I certify that the complaint has been properly completed and verified
An affidavit of probable cause must be completed before a warrant can be issued

12-2-05

(Magisterial District Court Number) (Issuing Authority)

COMMONWEALTH OF PENNSYLVANIA MAGISTERIAL DISTRICT JUDGE DISTRICT COURT 12-2-05 COUNTY OF DAUPHIN

AFFIDAVIT OF PROBABLE CAUSE

Your affiant, Trooper Randall Heckman, is a sworn member of the Pennsylvania State Police and is currently assigned to the Bureau of Criminal Investigation, Special Investigations Division, Auto Theft Task Force. Your affiant has been a member of the Pennsylvania State Police since May 2005 and has served in this current assignment since September 2021. As part of this role, your affiant is authorized to investigate violations of the laws of this Commonwealth, including those outlined in Titles 18, 75, 35, and 67. Your affiant has received specialized training in auto theft enforcement and investigations. My duties include conducting arrests, performing surveillance, preparing and executing search warrants, cultivating and debriefing informants, and interviewing individuals involved in auto theft. Through my training and experience, your affiant is familiar with the terminology, practices, methods, and techniques used by those engaged in the unlawful trafficking of stolen vehicles. Prior to my current assignment, your affiant served as a Vehicle Fraud Investigator with Troop M, Trevose. In that role, your affiant was responsible for conducting and assisting with investigations involving Issuing Agents (herein "Tag Agents"), Vehicle Dealers, and Inspection Stations working in partnership with the Pennsylvania Department of Transportation (herein "PennDOT").

Your co-affiant, Jeremy Becker, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation / Insurance Fraud Section. Your co-affiant has over 18 years of law enforcement / criminal investigative experience. Your co-affiant has been a sworn member of the PA Office of Attorney General since December 2016. As such, your co-affiant has received specialized training in auto theft enforcement and investigations. By virtue of training and experience, your co-affiant is familiar with the terminology, practices, methods and techniques used by those involved in committing auto theft and related auto crimes.

The facts set forth in this affidavit are based upon your Affiant's personal knowledge; knowledge obtained from other individuals/entities during my participation in this investigation, including other law enforcement personnel; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; as well as information gained through my training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause, your Affiant has not included every aspect, fact, or detail of this investigation.

Vehicle crime has evolved over the years. Title washing, which involves the fraudulent removal of a legal owner (typically a finance company) from a vehicle's title of ownership, has evolved into a major form of vehicle theft and often involves chop shops.

Once the legal owner is removed, a new title is issued, allowing the fraudulently obtained vehicle to be resold, exported, used as collateral for cash loans, or used for personal gain.

The Pennsylvania Department of Motor Vehicles authorizes issuing agents to handle, transfer, and file vehicle-related documentation such as Pennsylvania license plates, vehicle titles, and other PennDOT materials. These agents play a critical role in managing sensitive information, which, if mishandled, could lead to crimes like the creation of false identification. To become an issuing agent, a business must submit an application to PennDOT. PennDOT then verifies the information provided to determine the applicant's eligibility. If approved, the applicant signs a contract agreeing to PennDOT's terms and conditions. Upon execution of the contract, the agent is assigned a Dealer Identification Number ("D.I.N.") specific to the location listed in the application. Issuing agents are required to operate exclusively from the location specified in their application. All PennDOT-issued materials must be stored and managed at this designated location. The agent bears full responsibility for safeguarding these documents. Online Agents approved by PennDOT must complete transactions with "Dealertrack" software and are required to be used on a computer located within the approved place of business. Additionally, agents must maintain comprehensive and well-organized records, which must be available for inspection by PennDOT or law enforcement upon request. These records must be retained for a minimum of three years from the date of such a request.

Richardson Family Enterprises LLC was an authorized issuing agent by PennDOT, bearing DIN#18001820, authorized to complete online registration and title applications on behalf of PennDOT. PennDOT authorized Richardson Family Enterprises LLC to utilize that DIN # and conduct business on behalf of PennDOT only at the authorized location of 2449 Golf Road, Suite 7, Philadelphia PA. The primary agent and owner of the business is Adam Richardson, PA DL 27979768, with a date of birth of January 11, 1986.

SUMMARY OF INVESTIGATION

I. Adam Richardson Criminal Activity

On May 13, 2024, your affiant assisted Pennsylvania State Trooper Gentile in identifying a 2021 BMW x7. That day, your affiant was able to determine that the BMW was a stolen vehicle and displayed an altered Vehicle Identification Number ("VIN"). Your affiant found that the Richardson Family Enterprise LLC, located in 2449 Golf Road Suite 7, Philadelphia, titled the vehicle through PennDOT using counterfeit documents. Trooper Gentile seized two additional vehicles that Richardson Family Enterprises LLC titled using

counterfeit documents. Your affiant confirmed these vehicles were stolen vehicles and displayed altered VINs. Your affiant became aware that the Eastern Auto Theft Task Force is currently investigating other stolen and altered vehicles that Richardson Family Enterprise LLC titled. Your affiant obtained all vehicles titled by Richardson Family Enterprise LLC, provided by PennDOT, to identify additional transactions involving counterfeit titles. Through this examination, your affiant identified sixty-five vehicles titled by Richardson Family Enterprise LLC using fraudulent out-of-state certificates of title with non-conforming VINs since September 19, 2023. These titles were determined to be counterfeit and/or altered.

The DIN # associated with paperwork issued for these 65 vehicles was the same, #18001820. PennDOT assigned this number to Richardson Family Enterprises LLC for the purpose of being a contracted issuing agent authorized to complete online registration and title applications. PennDOT authorized Richardson Family Enterprises LLC to utilize that DIN # and conduct business on behalf of PennDOT only at the authorized location of 2449 Golf Road, Suite 7, Philadelphia PA. Adam Richardson is an approved agent for Richardson Family Enterprises LLC, who has his own username, and may conduct paperwork on behalf of PennDOT. Additionally, all 65 vehicles were processed online utilizing "User ID" Richad00. This user ID was assigned to Adam Richardson as the "RICH" designates the processors first 4 letters of users last name followed by "AD" designating the first 2 letters of the users first name. On December 19, 2024, your affiant conducted a recorded interview with Adam Richardson. Richardson indicated that he is the only one who processes the online paperwork for PennDOT.

The earliest transaction conducted by Richardson Family Enterprises LLC utilizing the subject DIN # from the sixty-five vehicles investigated was September 19, 2023. On that date, Richardson Family Enterprises LLC titled a 2018 Ford F-150 to Truman Wesley Sudler. Pennsylvania State Trooper Carbone recovered the vehicle and determined it was stolen out of Georgia. The vehicle displayed an altered VIN. Your affiant reviewed the paperwork submitted by Richardson Family Enterprises LLC utilizing DIN #18001820 and confirmed a counterfeit title was used as proof of ownership.

