COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. **AOUINO** Address: 50 Canal Street ARISTEDES First Name Middle Name Last Name Royalton, PA 17057 7400 Claridge Street, Philadelphia, PA 19111 Telephone: (717)944-4463 NGIC Extradition Code Type 5-Felony Pending Extradition 1-Felony Full C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANTIDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number Complaint Number **Incident Number** Services? CR-409-22 ☐ YES ☐ NO 1215122 396226-5 IFS210061 GENDER ров 03/16/1972 Co-Defendant(s) Add'l DOB Gen. Male Male First Name Middle Name Last Name ☐ Female AKA RACE White ☐ Native American Unknown Asian Black ETHNICITY X Hispanic ☐ Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) GRN (Green) PNK (Pink) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye PNK (Pink) Color HAZ (Hazel) ☐ MAR (Maroon) XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA ☐ YES ☐ NO **DNA Location** FBI Number **MNU Number** OLN 33510082 Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: 5 11 DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh, Code School Veh. Reg. State Registration Comm'i Veh. Haz Ind. \square same mat Plate # Sticker (MM/YY) as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code) in DAUPHIN County on or about 2018 TO PRESENT [22] (County Code)



Docket Number:				POLICE		
	Date Filed:	OTN/LiveS	can Number		olaint/incident N	umber
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Defendant Name:	First:	Middle:		Last:		
	ARISTEDES			AQUINO		
The acts committed by	the accused are	described below with	each Act of Assem	bly or statute	e allegedly viola	ited, if appropriate.
When there is more that	an one offense, e	each offense should be	numbered chronol	ogically.		
without more, is not sufficie	nt. In a∗summary case	to advise the defendant of the e, you must cite the specific	section(s) and subsect	ion(s) of the st	atute(s) or ordinand	ce(s) allegedly violated.
The age of the victim at the	ime of the offense m	ay be included if known. In a tablished, list only the last fo	iddition, social security	numbers and	financial informatio	n (e.g. PINs) should not
be listed. If the identity of al	account must be es	tablished, list only the last ic	di digita. 2041 A. Oode	33 2 10:1 - 2 10:	,	
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Acts of the accused as	sociated with this	s Offense: A person comm stolen or illegally obtained pro	its a reiony of the first	aegree ir trie po proceeds of unl	erson conducts a m awful activity, the n	erson acts with the
intent to promote the carrying	ng on of the unlawful	activity. To wit: the defenda	int repeatedly engaged	in financial tra	nsactions with know	vledge that the property
involved represented the pro	ceeds of unlawful ac	tivity with the intent to prom	ote the carrying on of	said unlawful ac	ctivity.	
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Lead? Offense# S	ection Subse	ection PA Sta	atute (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number		☐ Interstate		Safety Zone	☐ Work Zone
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(if applicable)	oludo tha nama c	of Statute of Ordinance).	. INERI DI DECEPIA	OIL		
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Docket Number:	Date Filed:	OTN/LiveScan N	umber	Complaint/Incident No IFS210061	ımber
Defendant Name:	First:	Middle:	Las		
	ARISTEDES		AQUINO		
Inchoate		☐ Conspiracy 18 903	Number of	Victims Age 60 or Older	
□ 04 4120	and the second s	of the 18		Grade NCIC Offense Code	uCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Section Subsection Accident Number ———	FA Statute (Title	☐ Interstate	☐ Safety Zone	☐ Work Zone
	clude the name of statute	e or ordinance): IDENT	TTY THEFT		
any means, identifying infor	ssociated with this Offens mation of another person witho another person through the me lawful purpose.	out the consent of that other	er person to further a	ny unlawful purpose, to wit: t	he defendant
Inchoate ☐ Attem Offense 18 907		Conspiracy 18 903	Number o	f Victims Age 60 or Older	
□ 05 712	21 (3) Section Subsection	of the 75	200 (300)	M1 Grade NCIC Offense Co	de UCR/NIBRS Code
PennDOT Data	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (in	clude the name of statute	e or ordinance): FALSE	APPLICATION FO	R CERTIFICATE OF TITLE	OR REGISTRATION
name or address or makes a	ssociated with this Offens a material false statement, or fa gistration, to wit: the defendan	ails to disclose a security in	terest, or conceals a	ny other material fact in an ap	plication for a
Inchoate	, —	Conspiracy	Number of	Victims Age 60 or Older _	
□ 06 712	2 (3)	of the 75	1 1	M1	
Lead? Offense#	Section Subsection	PA Statute (Tit		Grade NCIC Offense Cod	e UCR/NIBRS Code
PennDOT Data (if applicable)	Accident — — Number — — —		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (in	clude the name of statut	e or ordinance): ALTEI	RED, FORGED, OR	COUTERFEIT DOCUMENTS	\
alters or forges an assignment	ssociated with this Offens ent of a certificate of title, or a eparmtent, to wit: the defenda	n assignment or release of	a security interest or	a certificate of title or any ot	her document issued or



Docket	Number: -409-22	Date I	Filed:	OTN/LiveScan Nu 396226-5	ımber	Complaint/Incident Nu IFS210061	mber
	ant Name:	First:		Middle:	Last:		
Deletio	ant Name:	ARIST	EDES		AQU	JINO	
Inche Offer	The state of the s	empt 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number of	Victims Age 60 or Older _	
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	Offense# nnDOT Data applicable)	Section Accide Numb		PA Statute (Tit	☐ Interstate	☐ Safety Zone	☐ Work Zone
		early continues about the pathological problems	Right Angle Angle E. C.	or ordinance): unsw	ORN FALSIFICATIO	N TO AUTHORITIES	
false sta	tements which h	e did not belie	ve to be true, on forn	ns bearing notice that fals	è statements were pu	rtation (PennDOT) forms ther nishable by law.	
Incho Offer		mpt 01 A	☐ Solicitation 18 902 A	Conspiracy 18 903	Number of V	/ictims Age 60 or Older	
Lead?	08 4:	L17 Section	(a)(3)	of the 18	1 F3	3 Grade NCIC Offense Code	UCR/NIBRS Code
⊩ = Pel	nnDOT Data applicable) ⊹	Accider Numbe	jį.	77 Oledate (Trice	☐ Interstate	☐ Safety Zone	☐ Work Zone
		(include the	name of statute	or ordinance): INSUR	ANCE FRAUD		
conspired claim the or support insurer, and/or insurer.	s with another to at contains any forts an amount of made material sincomplete and/o	o prepare or m alse, incomplet laimed in exce tatement(s) int or misleading in	ake any statement the or misleading informs of the actual loss sended to be presented formation.	nat is intended to be prese mation concerning any fa- custained by the claimant ed to the insurer in connec-	ented to any insurer or ct or thing material to to wit: the defendant ction with and/or in su	r insurer or self-insured, assis r self-insured in connection w the claim, including informat did knowingly and with the in upport of an insurance claim to victims Age 60 or Older	ith, or in support of, a ion which documents itent to defraud an
Offe	nse 18	901 A	18 902 A	18 903			
	2,000 A 2 4 4 4 4 4 4 4	1118		of the 18	St. Co. 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Grade NCIC Offense Cod	ie UCR/NIBRS Code
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CR-						Numbe	Last	Complaint/Incident Nu IFS210061 JINO	mber .
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Per	inDOT D applicab	ata 💮	Accident Number				Interstate	☐ Safety Zone	☐ Work Zone
Acts of record, do	the accu	ised assor or thing belo povernment;	ciated wit	h this Offense	: The defendant, did kr	nowingly a	and with intent	make a false entry in, or false or required by law to be kept to do documents, or things below.	alteration of, any
Incho Offen	41.00 cm - 2.00 cm	Attempt 18 901 A		Solicitation 18 902 A	⊠ Conspiracy 18 903		Number of \	/ictims Age 60 or Older	32 10 10 10 10 10 10 10 10 10 10 10 10 10
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Per	mDOT D applicab	ata 💮 🥫	Accident Number				Interstate	☐ Safety Zone	☐ Work Zone
	Descrip			me of statute	or ordinance): CRIN	MINAL C	ONSPIRACY -	DEALING IN PROCEEDS O	F UNLAWFUL
following False App they or o did agree	crimes: D lication for ne or more with one uch crime	ealing in Pro r Certificate e of them wil or more indi (s). One or I	ceeds of Ur of Title or F Il engage in viduals, tha more of the	nlawful Activity, W Registration, and I conduct which o It one or more wo	/ashing Vehicle Titles, D Unsworn Falsification to onstitutes such crime(s)	eceptive Authoriti or an at that cons	Business Practices, did agree we tempt or solicitatitutes the aforemspiracy.	cilitating the commission of on tes, Tampering with Public Re ith such other person(s) and / tion to commit such crime(s); mentioned crime(s), or an att	cords or Information, or business(es) that to wit; the defendant
Offe	Mark House Till Strategy 1	18 901 A		18 902 A	18 903		Number of	Victims Age 60 or Older _	
	12	911		(b)(1)	of the 18	/Tisl_)	1 Counts	F1 Grade NCIC Offense Cod	le UCR/NIBRS Code
	Offens nnDOT l applica	Data (1.75)	Section Acciden Number		PA Statute] Interstate	☐ Safety Zone	☐ Work Zone
Acts of from a p proceeds received	the acc	used asso acketeering a acome, in the erived, direct	de the na	th this Offense	participated as a princi	or any pe pal, to us or operat	rson who has re e or invest, dire ion of, any ente	eceived any income derived, ductly or indirectly, any part of erprise, to wit: the defendant addrectly, any part of this incomplete.	such income, or the engaged in and



Incident Number OTN/LiveScan Number **Complaint Number** Date Filed: **Docket Number:** 396226 IFS210061 2157 22 Middle: Last: First: Defendant Name **AQUINO** ARISTEDES The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.) Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 902 A 18 903 18 901 A Offense of the 1 F1 911 18 13 (B)(2) UCR/NIBRS Code **NCIC Offense Code** Grade PA Statute (Title) Counts Offense# Section Subsection Lead? PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate (if applicable) : Number Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a car dealership. Inchoate ☐ Solicitation Conspiracy ☐ Attempt Number of Victims Age 60 or Older 18 903 18 901 A 18 902 A Offense of the F1 911 1 18 14 (B)(3) NCIC Offense Code UCR/NIBRS Code Offense# Subsection PA Statute (Title) Counts Grade Section Lead? PennDOT Data Accident ☐ Work Zone ☐ Safety Zone ☐ Interstate Number 1 (if applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity. ☐ Solicitation Conspiracy Inchoate ☐ Attempt Number of Victims Age 60 or Older 18 903 Offense 18 901 A 18 902 A F1 of the 15 911 (B)(4)18 UCR/NIBRS Code **NCIC Offense Code** PA Statute (Title) Counts Grade Offense# Subsection Lead? Section PennDOT Data Accident ☐ Work Zone ☐ Safety Zone ☐ Interstate (if applicable) Number Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).

Docket Number:	Date Filed: /み /5 / 22	TN/LiveScan Number		Complaint/Incident Number IFS210061
	First:	Middle:	Last	
Defendant Name:	ARISTEDES		AQL	JINO

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

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

(Issuing Authority

(Date)

(Year)

AND NOW, on this date

December 5, 7022

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

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

(Magisterial District Court Number)

SEAL



Docket Number:

CA-401-22

Date Filed:

A 39 6226-5

Defendant Name:

Defendant Name:

Date Filed:

ARISTEDES

Date Filed:

A 39 6226-5

Middle:

ARISTEDES

ARISTEDES

Date Filed:

A 39 6226-5

Middle:

AQUINO

AFFIDAVIT of PROBABLE CAUSE

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

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

- 1. Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
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- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
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- 24. Jean AQUINO
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- 31. Amatti Auto Sales LLC
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- 34. Santos Auto Gallery
- 35. Perfect Touch Auto Repair and Sales LLC
- 36. Pennsylvania Tag and Title
- 37. J&J Car & Truck Sales LLC

		4	
Docket Number: CR - 409-22	Date Filed:	G 3962265	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	ARISTEDES		AQUINO

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

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

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

. . . .

My commission expires first Monday of January,

, Magisterial District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. **GOMEZ-GOMEZ** ROBERTO Address: 50 Canal Street Ge Last Name First Name Middle Name Royalton, PA 17057 221 E. Eleanor Street Philadelphia, PA 19120 Telephone: (717)944-4463 NGIC Extradition Gode Type C-Misdemeanor Surrounding States 5-Felony Pending Extradition 1-Felony Full Distance: □ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States A-Misdemeanor Full F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANTIDENTIFICATION INFORMATION Request Lab **Complaint Number Incident Number Docket Number Date Filed** OTN/LiveScan Number Services? ☐ YES ☐ NO 1215122 IFS210061 15-22 Co-Defendant(s) ров 01/10/1970 Add'l DOB Gen. i ast Name Middle Name Male Male First Name ☐ Female AKA Unknown Native American White Black RACE Asian Mispanic Hispanic ☐ Non-Hispanic Unknown **ETHNICITY** BRO (Brown) SDY (Sandy) BLU (Blue) PLE (Purple) RED (Red/Aubn.) GRY (Gray) Hair GRN (Green) PNK (Pink) XXX (Unk./Bald) ☐ WHI (White) BLK (Black) ONG (Orange) Color BLN (Blande / Strawberry) GRY (Gray) BLU (Blue) GRN (Green) BLK (Black) BRO (Brown) Eye PNK (Pink) XXX (Unknown) Color HAZ (Hazel) ☐ MAR (Maroon) ☐ MUL (Multicolored) WEIGHT (lbs.) **DNA** Location DNA ☐ YES ☐ NO FBI Number 200 **MNU Number** OLN 25747957 Ft. HEIGHT In. **Defendant Fingerprinted** □ YES □ NO 8 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** School Veh. Oth, NCIC Veh. Code Reg. Comm'l Veh. State Haz Registration same Ind. mat Plate # Sticker (MM/YY) as Def. Color Style VIN Make Model Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above □ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) on or about 2018 TO PRESENT in DAUPHIN County [22] (County Code)



	*	,						鄭 P (OLICE	CRIMINA	L CO	MPLAINT
Docke	t Numb	er: 5-00	Date F		RS	OTN/LiveSca	n Numb	er		iplaint/Incldent 210061	Numbe	r.
Defen	ant Na	me:	First: ROBER			Middle:		1 -	ast: OMEZ-G	OMEZ		
	SACRET OF LANGUAGE	enter en seus seus seus seus seus seus seus s	*									
When (Set for without The age	there th a brie more, is of the v	s more that f summary of not sufficientiction at the	an one off f the facts summan. In a summatime of the office office of the office of the office of the office offic	ense, each ifficient to ac nary case, yo ffense may b	n Offense lvise the de ou must cite e included	should be not find the specific set the specific set.	umbered nature of 1 ection(s) a lition, soc	chronolog he offense(s) nd subsectio ial security n	gically. charged. A n(s) of the s umbers and	te allegedly vio citation to the sta tatute(s) or ordina financial informa 3.7.)	atute(s) al ance(s) al	llegedly violated,
Incho Offer	Bright School	Attempt 18 901 A		Solicitation	on [Conspiracy 18 903			Number o	f Victims Age 60	or Older	
×	01	5111		(a)(1)	of the	18		1	F1			
Lead?	Offens #	3	ection	Subsection		PA Statut	te (Title)	Counts	Grade	NCIC Offense Code	uc	R/NIBRS Code
15 miles	nnDOT applica	计算数据的	Accident Nu	mber				Interstate		Safety Zone	-	☐ Work Zone
			clude the i	name of st	atute or o	ordinance): D	EALING	IN PROCEE	OS OF UNL	AWFUL ACTIVIT	ΓY	
Inche Offer	Carlotte Committee	Attempt 18 901 A	[☐ Solicitation	on [Conspiracy			Number o	of Victims Age 60	or Oldei	
	02	3922		(a)(1)	of the	18		1	F3			
Lead?	Offens	e# S	Section	Subsection	1	PA Statu	te (Title)	Counts	Grade	NCIC Offense Code	uc	CR/NIBRS Code
	nnDOT applic	Service of the servic	Accident Nu	mber				Interstate] Safety Zone		☐ Work Zone
Acts defend	of the a	cription (in accused as present or ca (Penn DOT).	ssociated use to prese	with this O	ffense: Ti omplete or dant's dece	misleading infor	d intention mation m	nally obtain o aterial to veh erwork enable	r withhold picle title apped	roperty of anothe lication(s) to the ania vehicle titles	Pennsylva	ania Department of
	ioate ense	18 90°		Solicitat 18 902 A		☐ Conspiracy 18 903		Numb	er of Victim	s Age 60 or Olde	er	
	03	and the second second	<u> </u>	(a)	of t		tute (Title)	1 Counts	Grade	NCIC Offens	e Code	UCR/NIBRS Code
	ennDC		Section Accide Number	\$200 Act 124	uon	PA Sta	tute (Tide)	☐ Interstate		☐ Safety Zone		☐ Work Zone
			quite and a series of the seri	All Application of the A	tatute or	ordinance): I	RECEIVI	IG STOLEN	PROPERTY	, , , , , , , , , , , , , , , , , , , ,		
anothe restore to the	er knowir e it to the owner. I	ng that it has e owner; to w nowing that	been stolen vit: The defe such proper	, or believing ndant did int tv was stolen	that it has entionally r , or believing	probably been eceive, retain o	stolen, un r dispose robably be	less the prop of movable po en stolen, an	erty is recei operty, belo d the prope	ved, retained, or o	disposed (, with no	intent to restore it



Docket Number:	Date	Filed:	OTN/LiveScan	Number	Co	mplaint/Incident No S210061			
Defendant Name	First: ROBE	ERTO	Middle:		Last: GOMEZ-	GOMEZ			
	Attempt 18 901 A	☐ Solicitation 18 902 A	Conspiracy	Num	ber of Victim	s Age 60 or Older _			
U 04 Lead? Offense#	7121 Section	Subsection	of the 75	1	M1 s Grade	NCIC Offense Cod	uCR/NIBRS Code		
PennDOT Da (if applicable				☐ Intersta	te	☐ Safety Zone	☐ Work Zone		
Statute Description (include the name of statute or ordinance): FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION Acts of the accused associated with this Offense: A person is guility of a misdemeanor of the first degree if the person uses a false or ficticious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title.									
Inchoate	Attempt	☐ Solicitation	☐ Conspiracy	Nu	mher of Victir	ns Age 60 or Older			
Offense	18 901 A	18 902 A	18 903		TIDOT OF VIOLE				
Lead? Offense#	7122 Section	(3) Subsection	of the 75	(Title) Cou	M1	NCIC Offense Co	de UCR/NIBRS Code		
Lead? Offense# PennDOT Da (if applicabl	ata Accid	dent	FA Statute	☐ Intersi		☐ Safety Zone	☐ Work Zone		
		\$095 S. 605 S. 605	or ordinance): ALT	ERED, FORGED	, OR COUTE	RFEIT DOCUMENTS			
alters or forges an a	assianment of a ce	rtificate of title, or an	e: A person is guilty of assignment or release t, with fradulent intent,	of a security inte	rest on a certi	ficate of title or any oth	ner document issued or		
The state of the s	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Num	ber of Victim	s Age 60 or Older _			
□ 0 6	4904	\ \~)	of the 18	Title) Count	MI'M	NCIC Offense Cod	e UCR/NIBRS Code		
Lead? Offense# PennDOT Da (if applicable)			PA Statute (Intersta		☐ Safety Zone	☐ Work Zone		
			e or ordinance): UNS	SWORN FALSIF	TICATION TO	AUTHORITIES	<u></u>		
pursuant to a form l continuous course o	bearing notice, au of criminal conduct	thorized by law, to the	e : The defendant made e effect that false stater gly and intentionally sign ms bearing notice that	nents made ther ned (PA Dept. of	ein are punish Transportation	able; To wit: the defern (PennDOT)) forms th	idant engaged in a		