A full list of vehicles titled with fraudulent VINs is as follows:

VEHICLE TITLE LIST				
	STOLEN VEHICLE	FRADULENT VIN	DATE OF RECOVERY	ESTIMATED VALUE
1	2021 BMW x7	5UXCX6C00MLG12356	5/13/2024	$65,000
2	2023 Acura MDX	5J8YD8H94PL005852	05/13/2024	$50,000
3	2019 Audi Q7	WA1LHAF75KD024123	05/15/2024	$35,000
4	2021 Acura	19UUB6F52MA005901	05/15/2024	$40,000
5	2024 Subaru Outback	4S4BTANC1R3141501	06/26/2024	$41,250
6	2020 InfinitiQ60 3.0 Luxe	JN1EV7EL4LM381094	N/A	$45,500
7	2021 Acura TLX	19UUB6F63MY017099	07/05/2024	$30,000
8	2023 Dodge 1500	1C6SRFJT2PN605605	07/03/2024	$60,000
9	2023 Acura TLX	19UUB7F96PA003906	N/A	$50,000
10	2017 Mercedes Benz	WDDUG7JB4HA508960	N/A	$50,000
11	2019 Nissan Maxima SV	1N4AA6AV4KC278499	07/11/2024	$26,000
12	2022 Cadillac CT4-V Blackwing	1G6D75RP8N0411764	07/15/2024	$70,000
13	2020 Jeep Wrangler Sport S	1C4HJXDG6LW538199	N/A	$35,000
14	2023 GMC Savana 2500	1GTW7AFP5P1216317	N/A	$40,000
15	2023 Honda Accord Hybrid Sport-L	1HGCY2F70PA010863	07/19/2024	$34,000
16	2021 Ferrari Portofino	ZFF89FPA9M0298436	N/A	$260,000
17	2021 Cadillac Escalade	1GYS4RKL1MR416112	07/26/2024	$80,000
18	2019 Jeep Grand Cherokee SRT	1C4RJFDJ9KC574009	08/07/2024	$50,000
19	2024 Chevrolet Silverado 3500HD	1GC4YVEY2RF222653	07/18/2024	$90,000
20	2023 Chevrolet Silverado 1500	2GCUDGED8P1107077	04/16/2024	$50,000
21	2021 Cadillac Escalade Sport	1GYS4FKL7MR146981	06/04/2024	$65,000
22	2020 BMW M5 Competition	WBSJF0C05LC448535	N/A	$85,000
23	2022 Mercedes-Benz S580	W1K6G7GB2NA119486	06/07/2024	$92,000
24	2023 Mercedes-Benz G550	W1NYC6BJ8PX478020	02/23/2024	$165,000
25	2023 Ram 1500 Longhorn	1C6RRFKT3PN650999	03/25/2025	$50,000
26	2023 Acura TLX	19UUB5F68PY000801	05/23/2025	$50,000
27	2021 Acura TLX SH-AWD	19UUB6F37MA007285	05/29/2024	$30,000
28	2021 Acura TLX A-Spec	19UUB5F55MA019284	06/20/2024	$30,000
29	2021 Dodge Durango Hellcat	1C4SDJH90MC232348	06/10/2024	$66,000
30	2018 Ford F-150	1FTEW1E58JFC91442	11/06/2023	$25,000
31	2021 Acura TLX	19UUB5F35MA005867	N/A	$30,000
32	2021 Chevrolet Suburban Z71	1GNSKDKD4MR364876	12/30/2025	$50,000
33	2023 Acura TLX SH-AWD Type S	19UUB7F92PA003899	10/27/2024	$45,000
34	2019 Canam MC	3JB2FEG41KJ103610	N/A	$10,000
35	2023 Audi Q8 Quattro Prem 55 TFSI	WA1EVBF18PD545573	09/28/2024	$70,000
36	2016 Mazda CX-9 Signature	JM3TCBEY0G1118799	03/04/2025	$24,000
37	2020 Jeep Grand Cherokee Ltd.	1C4RJEBG5KC571299	N/A	$25,000
38	2019 Chevrolet Camaro SS	1G1FF1R73K0159119	N/A	$40,000

39	021 Dodge Durango Hellcat	1C4SDJH94MC789263	11/05/2024	$66,000
40	2023 Acura TLX	19UUB6F58PA002246	N/A	$50,000
41	2021 Chevrolet Tahoe LT	1GNSCNKD3MR358926	02/07/2025	$50,000
42	2022 BMW M5	WBS83CH01NCJ21554	N/A	$85,000
43	2021 Ram 1500 Longhorn	1C6SRFKG6MN783191	N/A	$25,000
44	2019 Ram 1500 Big Horn	1C6RREFT5KN498186	02/16/2025	$20,000
45	2023 BMW M3 Comp	WBS43AY07PFR50651	03/13/2025	$90,000
46	2022 Ram TRX	1C6SRFU98NN404191	N/A	$75,000
47	2023 BMW x6 Xdrive 40i	5UXCY4C04P9P24948	09/02/2022	$80,000
48	2023 Mercedes AMG 63S	W1K7X8KB1PA060662	11/21/2024	$200,000
49	2014 Porsche Cayenne	WP1AA2A26ELA86464	03/27/2025	$25,000
50	2024 Jeep Wagoneer L Series II	1C4SJSBP8RS102966	08/30/2024	$80,000
51	2023 Jeep Grand Cherokee 4XE	1C4RJYB62PC727508	N/A	$65,000
52	2018 Infinity Q50 Red Sport 400	JN1FV7AR5JM437491	N/A	$25,000
53	2019 Jeep Grand Cherokee Limited	1C4RJEBG2KC571311	06/02/2024	$20,000
54	2017 Infinity Q60 Red Sport	JN1FV7EL9HM550621	N/A	$20,000
55	2024 BMW M3 CS	WBS63AY0XRFR01892	N/A	$90,000
56	2023 Ford Transit 250	1FTBR1V82PKB05799	N/A	$50,000
57	2021 Acura TLX SH performance	19UUB7F90NA008998	N/A	$40,000
58	2023 Cadillac Escalade Sport	1GYS4EKL3PR187235	N/A	$90,000
59	2018 LR Range Rover Velar P250S	SALYB2RX7JA791043	N/A	$35,000
60	2023 Mercedes Benz GLE 53 AMG	4JGFD6BB2PA874639	N/A	$90,000
61	2022 Jeep Wrangler Rubicon	1C4HJXFN4NW246677	N/A	$42,000
62	2018 BMW M4	WBS4Y9C58JA286500	12/19/2024	$54,000
63	2014 Chevrolet SS	6G3F15RW1EL943986	N/A	$46,000
64	2018 Aston Martin	SCFRMFAV4JGL03902	N/A	$105,000
65	2022 Jeep Wrangler	1C4JJXFG4NW239253	N/A	$30,000
	TOTAL			**$3,801,750**

The following are ten (10) representative examples of the **sixty-five** fraudulent vehicles registered and/or titled by Richardson Family Enterprises LLC since September 19, 2023:

Vehicle #1: 2021 BMX X7 (VIN# 5UXCX6C00MLG12356)

On May 13, 2024, Pennsylvania State Trooper Gentile of PSP Trevose requested my assistance regarding a 2021 BMW X7 that he had impounded following an incident on May 7, 2024. Trooper Gentile suspected that the VIN on the vehicle might not be authentic and asked me to conduct further investigation. Your affiant examined the BMW's VIN, 5UXCX6C00MLG12356, in multiple databases and determined it to be fraudulent. The vehicle had been titled in Pennsylvania using a South Carolina title, which your affiant concluded was counterfeit or forged because no vehicle with that VIN had

ever been titled in South Carolina, and the VIN did not conform to the sequence of authentic BMW VINs.

Your affiant obtained the title history for the BMW and found the following details:

- The vehicle, a 2021 BMW with the fraudulent VIN 5UXCX6C00MLG12356, was titled on April 8, 2024, at Richardson Family Enterprise (DIN #18001820), located at 2449 Golf Rd, Philadelphia, PA.
- The title work was processed under the username "Richard00," which, after cross-referencing with PennDOT Dealer Track records, was identified as Adam Richardson (PA OLN 27979768).
- The vehicle was titled to Llewellyn W. Brightly ("Brightly"), residing at 2749 Miriam Ave, Roslyn, PA 19001.

The title documentation disclosed a purchase price of $6,500 for the vehicle, which has an approximate market value of $70,000. The Dealertrack front sheet indicated insurance from Progressive Insurance under policy number 957438745, effective from March 26, 2024, to September 26, 2024. However, no insurance card was attached. On May 14, 2024, your affiant contacted Progressive Insurance to verify the policy and was informed that the policy number did not correspond to Llewellyn Brightly, and no such policy existed for that individual. Furthermore, no Fair Market Value Form was submitted to justify why the vehicle was reported as purchased for less than 80% of its fair market value, as required by law.

Through the course of the investigation, your affiant examined the 2021 BMW X7 at alternate locations known to law enforcement for stolen vehicle investigations. During this examination, your affiant located the true VIN: 5UXCW2C00M9G12379. This VIN matched a vehicle reported stolen to the Montville Township Police Department on April 2, 2024, and is still listed as active stolen under case number 24-004736.

On December 9, 2024, your affiant conducted an interview at PSP Trevose of a confidential informant, herein referred to as RM. The interview was video, and audio recorded. Your affiant identified RM as involved in the purchase and resale of the instant vehicle, the 2021 BMW X7 (Vehicle #1 of the *Title Vehicle List*), and an Acura MDX (Vehicle #2 of the *Title Vehicle List*). RM made the following statements with regards to the purchase and transfer of the two vehicles:

- RM stated he purchased both vehicles from a black man named "Haj".
- RM said when he purchased the first vehicle, the Acura MDX, Haj took him to a guy named Adam, known as the "tag guy".

- RM discussed the business location of Adam Richardson, accurately describing what your affiant knows to be 2449 Golf Road, Suite 7, Philadelphia, PA, the site of Richardson Enterprises LLC.
- Regarding both vehicles, since he could not put them in his own name, RM admitted he texted Adam, the "tag guy", a picture of the identification card of the person whom he wanted the vehicle registered to. RM stated Adam would get the tags, registration, title, and insurance for him. RM acknowledged he knew the insurance information was fake. Finally, RM admitted he paid Haj to include all the above.
- After the first vehicle, RM stated he went to Adam directly for the tag work involving the BMW X7 and all subsequent deals.
- RM stated Adam was known in the community as the "24-hour tag guy", who would meet people anywhere and anytime to process tag work.
- RM notes all Adam needed was a text with an identification picture, both front and back, and he would take care of the rest, to include the fraudulent insurance information.

Your affiant presented RM with a photo lineup. RM positively identified Adam Richardson, owner of Richardson Family Enterprise LLC, calling him "Adam the tag guy."

Vehicle #5: 2024 Subaru Outback (VIN# 4S4BTANC1R3141501)

Your affiant received title documentation from PennDOT for a 2024 Subaru Outback bearing the fraudulent VIN 4S4BTANC1R3141501. The title work was submitted on May 8, 2024, at Richardson Family Enterprise (DIN #18001820), located at 2449 Golf Rd, Philadelphia, Pennsylvania. The transaction was processed by Adam Richardson (PA OLN 27979768). The vehicle was titled to Michael M. Pigford, and a Pennsylvania driver's license for Pigford (OLN 25068224) was attached, listing an address of 6315 Algard St, Philadelphia, PA.

The title application disclosed a purchase price of $2,000 for a vehicle with an approximate market value of $41,250. The application further disclosed an insurance policy with State Farm Insurance, policy number 6374617H2938H556, effective from May 5, 2024, through November 5, 2024; however, no copy of the insurance card was attached as required. Your affiant contacted the State Farm support line and confirmed that no policy existed for that policy number, for any vehicle bearing the listed VIN, or for any individual named Michael Pigford. This information was verified by State Farm analyst ID "Chad P."

Additionally, no Fair Market Value Form (MV-3) was submitted to explain why the vehicle was reported as purchased for less than 80% of its fair market value. A South

Carolina title was submitted as proof of ownership; however, NLETS and NMVTIS queries confirmed that no South Carolina title had ever existed for a vehicle with this VIN or for South Carolina title number 435208179046510. As a result, the submitted title was determined to be counterfeit, altered, or forged. Your affiant also conducted a VIN inquiry through CARFAX for Police, which revealed no records of sale, shipping records, window sticker, service history, or any prior records before the issuance of the Pennsylvania title—findings consistent with vehicles that have had their VINs altered or changed.

The vehicle was subsequently located and seized. Upon inspection of the VIN, your affiant determined the true VIN to be 4S4BTANC1R3141403, corresponding to a 2024 Subaru Outback reported stolen to the Philadelphia Police on April 5, 2024.

Vehicle #20: 20232 Chevy Silverado (VIN# 2GCUDGED8P1107077)

A CARFAX for Police query indicated no prior vehicle records for this vehicle other than the title obtained at Richardson Family Enterprise. The vehicle first appeared on a CARFAX for Police report on February 7, 2024. A query of the vehicle's VIN revealed that the vehicle was registered to Larry M. Belton, DOB 05/09/1965, residing at 4014 Lyman Drive, Philadelphia, Pennsylvania. According to PennDOT records, the title of a South Carolina vehicle was used to title this vehicle in Pennsylvania to Larry M. Belton. A query of the vehicle's VIN through the National Motor Vehicle Title Information System (NMVTIS) determined that no records existed in South Carolina for the VIN submitted for the 2023 Chevrolet Silverado. It was also confirmed that Pennsylvania registration ZXK8816 was issued to this vehicle.