Docket	Numbe	•	Date Fi	led:	OTN/LiveScan	Number		laint/Incident Nur 10061	mber
Defenda	ant Nam	e:	First:	-o	Middle:	1 101 20099	Last: GOMEZ-GO	OMEZ	
								1, 1	
Incho Offen		☐ Attemp 18 901 /		Solicitation 18 902 A	☐ Conspiracy 18 903	Nui	mber of Victims	Age 60 or Older	
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A STATE OF THE PARTY OF THE PAR	Offense InDOT I applical)ata 💮	Section Accident Number	Subsection	PA Statute	(Title) Cour		NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
			lude the n	ame of statute	or ordinance): INS	URANCE FRAU	D		
conspires claim that or suppor aninsurer and/or in	with and t contains ts an am r, made m complete	ther to pre any false, ount claime aterial stat and/or mis	pare or make incomplete ed in excess ement(s) int eleading infor	e any statement to or misleading info of the actual loss ended to be prese mation.	e: Knowingly and with that is intended to be promation concerning any sustained by the claimal ented to the insurer in content of the insurer in con	esented to any ir fact or thing ma nt to wit: the de connection with a	nsurer or self-insu terial to the claim fendant did knowi nd/or in support o	red in connection wit, including information in and including information in the interior in an insurance claim	h, or in support of, a on which documents ent to defraud
Inchos Offens	2010/11/1986	18 901 A		Solicitation 18 902 A	Conspiracy 18 903	Num	ber of Victims A	ge 60 or Older	
	08 Offense	4118	ection		of the 18	itle) Count	F3	NCIC Offense Code	UCR/NIBRS Code
	nDOT D	ata	Accident Number	Subsection	PA Statute (1	☐ Intersta		Safety Zone	☐ Work Zone
			Phonone in a point of the state of the	ame of statute	e or ordinance): WAS	SHING VEHICL	E TITLES		
knowledg made an	e that the application t made/c	e person is on for a cer	facilititing a tificate of title made appli	deception to be pe e for a motor veh	e: A person commits a erpretated by anyone coicle which includes materificate of title for a motor commits a committee of title for a motor commits a committee of title for a motor committee of title for a motor commits a committee of title for a motor commits a committee of title for a motor committee of title for a mot	oncerning the truerially false or fictor vehicle which	ue mileage of a me ticious information	otor vehile, the person to wit: with intent to live false or ficticious in the false or ficticious in	n makes/causes to be o deceive anyone, the
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100 CO. C.	Offenson DOT I	Data	Section Accident Number	Subsection	PA Statute	(Title) Cou		NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
			100 Park (201 120 below 110 below	(Matter)	e or ordinance): TAM	IPERING WITH	I PUBLIC RECOI	RDS OR INFORMAT	ION
record, d	ocuments on of the	or thing be governmer	elonging to,	or received or ke	e: The defendant, did k ot by, the government fo e false entries in, and/o	or information or	record, or require	ed by law to be kept	by others for



Docket	Number:	97-	Date File		OTN/Live\$can	Number	FOL	CE CRIMINAL C Complaint/Incident Nur IFS210061	
Defenda	ant Name		First: ROBERTO		Middle:		Last: GOM	EZ-GOMEZ	
Inchoa Offens	32 1986 303 389 31	Attempt 18 901 A		Solicitation 18 902 A	⊠ Conspiracy 18 903	Nu	mber of Vi	ctims Age 60 or Older	
	10 Offense#	5111	ection	(a)(1) Subsection	of the 18	Title) Cou	F1	rade NCIC Offense Code	UCR/NIBRS Code
🤃 (if a	nDOT Da pplicable	ta 🗼	Accident Number			☐ Inters	tate	☐ Safety Zone	☐ Work Zone
	Descripti ES, ETC (ne of statute	or ordinance): CRII	INAL CONSP	IRACY - I	DEALING IN PROCEEDS O	F UNLAWFUL
False Appli they or one did agree v	ication for e or more with one o	Certificate of them w r more ind	of Title or Re ill engage in d ividuals, that	gistration, and conduct which o one or more wo	Unsworn Falsification to constitutes such crime(s)	Authorities, did or an attempt that constitutes	l agree with or solicitati the aforen	es, Tampering with Public Rec in such other person(s) and / on to commit such crime(s); nentioned crime(s), or an atte	to wit; the defendant
Inchoa Offens	14-1803 HP-8153	Attempt 18 901 A		Solicitation 18 902 A	Conspiracy 18 903	Nu	mber of V	ictims Age 60 or Older	
	11	911		(b)(1)	of the 18	1	F1	and the property of the contract of the contra	UCR/NIBRS Code
	Offense# nDOT:Da pplicable	ta 🗀 🕌	ection Accident Number	Subsection	PA Statute	Title) Cou		rade NCIC Offense Code ☐ Safety Zone	☐ Work Zone
Acts of t from a pat proceeds of received in	the accustern of racoff such income derivatives	sed associated associa	ociated with activity in whe	n this Offense ich such person of any interest i y, from a patte	participated as a princi	or any person w pal, to use or in or operation of	ho has rec vest, direc	eived any income derived, di tly or indirectly, any part of s prise, to wit: the defendant e lirectly, any part of this incon	uch income, or the engaged in and
Incho Offen		☐ Attemp 18 901		Solicitation	Conspiracy	N	umber of	Victims Age 60 or Older	
	12 Offense	911	0-4	(b)(2)	of the 18	1 (Title)	Founts	1 Grade NCIC Offense Coo	ie UCR/NIBRS Code
(if	inDOT D applicab	ata le)	Section Accident Number			☐ Inte	rstate	☐ Safety Zone	☐ Work Zone
Statute	Descript	ion (incl	ude the na	me of statute	e or ordinance): co	RUPT ORGAN	IZATION	s	
maintain,	directly or	indirectly	ociated wit any interest I of a car dea	in or control of	e: It shall be unlawful f any enterprise; to wit: t	or any person t he defendant t	hrough a pa	attern of racketeering activity attern of racketeering activity	y to acquire or or maintained, directly on



POLICE CRIMINAL COMPLAINT Incident Number Date Filed: Complaint Number Docket Number: OTN/LiveScan Number 5100 IFS210061 First: Middle: Last: Defendant Name **GOMEZ-GOMEZ ROBERTO**

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.) Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 F1 13 911 (B)(3)of the 18 1 П UCR/NIBRS Code Offense# Section Subsection PA Statute (Title) Counts Grade **NCIC Offense Code** Lead? PennDOT Data Accident ☐ Work Zone ☐ Safety Zone ☐ Interstate (If applicable) Number -Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense of the F1 П 14 911 (B)(4) 18 NCIC Offense Code UCR/NIBRS Code PA Statute (Title) Offense# Section Subsection Counts Grade Lead? PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3). Inchoate ☐ Attempt ☐ Solicitation Conspiracy Number of Victims Age 60 or Older 18 903 18 901 A 18 902 A Offense of the П UCR/NIBRS Code NCIC Offense Code Subsection PA Statute (Title) Counts Grade Lead? Offense# Section PennDOT Data Accident ☐ Work Zone ☐ Interstate ☐ Safety Zone (if applicable) Number Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:



Defendant Name: First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ

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

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

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

(Date)

(Year)

AND NOW, on this date

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

(Issuing Authority)

(Issuing Authority)

(Issuing Authority)



Decket Number:	Date Filed:	OTN/LiveScan Numb	er/ C	Complaint/Incident Number FS210061
	First:	Middle:	Last:	
Defendant Name:	ROBERTO		GOME	Z-GOMEZ

AFFIDAVIT of PROBABLE CAUSE

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

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

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Docket Nymber:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061					
Defendant Name:	First: ROBERTO	Middle:	Last: GOMEZ-GOMEZ					

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

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

Magisterial District Judge

My commission expires first Monday of January,

COMMÓNWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. Address: 50 Canal Street LOPEZ-ROMAN AHMED Middle Name Last Name First Name Royalton, PA 17057 1210 E. Venango Street Philadelphia, PA 19134 Telephone: (717)944-4463 NGIC Extradition Code Type 5-Felony Pending Extradition □ 1-Felony Full C-Misdemeanor Surrounding States Distance: 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? 14 396195-2 ☐ YES ☐ NO CK- 408-22 1215122 IFS210061 Co-Defendant(s) ров 01/21/1972 Add'I DOB Gen. Middle Name Last Name ☐ Female AKA Unknown RACE ☑ White Native American Asian ☐ Black ETHNICITY Hispanic Unknown ☐ Non-Hispanic BRO (Brown) BLU (Blue) PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) Hair PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) **DNA Location** DNA ☐ YES ☐ NO **FBI Number** MNU Number OLN 27946315 314044MA4 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code School Veh. Reg. State Haz Registration Comm'l Veh. same mat Ind. Plate # Sticker (MM/YY) as Def. VIN Model Style Color Office of the attorney for the Commonwealth $\ \square$ Approved $\ \square$ Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General of (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Place-Political Subdivision)

on or about 2018 TO PRESENT

in DAUPHIN County

[22]

(County Code)



						🤲 P(COMPLAINT
Docket Nur	nber:	Date File	ed:	OTN/LiveS	Scan Numl	per		olaint/Incident Ni 10061	umber
Defendant	Name:	First:		Middle:			ast: _OPEZ-RO	MANI	
	1	AHMED					_OPEZ-RO	UMAIN	
When ther (Set forth a b without more	e is more than in its more than its more tha	n one offer the facts suff nt. In a summa ime of the off	nse, each offe ficient to advise ary case, you mu anse may be incl	ense should be the defendant of t yet site the specific	e numbere he nature of c section(s) addition, so	d Chronolog the offense(s) and subsectio cial security n	gically.) charged. A con(s) of the stumbers and § 213.1 – 213.	citation to the statut atute(s) or ordinanc financial information 7.)	ted, if appropriate. (e(s) allegedly violated, (e(s) allegedly violated. (e.g. PINs) should not
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A	☐ Conspirad	су		Number of	Victims Age 60 or	Older
⊠ 0 1	5111		(a)(1) G	of the 18		1	F1		
Lead?	#	ection	Subsection	PA S	tatute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDC (if appl		Accident Num	ber			Interstate		Safety Zone	☐ Work Zone
Statute De	escription (inc	clude the na	ame of statute	e or ordinance): DEALING	IN PROCEE	DS OF UNLA	WFUL ACTIVITY	,
involved reprint involv	Attempt 18 901 A	ceeds of unla	wful activity with Solicitation 18 902 A	Conspira	mote the car	rying on of sa	id uniawiui a	ctivity.	Viedge that the property
				of the 18		1	F3		****
		ection	Subsection		Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
The second secon	OT Data licable)	Accident Nun	nber] Interstate		Safety Zone	☐ Work Zone
Statute Do	escription (in	sociated w	rith this Offen	ate or micleading i	nt did intention	onally obtain o	or withhold pr	roperty of another b Insylvania Temporal Itment of Transporta	y deception; to wit: the ry Vehicle Registration ation (Penn DOT).
Inchoate Offense	52000		☐ Solicitation 18 902 A	☐ Conspir	асу	Numb	per of Victima	s Age 60 or Older	
	03 392	25	(a)	of the 18		1	. F3		
Lead?	Offense# DOT Data	Section Acciden	Subsection	PA	Statute (Title)			NCIC Offense C	UCR/NIBRS Code Work Zone
(if ap	plicable)	Number	· — —	te or ordinance). BECELVI	☐ Interstate		☐ Safety Zone	T MOUNTONO
Statute D	escription (in	Giude lile i	iaiiie oi sialu	te or ordinance	//. RECEIV	O. OLEN			
restore it to	wing that it has the owner; to war knowing that	been stolen, vit: The defen	or believing that dant did intentic was stolen, or l	it has probably be	een stolen, u in or dispose Id probably l	niess the prop e of movable p peen stolen, a	perty is receiv property, beloind the proper	rea, retained, or dist	s of movable property of posed with intent to ith no intent to restore it mobile, airplane,



Docket Number:	Date Filed:	OTN/LiveSca	n Number		Complaint/Incident Nu IFS210061	mber
Defendant Name:	First: AHMED	Middle:		Last:	Z-ROMAN	
Inchoate	☐ Solicitate 18 902 A	. —	Nur	nber of Vict	tims Age 60 or Older	
☐ 04 4120 Lead? Offense# S	ection Subsec	of the 18	1 Cour	F3	de NCIC Offense Code	UCR/NIBRS Code
Lead? Offense# S PennDOT Data (if applicable)	Accident Supsec	ndii FA Statute	☐ Interst		☐ Safety Zone	☐ Work Zone
Statute Description (inc	2010 J. J. 22 Ja. H. D. T. 126 STH DAY-99745	statute or ordinance): ID	ENTITY THEFT			
Acts of the accused assany means, identifying inform possession of a fake Pennsylv expired in early 2000s.	ation of another nerse	on without the consent of that	other person to 1	further any o	unlawful purpose, to wit: t	ne defendant was in
Inchoate		ı — · ·	Nı	ımber of Vi	ctims Age 60 or Older _	
□ 05 712 :		of the 75	1	M1	programme and the contract of	200 (200 (200 (200 (200 (200 (200 (200
Lead? Offense# PennDOT Data	Section Substantial Accident	ection PA Statu	te (Title) Co		rade NCIC Offense Cod Safety Zone	le UCR/NIBRS Code ☐ Work Zone
(if applicable) Statute Description (inc	Number —— lude the name of	 statute or ordinance): FA				R REGISTRATION
Acts of the accused ass name or address or makes a certificate of title or for a reg fraudulent Pennsylvania Tem	material false stateme istration, to wit: the de	nt, or fails to disclose a secur efendant made a material fals	ity interest, or cor	nceals any o	ther material fact in an ap	plication for a
Inchoate	_	<u> </u>	Nu	mber of Vic	tims Age 60 or Older	
□ 06 7122	(3)	of the 75	1	M1	74207 (4448)	
PennDOT Data	Section Subse Accident	ction PA Statute	e (Title) Cou	-	MCIC Offense Code ☐ Safety Zone	UCR/NIBRS Code ☐ Work Zone
(if applicable) Statute Description (inc	Number ————————————————————————————————————	statute or ordinance): A	LTERED, FORGE	D, OR COU	ITERFEIT DOCUMENTS	<u> </u>
(3) has possession of, sells of financial responsibility or any	or attempts to sell, use other document issue	Offense: A person is guilty es or displays a certificate of ted by the department, knowin orary Pennsylvania Registration	itle, registration o g it to have been	ard or plate,	, driver's license, inspectio	n certificate proof of



Docket Number:		Date Filed	i:	OTN/Lives		ber		Complaint/Incident Nu IFS210061	mber
Defendant Name		First: AHMED		Middle			Las	t: PEZ-ROMAN	
Inchoate C	Attempt 18 901 A		Solicitation 18 902 A	☐ Conspira 18 903	су	Nur	nber of	f Victims Age 60 or Older _	
□ 07	4904	100	(b)	of the 18		1 Cour	The state of the s	MT M3 Grade NCIC Offense Cod	le UCR/NIBRS Code
Lead? Offenser PennDOT D. (if applicab	ata le)	ection Accident Number	Subsection		Statute (Title)	☐ Interst	ate	☐ Safety Zone	☐ Work Zone
Statute Description (include the name of statute or ordinance): UNSWORN FALSIFICATION TO AUTHORITIES									
Acts of the accused associated with this Offense: A person commits a misdemeanor of the third degree if he makes a written false statement which he does not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are									
punishable. to wit:									
					4,,-				
	Attempt		Solicitation	☐ Conspirac	У	Num	ber of	Victims Age 60 or Older	
Offense	18 901 A 4118		8 902 A	18 903		1		3	
Lead? Offense#	Se	ction Accident	Subsection	3	atute (Title)	Count	888 5 J 778 A	Grade NCIC Offense Code	
(if applicable Statute Description	e)	Number		or ordinance)	· WACHTN	Intersta		☐ Safety Zone	☐ Work Zone
knowledge that the	nerson is f	acilitating a de	eception to be	perpetrated by an	vone conce	rning the tr	ue mile	ee if, with intent to deceive an lage of a motor vehicle, the per tious information, to wit: the o	rson makes or causes
to be made an appi to deceive anyone, information.	the defend	ant made/cau	sed to be mad	e application(s) fo	r a certifical	erially raise te of title fo	r a mol	tor vehicle which included mat	erially false or ficticious
								,	
Inchoate C	Attempt 18 901 A		Solicitation 18 902 A	☐ Conspira	ісу	Nui	mber o	f Victims Age 60 or Older _	
□ 09	4911		(a)(1)	of the 18		1		F3	
Lead? Offense: PennDOT D (if applicab	ata	Section Accident Number	Subsection	PA:	Statute (Title)	Cour		Grade NCIC Offense Cod	de UCR/NIBRS Code Work Zone
		THE RESIDENCE OF CASE OF STREET, SALES	ne of statut	e or ordinance)	: TAMPER	ING WITH	I PUBL	IC RECORDS OR INFORMA	TION
record, documents	or thing be jovernmen	lonaina ta, or	received or ke	ot by, the governr	nent for inf	ormation or	record	nt make a false entry in, or fal I, or required by law to be kep cords, documents, or things be	t by others for
									, s, s



Docke CR-	t Number: - 408-	22 12	e Filed: /5/22	OTN/LiveScan N	2	Complaint/Incident Nu IFS210061	mber
Defend	lant Name	First:	ED	Middle:	Last LOF	PEZ-ROMAN	
Incho Offen		Attempt 18 901 A	☐ Solicitation 18 902 A	⊠ Conspiracy 18 903	Number of \	/ictims Age 60 or Older	
	10	5111	(a)(1)	of the 18	1 F		
AND THE RESERVE	Offense# nnDOT Da	and the state of t	Partition of the source	PA Statute (Title	Counts Interstate	Grade NCIC Offense Code	UCR/NIBRS Code Work Zone
Statute			-2016 A-108 G-2-2000	or ordinance): CRIMI		DEALING IN PROCEEDS O	F UNLAWFUL
ACTIVIT	TY, ETC						141,1 - 17
False App they or o did agree	olication for ne or more with one o	Certificate of Title of them will enga r more individuals	e or Registration, and ge in conduct which s, that one or more w	Unsworn Falsification to Auconstitutes such crime(s) or	thorities, did agree wi an attempt or solicita constitutes the afore	tes, Tampering with Public Re th such other person(s) and , tion to commit such crime(s); mentioned crime(s), or an att	or business(es) that to wit; the defendant
Incho Offer	Fall Carlo Carlo Carlo	Attempt 18 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903	Number of V	/ictims Age 60 or Older	
	11	911	(b)(1)	of the 18] F	i	
	Offense# nnDOT Da			PA Statute (Titl	Counts Interstate	Grade NCIC Offense Code	UCR/NIBRS Code ☐ Work Zone
	applicable Descripti	1975 Tark and designation of the party of the second section of the	ber e name of statute	e or ordinance): CORRL			
from a p proceeds received	attern of rac of such inc income der	cketeering activity ome, in the acqui ived, directly or in	in which such person sition of any interest directly, from a patte	n participated as a principal in, or the establishment or	to use or invest, dire operation of, any ente nd used income or pr	eceived any income derived, d ctly or indirectly, any part of s rprise, to wit: the defendant oceeds of income derived from	such income, or the engaged in and
lnch ⊝ffe	oate [Attempt 18 901 A	Solicitation	Conspiracy 18 903	Number of	f Victims Age 60 or Older	
	12	911	(b)(2)	of the 18	1	F1	
Lead?	Offense		Subsection	PA Statute (T		Grade NCIC Offense Co	de UCR/NIBRS Code
:	f applicab	le) Nu	mber	e or ordinance): CORRI	☐ Interstate	☐ Safety Zone	☐ VVOIK ZONE
Otatuic	, Descript	ion (monage an	c name of clarat	o or oranianoop. Contra			
maintair	. directly or	indirectly, any int	erest in or control of	any enterprise; to wit: the	defendant through a p	pattern of racketeering activity pattern of racketeering activity duals within this organization.	y maintained, directly or



Incident Number Docket Number: Date Filed: OTN/LiveScan Number Complaint Number CR-408-22 IFS210061 クリターシン 396/94-First: Middle: Last: Defendant Name LOPEZ-ROMAN **AHMED** 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.) Attempt ☐ Solicitation ☐ Conspiracy Inchoate Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense 911 of the 18 F1 13 (B)(3)1 П NCIC Offense Code UCR/NIBRS Code PA Statute (Title) Offense# Section Subsection Counts Grade Lead? Accident PennDOT Data ☐ Work Zone ☐ Safety Zone ☐ Interstate Number (if applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity. ☐ Solicitation ☐ Conspiracy Inchoate ☐ Attempt Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 F1 1 14 911 (B)(4)of the 18 Grade NCIC Offense Code UCR/NIBRS Code Offense# PA Statute (Title) Counts Section Subsection Lead? PennDOT Data Accident ☐ Work Zone ☐ Safety Zone ☐ Interstate (if applicable) Number Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3). ☐ Conspiracy Inchoate ☐ Attempt ☐ Solicitation Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense of the UCR/NIBRS Code **NCIC Offense Code** Offense# Subsection PA Statute (Title) Counts Grade Lead? Section PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate Number (if applicable) Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:



Docket Number: CR-408-22	Date Filed: 12 15 1 22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	AHMED		LOPEZ-ROMAN

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

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

(Date)

(Year)

AND NOW, on this date

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

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

(Magisterial District Court Number)

(Issuing Authority)



Docket Number:
CR-408-32
Defendant Name:
Date Filed:
OTN/LiveScan Number
CR-408-32
IFS210061

Defendant Name:
AHMED

OTN/LiveScan Number
Lips210061

Last:
LOPEZ-ROMAN

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number: CR-408-22	Date Filed: /2/5/22	OTN/LiveScan Numb	per Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	AHMED		LOPEZ-ROMAN

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

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

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

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

day of

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

Signature of Amarit)

Magisterial District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY Esq. (NAME and ADDRESS): Address: 50 Canal Street **AOUINO-BELEN** JEAN First Name Middle Name Last Name Ge DEC - 5 2022 Royalton, PA 17057 4076 Benner Street TRICT COURT 12-2 -^UiPhiladelphia, PA 19135 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full □ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Docket Number Date Filed OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO 404.22 12/15/22 IFS210061 Co-Defendant(s) ров 03/18/1995 GENDER Add'I DOB Male Male First Name Last Name Gen. Middle Name **BELEN** ☐ Female AOUINO AKA RACE Unknown White Asian Black Native American M Hispanic ETHNICITY ☐ Non-Hispanic Unknown GRY (Gray) BLU (Blue) PLE (Purple) BRO (Brown) RED (Red/Aubn.) SDY (Sandy) Hair PNK (Pink) XXX (Unk./Bald) GRN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye HAZ (Hazel) MAR (Maroon) PNK (Pink) Color XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA ☐ YES ☐ NO **DNA Location** FBI Number 27675HF4 MNU Number OLN 32502881 230 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES □ NO 11 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. State Registration Haz same Ind. mat Plate # Sticker (MM/YY) as Def. П Color Model Style VIN Make Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar (Signature of the attorney for the Commonwealth) CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above □ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) in DAUPHIN County [22] on or about 2018 TO PRESENT

(County Code)



Docket Number:	Date Filed:	OTN/LiveSc	an Number		nplaint/Incident N 3210061	lumber
Defendant Name:	First:	Middle:		Last:	DELENI	
	JEAN	C.		AQUINO	-BELEN	
The acts committed by When there is more that (Set forth a brief summary of without more, is not sufficient The age of the victim at the tibe listed. If the identity of an	an one offense, ea the facts sufficient to it. In a summary case ime of the offense ma	ach offense should be no advise the defendant of the vou must cite the specific s	umbered chrono nature of the offense ection(s) and subsec dition, social security	logically. (s) charged. <i>i</i> tion(s) of the <i>i</i> numbers an	A citation to the statu statute(s) or ordinan d financial informatio	ite(s) allegedly violated, ce(s) allegedly violated.
Inchoate	☐ Solicit			Number	of Victims Age 60 o	r Older
	(a)(1)	of the 18	1	F1		
#	ection Subsec	tion PA Statu	ite (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	 	☐ Interstate	[☐ Safety Zone	☐ Work Zone
	lude the name of	statute or ordinance):	DEALING IN PROCE	EDS OF UN	LAWFUL ACTIVITY	
knowledge that the property intent to promote the carryin	involved, including st	Offense: A person commit olen or illegally obtained propactivity. To wit: the defendant vity with the intent to promote the committee of the c	perty, represents the perty, repeatedly engaged	proceeds of u in financial t	ınlawful activity, the pransactions with know	person acts with the
Inchoate	☐ Solicit			Number	of Victims Age 60 o	r Older
□ 02 3922	(a)(1)	of the 18	1	F3		
	ection Subsec		ute (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number		☐ Interstate		☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (inc	clude the name of	statute or ordinance):	THEFT BY DECEPTI	ON		
deception, created or reinfo present or cause to be prese	rced a false impression inted, false, incomplet	Offense: The defendant din, including false impressions e or misleading information nen vehicle(s) that were reVin	s as to law, value, inte naterial to out of state	ention or othe e salvage ver	er state of mind; to w	it: the defendant did
Inchoate			Num	ber of Victin	ns Age 60 or Older	
☐ 03 392 Lead? Offense#		of the 18 section PA Sta	tute (Title) Count	s Grade	NCIC Offense C	ode UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Accident Number	section PA Sta	☐ Intersta		☐ Safety Zone	☐ Work Zone
	HI Chiyinderikidin rxosor kurabiyi	statute or ordinance):	RECEIVING STOLE	N PROPERTY	7	
restore it to the owner; to w	been stolen, or believ it: The defendant did such property was sto	Offense: A person is guilty ng that it has probably been intentionally receive, retain o en, or believing that it had prehicle in violation of Section	stolen, unless the pro r dispose of movable robably been stolen, a	pperty is receing property, belond the property of the property.	ived, retained, or disp onging to another, w	oosed with intent to ith no intent to restore it



Docket Number: Date File	d: OTN/LiveScan るみ 足 396/27	Number	√ IFS210061			
Defendant Name:	Middle:		est:			
Defendant Name. JEAN	C.	<i>P</i>	QUINO-BELEN			
Inchoate	Solicitation	Number	of Victims Age 60 or Older			
	18 902 A 18 903	Number	Si Victims Age to 01 Older			
☐ 04 4120 Lead? Offense# Section	of the 18 Subsection PA Statute	(Title) Counts	F3 Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data Accident (if applicable) Number		☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include the na	me of statute or ordinance): IDI	ENTITY THEFT				
Acts of the accused associated wit any means, identifying information of anoth committed identity theft of another person / business to further any unlawful purpose.	er person without the consent of that	other person to furthe	r any unlawful purpose, to wit: the	e defendant		
Inchoate	Solicitation Conspiracy 18 902 A 18 903	Numbe	of Victims Age 60 or Older	·		
□ 0 5 7 121	(3) of the 75		M1			
Lead? Offense# Section	Subsection PA Statute	e (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data Accident (if applicable) Number		☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include the national Acts of the accused associated with name or address or makes a material false certificate of title or for a registration, to w	h this Offense: A person is guility o	of a misdemeanor of the interest, or conceals	ne first degree if the person uses a any other material fact in an appl	false or ficticious		
certificate of title.						
	4 4					
LONG THE TOTAL PROPERTY OF THE PARTY OF THE	Solicitation Conspiracy 18 902 A 18 903	Number	of Victims Age 60 or Older			
□ 06 7122	(3) of the 75	1	M1			
Lead? Offense# Section	Subsection PA Statute	(Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone		
Statute Description (include the na	nme of statute or ordinance): AL	TERED, FORGED, O	R COUTERFEIT DOCUMENTS			
Acts of the accused associated wi	th this Offense: A person is quilty o	of a misdemeanor of the	e first degree if the person, with f	raudulent intent,		
alters or forges an assignment of a certifical prepared for issue by the department, to widepartment.	ate of title, or an assignment or release	e of a security interest	on a certificate of title or any other	er document issued or		



Docket Num	oer: /- d	Date File	ed: 22 R	39407	Number	P T OL		int/Incident N	umber
Defendant N		First: JEAN		Middle:	r	Last AQI	1		
	and the second s			1					
Inchoate Offense	☐ Attemp 18 901 /		Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims A	ge 60 or Older	
□ 07	490 ²	1 Section	(b) Subsection	of the 18	1.	Counts	M3 Grade	NCIC Offense Co	de UCR/NIBRS Code
PennD0 (if appli	T Data cable)	Accident Number			☐ In	terstate		Safety Zone	☐ Work Zone
Statute Des	cription (inc	lude the na	ame of statute	or ordinance): UN	SWORN FA	LSIFICATIO	TUA OT NC	HORITIES	
pursuant to a f	orm bearing nerse of criminal	otice, authori	zed by law, to the which he knowing!	: The defendant mad effect that false state y and intentionally sig ns bearing notice that	ments made ned (PA Depi	therein are t. of Transpo	punishable; ortation (Pei	To wit: the defer nnDOT)) forms th	o be true, on or Idant engaged in a ereby making written
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Ag	e 60 or Older	
□ 08	4117		(a)(3)	of the 18]i	F	Water from the first		
Lead? Offe PennDO	T Data	Section Accident Number	Subsection	PA Statute		Counts erstate	Grade	NCIC Offense Cod Safety Zone	le UCR/NIBRS Code ☐ Work Zone
Acts of the a conspires with claim that cont	accused as another to pre ains any false amount claim material state	sociated we pare or make, incomplete ed in excessment(s) inten	ith this Offense e any statement to or misleading infor of the actual loss ded to be present	or ordinance): IN E: Knowingly and with nat is intended to be p mation concerning an sustained by the claim ed to the insurer in co	the intent to presented to a by fact or thin	defraud an any insurer o g material to be defendant	or self-insure to the claim, t did knowin	ed in connection was including information in gly and with the	with, or in support of, a ation which documents intent to defraud an
Inchoate Offense	☐ Attem	, , , -	Solicitation 18 902 A	Conspiracy		Number o	f Victims A	ge 60 or Older	
	(624			of the 18			F3		
Lead? Of	fense#)T Data	Section Acciden	Proceedings to	PA Statut		Counts nterstate	Grade	NCIC Offense C Safety Zone	ode UCR/NIBRS Code Work Zone
Statute Des	icable) scription (in	Number clude the n		or ordinance): w	ASHING VE	HICLE TITI	LES		
knowledge tha	it the person i	s facilititing a	deception to be p	e: A person commits erpretated by anyone icle which includes ma rtificate of title for a m	concerning taterially false	he true mile or ficticious	age of a mo information	otor vehile, the pe o to wit: with inte	erson makes/causes to be nt to deceive anyone, the



Docket	Number 404	Dat	e Filed:	OTN/LiveScan!	Number	Complaint/Incident Number IFS210061			
Defend	lant Nam	First:		Middle:		Last:			
新港 主		JEAN	\ 	C.		AQUINO-E	BELEN		
- Marine			-						
Incho Offen		18 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903	Num	ber of Victims	Age 60 or Older	· · · · · · · · · · · · · · · · · · ·	
Lead?	10 Offense#	4911 Section	(a)(1) Subsection	of the 18	itle) Count	F3 s Grade	NCIC Offense Code	UCR/NIBRS Code	
Per (If:	inDOT Da applicabl	e) Num	ber		☐ Intersta] Safety Zone	☐ Work Zone	
Statute	Descript	ion (include the	e name of statute	or ordinance): TAMP	ERING WITH	PUBLIC RECOF	RDS OR INFORMAT	ION	
record, do	ocuments o	or thing belonging overnment; To wit	to, or received or ker	e: The defendant, did kno ot by, the government for e false entries in, and/or f	information or r	ecord, or require	ed by law to be kept b	y others for	
Incho Offen	在1988年中 中国共和国	Attempt 18 901 A	Solicitation 18 902 A	⊠ Conspiracy 18 903	Num	ber of Victims	Age 60 or Older		
	11 Offense#	5111	(a)(1)	of the 18	1 Count	F1	NCIC Offense Code	UCR/NIBRS Code	
A STATE OF THE PARTY OF THE PAR	nnDOT D	ata . Accid	lent I	FA Statute (1	☐ Intersta		Safety Zone	☐ Work Zone	
Statute	applicab Descript ries, etc			e or ordinance): CRIM	INAL CONSPI	RACY - DEALI	NG IN PROCEEDS O	F UNLAWFUL	
following False App they or o did agree commit s	crimes: De plication for one or more e with one o such crime(ealing in Proceeds r Certificate of Title of them will enga or more individuals s). One or more o	of Unlawful Activity, of or Registration, and ge in conduct which s, that one or more was if them engaged in an	ee: The defendant, with in Washing Vehicle Titles, De Unsworn Falsification to constitutes such crime(s) would engage in conduct the overt act in pursuance of	eceptive Busines Authorities, did or an attempt on the constitutes to f the conspiracy	s Practices, Tam agree with such r solicitation to c he aforemention	pering with Public Recother person(s) and /commit such crime(s); ed crime(s), or an att	cords or Information, or business(es) that to wit; the defendant	
Inche Offe		☐ Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nu	mber of Victims	s Age 60 or Older _		
	12	911	(b)(1)	of the 18	(Title) Cou	F1	NCIC Offense Coo	le UCR/NIBRS Code	
	Offense ennDOT L f applicat	ata Acc	Subsection Sident	PA Statute	(Inte) Cou		☐ Safety Zone	☐ Work Zone	
Statute Acts of	Descrip	tion (include th	e name of statute	e or ordinance): corr se: It shall be unlawful fo	r any person wh	no has received a	any income derived, d	irectly or indirectly,	
from a p proceeds received	attern of ra	acketeering activity come, in the acqu rived, directly or in	in which such perso	n participated as a princip in, or the establishment o ern of racketeering activity	oal, to use or involved or operation of,	est, directly or in any enterprise, t	ndirectly, any part of some of the control of the c	such income, or the engaged in and	



Docket Nu	mber:	Date Filed:	OTN/LiveScan			plaint Nur		ent Number
Cr-40	4-32	1215122	R 396/3) 7-4	IFS:	210061		
Defendant	Name	First:	Midd	le:		Last:		
1,000		JEAN	C.			AQUIN	O-BELEN	···
appropriat	e. When there is rief summary of the flout more, is not suffi	accused are desc more than one off acts sufficient to advi- icient. In a summary c	ense, each offense the defendant of t	se should	be number	ered chrons) charged. A	ologically. A citation to the sta	itute(s) allegedly
Inchoate Offense	Attempt	☐ Solicita 18 902 A		Conspiracy	У	Numbe	er of Victims Age	60 or Older
Ollelise	10 30 1 A	10 302 7		70 300	г	·	T	
□ 13	911	(B)(2)	of the 18		1	F1		
	nse# Section	Subsection	PA Stat	ute (Title)	Counts	Grade	NCIC Offense Co	de UCR/NIBRS Code
		ident			Interstate		Safety Zone	☐ Work Zone
	and the first of t	the name of state	ite or ordinance)	· COBBI IDT	ORGANT7AT	TONS		l
maintain, din	ectly or indirectly, any	ated with this Offe interest in or control control of a car dealer	of any enterprise; to	wit: the de	fendant throu	igh a pattern	of racketeering a	ctivity maintained,
Inchoate Offense	Attempt 18 901 A	☐ Solicita 18 902 /		Conspirac	у	Numbe	er of Victims Age	60 or Older
□ 14	911	(B)(3)	of the 18	1	. F	1		
	nse# Section	Subsection	PA Statu	te (Title)	Counts	Grade 1	NCIC Offense Code	UCR/NIBRS Code
PennD0 (if app		ident nber] interstate		Safety Zone	☐ Work Zone
Acts of the	e accused associ	e the name of stat ated with this Offe , in the conduct of su ith a vehicle dealershi	ense: It shall be unli	awful for any	y person emp	oloyed by or	tivity, to wit: the o	y enterprise to conduct lefendant was an tivity.
Inchoate Offense	Attempt	☐ Solicita 18 902	l -	Conspirac	;y	Numb	er of Victims Age	60 or Older
	911	(B)(4)	of the 18		L F	1		
L	ense# Section	Subsection	PA Statu	te (Title)	Counts		NCIC Offense Code	UCR/NIBRS Code
		pident] Interstate	[] Safety Zone	☐ Work Zone
Statute D		mber e the name of stat	ute or ordinance): Corrupt	ORGANIZAT	TONS		4
(1), (2), or (e accused associ (3) of this subsection. (1), (2), and/or (3).	ated with this Offe To wit: the defendant	ense: It shall be unl conspired with othe	awful for an r individuals	y person to d to engage in	conspire to vi	olate any of the pr f racketeering activ	rovisions of paragraphs vity in violation of

Docket Number:	Date Filed:	人 396/2 フーゲ Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	JEAN	C.	AQUINO-BELEN

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.) (Year) (Date) 12-5-32

AND NOW, on this date

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

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

12-2-63 (Magisterial District Court Number)

(Issuing Authority)



Complaint/Incident Number **Docket Number:** Date Filed: OTN/LiveScan Number 239 15122 1-305-2 6127°4 IFS210061 First: Middle: Last: Defendant Name: **AQUINO-BELEN JEAN** C.