On March 25, 2024, Trooper Avdulla requested and received the title history for the 2023 Chevrolet Silverado from PennDOT. Upon further review of the title history, Trooper Avdulla determined that the vehicle was processed and notarized at Richardson Family Enterprise LLC (DIN #18001820) on February 7, 2024. The review confirmed that a South Carolina vehicle title, number 850395432048048, was utilized to title the vehicle. The South Carolina title displayed VIN 2GCUDGED8P1107077 for the 2023 Chevrolet Silverado. According to the title application, the vehicle was purchased by Larry M. Belton for $3,000, which is grossly undervalued. A copy of a driver's license, number 22 355 999, was attached to the transaction. A query of driver's license number 22 355 999 returned to Larry M. Belton.

On March 26, 2024, Trooper Avdulla contacted the South Carolina Department of Inspector General and spoke with Fraud Inspector Kelly Oswald to verify the South

Carolina title used to title and register the vehicle in Pennsylvania. According to Fraud Inspector Oswald, title number 850395432048048 is not valid, as South Carolina vehicle titles begin with the number "77." Inspector Oswald further advised that the title was never issued by the South Carolina Department of Motor Vehicles. The individual listed as the original owner on the title, Larry Belton, with an address of 106 Leaning Tree Road, Columbia, South Carolina, was not found in their system. Additionally, South Carolina customer number 620903568 was determined to be invalid.

On April 14, 2024, the vehicle was located and inspected, at which time the true VIN was identified as 2GCUDGEDXP1107064. The vehicle associated with this VIN was confirmed stolen and had been entered by the Westville Police Department in New Jersey.

Vehicle # 23: 2023 Mercedes Benz S580 (VIN # W1K6G7GB2NA119486)

Your affiant received title documentation from PennDOT for a 2022 Mercedes-Benz S580 bearing the fraudulent VIN W1K6G7GB2NA119486. The title work was submitted on April 10, 2024, at Richardson Family Enterprise (DIN #18001820), located at 2449 Golf Rd, Philadelphia, Pennsylvania. The transaction was processed by Adam Richardson (PA OLN 27979768). The vehicle was titled to Anna Maria Donnarumma. A Pennsylvania driver's license for Donnarumma was attached, listing an address of 461 Hill St, East Stroudsburg, PA.

The title application disclosed a purchase price of $5,000 for a vehicle with an approximate market value of $92,000. The application disclosed no insurance policy, as the transaction was processed as title only. Additionally, no Fair Market Value Form (MV-3) was submitted to explain why the vehicle was reported as purchased for less than 80% of its fair market value. An Alabama title was submitted as proof of ownership; however, NLETS and NMVTIS queries confirmed that no Alabama title had ever existed for a vehicle bearing this VIN or Alabama title number 160388732. As a result, the submitted title was determined to be counterfeit, altered, or forged. A VIN inquiry through CARFAX for Police revealed no records of sale, shipping records, window sticker, service history, or any prior records before the issuance of the Pennsylvania title, which is consistent with vehicles that have had their VINs altered or changed.

On May 30, 2024, Task Force Officer Varkanis entered the vehicle into NCIC based on his independent review of these facts. Officer Varkanis determined that following the title-only transaction, Donnarumma applied for a registration plate,

MMB8962. The registration application listed Progressive Insurance policy number 978962912. This policy was valid at the time of issuance; however, it was opened and rescinded within hours due to nonpayment of $809.40 toward the premium.

On June 6, 2024, NYPD officers located the vehicle in Brooklyn, New York. Based on the active NCIC entry, officers examined the vehicle and identified the true VIN as W1K6G8GB2NA119892. This VIN corresponded to the legitimate vehicle records and confirmed that the vehicle had been reported stolen on February 26, 2024, out of Nassau County, New York.

On November 20, 2024, Donnarumma was interviewed and stated that she allowed the vehicle to be placed in her name in exchange for payment. She further stated that she never provided anyone with the use of her driver's license, never met with a tag agent, and never traveled to Philadelphia, Pennsylvania, where Richardson Family Enterprise is located.

Vehicle # 27: 2021 Acura TLX (VIN # 19UUB6F37MA007285)

Your affiant received title documentation from PennDOT for a 2021 Acura TLX bearing the fraudulent VIN 19UUB6F37MA007285. The title work was submitted on March 29, 2024, at Richardson Family Enterprise (DIN #18001820), located at 2449 Golf Rd, Philadelphia, Pennsylvania. The transaction was processed by Adam Richardson (PA OLN 27979768). The vehicle was titled to Travon William King. A Pennsylvania driver's license for King (OLN 33869438) was attached, listing an address of 1837 N. Gratz St, Philadelphia, PA.

The title application disclosed a purchase price of $2,000 for a vehicle with an approximate market value of $30,000. King disclosed an insurance policy with GEICO Insurance, policy number 8013359086 (the same policy number used in fraudulent vehicle #31), effective from March 29, 2024, through March 29, 2025; however, no copy of the insurance card was attached as required. Additionally, no Fair Market Value Form (MV-3) was submitted to explain why the vehicle was reported as purchased for less than 80% of its fair market value. A South Carolina title was submitted as proof of ownership; however, NLETS and NMVTIS queries confirmed that no South Carolina title had ever existed for a vehicle bearing this VIN or South Carolina title number 951006547304867. As a result, the submitted title was determined to be counterfeit, altered, or forged. A VIN inquiry through CARFAX for Police revealed no records of sale, shipping records, window sticker, service history, or any prior records before the issuance of the Pennsylvania title, which is consistent with vehicles that have had their VINs altered or changed.

After the vehicle was located, it was examined by officers, who identified the true VIN as 19UUB6F57MA007093. This VIN was confirmed as stolen out of New York on March 12, 2024. At the time of the theft, the vehicle was registered under New Jersey registration E47CLR. A hit confirmation request was sent to the New York City Police Department, which confirmed the theft under NYPD OCA #2024106001615. The fraudulent VIN sticker affixed to the door frame was removed with ease, which is not consistent with an authentic manufacturer-applied VIN label.

The insurance policy number submitted in this transaction was fraudulent and was used by Richardson in multiple submissions for different customers involving vehicles with altered VINs.

Vehicle # 29: 2021 Dodge Durango (VIN# 1C4SDJH90MC232348)

Upon reviewing the title history for Pennsylvania title number 86771570, the only record reflected was an online title transaction completed on January 14, 2024, through the PennDOT system under WID 24014 3410 000078 001 at Richardson Family Enterprise LLC (DIN #18001820). The South Carolina title and supporting paperwork provided to Richardson Family Enterprise LLC listed Fred Dysil Revere, DOB 01/11/1994, Pennsylvania driver's license number 31873651, residing at 2311 N. 7th St., Apt. 4, Philadelphia, Pennsylvania.

Upon review of the submitted South Carolina title for the green 2021 Dodge Durango SRT Hellcat SUV bearing VIN 1C4SDJH90MC232348, it was determined that the vehicle being titled in Pennsylvania was represented as a green 2021 Dodge Durango SRT Hellcat SUV with 29,563 miles, titled to Fred Revere at 205 Dean Dr., Summerville, South Carolina 29483, under South Carolina title number 770400965232946. The reported purchase price on the title documentation was $3,000, despite the vehicle having an approximate market value of $80,000.

The South Carolina title submitted to Richardson Family Enterprise LLC was determined to be forged and altered in multiple locations. A query through the National Motor Vehicle Title Information System (NMVTIS) confirmed that no South Carolina title exists for this vehicle. Additionally, the VIN 1C4SDJH90MC232348 was queried through the ISO database, which returned no shipping records or additional information associated with the vehicle.

The title history also included a bill of sale for the green 2021 Dodge Durango SRT Hellcat SUV bearing VIN 1C4SDJH90MC232348.

Vehicle # 30: 2018 Ford F-150 (VIN # 1FTEW1E58JFC91442)

A request for the title history of a white 2018 Ford F-150 bearing VIN 1FTEW1E58JFC91442 was submitted to PennDOT. Upon review of the title history for Pennsylvania title number 86381770, the only record reflected was an online title transaction completed on September 19, 2023, through the PennDOT system under WID 23262 3410 045687 001 at Richardson Family Enterprise LLC (DIN #18001820). The Connecticut title and supporting paperwork provided to Richardson Family Enterprise LLC listed Truman Wesley Sudler, DOB 06/07/1983, Pennsylvania driver's license number 28882601, residing at 1825 Nedro Ave., Philadelphia, Pennsylvania. No insurance card was included with the title submission.

Upon review of the submitted Connecticut title for the white 2018 Ford F-150 bearing VIN 1FTEW1E58JFC91442, Trooper Carbone determined that the vehicle being titled in Pennsylvania was represented as a white 2018 Ford F-150 with 96,746 miles, titled to All Powersports, located at 3 Peerless Way, Enfield, Connecticut 06082, under Connecticut invoice number 1156495 and title number B01604689. The reported purchase price was $430, as reflected in the title history and attached bill of sale, despite the vehicle having an approximate market value between $18,000 and $40,000. Trooper Carbone determined that the Connecticut title provided to Richardson Family Enterprise LLC was forged and altered in multiple locations. A query through the National Motor Vehicle Title Information System (NMVTIS) confirmed that no Connecticut title exists for this vehicle. The VIN was also queried through the ISO database, which returned no shipping records or additional information.

On November 1, 2023, at approximately 0810 hours, Trooper Carbone spoke by telephone with Julia Castro, a Connecticut motor vehicle analyst. Trooper Carbone requested verification of the Connecticut title, and Castro advised that the white 2018 Ford F-150 bearing VIN 1FTEW1E58JFC91442 had never been titled in Connecticut. Castro further stated that Connecticut invoice number 1156495 and title number B01604689 did not correspond to the vehicle. Castro also advised that the seller listed on the Connecticut title, All Powersports, is not a licensed Connecticut dealer and does not exist as a customer in the Connecticut system. Castro subsequently provided a Connecticut Department of Motor Vehicles certification on official letterhead confirming that the submitted Connecticut title for the white 2018 Ford F-150 was fraudulent. This certification is attached to report number 2023-1430366.

On November 6, 2023, at approximately 0800 hours, Trooper Carbone responded to EVB Towing, located at 601 S. Gravers Road, Plymouth Meeting, Pennsylvania, to inspect the white 2018 Ford F-150. Trooper Carbone inspected the confidential VIN location and identified a VIN derivative of JFC91502. He then inspected an alternate confidential location and identified the full VIN as 1FTEW1E50JFC91502. A query through the ISO database confirmed the full VIN to be 1FTEW1E50JFC91502, which is assigned to a 2018 Ford F-150 and was active in NCIC as stolen. The vehicle was reported stolen by the Chamblee Police Department in Georgia.

Vehicle #33: 2021 Acura TLX (VIN# 19UUB7F92PA003899)

Your affiant received from PennDOT the titling documentation for a 2021 Acura TLX, with a documented VIN of 19UUB7F92PA003899 (later determined to be fraudulent). Upon reviewing the title records for the Acura TXL, your affiant determined the following:

- The vehicle was titled January 2, 2024, at Richardson Family Enterprise (DIN 18001820), located at 2449 Golf Rd, Philadelphia, PA.
- The title work was processed under the username "Richard00," which, after cross-referencing with PennDOT Dealer Track records, was identified as Adam Richardson (PA OLN 27979768).
- The Acura TLX was titled to Britney Rogers, with a Pennsylvania Driver's License #32977778 and a listed address of 2301 Woodward St Apt I4, Philadelphia PA.

Application listed a purchase price of $5,000 for a vehicle worth approximately $45,000. Listed was insurance policy with Geico Insurance (8050210922) effective January 4, 2024, to July 4, 2024, with a photocopy attached as required. Upon contacting Geico's theft support line, your affiant confirmed that no policy exists under that policy number, with that VIN, or for any person named Britney Rogers. Additionally, no Fair Market Value Form (MV-3) was submitted by the agent to justify why the vehicle was reported as purchased for less than 80% of its fair market value. The transaction included a purported South Carolina title for ownership. Queries through NLETS and NMVTIS confirmed that no South Carolina title ever existed for a vehicle with this VIN or the South Carolina title number #769382076703190. The title submitted was determined to be fraudulent.

Your affiant conducted a check of the VIN through CARFAX for Police and observed no records of sale, shipping, window sticker, service history, or prior records before the Pennsylvania title issuance, consistent with vehicles that have had their VINs

altered or changed. On October 22, 2024, your affiant entered the vehicle into NCIC to facilitate its location and identification. On October 27, 2024, the Upper Chichester Police Department informed your affiant that they had stopped the Acura during a traffic stop. The true confidential VIN was identified as 19UUB7F0XPA003862, which differed from the public VIN displayed on the dashboard and the title VIN. Utilizing that VIN, your affiant found the vehicle was stolen out of New York City on January 6, 2024.

Vehicle # 35: 2023 Audi Q8 Quattro Prem (VIN # WA1EVBF18PD545573)

Your affiant received title documentation from PennDOT for a 2023 Audi Q8 bearing the fraudulent VIN WA1EVBF18PD545573. The title work was submitted on October 21, 2023, at Richardson Family Enterprise (DIN #18001820), located at 2449 Golf Rd, Philadelphia, Pennsylvania. The transaction was processed by Adam Richardson (PA OLN 27979768). The vehicle was titled to R&S Auto 1/C. No Pennsylvania driver's license was attached; however, a Charitable Organizations form was submitted listing the business organizer as Tyshera Dixon, with an address of 5512 N. Front Street, Philadelphia, PA 19120.