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:	Date Filed:	37 6127 4	Complaint/Incident Number IFS210061
1000 000 000 000 000 000 000 000 000 00	First:	Middle:	Last:
Defendant Name	JEAN	C.	AQUINO-BELEN

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

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

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

13/22 Date

day of

ン 、Magisterial District Judge

My commission expires first Monday of January,

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POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA COUNTY OF: DAUPHIN Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. SANTIAGO-RAFAEL Address: 50 Canal Street Ge Middle Name Last Name First Name Royalton, PA 17057 5900 Bennington Street, Apt 1 Philadelphia, PA 19120 Telephone: (717)944-4463 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States □ 1-Felony Full 5-Felony Pending Extradition ☐ Distance: □ D-Misdemeanor No Extradition ☐ 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition A-Misdemeanor Full ☐ 3-Felony Surrounding States ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited ☐ 4-Felony No Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Incident Number** OTN/LiveScan Number **Complaint Number Date Filed** Services? **Docket Number** ☐ YES ☐ NO IFS210061 215122 Co-Defendant(s) Add'l DOB Gen. Middle Name Last Name Male First Name ☐ Female AKA Unknown Native American Black RACE White Hispanic Unknown ☐ Non-Hispanic ETHNICITY BRO (Brown) PLE (Purple) BLU (Blue) RED (Red/Aubn.) SDY (Sandy) GRY (Gray) PNK (Pink) Hair GRN (Green) XXX (Unk./Bald) BLK (Black) ONG (Orange) ☐ WHI (White) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BRO (Brown) BLU (Blue) BLK (Black) Eye XXX (Unknown) PNK (Pink) MAR (Maroon) MUL (Multicolored) Color HAZ (Hazel) WEIGHT (lbs.) ☐ YES ☐ NO **DNA Location** DNA 150 **FBI Number MNU Number** OLN 27355765 645350EB6 Ft. HEIGHT In. ☐ YES □ NO **Defendant Fingerprinted** 10 **Fingerprint Classification:** DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh, Code Reg. School Veh. Comm'l Veh. Registration State Haz same Ind. mat Sticker (MM/YY) Plate # as Def. Color Style Model Year Make VIN Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. 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 \square I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code) on or about 2018 TO PRESENT in DAUPHIN County [22] (County Code)



					P(DLICE	CRIMINAL	COMPLAINT
ocket Number:	Date Filed:	@ 3 C/	N/LiveScan Nu	mbe	r		nplaint/Incident N 210061	lumper
4-401-02	10/15/20-	2 3 96	Middle:			ast:		
Defendant Name:	RAFAEL				S	ANTIAG	O-PACHECO	
								. 1 :6
The acts committed by When there is more the Set forth a brief summary of without more, is not sufficient age of the victim at the be listed. If the identity of an	an one offense, 6 If the facts sufficient In a summary cas	each offense sr to advise the defer se, you must cite the	ndant of the nature specific section in addition.	of th (s) an	e offense(s) d subsectio	charged. A n(s) of the umbers an	A citation to the state statute(s) or ordinan d financial information	ute(s) allegedly violated,
Inchoate	☐ Solic 18 90		Conspiracy 18 903			Number	of Victims Age 60 o	or Older
5 O. 544	(0)(:	1) of the	18		1	F1		
	(a)(:	ection	PA Statute (Titl	 e)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data					nterstate		☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (ir	Accident Number	of statute or or	dinance): DEAL					Y
Statute Description (ir	iciude the name	or statute or ore	anianos). DEAL					
Inchoate		citation 02 A	Conspiracy 18 903			Number	of Victims Age 60	or Older
	2 (a)(1) of the	18		1	F3		
☐ 02 3922 Lead? Offense#		section	PA Statute (Ti	tie)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data	Accident Number				Interstate		☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (i		of statute or o	rdinance): THEF	ТВҮ	DECEPTIO	ON ON		
Acts of the accused a defendant did present or of Transportation (Penn DOT Pennsylvania vehicle titles vehicles.	cause to present, fals	e, incomplete or m	isieading informati	011 111		ndont's dos	ention the fraudule	nt paperwork enabled
Inchoate ☐ Atte		olicitation 902 A	Conspiracy		Num	ber of Vict	ims Age 60 or Olde	r
	925 (a) of th	e 18		1			
Lead? Offense#		Subsection	PA Statute (Title)	Count	s Gra		
PennDOT Data	Accident Number				☐ Intersta		☐ Safety Zone	☐ Work Zone
Statute Description (include the name	e of statute or o	rdinance): REC	EIVII	NG STOLEN	I PROPER	TY	
Acts of the accused another knowing that it h restore it to the owner; to the owner, knowing th motorcycle, motorboat, o	as been stolen, or be wit: The defendant	did intentionally re	ceive, retain or dis	spose	of movable	property, band the pro	pelonging to another, operty stolen is an au	oses of movable property or disposed with intent to , with no intent to restore i utomobile, airplane,



Docket		ber:	2_	Date	Filed: シノシュ	R	394	N/LiveScar	n Nun	nbe	r			plaint/Incident Nu 10061	ımber	
Defenda	ant N	ame:		First: RAFAE	L			Middle:			Last: SANTIAGO-PACHECO					
				·												
						·										
Inchoa Offen		☐ Atte	empt 901 A		☐ Solici 18 902			onspiracy 903			Number	of Victi	ms A	Age 60 or Older		
	04	4	120			,	of the	18			1	F3				
Lead?	Offer		Se	ction	Sub	section	1280 1284 	PA Statute	(Title)		Counts	Grad	le	NCIC Offense Code	UCR/NIBRS C	Code
		T Data able)		Accider Numbe							Interstate] Safety Zone	☐ Work Zon	ne .
			(incl		-	of statute	e or ord	inance): ID	ENTI	ГΥТ	HEFT					
		•	`					·								
	ns, ide ed ider	ntifying i itity thefi	informa t of and	ation of a other per	nother pe son throu	rcon with	out the co	ncent of that	other	ners	on to furthe	er anv u	nlawi	ther person if he positive full purpose, to wit: the same without the consentations of the co	ne derendant	
Incho Offer			ttempt 3 901 A			citation 02 A		Conspiracy 18 903			Numbe	r of Vic	tims	Age 60 or Older _		
П	05		7121		(3)		of the	75			1	M1				
∟∟ Lead?	L	ense#		Section		bsection		PA Statut	te (Title)	Counts		ade	NCIC Offense Cod	de UCR/NIBRS	Code
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False App	olicatio	n for	Certificat	e of Title	e or Re	gistration, an	d Unsw	vorn i	-alsification	to Author	ities atter	s, ala agre mot or sol	e wiui : icitatior	sucii oi n to coi	mmit such crime(s	s); to	wit; the defendant
I did agree	with a	one o	r more in	idividuals	s. that	one or more	would 6	engac	ge in conduc	tnat cor	Suu	นเซรเทษ ส	foreme	entioned	d crime(s), or an a	atter	pt or solicitation to
commit s	uch cr	ime/s	i). One o	r more	of them	engaged in a	an over	t act	in pursuanc	e of the o	cons	piracy.					



Docket Num	ber:	1 .~	Filed:	OTN/L	iveS	can Number		-	plaint No	umber	Incident	Number
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Defendant N	ame	RAFAE	L						SANT	IAGO-PAC	HECO	
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]	☐ Solicitat 18 902 A			☐ Conspira 18 903	су		Num	ber of Victim	ıs Age 60 d	or Older
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Defendant	Name	First:	\EL		Middle:				Last: SANTIA	GO-PACH	HECO	
appropriate (Set forth a b violated, with allegedly viol	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 initiated, 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) legedly violated.) Inchoate											
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			POLICE CRIMINAL COMPLAIN
Docket Number:	Date Filed:	OTN/LiveScan Numb	er Complaint/Incident Number
C -101-22	1215120	K396199-6	
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO
I ask that a warra made.	nt of arrest or a su	mmons be issued and that the	defendant be required to answer the charges I have
belief. This verific	cts set forth in this cation is made sub cation to authoritie	ject to the penalties of Section	t to the best of my knowledge or information and 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	onsists of the prece	eding page(s) numbered $\underline{1}$ thro	ugh
5. I certify that this f System of Pennsy information and de	<i>Ivania</i> that require	the provisions of the Case Re filing confidential information	cords Public Access Policy of the Unified Judicial and documents differently that non-confidential
of Pennsylvania and	d were contrary to of arrest can be is	the Act(s) of the Assembly, or	ainst the peace and dignity of the Commonwealth in violation of the statutes cited. le cause must be completed, sworn to before the
(Date)		(Year)	(Signature of Affiant)
AND NOW, on this da	ite 125-0	I certify th	at the complaint has been properly completed and verified.
An affidavit of probab	le cause must be co	mpleted before a warrant can be is	ssued.
(Magisterial District C	ourt Number)	(Issuing Authority)	



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number	
C1-407-22	1215122	23961496	IFS210061	
	First:	Middle:	Last:	
Defendant Name:	RAFAEL	. 1	SANTIAGO-PACHECO	

AFFIDAVIT of PROBABLE CAUSE

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

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

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



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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number IFS210061
Defendant Name:	First: RAFAEL	Middle:	Last: SANTIAGO-PACHECO

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

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

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

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

Sworn to me and subscribed before me this

day of

(Signature of Affiant)

2022

Magisterial District Judge

My commission expires first Monday of January,

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esa. (NAME and ADDRESS): Address: 50 Canal Street OSIRIS **FERNANDEZ** Royalton, PA 17057 First Name Middle Name Last Name 3230 Birch Street Philadelphia, PA 19154 Telephone: (717)944-4463 NGIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ D-Misdemeanor No Extradition 6-Felony Pending Extradition Determ. ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab OTN/LiveScan Number **Docket Number Date Filed Complaint Number Incident Number** Services? ☐ YES ☐ NO IFS210061 ров 10/16/1982 Co-Defendant(s) Add'l DOB Male First Name Middle Name Last Name Gen. ☐ Female ΔΚΔ RACE White Asian Black ☐ Native American Unknown Hispanic **ETHNICITY** Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) PNK (Pink) WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) ☐ MUL (Multicolored) DNA WEIGHT (lbs.) **DNA Location** ☐ YES ☐ NO **FBI Number** 2FJVJ09TV **MNU Number** OLN 31848303 200 ☐ YES Ft. HEIGHT In. **Defendant Fingerprinted** □ NO Fingerprint Classification: 5 10 **DEFENDANT VEHICLE INFORMATION** School Veh. Oth, NCIC Veh, Code State Haz Registration Comm'l Veh. Reg. Ind. same mat Plate # Sticker (MM/YY) as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code) in DAUPHIN County on or about 2018 TO PRESENT [22] (County Code)



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			e name of statu	ite or ordinance): D	EALING IN PRO	CEEDS OF U	NLAWFUL ACTIVITY	7
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Incho Offen	ate 🗆	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	a the Carrying Off C		r of Victims Age 60 c	or Older
APPROXICATION SAIN		1 0 × 0×0 − 0×30°0 −				F3		
Lead?	Offense#	3922 Section	(a)(1) Subsection	of the 18	<u>agaig laise in 1919 ag Fanking gibt na</u>	i e e la letterioria i i i	NCIC Offense	UCR/NIBRS Code
Per	nnDOT Da	ita Accident			☐ Interstat		Code ☐ Safety Zone	☐ Work Zone
D. Co. Co. Bridge	applicabl	e) and the street	298723874	to or ordinance): T				
Statut	re Descrit	buon (include tr	ie name oi statt	ıte or ordinance): T	HERI BY DECEP	ITOM		
defenda	ant did pres endant obta	sent or cause to pro ained titles for thos	esent, false, incomp se vehicle(s) that we	nse: The defendant di lete or misleading infor ere never completely re t only" was removed (i.	mation material to paired to manufact	the condition urer standard	of vehicle(s) at the ting s and/or the vehicle(s	by deception; to wit: the me of the sale, in which,) were never meant to an unsafe vehicle.
	ioate ense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nu	mber of Vict	ims Age 60 or Older	
	03	3925	(a)	of the 18	1			
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			Party program	ıte or ordinance): R	ECEIVING STOL	EN PROPER	ΓY	
Acts of								



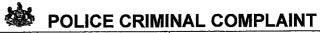
Docket	Number		Filed: 51 9038	OTN/LiveScan			Complaint/Incident Nu IFS210061	mber
Defenda	ant Nam	First: OSIR	IS	Middle:		Last: FERN	NANDEZ-GONZALEZ	
lnchøa		Attempt	☐ Solicitation	☐ Conspiracy			etime Are CO or Older	
Offens		18 901 A	18 902 A	18 903	NC	Imber of Vi	ctims Age 60 or Older	
☐ [04 Offense#	7121 Section		f the . 75	1	M1		HODAUDDOG-L
to a series of the series of	nDOT D	ita Accide	00F772F90X7	PA Statute (☐ Inter		rade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
			CC194-499004	or ordinance): FAL	SE APPLICAT	TON FOR	CERTIFICATE OF TITLE O	R REGISTRATION
certificate	e of title.	☐ Attempt	☐ Solicitation	☐ Conspiracy			d any other material fact in	
e⊯Offen —		18 901 A	18 902 A	18 903				
Lead?	05 Offense	7122 Section	(3) Subsection	of the 75	(Title) C	ounts (1 Grade NCIC Offense Code	e UCR/NIBRS Code
Per	mDOT D applicab	ata 🔠 🦛 Accid	ent/C	171 Otatulo	☐ Inte		☐ Safety Zone	☐ Work Zone
			- TATUS (0) ST (40)	or ordinance): ALT	ERED, FORG	ED, OR CO	UTERFEIT DOCUMENTS	
alters or f	forges and for issue I	assignment of a cer	tificate of title, or an a	ssignment or release	of a security in altered and/or	terest on a a forged any	t degree if the person, with for certificate of title or any other document issued or prepare to the certificate of title or any other to the certificate of title or any other to the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of title or any other document of the certificate of the certifi	er document issued or
	06	4904	(b) ¢	f the 18	1	M1		
	Offense# nDOT D		CONTRACTOR AND ADDRESS OF THE PARTY OF THE P	PA Statute (Title) Co ☐ Inten		rade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
	pplicab Descrip		(spikestr)	or ordinance): un s				
pursuant continuou	to a form us course (bearing notice, aut of criminal conduct,	horized by law, to the in which he knowingl	effect that false states	ments made th ned (PA Dept.	erein are pu of Transport	which he did not believe to unishable; To wit: the defendation (PennDOT)) forms the ishable by law.	lant engaged in a



Docket Number: 4-415-308	Date Filed: 12 15 1 3032	ROTN/LiveScan Number	Complaint/Incident Num	ber
Defendant Name:	First:	Middle:	Last:	
	OSIRIS	M.	FERNANDEZ-GONZALEZ	
Inchoate ☐ Atte Offense 18 9	mpt ☐ Solicitation 01 A 18 902 A	☐ Conspiracy 18 903	Number of Victims Age 60 or Older	
<u> </u>	l17 (b)(3)	1 -0	l F3	HODAIDDCCada
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Title)	Counts Grade NCIC Offense Code nterstate Safety Zone	UCR/NIBRS Code Work Zone
(if applicable)	Number ——			
Statute Description (include the name of statute	or ordinance): INSURANCE F	RAUD	
participate, directly or ind	irectly, in the conduct of such ente	erprise's affairs through a pattern o	on employed by or associated with any enter of racketeering activity, to wit: the defendant of a pattern of racketeering activity.	prise to conduct or was an operator
Inchoate		☐ Conspiracy 18 903	Number of Victims Age 60 or Older	
□ 08 41		of the 18 1	F3 Counts Grade NCIC Offense Code	UCR/NIBRS Code
Lead? Offense# PennDOT Data	Accident		terstate	☐ Work Zone
(if applicable)	include the name of statute	or ordinance): WASHING VE	HICLE TITLES	
Clarato Bosonparon (morado mo mamo o ocumo			
knowledge that the perso	n is facilititing a deception to be portion to be portion to be portion and the form a motor vehicle for a	erpretated by anyone concerning ticle which includes materially false	ne third degree if, with the intent to deceive a the true mileage of a motor vehile, the person or ficticious information to wit: with intent to which included materially false or ficticious in	n makes/causes to be of deceive anyone, the
Inchoate	empt Solicitation 901 A 18 902 A	Conspiracy 18 903	Number of Victims Age 60 or Older	
□ 09 4	911 (a)(1)	of the 18	1 F3	
Lead? Offense#	Section Subsection	PA Statute (Title)	Counts Grade NCIC Offense Code	
PennDOT Data (if applicable)	Number ———		Interstate	☐ Work Zone
Statute Description	(include the name of statute	e or ordinance): TAMPERING	WITH PUBLIC RECORDS OR INFORMAT	ION
record documents or this	na belonging to, or received or ker	ot by, the government for informat	and with intent make a false entry in, or false tion or record, or required by law to be kept l rations of, records, documents, or things belo	by others for



Docket Number: Date Filed: CR - 415 - 3032 1215 13032					OTN/LiveScan	5	Complaint/Incident Number IFS210061				
	nt Nam		First:		Middle:	7	Las		7 CONTALET		
			OSIRIS		M.		Z-GONZALEZ				
Inchoa Offens	一种人类的产品	18 901 A		Solicitation 18 902 A	⊠ Conspiracy 18 903		Number of	Victims Age	e 60 or Older		
Lead?	10 Offense#		ction	Subsection	of the 18 PA Statute ((Title)	1 F	1 Grade	NCIC Offense Code	uCR/NIBRS Code	
	i DOT Da pplicabl	CATALOG THE SECOND	Accident : Number			×	Interstate		Safety Zone	☐ Work Zone	
Statute [Descript		Over commendation countries, and in panie	ne of statute	or ordinance): CRI	MINAL C	ONSPIRACY -	DEALING	IN PROCEEDS O	F UNLAWFUL	
ACTIVITI	ES, ETC										
False Appli they or one did agree v	cation for e or more with one o	Certificate of of them will or more indiv	of Title or Re I engage in viduals, that	egistration, and conduct which cone or more wo	Vashing Vehicle Titles, D Unsworn Falsification to constitutes such crime(s) ould engage in conduct to overt act in pursuance	Authoritie) or an att that const	es, did agree w empt or solicita itutes the afore	ith such oth ation to com	ner person(s) and normal mit such crime(s)	/ or business(es) that ; to wit; the defendant	
Inchoa Offens		Attempt 18 901 A		Solicitation 18 902 A	Conspiracy		Number of	Victims Ag	e 60 or Older		
	11	911	i. I ski lek	(-//-/	of the 18		1 F			e UCR/NIBRS C∞de	
Lead? - Peni	Offense#	1879 may 1880, 10 port 15 3 (1, 4) a 10 \$7 m W S	ction Accident	Subsection	PA Statute (·	Counts Interstate		NCIC Offense Code Safety Zone	☐ Work Zone	
(if a			Number		or ordinance): cor		······································		Salety Zone		
from a pat proceeds or received in	tern of ra of such ind ncome der	cketeering a come, in the	ctivity in wh acquisition y or indirect	iich such person of any interest i ly, from a patter	e: It shall be unlawful for participated as a principn, or the establishment of racketeering activit	pal, to use or operati	e or invest, dire on of, any ente	ectly or indire erprise, to w	ectly, any part of s it: the defendant	such income, or the engaged in and	
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A	Conspiracy		Number o	f Victims A	ge 60 or Older		
	12	911		(b)(2)	of the 18			F1	1000	do HODWIDDS Code	
	Offense InDOT D applicab	ata	ection Accident Number	Subsection	PA Statute	Π	Counts Interstate	Grade	NCIC Offense Co Safety Zone	de UCR/NIBRS Code Work Zone	
	·	<u> </u>			or ordinance): COR				nekotooring activi	by to acquire or	
maintain,	directly or	indirectly, a	ny interest	in or control of a	e: It shall be unlawful for any enterprise; to wit: the e(s) and the furtherance	he defend	ant through a	pattern of ra	acketeering activity	y maintained, directly or	



Docket Nu	mber: 115-3032	Date Filed:	OTN/LiveScan	Number 6 36 1-0		iplaint Nur 210061	nber Incide	ent Number
2. 建氯酸化	外别是17.30 年制度4.50	First:	Middle	*	11 32	Last:		
Defendant	Name	OSIRIS	M.			FERNA	NDEZ-GONZA	LEZ
appropriat (Set forth a b violated, with	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 <i>brief</i> 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 8 903		Numbe	er of Victims Age	60 or Older
□ 13	911	(B)(3)	of the 18	1		F1		
	ense# Section DT Data Acc	Subsection ident	PA Statu	T	ounts	Grade	NCIC Offense Co	
(if appl	licable) Nur	nber the name of statut	*	☐ Inter			Safety Zone	☐ Work Zone
or participate	e, directly or indirectly	ated with this Offen , in the conduct of such ith a vehicle dealership	enterprise's affairs t	hrough a patter	n of rac	keteering ac	tivity, to wit: the d	efendant was an
Inchoate Offense	☐ Attempt 18 901 A	Solicitati 18 902 A		Conspiracy 8 903		Numbe	er of Victims Age	60 or Older
			of the 18	1	F			HODAUDDO O.d.
	ense# Section OT Data Acc	Subsection ident	PA Statute	(Title) Count			NCIC Offense Code Safety Zone	UCR/NIBRS Code
Section 1 and 1 an	para ang it ang ang pangganan na maraja i ng anami	nber	t				Todacty Zone	
Statute De	escription (include	e the name of statu	te or ordinance):	CORRUPT ORGA	ANIZA I .	IONS		
(1), (2), or (e accused association of this subsection. (1), (2), and/or (3).	ated with this Offen To wit: the defendant o	nse: It shall be unlaw conspired with other i	wful for any pers ndividuals to en	on to co	onspire to vio a pattern of	olate any of the pro racketeering activ	ovisions of paragraphs ity in violation of
Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitati 18 902 A		Conspiracy 18 903		Numb	er of Victims Age	60 or Older
		1	of the					
	ense# Section	Subsection	PA Statute	(Title) Coun	ts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennD (if app		ident i mber		☐ Inte	erstate] Safety Zone	☐ Work Zone
		e the name of statu	ite or ordinance):					
Acts of th	e accused associ	ated with this Offer	nse:					