The title application disclosed a purchase price of $1,200 for a vehicle with an approximate market value of $70,000. Dixon disclosed an insurance policy with State Farm Insurance, policy number 38157DD34, effective from September 6, 2023, through January 6, 2024; however, no copy of the insurance card was attached as required. Your affiant contacted the State Farm support line and confirmed that the policy number was valid and not fraudulent. Additionally, no Fair Market Value Form (MV-3) was submitted to explain why the vehicle was reported as purchased for less than 80% of its fair market value. A South Carolina title was submitted as proof of ownership; however, NMVTIS queries confirmed that no South Carolina title existed for a vehicle bearing this VIN or the submitted South Carolina title number. As a result, the title was determined to be counterfeit, altered, or forged. A VIN inquiry through CARFAX for Police revealed no records of sale, shipping records, window sticker, service history, or any prior records before the issuance of the Pennsylvania title, which is consistent with vehicles that have had their VINs altered or changed.

Task Force Officer and Detective Emmanuel Varkanis reviewed the documentation associated with this investigation and entered the vehicle into NCIC on September 25, 2024.

On September 28, 2024, the Philadelphia Police Department received a license plate reader (LPR) alert for the vehicle and initiated a traffic stop on a gray Audi Q8

bearing Pennsylvania registration MJK4696. During the stop, Police Officer Rogers located the confidential VIN and observed VIN WA1BVAF16LD025363. This VIN identified the vehicle as a 2020 Audi Q8 that had been reported stolen out of Philadelphia on August 18, 2023. The operator of the vehicle was not Tyshera Dixon.

Vehicle # 44: 2019 Ram 1500 Big Horn (VIN # 1C6RREFT5KN498186)

Your affiant received title documentation from PennDOT for a 2019 Ram 1500 bearing the fraudulent VIN 1C6RREFT5KN498186. The title work was submitted on May 30, 2024, at Richardson Family Enterprise (DIN #18001820), located at 2449 Golf Rd, Philadelphia, Pennsylvania. The transaction was processed by Adam Richardson (PA OLN 27979768). The vehicle was titled to Anthony Michael Niemeyer. A Pennsylvania driver's license for Niemeyer (OLN 31673254) was attached, listing an address of 1922 N. 17th St., Philadelphia, PA 19121.

The title application disclosed a purchase price of $1,500 for a vehicle with an approximate market value of $20,000. The application disclosed an insurance policy with State Farm Insurance, policy number 8742788549, effective from May 29, 2024, through November 29, 2024; however, no copy of the insurance card was attached as required. Your affiant contacted State Farm Insurance and confirmed that no active or prior policy existed under that policy number. Additionally, no Fair Market Value Form (MV-3) was submitted to explain why the vehicle was reported as purchased for less than 80% of its fair market value. A State of Michigan title was submitted as proof of ownership; however, NMVTIS queries confirmed that no Michigan title had ever existed for a vehicle bearing this VIN or Michigan title number H5296873015. As a result, the submitted title was determined to be counterfeit, altered, or forged. A VIN inquiry through CARFAX for Police revealed no records of sale, shipping records, window sticker, service history, or any prior records before the issuance of the Pennsylvania title, which is consistent with vehicles that have had their VINs altered or changed.

On January 31, 2025, during a meeting with PennDOT, your affiant learned that Anthony Michael Niemeyer (correct spelling) had filed an affidavit stating that his identity had been stolen, and that supporting documentation had been requested and was pending review. Based on this information, the paperwork associated with this transaction (Car #44) was reviewed, and Niemeyer's OLN was queried for comparison. The driver's license image included with the registration paperwork did not match the current photograph on file, nor any prior photograph associated with Niemeyer. Additionally, the

duplicate count displayed on the photocopied license was inconsistent with his legitimate driver's license, and the issue dates did not correspond with his true OLN record. Further, the name on the photocopied license was spelled "Micheal," whereas the correct spelling on record is "Michael." Based on these discrepancies, the driver's license copy submitted with the registration paperwork for the fraudulent VIN was determined to be counterfeit.

On February 16, 2025, your affiant was contacted by Officer Patton of the Cherry Hill Police Department in New Jersey. Officer Patton advised that he had located the truck parked and unattended in the parking lot of the Hillview Shopping Center in Cherry Hill, New Jersey. The vehicle was displaying Pennsylvania registration MMW7137, which had been issued through Richardson Family Enterprise. Your affiant advised Officer Patton of the nature of the investigation and that the confidential VIN needed to be located. Officer Patton located the confidential VIN and confirmed the true VIN as 1C6RREFT7LN398186, which corresponds to a 2020 Ram 1500 reported stolen to the Philadelphia Police Department on August 21, 2023.

The last transaction currently involved in this investigation occurred on August 17, 2024. On that date, Richardson Family Enterprises LLC submitted titling paperwork to PennDOT on behalf of Junior Remy. The title submission included an Illinois title and VIN that were deemed fraudulent. This vehicle transaction was processed by the username "Richard00," which, after cross-referencing with PennDOT Dealer Track records, was identified as Adam Richardson, utilizing DIN #18001820, held by the Richardson Family Enterprises at 2449 Golf Rd, Philadelphia, PA.

Multiple interviews were conducted during the investigation. Several individuals admitted they had allowed vehicles to be titled in their names, despite not being present at the business when the transactions were processed. *See* Vehicles #1, #23, and #33 of the *Title Vehicle List*. Additionally, interviewees and Confidential Informant RM stated that they did not provide any of the fraudulent insurance policies or titles that Adam Richardson submitted on their behalf. In the case of Anthony Niemeyer, where a fraudulent copy of his driver's license was used to process the paperwork, Mr. Niemeyer stated he was unaware that three vehicles had been titled in his name.

II. PennDOT Audits & Warnings

During the investigation, it was determined that PennDOT auditors and law enforcement visited the business location for Richardson Family Enterprise on multiple occasions. On most occasions, no one was present at the business, except during visits that had been scheduled in advance with Adam Richardson. During PennDOT

inspections, multiple violations were noted, including failure to file required forms, failure to conduct driver's license verifications, failure to present records for specific transactions, and failure to comply with other agent requirements as outlined in PennDOT's contract. Most of these warnings occurred before the transactions at issue in this complaint.

The history of audits at Richardson Family Enterprise LLC includes several "attempted" audits when the auditor showed up at the business during business hours, but nobody was present. It also includes scheduled audits. Your affiant reviewed the audit documents relating to these visits and interviewed the auditors. Your affiant noted the following PennDOT *Audits & Suspensions*:

PennDOT Audits & Suspensions		
Date	**Auditor**	**Action**
09/02/22	Marybeth O'Neill	Audit Completed. Warning letter issued
11/30/22	Marybeth O'Neill	Audit Completed. Verbally instructed on corrections
11/15/23	Louis Lanni	Audit Completed. Revisit scheduled for compliance.
12/18/23	Louis Lanni	Attempted Audit
12/19/23	Louis Lanni	Attempted Audit
12/21/23	Louis Lanni	Attempted Audit
12/27/23	Louis Lanni	Attempted Audit
01/17/14	Louis Lanni	Attempted Audit
01/30/24	Louis Lanni	Audit Completed. Sanctions recommended.
12/12/25	Louis Lanni	Suspension served.
01/17/25	None	PennDOT cancelled agents' processing ability

Your affiant conducted interviews of Marybeth O'Neill and Louis Lanni, the auditors involved in the audits of Richardson Family Enterprise LLC. In summary, the auditors stated the following:

PennDOT Auditor - Marybeth O'Neill

- O'Neill stated that her first audit was for "first sight inspection" as a new business.
- O'Neill stated there was no signage on the building. She added that the office was very disheveled, with unorganized paperwork everywhere.
- O'Neill instructed Richardson to make copies of the insurance cards used the the transactions and to keep copies.
- During the audit, Richardson initially denied selling vehicles from the lot behind the business, despite not having a license. However, he ultimately admitted he was selling vehicles. O'Neill told Richardson to stop.

- O'Neill stated Richardson was processing a lot of salvage deals and using out-of-state reassignments.
- O'Neill stated she observed "stock" vehicle photos, which led to the suspicion he was involved in fraudulent reconstructions.
- O'Neill stated Richardson was issuing tags to salvage vehicles, which was illegal.
- O'Neill stated she gave Richardson verbal warnings for all the above-mentioned infractions. She warned him if the infractions continued, his issuing agent privileged would be suspended.

PennDOT Auditor - Louis Lanni

- Lanni stated his first audit was November 15, 2023.
- During that audit, Lanni requested Richardson provide the required documents, including the issuing agent's Training Certificates, PSP Background Check, and other PennDOT requirement. Richardson was unable to provide the documents.
- Lanni stated the transactions and their documentation were disorganized, cluttered in large stacks of paper, improperly assigned and/or blank.
- Lanni said that the transactions he examined were missing driver license copies, bills of sales, insurance information, and had unsigned CVR reports.
- Lanni advised most of the documents were exclusively Salvage Certificate and Enhanced Inspections (MV-426B).
- Lanni advised that he suspected that there was more going on than Tag & Title transactions. Lanni advised that agents make most of their money through "Tag & Title". Lanni advised that he has visited the location numerous times and there was no "foot traffic" at the business to reflect the documents in the office and there's more going on than "Tag & Title" work.
- Lanni advised his second audit was January 30, 2024.
- Lanni advised that during this audit, Richardson was in violation of completing driver's license verification request.
- Lanni advised he reviewed a deal jacket for a motor vehicle title transaction for a reconstructed vehicle completed by Richardson on December 1, 2023. Lanni advised that the transaction had numerous issues, including mi
- Lanni advised that he observed several violations, including a lack of DLDV checks, driver's licenses not reflecting ownership, title assignments being completed before the work was dated, missing MV-13ST gift documents, and issuing metal plates to salvage cars.
- Lanni also noted Richardson was in violation of the following subsections of the PennDOT contract:

  Paragraph 17(74) – Provider has failed to comply with any Department policy or procedure not otherwise mentioned above – ***first violation – a written warning is issued in lieu of suspension of Certificate of Authorization***

- **Paragraph 17(53) –** The Provider issued a registration card or plate to an applicant without receiving proper proof of ownership documentation – ***first violation – a written warning is issued in lieu of Certificate of Authorization suspended for one (1) month***
- **Paragraph 17(72) –** The Provider has issued registration cards or plates but has delivered documents that are incomplete, invalid, other otherwise defective - ***first violation – a written warning is issued in lieu of Certificate of Authorization suspended for one (1) month***

Paragraph 17(38) - The Provider has failed, on more than two occasions, to be open during posted business hours - ***first violation - first violation – written warning.***

III. November 26, 2024 - Search Warrant

The Pennsylvania Motor Vehicle Code, codified at Title 75 Section 6308 – Investigations by Police Officers, mandates that miscellaneous motor vehicle businesses, such as Richardson Family Enterprises LLC, shall keep accurate records relating to titling transactions.[1] Furthermore, the records shall be maintained for three years from the date of disposition of the vehicle. In addition to the Motor Vehicle Code, PennDOT agents must maintain comprehensive and well-organized records, which must be available for inspection by PennDOT or law enforcement upon request. These records must be retained for a minimum of three years from the date of such a request.

On November 26, 2024, a search warrant was approved at the Philadelphia CJC for a search of Richardson Family Enterprise LLC, Full Agent # 18001820, located at 2449 Golf Road, Suite 7, in the City of Philadelphia, in part for the above-noted documentation relating to the instant investigation.

The building is a single-story structure with a yellow facade with the numbers 2449 appearing to the right side of the front double door. The rear door was open. Suite 7 was locked. Other rooms were observed with open doors, and all appeared to be vacant. There was no exterior signage indicating the presence of any business. Your affiant observed the office as a small room, approximately 8x8 in diameter, with a single desk and a computer. There were piles of unorganized paperwork strewn around various locations throughout the office. The following items were seized during the search:

1. Intel Computer Tower Serial # EB2D7EA6382891765
2. Black Heritage Safe #SVA2001210152070

The records have to nclude a corresponding customer receipt with the vehic e identification number, make, year and type of vehicle, from whom the vehicle was purchased or acquired sold to or disposed of the date, location and place purchased, acquired, sold or disposed of and the amount paid or other tender exchanged for the purchase acquisition, sale or disposition.

3. Miscellaneous Motor Vehicle related documents

During the execution of a search warrant, Richardson was not present, despite the required business hours. Your affiant found assorted MV-1 transactions for titles between 2023 and 2024. However, your affiant was only able to locate two (2) titling transactions out of the sixty-five (65) vehicles titled as part of this investigation. The other records were found to be incomplete, unorganized, and piled on a chair and under the desk. No registration plate inventory was located. The amount of paperwork was minimal. Your affiant also found over thirty (30) photocopies of Pennsylvania Driver's Licenses. However, these were not attached or associated with any known transactions.

Your affiant also located a paper MV-1 title application for a 2023 Genesis and a 2022 Jeep Wrangler. Both had photocopies of a South Carolina title. The application indicated they were not processed online. Subsequent investigation revealed that both the VINs and the South Carolina titles were fraudulent or incomplete.

IV. Adam Richardson Interview

On December 18, 2024, Richardson Family Enterprises LLC was suspended by PennDOT. Shortly thereafter, Richardson contacted PennDOT to inquire why the business was suspended. PennDOT provided Richardson with your affiant's contact information. Around that time, Richardson called your affiant and scheduled to come in the next day to meet with your affiant for an in-person interview.