Docket Number: CR-415-3033	Date Filed:	OTN/LiveScan Number 396361-0	Complaint/incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	OSIRIS	M.	FERNANDEZ-GONZALEZ

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

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

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

(Date)

(Year)

AND NOW, on this date

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

(Issuing Authority)

| Docket Number: | Date Filed: | OTN/LiveScan Number | Complaint/Incident Number | IFS210061 | IFS210061 | | Defendant Name: | OSIRIS | M. | | Defendant Name: | Date Filed: | OTN/LiveScan Number | Complaint/Incident Number | IFS210061 | IFS210061 | | Last: | Defendant Name: | OSIRIS | M. | FERNANDEZ-GONZALEZ

AFFIDAVIT of PROBABLE CAUSE

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

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

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

		al mattern or	
Docket Number:	Date Filed:	OTN/LiveScan Number R 3 96 3-0	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	OSIRIS	M.	FERNANDEZ-GONZALEZ

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

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

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

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

(Signature of Affiant)

Magisterial District Judge

Sworn to me and subscribed before me this

day of

all a 2

My commission expires first Monday of January,

OEAF

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): Address: 50 Canal Street **BELEN-DE** Juana Middle Name First Name Royalton, PA 17057 5919 Saul Street Philadelphia, PA 19149 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO 12/5/ 22 R 396128-5 IFS210061 Co-Defendant(s) ров 03/08/1986 Add'I DOB ☐ Male First Name Middle Name Last Name **AKA** RACE ☐ White Asian Black Native American Unknown M Hispanic ETHNICITY Unknown ☐ Non-Hispanic GRY (Gray) BRO (Brown) RED (Red/Aubn.) SDY (Sandy) ☐ BLU (Blue) PLE (Purple) Hair ONG (Orange) BLK (Black) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) DNA WEIGHT (lbs.) ☐ YES ☐ NO **DNA Location FBI Number MNU** Number OLN 33005900 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO 2 **Fingerprint Classification: DEFENDANT VEHICLE INFORMATION** Oth, NCIC Veh. Code State Нат Registration Comm'l Veh. School Veh. Reg. same Plate # mat Ind. П Sticker (MM/YY) as Def. Style Color VIN Year Make Model Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. X I accuse the above named defendant who lives at the address set forth above □ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

in DAUPHIN County

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[22]

Harrisburg City
(Place-Political Subdivision)

(Subdivision Code)

on or about 2018 TO PRESENT



Docket Number:	Date Filed:	OTN/LiveSca	an Number	Complaint/Incide	ent Number			
Defendant Name:	First: JUANA	Middle:		Last: BELEN-DE EVANGEL	ISTA			
When there is more that (Set forth a brief summary of without more, is not sufficier The age of the victim at the ti	The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)							
Inchoate	☐ Solicit 18 902			Number of Victims Age	60 or Older			
□ 01 □ 5111	(a)(1)	of the 18	1	F1	20 a			
#	ction Subsec	tion PA Statut	te (Title) Counts	Grade NCIC Offens	UCR/NIBRS Code			
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone			
involved represented the pro-	ceeds of unlawful acti	vity with the intent to promot			knowledge that the property			
Inchoate	☐ Solicita 18 902			Number of Victims Age	60 or Older			
□ 02 3922	(a)(1)	of the 18	1	F3				
	ction Subsec	tion PA Statut	te (Title) Counts	Grade NCIC Offens	UCR/NIBRS Code			
PennDOT Data (if applicable)	Accident Number	<u> </u>	☐ Interstate	☐ Safety Zone	☐ Work Zone			
defendant did present or cau Transportation (Penn DOT). that were used for the sale o	se to present, false, i As a result of the def f reVin'd and/or stole	endant's deception, the fraudi n vehicles.	mation material to ve ulent paperwork enal	hicle title application(s) to the bled Pennsylvania vehicle title	e Pennsylvania Department of es to be obtained for vehicles			
Inchoate			Num	ber of Victims Age 60 or Ol	der			
□ 03 3925 Lead? Offense#		of the 18 section PA State	ute (Title) Counts	F3 Grade NCIC Offer	nse Code UCR/NIBRS Code			
PennDOT Data (if applicable)	Accident Number —		☐ Interstat	e 🔲 Safety Zor				
Statute Description (inc	lude the name of	statute or ordinance): R	ECEIVING STOLEN	PROPERTY				
another knowing that it has be restore it to the owner; to wit to the owner, knowing that si	een stolen, or believi :: The defendant did i uch property was stol	Offense: A person is guilty ng that it has probably been s intentionally receive, retain or en, or believing that it had proehicle in violation of Section 3	itolen, unless the pro dispose of movable p obably been stolen, a	perty is received, retained, or property, belonging to another and the property stolen is an	r disposed with intent to er, with no intent to restore it			



Docket Number:	Date Filed: / /	OTN/LiveScan	Number		Complaint/Incident Number IFS210061		
Defendant Name:	First: JUANA		Middle:		Las BE		
Inchoate	☐ Solicit		Conspiracy		Number of	Victims Age 60 or Older	
Offense 18 901 A	18 902	<u>A</u>	18 903				
☐ 04 4120 Lead? Offense# S	ection Subs	of the ection	18 PA Statute (Title)	Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ——	COLOTT	177 Statute (terstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	MINEGOPTH KONEK SKIPTKUP LANTY FAKE	f statute or or	dinance): ID E	NTITY TH	EFT		
any means, identifying inform	ation of another per other person throug	son without the	consent of that o	ther person	n to further a	eft of another person if he pose any unlawful purpose, to wit: the a / business without the conser	ne defendant
Inchoate			Conspiracy 18 903		Number o	f Victims Age 60 or Older _	
☐ 05 7121	00.7 (2.10.00.000.2000#10000\$800#10	of the	75 PA Statute	1000	1 Counts	M1 Grade NCIC Offense Cod	le UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number —		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u> </u>	nterstate	☐ Safety Zone	☐ Work Zone
	\$2500 000408 0044FE SHANGING 06	f statute or or	dinance): FAL	SE APPLI	CATION FO	R CERTIFICATE OF TITLE O	R REGISTRATION
name or address or makes a	material false statem stration, to wit: the o	ent, or fails to didefendant made	isclose a security	interest, o	r conceals ar and/or conce	first degree if the person uses ny other material fact in an appaled any other material fact in fact in the second	olication for a
□ 06 7122	(3)	of the	75	1	1	41	
		ection	PA Statute (Counts	Grade NCIC Offense Code	
(if applicable)	Number		dinonas\: ===		terstate	Safety Zone	☐ Work Zone
Acts of the accused assalters or forges an assignmen	sociated with this	Offense: A p	erson is guilty of ment or release	a misdeme	anor of the f	irst degree if the person, with a certificate of title or any oth any document issued or prepar	er document issued or



			Date	Filed: 57.22										Numbe			
Defenda		WIND O	First:				Middle:	-			est: ELEN	-DE E	EVANC	ELIST	A		
												·					
Incho Offen		☐ Attemp 18 901		☐ Solic 18 90			onspiracy 903			Number	of Vic	tims A	ge 60 o	r Older			
	07	4107	7	(a)	(4)	of the	18			i	F3						
Marie Control of the Control of the	Offens INDOT applica	Data 👵 🗟	Section Accide Numb	int	section		PA Statute	e (Title		Counts Interstate	Gra	ade	Safety	Offense C Zone		UCR/NIBRS C	
			- Committee Act and the	SUPERIOR TOTAL	f statute	or ordin	ance): DE	CEPT	IVE I	BUSINESS	PRAC	TICES	111, 77		L.		
defendan (PennDO	t knowin	gly and inte	entionally s	submitted f	fraudulent	applicatio	ns for PA sa	lvage	and r	econstructe	d vehic	cie titles	s to the	PA Dept.	of Tran	ct in which th	
Inchos Offens	副 为公共共2000年代表	Attempt 18 901 A		☐ Solicit 18 902		☐ Coi 18 9	nspiracy 903			Number	of Vict	ims Ag	e 60 or	Older _		-	
	08	4904		(b)	388	of the	18	FF-AL-X			МЗ	12	NGIC O	ffense Co	da	UCR/NIBRS Co	nda
a, harmon kerner and	Offense nDOT I applica	Data -	Section Accider Numbe	nt	ection		PA Statute	(Inte)	<u></u> □ 1	Counts nterstate	Grad		Safety 2			☐ Work Zone	
			CASE CONDITION AREA OF THE	7E-0464 ISO	f statute	or ordin	nance): UN	ISWO	RN F	ALSIFICA	TION .	TO AU	THORI	ΓIES			
pursuant	Acts of the accused associated with this Offense: The defendant made a written false statement which he did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; To wit: the defendant engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.																
Offer		18 901		18 90			onspiracy 3 903			Number	OTVIC	Zims P	ige ou c	or Older			
Lead?	09 Offens	411	7 Section		(3) bsection	of the	18 PA Statul	te (Title		1 Counts	F3	ade	NCIC	Offense C	Code	UCR/NIBRS C	ode
: Pei	nnDOT applica	Data -	Accid Numi	ent	Daecton		17 Cada	(1,120		Interstate] Safety			☐ Work Zon	
			clude the	name c	of statute	or ordin	nance): IN	ISUR/	ANCE	FRAUD							
conspired claim that or suppo insurer, i	s with an at contain arts an ar made ma	other to prons any false	epare or m , incomple led in exce ment(s) in	nake any st ete or misle ess of the a etended to	tatement to eading info actual loss be present	hat is inte rmation co sustained	nded to be poncerning are by the claim	preser ny fact nant to	ted to or the wit:	any insure ing materia the defend	er or se al to the ant did	elf-insur e claim, I knowii	ed in co , includi ngly and	nnection ng inform I with the	n with, o nation w e intent	ets, solicits or r in support o hich documer to defraud an ontained false	if, a nts



	Number 40 3	er: 2-22		Filed:	2	TN/LiveSca		er	Con	iplaint/Incident Nu 210061	ımber
	ant Na	CHARLEN A	First: JUANA	Α	•	Middle:			Last: BELEN-D	E EVANGELISTA	
Incho Offen		18 901 A		☐ Solicitation		onspiracy 3 903		Numbe	r of Victims	Age 60 or Older	
Lead?	10 Offense	4118	Section	Subsection	of the	18 PA Statut	o (Titlo)	1 Counts	F3 Grade	NCIC Offense Code	UCR/NIBRS Code
Per	nDOT I	Data 🐩	Accide Numbe	n t 🖺		FA Statut	T'	Interstate		Safety Zone	☐ Work Zone
Statute Description (include the name of statute or ordinance): WASHING VEHICLE TITLES Acts of the accused associated with this Offense: A person commits a felony of the third degree if, with the intent to deceive anyone or with knowledge that the person is facilititing a deception to be perpretated by anyone concerning the true mileage of a motor vehile, the person makes/causes to be made an application for a certificate of title for a motor vehicle which includes materially false or ficticious information to wit: with intent to deceive anyone, the											
defendan	t made/c	aused to be	e made app	olication(s) for a	certificate of	title for a m	otor vehic	de which incl	uded materia	ally false or ficticious i	nformation.
Offen		18 901 /		18 902 A		3 903		Numbe	I OI VICIIIIS	Age 00 0, Oldo!	
	11	4911	<u> </u>	(a)(1)	of the	18		1	F3		
	Offens in DOT		Section Accide Numbe	an or the control of	n	PA Statut		Counts Interstate	Grade	NCIC Offense Code Safety Zone	uCR/NIBRS Code ☐ Work Zone
Statute	Descri	ption (inc			tute or ordi	nance): TA	MPERIN	G WITH PL	BLIC RECO	RDS OR INFORMAT	TION
record, dinformation	Acts of the accused associated with this Offense: The defendant, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT.										
Offe		☐ Attem 18 901		☐ Solicitati 18 902 A		Conspiracy 18 903		Numi	er of vicum	s Age 60 or Older _	
	12	511		(a)(1)	of the		(Company)	1	F1	NCIC Offense Co	de UCR/NIBRS Code
	Offer nnDOT	Data	Section Accid		ion	PA Stat	tute (Title)	Counts ☐ Interstat	T T	☐ Safety Zone	☐ Work Zone
Statute ACTIVIT		ption (inc		name of sta	tute or ord	inance): CI	RIMINAI		· .	ING IN PROCEEDS	OF UNLAWFUL
following False Ap they or o did agree	crimes: plication one or mo e with on	Dealing in F for Certifica ore of them e or more in	Proceeds of te of Title will engag ndividuals,	f Unlawful Activ or Registration, e in conduct wh	ity, Washing ' and Unsworr nich constitute re would eng	Vehicle Titles Falsification s such crime age in condu	i, Deception to Authorse(s) or an act that co	ve Business I rities, did ag attempt or s nstitutes the	Practices, Tai ree with such olicitation to	other person(s) and commit such crime(s)	ne or more of the , ecords or Information, / or business(es) that it to wit; the defendant etempt or solicitation to



Docke	t Num 2-4	per: 13-22	1215122	OTN/LIVe:	396/3			S210	int Nu 1061	IIIIDer I	ncident	dulline:
		English to some	First:		<i>3961</i> Middle:	18	<u>الله (ص.</u>	L	ast:			
Defen	ant V	ante	JUANA					В	ELEN	I-DE EVAN	GELIST	A
appro (Set for violated	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 <i>brief</i> 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.)											
Incho Offer	37 37 50	18 901 A	☐ Solicit 18 902		☐ Cons 18 903				Numb	er of Victims	Age 60 o	r Older
Lead?	13 Offens	911 se# Section	(B)(1) Subsection	of the 18	A Statute (Titl	e)	1 Counts	F1	Grade	NCIC Offer	nse Code	UCR/NIBRS Code
Pei	nnDO	Data 👚 🕛 Acc	ident 🔛				Interstate		1] Safety Zone	э	☐ Work Zone
		able) Nur cription (include	the name of sta	tute or ordina	nce): CORI	RUPT (ORGANIZA	ATIONS	<u>. </u>			
from a proceed receive	Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate Carla Matia Auto Sales.											
700,74000	Inchoate Attempt Solicitation Conspiracy 0ffense 18 901 A 18 902 A 18 903 Number of Victims Age 60 or Older											
	14	911	(B)(2)	of the 18		1		F1				
Lead?	Offen	The State of the S	Subsection sident	PA	Statute (Title		Counts	Gra	T	NCIC Offense		UCR/NIBRS Code
(if	applic	able) / Nu	mber 🖈 🔃				Interstate			Safety Zone	e	☐ Work Zone
Statul	te Des	scription (include	e the name of sta	itute or ordina	ance): COR	RUPT (ORGANIZA	ATION:	5			
mainta	Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of Carla Maita Auto Sales.											
												
1 × 7570000.	Inchoate Attempt Solicitation Conspiracy 18 901 A 18 902 A 18 903 Number of Victims Age 60 or Older											
	15	911	(B)(3)	of the 18		1	20.000	F1	do	NCIC Offense	Code	UCR/NIBRS Code
1000	THE RESIDENCE TO SHEET	T Data Ac	cident	PA	A Statute (Title		Counts Interstate			☐ Safety Zon		☐ Work Zone
			mber e the name of sta	atute or ordina	ance): COR							
or part	Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.											



Docket Number:	Date Filed: OTI	N/LiveScan Number 396 128		plaint Number I	ncident Number			
ACCORDED TO MESSAGE AND ACCORD	First:	Middle:		Last:				
Defendant Name	JUANA		,,	BELEN - DE EVA	NGELISTA			
appropriate. When there is (Set forth a <i>brief</i> summary of the violated, without more, is not suf allegedly violated.)	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 <i>brief</i> 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 18 901 A	18 902 A	18 903		Number of Victims	s Age 60 or Older			
☐ 16 911 Section	(B)(4) of the	18 PA Statute (Title)	1 Counts	F1 Grade NCIC Offe	nse Code UCR/NIBRS Code			
	Subsection sident mber		nterstate	☐ Safety Zone				
Statute Description (includ		ordinance): CORRUPT C	RGANIZATIO	ONS				
Acts of the accused assoc (1), (2), or (3) of this subsection. subsections (1), (2), and/or (3).	iated with this Offense: In To wit: the defendant conspir	t shall be unlawful for any ped with other individuals to	oerson to col engage in a	nspire to violate any of to pattern of racketeering	the provisions of paragraphs g activity in violation of			
Inchoate ☐ Attempt Offense 18 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903		Number of Victim	s Age 60 or Older			
	of the				A II HODAUFFO O II			
	Subsection	T	ounts Interstate	Grade NCIC Offense ☐ Safety Zon				
(if applicable) Ni Statute Description (include	imper le the name of statute or							
Cidate Decomption (morac								
Acts of the accused assoc	iated with this Offense:							
Inchoate	☐ Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Victim	ns Age 60 or Older			
	of th			Grade NCIC Offens	e Code UCR/NIBRS Code			
Lead? Offense# Section PennDOT Data A	n Subsection		Counts Interstate	Grade NCIC Offens ☐ Safety Zo				
1 - 2 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	umber		microtate					
Statute Description (include	20 and harne of statute of							
Acts of the accused associ	ciated with this Offense:							



				POLICE CRIM	INAL COM	PLAINT
Docket Number: CR-403-22	Date Filed:	8396	LiveScan Number	Complaint/In IFS210061	cident Number	
Defendant Name:	First: JUANA		ddle:	Last: BELEN-DE EVANO	GELISTA	
I ask that a warn made.	ant of arrest or a su	mmons be issu	ed and that the defe	ndant be required to an	swer the charge	s I have
belief. This veri	facts set forth in this fication is made sub fication to authorities	ject to the pena	rue and correct to th Ities of Section 4904	e best of my knowledge of the Crimes Code (1	e or information a 8 Pa.C.S. § 490	and 4) relating
4. This complaint	consists of the prece	eding page(s) nu	umbered $\underline{1}$ through $\underline{ ext{}}$	_ <i>-</i> ·		
5. I certify that this System of Penns information and	sylvania that require	the provisions of filing confidential	of the <i>Case Records</i> al information and d	Public Access Policy of ocuments differently the	of the Unified Jud at non-confidenti	<i>licial</i> al
of Pennsylvania a	nd were contrary to t of arrest can be is	the Act(s) of the	Assembly, or in vio	the peace and dignity of lation of the statutes cit use must be complete	ed.	
(Date)		(Year)		(Sig	nature of Affiant)	
AND NOW, on this	date		I certify that the	complaint has been prope	erly completed and	l verified.
An affidavit of proba	ble cause must be con	mpleted before a	warrant can be issued			
(Magisterial District	Court Number)	(Is	suing Kuthority)		SEAL	



Docket Number:

OR-403-22

Defendant Name:

Date Filed:

OTN/LiveScan Number

IFS210061

BelEN-DE EVANGELISTA

AFFIDAVIT of PROBABLE CAUSE

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

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

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



		Tundline.	
Docket Number:	Date Filed: /2/5722	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	ANAUL		BELEN-DE EVANGELISTA
			 -