On December 19, 2024, Adam Richardson came to the Pennsylvania State Police Trevose Station and met with your affiant. The interview was audio and video recorded. Adam Richardson was instructed that he was not in custody and was free to leave. He was also instructed that he had no outstanding warrants or charges, given this matter was an ongoing investigation. In an overabundance of caution, your affiant read Richardson his Miranda rights.

Your affiant asked Richardson about his business, its daily operations, and the discrepancies involved in the titles. In summary, Richardson stated the following:

- Richardson said Richardson Family Enterprises LLC is his business. He stated he had been in business for 4-5 years.
- Richardson noted that he had another person on his PennDOT contract but could not recall the person's name, other than a man from Pittsburgh. He stated that Alexandra Goins helps him with the business, but she does not process any paperwork.
- Richardson stated he processes all the work himself.

- Richardson said he has not been in the office since the beginning of October, approximately two months prior to the interview. He elaborated that he has been in the building, but was in another room because, per PennDOT guidelines, he has to process the paperwork from that location.
- Richardson stated he works as an agent "24/7".
- Richardson stated he is not issuing any registration plates because they are all locked in the safe in his office, along with his PennDOT contract, notary stamp, and other business documents.
- When questioned about the documents that issuing agents are required to collect, review, and maintain a copy for PennDOT, Richardson stated he reviews insurance cards but does not maintain a copy. He stated a PennDOT auditor, later alleged to be Marybeth O'Neill, informed him he does not need to maintain a copy. Richardson added that Marybeth O'Neill told him that he does not need to keep copies if the submission is online, and no records need to be kept for more than two months.
    - When your affiant spoke with Marybeth O'Neill, she denied instructing Richardson to violate these PennDOT guidelines.
- Richardson denied that he was to complete the Fair Markey Value form for any vehicle reported to be sold for less than 80% of its value.
- When questioned regarding counterfeit South Carolina titles that were processed by Richardson Family Enterprises LLC, Richardson alleged he does not remember the last time he saw a South Carolina Title.
- Richardson stated the businesses' unissued plates are in his office, but he did not have anything in his possession.

During the investigation, your affiant submitted a request for data from PennDOT regarding the registration plates delivered to Richardson Family Enterprises LLC. Your affiant learned that 145 unissued registration plates were delivered to Richardson Family Enterprises LLC. Furthermore, your affiant learned that those registration plates were unaccounted for. Your affiant conducted and License Plate Reader ("LPR") search for those registration plates in the previous 365 days. Your affiant found 92 of the 145 plates displayed on unauthorized vehicles throughout several states, including New York, New Jersey, Pennsylvania, Illinois, Connecticut, and Florida.

During the search warrants, your affiant only located three registration plates in the safe at Richardson Family Enterprise Business location. Only two were part of the 145 unissued registration plates.

V. Department of State – Unsworn Falsification to Authorities

On October 2, 2018, Richardson applied to the Department of State seeking appointment as a notary public. In Part II, question #2 of the Notary Public Application, Richardson answered "no" to the following question:

> *"Have you ever been convicted or accepted Accelerated Rehabilitative Disposition in resolution of a felony or misdemeanor preceding the date of this application? Conviction includes a finding of guilt by a court or jury, a plea of guilty or nolo contendere or a finding of not guilty due to insanity or of guilty but mentally ill. If yes, attach full details (name of court, plea/conviction/ARD, sentence and length of probation) and appropriate supporting documents with a signed and dated personal explanation."*

In addition to answering "no" to the above question, Richardson did not attach any information relating to the following criminal convictions:

> On April 27, 2007, Richardson entered a guilty plea to two counts of violating ***35 P.S. § 708-113(a)(30)**, Manufacture, Delivery or Possession with Intent to Deliver a Controlled Substance*, and two counts of violating ***18 P.a. C.S. § 903(a)(1)** Criminal Conspiracy Engaging to Manufacture, Delivery or Possession with Intent to Deliver A Controlled Substance,* all felonies, in the Court of Common Pleas of Delaware County.
> On June 25, 2012, Richardson entered a guilty plea to one count of violating ***75 P.a. C.S. § 3802(d)(1) DUI: Controlled Substance of Metabolite 1st Offense***, a misdemeanor, in the Court of Common Pleas of Delaware County.
> On September 26, 2013, Richardson entered a guilty plea to one count of violating ***35 P.S. § 708-113(a)(30),** Manufacture, Delivery or Possession with Intent to Deliver a Controlled Substance*, a felony, in the Court of Common Pleas of Delaware County.

On January 30, 2019, Adam Richardson was granted a commission to practice as a notary public in Pennsylvania by the Department of State, Notary I.D. 1341831.

On October 12, 2022, Richardson applied to the Department of State seeking reappointment as a notary public. In Part II, question #2 of the Notary Public Application, Richardson again answered "no" to the aforementioned question regarding prior criminal convictions. Richardson did not attach any information relating to his criminal convictions in 2007, 2012, and/or 2013. On January 30, 2023, Adam Richardson was granted a commission to practice as a notary public in the Commonwealth of Pennsylvania by the Department of State, Notary I.D. 1341831.

Your affiant reviewed a transcript of a hearing involving the matter of *Commonwealth of Pennsylvania Bureau of Notaries, Commissions and Legislation vs. Adam Richardson, Notary Public*, Case Number 21-99-004330. In that hearing, Richardson acknowledged he applied for appointment for a Notary Commission on October 2, 2018, and for re-appointment on October 12, 2022. Richardson acknowledged the signature on both applications are his.

On June 24, 2025, the Department of State revoked the notary public commission issued to Adam Richardson, notary ID #1341831.

CONCLUSION

Your affiant found more than sixty-five vehicles registered or titled by Richardson Family Enterprises LLC through its owner, Adam Richardson, between September 19, 2023, and August 17, 2024, that were processed with fraudulent or counterfeit documents to forty-nine different people.

Out of those sixty-five vehicles, thirty-seven vehicles have been located. All the vehicles located displayed altered VINs and found to be stolen from various jurisdictions, New York, Pennsylvania, New Jersey, Florida, and Texas. All sixty-five vehicles subject to this investigation were processed with PennDOT software by username "Richard00", which, after cross-referencing with PennDOT Dealer Track records, was identified as Adam Richardson, utilizing DIN #18001820, held by the Richardson Family Enterprises at 2449 Golf Rd, Philadelphia, PA. Identical fraudulent practices, negligent document omissions, and repeated fraudulent identification numbers are observed in the processing of all the stolen vehicles by Adam Richardson.

Based on the foregoing, your affiant believes probable cause exists that the aforementioned crimes listed in this Criminal Complaint have been committed by Adam Richardson and/or Richardson Family Enterprises LLC.

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

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

Tpr Randall Heckman
Trooper Randall Heckman

SA Jeremy Becker
Special Agent Jeremy Becker