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

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

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

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

		(Signature of Affiant)
Sworn to me and subscribed before me this	day of	
Date		, Magisterial District Judge
My commission expires first Monday of Janu	ary,//	
	•	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): Address: 50 Canal Street **JUANA BELEN-VALDEZ** First Name Royalton, PA 17057 Middle Name Last Name 5923 Saul Street Telephone: (717)944-4463 Philadelphia, PA 19149 NCIC Extradition Code Type X 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number Incident Number** Services? 12/5/22 ☐ YES ☐ NO IFS210061 -22 GENDER ров 06/28/1974 Add'I DOB Co-Defendant(s) ☐ Male First Name Middle Name Last Name Gen **JUANA** AKA **VALDEZ** RACE White Asian Black Native American Unknown ETHNICITY M Hispanic ☐ Non-Hispanic Unknown GRY (Grav) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) GRN (Green) BRO (Brown) GRY (Gray) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number MNU Number K7F045CPF 170 **Defendant Fingerprinted** ☐ YES □ NO Ft. HEIGHT In. Fingerprint Classification: 5 4 DEFENDANT VEHICLE INFORMATION State Oth, NCIC Veh. Code Нат Registration Comm'l Veh. School Veh. Reg. Plate # mat Ind. same Sticker (MM/YY) as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth $\ \square$ Approved $\ \square$ Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Place-Political Subdivision) Subdivision Code) in DAUPHIN County [22] on or about 2018 TO PRESENT (County Code)



Docket Number:	Date Filed:	OTN/LiveScan	Number	Number	
Defendant Name:	First: JUANA	Middle:		Last: BELEN-VALDEZ	
When there is more that (Set forth a brief summary of without more, is not sufficien The age of the victim at the ti	n one offense, eac the facts sufficient to a t. In a summary case, y me of the offense may l	h offense should be nun dvise the defendant of the nat ou must cite the specific sect	nbered chronolo ture of the offense(ion(s) and subsecti ion, social security	s) charged. A citation to the state on(s) of the statute(s) or ordinan numbers and financial informati	ute(s) allegedly violated, ace(s) allegedly violated.
Inchoate	☐ Solicitati 18 902 A	on Conspiracy 18 903		Number of Victims Age 60 o	r Older
⊠ 01 5111	(a)(1)	of the 18		F1	100 (100 (100 (100 (100 (100 (100 (100
# -	ction Subsection	n PA Statute ((Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Accident Number		☐ Interstate	☐ Safety Zone EDS OF UNLAWFUL ACTIVITY	☐ Work Zone
involved represented the pro-	ceeds of unlawful activit	y with the intent to promote t	the carrying on of s	n financial transactions with kno	
Inchoate	☐ Solicitati 18 902 A	on Conspiracy 18 903		Number of Victims Age 60 o	r Older
□ 02 3922	(a)(1)	of the 18	1	F3	A STATE OF THE STA
	ction Subsectio	n PA Statute	(Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
defendant did present or cau	se to present, false, inc As a result of the defer	omplete or misleading informa	ation material to vel	or withhold property of another be nicle title application(s) to the Pe led Pennsylvania vehicle titles to	nnsylvania Department of
Inchoate			Numi	per of Victims Age 60 or Older	
□ 03 392!		of the 18	(Title) Counts	F3 Grade NCIC Offense C	Code UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Section Subsection Sub		☐ Interstat	e	☐ Work Zone
Acts of the accused as another knowing that it has be restore it to the owner; to wito the owner, knowing that s	sociated with this Copeen stolen, or believing to the defendant did intuch property was stoler	ı that it has probably been sto entionally receive, retain or di	theft if he intention len, unless the propispose of movable parallely been stolen, a	nally receives, retains, or dispose perty is received, retained, or dis property, belonging to another, we and the property stolen is an auto	posed with intent to vith no intent to restore it



Docket Numb	er:	Date Filed	d:	OTN/LiveScan	Number	FOL	mber				
Defendant Na	me:	First: JUANA		Middle:	Middle: Last: BELEN-VALDEZ						
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 8 902 A	Conspiracy	Num	ber of V	/ictims Age 60 or Older				
□ 04	4120			of the 18	1	F		2000 C			
Lead? Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code PennDOT Data Accident Interstate Safety Zone Work Zone											
		lude the nar	ne of statute	or ordinance): IDE	NTITY THEFT						
any means, iden	tifying inform ty theft of ar	nation of anothe nother person t	er person withou	it the consent of that of	ther person to fu	irther an	t of another person if he poss y unlawful purpose, to wit: th / business without the consen	e defendant			
Inchoate Offense	☐ Attemp		Solicitation 18 902 A	☐ Conspiracy 18 903	Nur	nber of	Victims Age 60 or Older				
□ 05	7121			of the 75	1		11 NCIC Offense Code	uCR/NIBRS Code			
Lead? Offer PennDOT (if applic	Data	Section Accident Number	Subsection	PA Statute	(Title) Cour ☐ Interst		☐ Safety Zone	☐ Work Zone			
		lude the nar	ne of statute	or ordinance): FAL	SE APPLICATIO	ON FOR	CERTIFICATE OF TITLE OF	R REGISTRATION			
name or address	or makes a or for a regi	material false sistration, to wit	tatement, or fai	Is to disclose a security	interest, or conditatement and/or	eals any	rst degree if the person uses a y other material fact in an app led any other material fact in a	lication for a			
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following False App they or o	crimes: Deplication for one or more with one	ealing in Pro or Certificate e of them wil or more indi	ceeds of Ur of Title or F I engage in viduals, tha	nlawful Activity, Registration, and conduct which	Washing Vel I Unsworn Fa constitutes s vould engage	nicle Titles, alsification t such crime(s in conduct	Deceptive o Authorit s) or an at that cons	Business Files, did agreet tempt or settitutes the	Practices, ree with s olicitation	Tamper such oth to com	ring with Public R er person(s) and mit such crime(s)	ne or more of the ecords or Information, / or business(es) that); to wit; the defendant ttempt or solicitation to		



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Defendant	Name "	First:	IVI	liddle:			Last:	E7		
		JUANA					BELEN-VALD	<u> </u>		
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 <i>brief</i> 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.)										
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Statute De	escription (include	e the name of statu		·				keteering a	ctivity to acquire or	
Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a Carla Matia Auto Sales.										
Inchoate Offense	Attempt 18 901 A	Solicitat 18 902 A	1	☐ Conspira 18 903	ісу		Number of Vi	ctims Age	60 or Older	
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	ense# Section DT Data Acc	Subsection	PAS	Statute (Title)	Counts			fense Code	UCR/NIBRS Code	
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		e the name of statu	te or ordinar	nce): CORRUI	PT ORGANIZA	ATIC	ONS			
or participate	e, directly or indirectl	ated with this Offer y, in the conduct of suc vith a vehicle dealership	h enterprise's af	ffairs through	a pattern of r	acke	eteering activity, t	o wit: the d	efendant was an	



Docket Number: Date Filed: OTN/LiveScan Number Complaint Number Incident Number CR-406-22 12/5/22 396149-5 IFS210061 First: Middle: Last Defendant Name **BELEN-VALDEZ JUANA** The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.) Inchoate ☐ Solicitation ☐ Attempt ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense П 16 911 of the 18 1 F1 (B)(4)UCR/NIBRS Code Offenset Subsection PA Statute (Title) Counts Grade **NCIC Offense Code** Lead? Section PennDOT Data Accident ☐ Safety Zone ☐ Work Zone (if applicable) ☐ Interstate Number Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3). Inchoate ☐ Solicitation ☐ Attempt Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense of the UCR/NIBRS Code **NCIC Offense Code** Offense# Section Subsection PA Statute (Title) Counts Grade PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate (if applicable) Number Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense: Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older _ 18 902 A Offense 18 901 A 18 903 of the NCIC Offense Code UCR/NIBRS Code Offense# Subsection PA Statute (Title) Counts Grade Lead? Section PennDOT Data Accident ☐ Work Zone ☐ Interstate ☐ Safety Zone (if applicable) Number Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:



Docket Number:	Date Filed: /2/5/ 12	OTN/LiveScan Number	Complaint/Incident Number IFS210061
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Defendant Name:	JUANA		BELEN-VALDEZ

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

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

(Date)

(Year)

(Year)

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

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

(Magisterial District Court Number)

(Issuing Authority)



Docket Number:

CR-406-32

Defendant Name:

Date Filed:

OTN/LiveScan Number

Complaint/Incident Number

IFS210061

Middle:

Last:

BELEN-VALDEZ

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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Docket Number: Date Filed: (2) 12/5/22	OTN/LiveScan Number	Complaint/Incident Number IFS210061
First:	Middle:	Last:
Defendant Name: JUANA		BELEN-VALDEZ

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

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

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

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day of

Magisterial District Judge

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My commission expires first Monday of January

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. DEFENDANT: **LUCIANO-ALBERT** Address: 50 Canal Street Last Name Ge First Name Middle Name Royalton, PA 17057 2617 N. 8th Street Philadelphia, PA 19133 Telephone: (717)944-4463 NCIC Extradition Code Type 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States 1-Felony Full ☐ Distance: D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full 4-Felony No Extradition □ B-Misdemeanor Limited F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed OTN/LiveScan Number **Complaint Number Incident Number** Services? ☐ YES ☐ NO D 15122 IFS210061 Co-Defendant(s) Add'I DOB GENDER ров 04/01/1998 Last Name Gen Middle Name Male First Name ☐ Female **AKA** Unknown ☐ White Asian Black ☐ Native American Mispanic Hispanic Unknown ETHNICITY Non-Hispanic BRO (Brown) SDY (Sandy) BLU (Blue) ☐ PLE (Purple) GRY (Gray) RED (Red/Aubn.) Hair PNK (Pink) GRN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color BLN (Blonde / Strawberry) GRY (Gray) BLU (Blue) BRO (Brown) GRN (Green) BLK (Black) Eye HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) Color ☐ MUL (Multicolored) WEIGHT (lbs.) **DNA Location** DNA ☐ NO ☐ YES **FBI Number MNU Number** OLN 31698197 Ft. HEIGHT in. **Defendant Fingerprinted** ☐ YES ☐ NO 10 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** Reg. Oth. NCIC Veh. Code School Veh. State Registration Comm'l Veh. Haz same Ind. П mat Plate # Sticker (MM/YY) as Def. Style Color Make Model Year VIN (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as □ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code)

on or about 2018 - PRESENT

in DAUPHIN County

[22]

(County Code)



Docket Number: Date F	Filed: R 390	TN/LiveScan Numb	er	Complaint/Incident Nun IFS210061	nber
Defendant Name: First: ALBER		Middle:	Last: LUCI	ANO-RODRIGUEZ	
The acts committed by the accu When there is more than one of (Set forth a brief summary of the facts s without more, is not sufficient. In a sum The age of the victim at the time of the be listed. If the identity of an account m	fense, each offense s sufficient to advise the defe imary case, you must cite t offense may be included if	hould be numbered endant of the nature of t the specific section(s) a known. In addition, soc	f chronological he offense(s) char nd subsection(s) o ial security numbe	ly. ged. A citation to the statute(f the statute(s) or ordinance(rs and financial information (s) allegedly violated, s) allegedly violated.
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Lead? Offense # Section PennDOT Data	Subsection	PA Statute (Title)	Counts G	rade Code	UCR/NIBRS Code
PennDO1 Data Accident Ni (if applicable)	umber		Interstate	☐ Safety Zone	☐ Work Zone
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Lead? Offense# Section	Subsection	PA Statute (Title)	Counts G	rade Code	UCR/NIBRS Code
PennDOT Data (if applicable) Accident N			Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (include the Acts of the accused associated namely, PA Deptartment of Transportat false, incomplete or misleading informa insurance rate filing, a motor vehicle in request; to wit: the defendant, knowing fraudulently misrepresented facts and i	with this Offense: The tion (PennDOT), file, presention concerning a fact or the surance transaction or other gly and with intent to defra	e defendant did knowing nt or cause to be filed o ning material to the age er motor vehicle insuran ud the PA Dept. of Tran	ly and with the int r presented to the ncy's determination ce action which is	government agency a docum n in approving or disapproving required or filed in response t	ent that contained g a motor vehicle to an agency's
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of	Victims Age 60 or Older _	
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Lead? Offense# Section PennDOT Data Accide	Subsection ent	PA Statute (Title)	Counts ☐ Interstate	Grade NCIC Offense Cod Safety Zone	e UCR/NIBRS Code ☐ Work Zone
(If applicable) Numb Statute Description (include the	nerelease and a second				
Acts of the accused associated presented to an insurer a statement for concerning a fact or thing material to the such statements to be made in support	rming a part of, or in suppo he insurance claim; to wit:	ort of, an insurance clair	n that contained fa	ilse, incompleted or misleadin	ig information



Docket Number:	Date Filed:	OTN/LiveScan N	lumber	Complaint/Incident Null IFS210061	
Defendant Name:	First: ALBERT	Middle:		Last: LUCIANO-RODRIGUEZ	
Inchoate Attempt Offense 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Numbe	r of Victims Age 60 or Older	
☐ 04 4117 Lead? Offense# So	(a)(3)	of the 18 PA Statute (Tit	tle) Counts	F3 Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (incl	ude the name of statut	e or ordinance): INSU	RANCE FRAUD		
conspires with another to predaim that contains any false, or supports an amount claims	pare or make any statement incomplete or misleading inf ed in excess of the actual lose ment(s) intended to be preser	that is intended to be presormation concerning any factorials in the claimant	sented to any insu act or thing mater t to wit: the defen	d any insurer or self-insured, assist: rer or self-insured in connection wit ial to the claim, including information dant did knowingly and with the int in support of an insurance claim the	th, or in support of, a on which documents tent to defraud an
Inchoate		Conspiracy 18 903	Numb	er of Victims Age 60 or Older	
□ 05 4117		of the 18	1	Grade NCIC Offense Code	e UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Section Subsection Accident Number	PA Statute (Title) Counts ☐ Interstate		☐ Work Zone
Statute Description (incl	ude the name of statut	e or ordinance): INSU	RANCE FRAUD		
other person file an application thereto; to wit: the defendant information to conceal any factorial information to conceal any factorial inchange in the conceal and factorial inchange	n for insurance containing and the insurance containing and with intent that material to the insurance of th	ny false information or con o defraud an insurance con company	ceal for the purpo mpany, filed an ap	tent to defraud any insurance com se of misleading information conce plication for insurance containing for r of Victims Age 60 or Older	rning any fact material
Offense 18 901 A	18 902 A	18 903			
	(a)(1) ection Subsection	of the 18 PA Statute (Ti	tle) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number ———		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statut	e or ordinance): THEF	T BY DECEPTIO	N	
defendant did present or caus the Pennsylvania Department	se to present, false, incomple of Transportation (Penn DO	ete or misleading informati T) for a vehicle(s) that wa	on material to MV s never repaired a	or withhold property of another by one of the control of the contr	at were submitted to operating condition as



Docket Num	ber:	Date Fil	ed:	2 396 7	an Number		Complaint/Incident Nur IFS210061	mber
Defendant N	ame:	First:		Middle:	30	Last		
		ALBERT				LUC	CIANO-RODRIGUEZ	
		. -	7.0.0.0	Te :				
Inchoate Offense	18 901 Attempt		Solicitation 18 902 A	☐ Conspiracy 18 903		Number of	Victims Age 60 or Older	
□ 07	4101		(a)(3)	of the 18			М1	
Lead? Offe		Section Accident	Subsection	PA Stat	ute (Title)	Counts	Grade NCIC Offense Code	● UCR/NIBRS Code □ Work Zone
(if appli		Number	ame of statute	e or ordinance): F		ileistate	Galety Zolic	- VVOIR ZORG
Clarate Best	Sription (mo	ado alo in	arrie or statute	or ordinarioo). I	OKOLK!			
Acts of the a	ccused ass	ociated w	ith this Offens	e: A person is guilty	of forgery if, v	vith intent to	defraud or injure anyone, or w be forged in a manner specifie	with knowledge that he
(2) of this subs	ection, to wit:	On two (2) (occassions the de	fendant, with the inte	ent to defraud	and/or injure	e anyone, and/or with knowled	ge that he is
racilitating a fra	aud or injury to	be perpetra	ited by anyone, u	ttered a writing whic	n ne knows to	be forged in	a manner specific in paragrapl	r (2) or this section.
								
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A	☐ Conspiracy 18 903		Number of	Victims Age 60 or Older	
□ 08	7121			of the 75	1	N	11	
Lead? Offer	nse# S	ection	Subsection	PA Statu		Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDO (If a ppli	CONTRACTOR STREET, STR	Accident Number			☐ in	terstate	☐ Safety Zone	☐ Work Zone
Statute Des	cription (inc	lude the n	ame of statute	e or ordinance): F	ALSE APPLIC	CATION FO	R CERTIFICATE OF TITLE O	R REGISTRATION
Acts of the	accused ass	ociated w	ith this Offens	A. V become anility	of a misdeme	anor of the	first degree if the person uses a	a false or ficticious
name or addre	ss or makes a	material fals	e statement, or fa	ails to disclose a secu	rity interest, o	r conceals ar	ny other material fact in an app aled any other material fact in	lication for a
certificate of tit		stration, to v	wit, the defendan	i, made a material iai	se statement o	mayor conce	aled any outer material fact in	an application for a
-								
Inchoate	☐ Attemp	t [Solicitation	☐ Conspiracy		Number o	f Victims Age 60 or Older _	
Offense	18 901 .	4	18 902 A	18 903				
□ 09	 See At Social Collins 	33, 54 (co. 100 co. 10	(3)	of the 75		Share in A & E.	M1	
Lead? Off	ense#) T Data	Section Acciden	Subsection	PA Sta	tute (Title)	Counts nterstate	Grade NCIC Offense Cod	e UCR/NIBRS Code ☐ Work Zone
(If appl				e or ordinance).			COUNTERFEIT DOCUMENTS	
Statute Des	oription (inc	1445 HIC H	idino di statut	o or oranianoc). I				
Acts of the	accused as	sociated w	ith this Offens	se: The defendant w	ith fraudulent	intent, have	possession of, sell or attempt t	o sell, use or display a
certificate of ti	tie, registration amely (MV426	ı card or plat 3 Application	te, driver's license (s), knowing it to	e, inspection certifica have been altered, t	te, proof of fin- forged or coun	anciai respor terfeited, in i	nsibility or any other document violation of Section 7122(3) of	the PA Vehicle Code



Decke	t Numbe		Date Filed:	396 755-2		r		plaint/Incident No 210061	umber
Defend	lant Nan	Fin	st:	Middle:			ast:	DODDIOUEZ	
10 (10 m) 10 (10 m) 10 (10 m)	e de la company	AL AL	BERT				UCIANO	-RODRIGUEZ	
Incho Offer	The state of the s	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number	of Victims	Age 60 or Older	
Lead?	10 Offenses	4904 Section	(b)	of the 18	(Title)	1 Counts	M3 Grade	NCIC Offense Cod	e UCR/NIBRS Code
Per	INDOT D	ata 🐩 📗 Ad	cident Imber ———			Interstate		Safety Zone	☐ Work Zone
	applicab Descrip	TANDERSON SERVICE OF STATE OF THE STATE OF STATE OF THE S	A Bank Gard Caraba Acadegra St.	e or ordinance): UNS	SWORN F	ALSIFICA	TION TO A	UTHORITIES	L
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to a form course of	bearing n	otice, authorized	d by law, to the effect the heart that he had a to the heart to the he	nat false statements mad ntionally signed (PA Dep earing notice that false s	de therein ot, of Tran	are punishas sportation (able; To wit: PennDOT)) 1	the defendant engage forms thereby making	be true, on or pursuant ged in a continuous g written false
Inche Offen		Attempt 18 901 A	Solicitation 18 902 A	⊠ Conspiracy 18 903		Number	of Victims	Age 60 or Older _	
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Lead?	Offense		n Subsection	PA Statute	Ĭ	Counts	Grade	NCIC Offense Cod Safety Zone	e UCR/NIBRS Code ☐ Work Zone
	applicat	schape water a rushy, spilit is helicite.	umber	e or ordinance): CRI				<u> </u>	
ACTIVIT		don (include	the name of statute	e or ordinance). CRI	HATIANT (.UNSPIKA	JI -DEALI:	16 IN PROCEEDS	, ONLAWIOL
following False App they or o did agree	crimes: D plication for one or more with one such crime	ealing in Procee or Certificate of T e of them will en or more individu	ds of Unlawful Activity, Title or Registration, and ngage in conduct which uals, that one or more w	Se: The defendant, with Washing Vehicle Titles, I Unsworn Falsification to constitutes such crime(swould engage in conduct in overt act in pursuance Conspiracy 18 903	Deceptive o Authorit s) or an at that cons	Business Prices, did agretempt or so stitutes the anspiracy.	actices, Tan ee with such licitation to aforemention	npering with Public R other person(s) and commit such crime(s	ecords or Information, / or business(es) that); to wit; the defendant
	and a transfer of the contract of								
Lead?	12 Offens	911 se# Sect	(b)(1)	of the 18	te (Title)	1 Counts	F1 Grade	NCIC Offense Co	ode UCR/NIBRS Code
Pe	nnDOT:	Data i	Accident United Number	17.044		☐ Interstate		☐ Safety Zone	☐ Work Zone
		PARTY AND A SECOND	PROTECT SERVICE STREET	e or ordinance): co	RRUPT O	RGANIZA	TONS	······································	
from a p proceeds received	attern of r s of such it income de	acketeering acti	vity in which such perso equisition of any interest or indirectly, from a patte	Se: It shall be unlawful on participated as a princ in, or the establishmen ern of racketeering activ	cipal, to us	se or invest, tion of, anv	directly or i	ndirectly, any part of to wit: the defendant	such income, or the



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Bocket	Numbe	52	Date File	led: C	11 00	Scan Num	ber			plaint 21006	Number	Incident	Number
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or partic	cipate, dire	cused associated w	, in the condu	ct of such en	terprise's a	affairs throu	ah a	pattern of	f racl	keteerii	ng activity, to	wit: the defe	nterprise to conduct ndant was an y.
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(if	applical	STATE OF THE PARTY	mber	of statute	or ordina	ance). COL		Intersta		IONS	☐ Safety	Zone	☐ Work Zone
Statut	G D6801	ibaou (molude	s uic name	oi siaiule	oi oiuma	aios). COM	avur	ONGANI	د ۱ ۱۸ عم	.0140			
(1), (2)	, or (3) of	cused associ this subsection. (2), and/or (3).	ated with th To wit: the de	is Offense fendant cons	: It shall b spired with	e unlawful (other indivi	for ar	ny person s to engag	to co	onspire a patte	to violate any ern of rackete	of the provisering activity	sions of paragraphs in violation of



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	ALBERT		LUCIANO-RODRIGUEZ

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

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

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

(Year)

(Date)	(Year)	Signature di Affiarit)
AND NOW, on this date	12-6-20	I certify that the complaint has been properly completed and verified
An affidavit of probable caus	se must be completed before a wa	— arrant can be issued.
		//////
_		- 1

14-2-03
(Magisterial District Court Number) (Issuing Authority)



Docket Number:
Craditate Date Filed:
Docket Number:

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:	Date Filed:	K 391	N/LiveScan Number		Complaint/incident Number IFS210061
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Defendant Name:	ALBERT			LUC	IANO-RODRIGUEZ

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

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

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

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

Sworn to me and subscribed before me this

day of

(Signature of Affiant)

, Magisterial District Judge

My commission expires first Monday of January

SEAL

COMMONWEALTH OF PENNSYLVANIA		POLI	CE CRIMII	NAL CO	MPLAIN	IT
COUNTY OF:DAUPHIN		COM	MONWEALTH		ISYLVAN	Α
N			'	/ S.		
Magisterial District Number 12 2-03 MDJ: Hon. DAVID H. JUDY, Esq.	DEFENDA	NT.	(NAME s	nd ADDRES	(S)·	
Address: 50 Canal Street 0EC - 5 2022	MOHAMED			KERDI		
Royalton, PA 17057			Middle Name	Last Nam	e	Ge
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Telephone: (/1/)9 11-11 03	bensalem,	PA 19020				
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Office of the attorney for the Commonwealth	7 Approved □ Disa	approved becau	se:			
•	* *					
(The attorney for the Commonwealth may require that the to filing. See Pa.R.Crim.P. 507).	complaint, arrest warrant	affidavit, or both be	approved by the a	ttorney for the	: Commonwea	ith prior
	Daho	rt G. LaBa	1			
CDAG ROBERT LABAR (Name of the attorney for the Commonwealth)		ittorney for the Comm			12/05/	
(Name of the attorney for the Commonwealth)	(Oignature of the				(L	ate)
I, JEREMY BECKER (Name of the Affiant)	·	737643/E (PSP/MF	ADGE # 736 OETC -Assigned	Affiant ID Num	ber & Badge #	<u>I</u>
of Pennsylvania Office of Attorney C	General	PAO	222400			. 4. 4
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☐ I accuse the defendant whose name is						
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therefore designated as John Doe or Jar	ne Doe					
with violating the penal laws of the Comn	nonwealth of Penns	ylvania at [301] (Subniv		isburg City ace-Political S	ubdivision)	
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Docket	t Number:	(A) 1 1 1 1	Filed: 5/20 /	C 396	N/LiveScan N	lumber		Comp IFS2	laint/Incident N I 0061	umber
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Defendant Name:	First:		Middle:	1 1	Last: KERDI		
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Docket Number: 0 20 2	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	MOHAMED		KERDI

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



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ead? Offens	se# Section		Subsection_			Statute (Title)	Counts		Grade	NCIC Offer	nse Code	UCR/NIBRS Code
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061		
Defendant Name:	First: MOHAMED	Middle:	Last: KERDI		
2. I ask that a warra	nt of arrest or a s	ummons be issued and that the defen	dant be required to answer the charges I have		

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.) (Year) (Date) 12-6-22 I certify that the complaint has been properly completed and verified. AND NOW, on this date An affidavit of probable cause must be completed before a warrant can be issued.



Docket Number:

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OTN/LiveScan Number

IFS210061

First:

Middle:

MoHAMED

Defendant Name:

MoHAMED

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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Defendant Name:	MOHAMED			KER	DI

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

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

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

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

Sworn to me and subscribed before me this

12/(22) Date

My commission expires first Monday of January,

(Signature of Affiant)

n Be

Magisterial District Judge

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2014

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. 50 Canal Street RODRIGUEZ YMMIL Address: Last Name Middle Name Ge First Name Royalton, PA 17057 4345 Potter Street Philadelphia, PA 19124 Telephone: (717)944-4463 NCIC Extradition Code Type ☐ 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States 1-Felony Full □ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Docket Number **Date Filed Complaint Number Incident Number** OTN/LiveScan Number Services? ☐ YES ⊠ NO 21512632 IFS210061 Co-Defendant(s) GENDER ров 11/17/1961 Add'l DOB Last Name Gen. Middle Name Male Male First Name ☐ Female **AKA** Unknown ☐ White Native American RACE Asian ☐ Black M Hispanic ☐ Non-Hispanic ETHNICITY Unknown BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair PNK (Pink) XXX (Unk./Bald) GRN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLK (Black) BLU (Blue) BRO (Brown) Eye PNK (Pink) XXX (Unknown) Color HAZ (Hazel) MAR (Maroon) MUL (Multicolored) WEIGHT (lbs.) **DNA Location** DNA ☐ YES **FBI Number MNU Number** OLN 24262513 185 625060VA9 Ft. HEIGHT In. ☐ YES ☐ NO **Defendant Fingerprinted** Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Comm'l Veh. State Haz Registration Ind. same mat Plate # Sticker (MM/YY) as Def. Style Make Model VIN Year П Office of the attorney for the Commonwealth Approved Disapproved because: DISTRICT COURT 12-2-03 (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar (Signature of the attorney for the Commonwealth) 12/05/2022 CDAG ROBERT LABAR (Name of the attorney for the Commonwealth) (Date) 737643 / BDG # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) Harrisburg City on or about 2018 - PRESENT [22] in DAUPHIN County (County Code)



CR-432-3032	Date Filed:	OTN/LiveScar	i Nulliber	Complaint/Incident	Number
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Defendant Name:	JIMMY	Wildale.	1 '	RODRIGUEZ-COSME	1
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The acts committed by When there is more that				y or statute allegedly vio	nated, if appropriate.
(Set forth a brief summary of	the facts sufficient to adv	vise the defendant of the na	ature of the offense(s	charged. A citation to the sta	tute(s) allegedly violated,
without more, is not sufficient. The age of the victim at the ti	nt. In a summary case, you ime of the offense may be	u must cite the specific sec included if known. In addi	tion(s) and subsection tion.	on(s) of the statute(s) or ordination	ince(s) allegedly violated. tion (e.g. PINs) should not
be listed. If the identity of an	account must be establis	hed, list only the last four	digits. 204 PA.Code §	§ 213.1 213.7.)	
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concerning a fact or thing ma	aterial to the insurance da	aim; to wit: the defendant o	did make materially fa	lse, incomplete, or misleading	statements or did cause
Such statements to be made	in support or an insurance	e daini.			
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Docket Number: OR 417 7032	Date Filed: / 2/5/3032	OTN/LiveScan Number	Complaint/Incident Number		
Defendant Name:	First: JIMMY	Middle:	Last: RODRIGUEZ-COSME		
2 Lask that a warra	int of arrest or a sumi	mons he issued and that the defen	dant be required to answer the charges I have		

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

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

AND NOW, on this date

December 6, 3033 I certify that the complaint has been properly completed and verified.

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

(Magisterial District Court Number)

(Date)

(Issuing Authority)

Docket Number: Date Filed: OTN/LiveScan Number | Complaint/Incident Number | IFS210061 | IFSt: | JIMMY | Complaint/Incident Number | IFS210061 | Last: | RODRIGUEZ-COSME

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:
CR-411-313-3
Defendant Name:
Date Filed:
Date Filed:
DotN/LiveScan Number
R 396770-3
IFS210061
Last:
RODRIGUEZ-COSME

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

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

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

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

Sworn to me and subscribed before me this

/ 3/4/3037 Date

My commission expires first Monday of January

(Signature of Affiant)

, Magisterial District Judge

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): 50 Canal Street **ENGELKE** JESSICA Address: Last Name Ge First Name Middle Name Royalton, PA 17057 321 Washington Avenue, Apt 2 Souderton, PA 18964 Telephone: (717)944-4463 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition □ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Complaint Number Incident Number** OTN/LiveScan Number Døcket Number Services? ☐ YES **⊠** NO IFS210061 Co-Defendant(s) **GENDER** ров 02/08/1968 POB Add'I DOB Last Name Gen. Male Male First Name Middle Name WILCOX ☐ Female **JESSICA** White Native American Unknown RACE Asian Black ETHNICITY ☐ Non-Hispanic Unknown ☐ Hispanic BRO (Brown) GRY (Grav) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA □ NO **DNA Location** ☐ YES **FBI Number MNU Number** OLN 21558370 Ft. HEIGHT In. ☐ YES ☐ NO **Defendant Fingerprinted** Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** Oth. NCIC Veh. Code School Veh. Reg. Comm'l Veh. State Haz Registration same Ind. mat Plate # Sticker (MM/YY) as Def. Color Style Model VIN Year Make Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar (Signature of the attorney for the Commonwealth) CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Date) 737643 / BDG # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(Subdivision Code)

on or about 2018 - PRESENT

in DAUPHIN County

[22]

(County Code)



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withou	t more, is n	ot sufficient. In	a summary case	. vou must cite the	specific section	(s) and subsection	on(s) of the s	tatute(s) or ordinar	nce(s) allegedly violated.
The ag	e of the vic	tim at the time o	of the offense ma	y be included if kr	nown. In addition	, social security r	numbers and	l financial informati	ion (e.g. PINs) should not
be liste	ea. It the ide	entity of an acco	ount must be esta	ablished, list only	tne last four digit	s. 204 PA.COGE §	9 213.1 – 21.	o.r.j	
APPENDICTE		A44 4				٦			011
Inche Offer	建筑的的特别	Attempt 18 901 A	☐ Solicita 18 902		onspiracy 3 903		Number o	f Victims Age 60 o	or Older
Unel			10 302				L		
\boxtimes	01	5111	(a)(1)	of the	18	1	F1		
Lead?	Offense	Section	Subsec	Expression and Administration	PA Statute (Titl	gat Alina I an Nyeono Vilena	Grade	NCIC Offense	UCR/NIBRS Code
	#		Supsec	ni Oli	- A Statute (111		T	Code	T
	nnDOT D applicab	TOO OF THE RESERVE AND COLD	ent Number			☐ Interstate] Safety Zone	☐ Work Zone
			the name of	etatute or ordi	nance). DEAL	ING IN PROCEE	DS OF HIN	AWFUL ACTIVITY	Y
Sidill	19 DG2011	paon (moidde	- ale name of	SIGILIE OF ORGI	Harios). DEAL	IIIG III FROCEE	DO OF WILL	atti wa nciatal	•
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Acts	of the acc	cused associ	ated with this	Offense: A pers	son commits a fe	lony of the first de	egree if the	person conducts a 1	financial transaction with
knowle	dge that th	e property invol	ved, including st	olen or i <u>ll</u> egally ob	tained property,	represents the pr	oceeds of ur	lawful activity, the	person acts with the
intent	to promote	the carrying on	of the unlawful a	activity. To wit: the	e defendant repe	atedly engaged ir	n financial tr	ansactions with kno	wledge that the property
involve	a represen	tea tne proceed:	s or unlawful acti	ivity with the inten	it to promote the	carrying on or sa	iiu uniawtul i	activity.	
TO SERVICE AND THE						¬	<u> </u>		
Inch		Attempt	☐ Solicit		onspiracy 8 903		Number o	of Victims Age 60	or Older
Offe	ise.	18 901 A	18 902	A 78	903		<u></u>		
	Section 1	471	ergy in this section	of the	75	2	M1		
1 1	ነ በጋ	7121			73				
Ш	02	7121				<u> </u>	145 <u>987 is Adverte</u>	NCIC Offense	LICE/NIBBS Code
Lead?	Offense#	Section	Subsec		PA Statute (Tit	<u> </u>	Grade	NCIC Offense Code	UCR/NIBRS Code
Lead?	Offense#	Section	and the second second		PA Statute (Tit	<u> </u>	Grade		UCR/NIBRS Code
Lead?	Offense# nnDOT E applicab	Section Accid	lent Number	ction		le) Counts	Grade	Code Safety Zone	☐ Work Zone
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Lead? Per (it of the control of the certific o	Offense# InnDOT E I applicate the Description of the accordance of title cate of title	Section ata Acciding	e the name of stated with this erial false statem tion, to wit: the of the statem of t	f statute or ord GOffense: A persent, or fails to disdefendant made a defendant made a def	inance): FALSI son is guility of a close a security ir material false st Conspiracy 18 903 75 PA Statute (1) inance): ALTE son is guilty of a lent or release of	Interstate E APPLICATION misdemeanor of nterest, or conceatement and/or or number of nterest. I Title) Counts Interstate RED, FORGED, or nisdemeanor of a security interest.	the first degals any other oncealed and Grade M1 Grade Per of Victim M1 Grade OR COUNTI	Safety Zone IFICATE OF TITL Tree if the person us material fact in an y other material fact IFICATE OF TITL TREE if the person us material fact in an y other material fact in an y other material fact IFICATE OF TITL TREE if the person us material fact in an y other material f	Work Zone E OR REGISTRATION ses a false or ficticious application for a trin an application for a driving application fo
Lead? Per (it Status Acts name certific	Offense# InnDOT E I applicate the Descr of the ac or address tate of title tate of ti	Section ata Acciding	e the name of stated with this erial false statem tion, to wit: the of the statem of t	f statute or ord GOffense: A persent, or fails to disdefendant made a defendant made a def	inance): FALSI son is guility of a close a security ir material false st Conspiracy 18 903 75 PA Statute (1) inance): ALTE son is guilty of a lent or release of	Interstate E APPLICATION misdemeanor of nterest, or conceatement and/or or number of nterest. I Title) Counts Interstate RED, FORGED, or nisdemeanor of a security interest.	the first degals any other oncealed and Grade M1 Grade Per of Victim M1 Grade OR COUNTI	Safety Zone IFICATE OF TITL Tree if the person us material fact in an y other material fact IFICATE OF TITL TREE if the person us material fact in an y other material fact in an y other material fact IFICATE OF TITL TREE if the person us material fact in an y other material f	Work Zone E OR REGISTRATION ses a false or ficticious application for a at in an application for a The work Zone Work Zone with fraudulent intent, other document issued or



Docket	Number:	22 Date 12/3	Filed: R 3	OTN/LiveScan	Number	E 12	Complaint/Incident Number IFS210061		
Defaces	ant Name:	First:		Middle:		Last:			
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		· · · · · · · · · · · · · · · · · · ·							
lincho Offer	Section of the second	tempt 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nun	nber of Vict	tims Age 60 or Older		
Lead?	04 4	4904 Section	(b) Subsection	of the \pm 18	1 (Title) Coun	M3 ts Gra	de NCIC Offense Code	UCR/NIBRS Code	
(if	mDOT Data applicable):	/ Numbe	er. 50		☐ Interst		☐ Safety Zone	☐ Work Zone	
Statute	Description	n (include the	name of statute	or ordinance): UN	SWORN FALSI	FICATION	TO AUTHORITIES		
pursuant continuo	t to a form bea	aring notice, auth riminal conduct,	norized by law, to the in which he knowing	e effect that false state	ments made the ned (PA Dept. of	rein are pun Transporta	which he did not believe to laishable; To wit: the defendition (PennDOT)) forms there hable by law.	ant engaged in a	
i inche Offe	東京の中央の大学の大学の大学の大学	Attempt 8 901 A	Solicitation 18 902 A	Conspiracy 18 903	Nu	mber of Vi	ctims Age 60 or Older		
	05	4118		of the : 18	1	F3	A COMPANY OF THE PROPERTY OF T	UCR/NIBRS Code	
1000	Offense# nnDOT Data applicable)	COLUMN TO THE REAL PROPERTY.	CHROST CHAN	PA Statute	(Title) Cou		rade NCIC Offense Code Safety Zone	☐ Work Zone	
		according to the anomator in sector lack and design calls.	discensive a feating	or ordinance): wa	SHING VEHIC	LE TITLES			
knowled made ar	ge that the pe	erson is facilititing or a certificate of	g a deception to be p title for a motor veh	erpretated by anyone of the state of the sta	concerning the to terially false or fi	ue mileage cticious info	f, with the intent to deceive of a motor vehile, the person formation to wit: with intent materially false or ficticious in	on makes/causes to be to deceive anyone, the	
- Inche One		ttempt 3 901 A	☐ Solicitation 18 902 A	Conspiracy	Nui	nber of Vic	tims Age 60 or Older		
THE RESERVE OF THE PARTY OF THE	06	4911	(a)(1)	of the 18	1	F3			
Lead?	Offense#	Section Accide	Subsection	PA Statute	(Title) Cour	nts Gr	ade NCIC Offense Code	UCR/NIBRS Code	
(if	applicable)	Numb	er 📆		☐ Inters		☐ Safety Zone	☐ Work Zone	
Statute	e Descriptio	on (include the	e name of statute	e or ordinance): TA	MPERING WIT	'H PUBLIC	RECORDS OR INFORMA	TION	
record, informa	documents or	thing belonging	to, or received or ker	ot by, the government	for information of	or record, or	nake a false entry in, or fals r required by law to be kept ds, documents, or things be	by others for	



Aocket 2	Number:	Date 2	Filed:	3 OTN/LiveScan N	umber	Complaint/Incident Num IFS210061	nber	
Defendant Name:				Middle:		Last:		
		JESSI	ICA	L.	EN	GELKE		
						- M		
Inchea Offens		Attempt 18 901 A	Solicitation 18 902 A	⊠ Conspiracy 18 903	Number of	Victims Age 60 or Older		
Lead?	07 Offense#	5111 Section	(a)(1) Subsection	of the 18 PA Statute (Titl	1 F	1 NCIC Offense Code	UCR/NIBRS Code	
(if a	nDOT Da ipplicable	e) Numb	ier 🤚 ———		☐ Interstate	☐ Safety Zone	☐ Work Zone	
	Descript TES, ETC	ion (include the	e name of statute	or ordinance): CRIM	INAL CONSPIRACY	- DEALING IN PROCEEDS O	F UNLAWFUL	
following False App they or or did agree	crimes: De plication for ne or more with one o	aling in Proceeds Certificate of Title of them will enga or more individuals	of Unlawful Activity, Ve or Registration, and ge in conduct which on that one or more we	Vashing Vehicle Titles, De Unsworn Falsification to A constitutes such crime(s)	ceptive Business Prac authorities, did agree or an attempt or solici at constitutes the afo	acilitating the commission of or tices, Tampering with Public Re with such other person(s) and / tation to commit such crime(s); rementioned crime(s), or an att	cords or Information, or business(es) that to wit; the defendant	
Incho Offen	NAME OF TAXABLE PARTY.	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Number o	Number of Victims Age 60 or Older		
Lead?	08 Offense#	911 Section	(b)(1)	of the 18		F1 Grade NCIC Offense Code	UCR/NIBRS Code	
- Per	nnDOT Da applicab	ata . Acelo	dent 🐇		☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute	Descript	ion (include th	e name of statute	or ordinance): CORR	UPT ORGANIZATIO	DNS		
from a pa proceeds received proceeds	attern of ra of such ind income der to furhter	cketeering activity come, in the acqui ived, directly or in the opations of Ch	in which such persor isition of any interest idirectly, from a patte naro's Auto Sales.	n participated as a principa in, or the establishment o rn of racketeering activity	al, to use or invest, di r operation of, any en and used, directly or	received any income derived, d rectly or indirectly, any part of s terprise, to wit: the defendant of indirectly, any part of this incor	such income, or the engaged in and	
Incho:	A62"8F75\899995	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903				
Lead?	09 Offense#	911 Section	(b)(2) Subsection	of the 18 PA Statute (Tit		1 Grade NCIC Offense Code	UCR/NIBRS Code	
Pen	mDOT Da applicabl	ita Accid	ent =		☐ Interstate	☐ Safety Zone	☐ Work Zone	
			e name of statute	e or ordinance): CORF	RUPT ORGANIZATIO	DNS		
maintain	, directly or	Ised associate r indirectly, any int at in or control of a	terest in or control of	e: It shall be unlawful for any enterprise; to wit: the	r any person through e defendant through a	a pattern of racketeering activit a pattern of racketeering activity	y to acquire or v maintained, directly	

Docket Number: Date		Date File	Filed: OTN/LiveScan Number				Complaint/Incident Number		
Defendant Name: AFCCT				Middle:	Last:				
JESSI				L.		ENGELKE			
Inchoate Offense	☐ Attemp 18 901		Solicitation 18 902 A	☐ Conspiracy 18 903	Nun	nber of \	/ictims Age 60 or Older	-	
	was to provide the first of the same		「んつん」	of the 18	1	F		1 to Constitution of the last	
PempQ		Section Accident	Subsection	PA Statute	(Title) Coun		Grade NCIC Offense Code	UCR/NIBRS Code Work Zone	
(if appl Statute Des		Number lude the na	me of statute	or ordinance): co l			is —		
participate, dir and/or was as	ectly or indirectoriated with a	tly, in the con vehicle dealer	duct of such ente	rprise's affairs through ed the enterprise's aff	n a pattern of rack airs through a pa	keteering ttern of r	activity, to wit: the defendan	t was an operator	
Inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A	Conspiracy 18 903	Num	ber of V	ictims Age 60 or Older		
	911		(b)(4)	of the 18	1	F1			
PennDC	T Data	Section Accident	Subsection	PA Statute	(Title) Count		Grade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone	
	cable) cription (inc	Number clude the na	me of statute	or ordinance): co	RRUPT ORGANI	ZATION	NS		
Acts of the (2), or (3) of t (1), (2), and/o	his subsection.	To wit: the d	th this Offense efendant conspire efendant conspire Solicitation 18 902 A	E: It shall be unlawfuled with other individual	lls to engage in a	pattern o	e to violate any of the provisio of racketeering activity in viola Victims Age 60 or Older	ns of paragraphs (1), ition of subsections	
[242,255 Sel St. phrepharking their emphysical parts	38 Marie 1			of the					
Lead? O	fense# OT Data	Section	' Subsection	PA Statut			Grade NCIC Offense Cod		
(if app	icable)	Accident Number			☐ Inters	tate	☐ Safety Zone	☐ Work Zone	
Statute De	scription (in	clude the na	ame of statute	or ordinance):					
Acts of the	accused as	sociated w	th this Offens	e:					



Docket Number:	Date Filed:	OTN/LiveScan Nur	nber Complaint/Incident Number
C1428-22	1215122	R376827-4	IFS210061
	First:	Middle:	Last:
Defendant Name:	JESSICA	L.	ENGELKE

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

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

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date

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

(Magisterial District Court Number)

(Issuing Authority)

SEAL



AFFIDAVIT of PROBABLE CAUSE

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

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

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

			I OLIOL ORGANITATE GOIN EXCITE	
Decket Number:	Date Filed:	OTN/LiveScan	Number Complaint/Incident Number	
W 428-00	12500	K35 4827	· 4 IFS210061	<u> </u>
	First:	Middle:	Last:	
Perengam Name:	JESSICA	L.	ENGELKE	

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

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

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

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

day of

Sworn to me and subscribed before me this

Date _____

My commission expires first Monday of January,

(Signature of Affiant)

ember

, Magisterial District Judge

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COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: DAUPHIN VS. Magisterial District Number: 12-2-03 (NAME and ADDRESS): DEFENDANT: MDJ: Hon. DAVID H. JUDY, Esq. COLLADO 50 Canal Street Address: **EDGAR** Ge First Name Middle Name Last Name Royalton, PA 17057 4601 Flatrock Road, Unit 604 Philadelphia, PA 19127 Telephone: (717)944-4463 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States X 1-Felony Full 5-Felony Pending Extradition ☐ Distance: □ D-Misdemeanor No Extradition 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ E-Misdemeanor Pending Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT DENTIFICATION INFORMATION Request Lab **Incident Number Complaint Number Docket Number** OTN/LiveScan Number Services? R4114. ☐ YES **⊠** NO 121512628 IFS210061 Co-Defendant(s) **GENDER** ров 02/04/1997 Add'I DOB Gen. Last Name First Name Middle Name Male ☐ Female AKA Unknown RACE White Black Native American ☐ Asian Unknown **ETHNICITY** Mispanic Hispanic Non-Hispanic BRO (Brown) ☐ PLE (Purple) BLU (Blue) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) Hair PNK (Pink) GRN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLU (Blue) BRO (Brown) BLK (Black) Eve XXX (Unknown) HAZ (Hazel) MAR (Maroon) PNK (Pink) Color MUL (Multicolored) WEIGHT (lbs.) **DNA Location** DNA ☐ YES ☐ NO FBI Number MNU Number OLN 31330322 Ft. HEIGHT in. ☐ YES ☐ NO Defendant Fingerprinted 5 10 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Reg. Registration Comm'l Veh. State Haz same s Def. Ind. Г mat Plate # Sticker (MM/YY) Make Model Style Color VIN Year n#C 0 5 20 Office of the attorney for the Commonwealth 🛛 Approved 🖂 Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint affidavit is a complaint of the to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643 / BDG # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above. ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code) on or about 2018 - PRESENT in DAUPHIN County [22] (County Code)



Docket Number: CR-474-1622	Date Filed: 1みらねねる	OTN/LiveScan No	<i>3-</i> /	Complaint/Incident N IFS210061	umber
Defendant Name:	First: EDGAR	₩iddle:	La	st: DLLADO	
上海	LDGAR			DELFADO	
When there is more that (Set forth a brief summary of without more, is not sufficier. The age of the victim at the time.	the accused are described n one offense, each offen the facts sufficient to advise the f. In a summary case, you must me of the offense may be include account must be established, lie	se should be numbe defendant of the nature cite the specific section led if known. In addition,	ered chronologi e of the offense(s) c (s) and subsection(, social security nur	Cally. harged. A citation to the statu s) of the statute(s) or ordinand mbers and financial informatio	te(s) allegedly violated, ce(s) allegedly violated.
Inchoate	☐ Solicitation 18 902 A	Conspiracy 18 903	ı	Number of Victims Age 60 or	Older
□ 01 4117	(a)(2) ef	he: 18	1	F3	
#	ction Subsection	PA Statute (Title	e) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	scaldent Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
	lude the name of statute	or ordinance): INSU	RANCE FRAUD		
concerning a fact or thing ma	tement forming a part of, or in s sterial to the insurance claim; to in support of an insurance claim	wit: the defendant did n	nake materially falso	e, incomplete, or misleading st	atements or did cause
Inchoate	Solicitation 18 902 A	Conspiracy		Number of Victims Age 60 o	r Older
□ 02 4117	(AVA)	the 18 PA Statute (Title	3 17.58. <u> 11.03.176. 20.1. 3</u>	Grade NCIC Offense	UCR/NIBRS Code
PennDOT Data	ection Subsection	PA Statute (110		Code	☐ Work Zone
(if applicable)	Accident Number Clude the name of statute	an andinanca): Tregre	☐ Interstate	☐ Safety Zone	☐ Walk Zoile
conspires with another to pre claim that contains any false or supports an amount claim	sociated with this Offense epare or make any statement the incomplete or misleading informed in excess of the actual loss sment(s) intended to be presented sleading information.	at is intended to be pres mation concerning any fa ustained by the claimant	ented to any insure act or thing material to wit: the defenda	r or self-insured in connection I to the claim, including inform ant did knowingly and with the	with, or in support of, a ation which documents intent to defraud an
Inchoate		Conspiracy 18 903	Number	of Victims Age 60 or Older	
	Telegraph Tel	of the			l Handings and
Lead? Offense# PennDOT Data	Section Subsection Accident Number	PA Statute (T	itle) Counts Interstate	Grade NCIC Offense C	UCR/NIBRS Code Work Zone
(if applicable) Statute Description (inc	clude the name of statute	or ordinance):			
Acts of the accused as	sociated with this Offense	:			



		4 5 mgs	, · · · · · · · · · · · · · · · · · · ·
Docket Number: (R-434-4022)	Date Filed: 12/5/3022	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	EDGAR		COLLADO

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

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

(Date)

AND NOW, on this date

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

(Magisterial District Court Number)

(Year)

(Signature of Affiant)



Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number IFS210061

| Defendant Name: EDGAR | COLLADO | Complaint/Incident Number | Complaint/Incident Number | IFS210061 | Last: COLLADO

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:	Date Filed: 12/5/ 4042	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	EDGAR		COLLADO

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

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

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

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

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

4 200

, Magisterial District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. 50 Canal Street NORA D. RODRIGUEZ Address: Last Name Ge First Name Middle Name Royalton, PA 17057 4345 Potter Street Philadelphia, PA 19124 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full ☐ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition ☐ Distance: □ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION 1.14 Request Lab OTN/LiveScan Number **Complaint Number Incident Number Date Filed Docket Number** Services? ☐ YES 🖾 NO FS210061 GENDER Co-Defendant(s) ров 03/10/1972 Add'l DOB First Name Middle Name Last Name Gen. ☐ Male **AKA** RACE Unknown White Asian Black Native American M Hispanic ETHNICITY ☐ Non-Hispanic Unknown BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair XXX (Unk./Bald) GRN (Green) PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) Color BLN (Blonde / Strawberry) GRN (Green) GRY (Gray) BLK (Black) ☐ BLU (Blue) BRO (Brown) Eye HAZ (Hazel) MAR (Maroon) PNK (Pink) Color XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA ☐ YES ☐ NO **DNA Location FBI Number MNU Number** OLN 28872122 **Defendant Fingerprinted** Ft. HEIGHT In. ☐ YES ☐ NO 5 4 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** Oth. NCIC Veh. Code School Veh. Reg. Comm'l Veh. State Haz Registration same Ind. Plate # mat Sticker (MM/YY) s lef. Model Style VIN Make Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth may require that the complaint arrest warrant affidavit, or both be approved by the attorney for the complaint are to filing. See Pa.R.Crim.P. 507). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643 / BDG # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) (Subdivision Code) on or about 2018 - PRESENT in DAUPHIN County [22] (County Code)



CR-4/9					The second secon		A Recommendation of the contract of the contra
	-2022 1	ate Filed: 215 18082	OTN/LiveScan N R 396740	umber		plaint/Incident N !10061	lumber
Defendant Nar	Fire		Middle:		Last:		
	NC)RA	D		RODRIGU	<u>در</u>	·
Vhen there is Set forth a <i>brief</i> : rithout more, is in he age of the viden	more than or summary of the f not sufficient. In a ctim at the time o	ne offense, each of acts sufficient to adviso a summary case, you m f the offense may be in	ibed below with each a fense should be number the name of the nature of the nature of the specific section of the section of t	pered chronologe re of the offense(s n(s) and subsection, social security (ogically. b) charged. A con(s) of the stoumbers and	citation to the statu atute(s) or ordinan financial informatio	rte(s) allegedly violated, ce(s) allegedly violated.
nchoate Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 o	r Older
⊠ 01	4117	(a)(2)	of the 18	1	F3		
ead? Offense	Section	Subsection	PA Statute (Ti	tie) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT L	Barrier A A COLOR	ent Number		☐ Interstate		Safety Zone	☐ Work Zone
		the name of statu	te or ordinance): INSU	RANCE FRAUD			
	Attempt	☐ Solicitation	☐ Conspiracy	7	Number of	Victims Age 60 o	r Older
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Docket Number:	Date Filed: 0 12/5/3032 R	TN/LiveScan Number 396740-1	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	NORA	D.	RODRIGUEZ

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

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

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

(Date)

(Year)

(Signature of Affiant)

AND NOW, on this date

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

(Magisterial District Court Number)



Docket Number: CR - 414-3632	Date Filed: 0	TN/LiveScan Number	Complaint/incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	NORA	D.	RODRIGUEZ

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number: CR-4/9-3032	Date Filed: 12/5/3028	OTN/LiveScan Number	Complaint/Incident Number IFS210061				
	First:	Middle:	Last:				
Defendant Name:	NORA	D.	RODRIGUEZ				

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

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

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

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

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

, Magisterial District Judge

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. DEFENDANT: (NAME and ADDRESS): **ALKURDI** Address: 50 Canal Street **MOHAMMAD** Last Name Ge First Name Middle Name Royalton, PA 17057 1000 Irvin Road Huntingdon Valley, PA 19006 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: □ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States A-Misdemeanor Fuli 4-Felony No Extradition B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO HCIDD IFS210061 Co-Defendant(s) **GENDER** ров 01/10/1962 POB Add'I DOB Last Name Gen. First Name Middle Name ☐ Female AKA RACE White ■ Asian 🗌 Black ☐ Native American Unknown ETHNICITY ☐ Hispanic Unknown ☐ Non-Hispanic BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) PLE (Purple) BLU (Blue) Hair BLK (Black) ONG (Orange) GRN (Green) PNK (Pink) ☐ WHI (White) XXX (Unk./Bald) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) ☐ MUL (Multicolored) WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO FBI Number **MNU** Number OLN 23765999 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh. Code Reg. State Registration Comm'i Veh. Haz Ind. same Plate # mat Sticker (MM/YY) as Def. Style Color VIN Make Model Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. X I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) in DAUPHIN County on or about 2018 - PRESENT [22] (County Code)



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appropria (Set forth a violated, with	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												
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	5 911		(B)(4)	of the 18		1	F	1					
	ffense#	Section Accident	Subsection	PA	Statute (Title)	Count		Grade	NCIC Offer		UCR/NIBRS Code		
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(1), (2), or	ne accused a (3) of this subs s (1), (2), and/o	section. To wit:	vith this Offe the defendant	ense: It shall b conspired with	oe unlawful fo other individ	or any pers duals to eng	on to c gage in	onspire t a patter	to violate any on of racketee	of the provis	ions of paragraphs in violation of		



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Docket Nuraber:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number 8イン IFS210061
	First:	Middle:	Last:
Defendant Name:	MOHAMMAD		ALKURDI

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

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

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

issuing authority, and a		\sim
		SMIRN
(Date)	(Year)	(Signature of Affiant)
AND NOW, on this date	12-6-22	I certify that the complaint has been properly completed and verified.
An affidavit of probable caus	se must be completed before	e a warrant can be issued.
(Magisterial District Court N	umber)	(Issuing Authority)
		A William Committee of the Committee of



Decket Number:

Other Field:

Date Filed:

Defendant Name:

Defendant Name

AFFIDAVIT of PROBABLE CAUSE

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

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

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



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Bocket Number:	, Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
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	First:	Middle:	Last:
Defendant Name:	MOHAMMAD		ALKURDI

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

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

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

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

day of

Sworn to me and subscribed before me this

12/12/2

My commission expires first Monday of January

(Signature of Affiant)

4

, Magisterial District Judge

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. DEFENDANT: SALDIVAR Address: 50 Canal Street EDWARD Last Name Ge Middle Name First Name Royalton, PA 17057 2730 Stevens Street Philadelphia, PA 19149 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full ☐ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition ☐ Distance: ☐ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO Ω ISI $\partial \lambda$ IFS210061 Co-Defendant(s) GENDER DOB 04/30/1978 Add'I DOB Last Name Gen. First Name Middle Name Male ☐ Female AKA RACE ☐ White Asian Black Native American Unknown X Hispanic Unknown **ETHNICITY** ☐ Non-Hispanic BRO (Brown) ☐ PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair GRN (Green) PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Baid) Color BLN (Blonde / Strawberry) GRY (Gray) BRO (Brown) GRN (Green) BLK (Black) BLU (Blue) Eye Color THAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) **DNA Location** DNA ☐ YES ☐ NO FBI Number 195 576237FE4 **MNU Number** OLN 25867069 Ft. HEIGHT In. ☐ YES ☐ NO **Defendant Fingerprinted** 8 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration School Veh. Oth. NCIC Veh. Code Reg. State Comm'l Veh. Haz Ind. same П Plate# Sticker (MM/YY) as Def. Style Color Make Model Year VIN Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above. ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

in DAUPHIN County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[22]

Harrisburg City
(Place-Political Subdivision)

(Subdivision Code)

on or about 2018 - PRESENT



Docket	Number:		Filed:	R 391	N/LiveScan - 7つ3 -				mplaint/Incident S210061	Number	
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Table of the Control of the	mDOT Data applicable)	Accident N	lumber			☐ int	erstate		☐ Safety Zone		Work Zone
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Inch Offe	選挙事の動物を表現している。	tempt 901 A	☐ Solicitat 18 902 A		Conspiracy 18 903		Numbe	er of Victin	ns Age 60 or Olde	r	_
	03 Offense#	4117	(a)(2)	Supplement demonstratives	18 PA Statute	(Title)	1 Counts	F3 Grade	NCIC Offense	Code	JCR/NIBRS Code
ALTERNATION OF	ennDOT Data f applicable)	Section Accid Numi		<u></u>	PA Statute		Interstate		☐ Safety Zone		Work Zone
	e Description	(include the	e name of st	atute or ord	linance): IN	SURANCE	FRAUD				
present concerr	ed to an insurer	a statement fo ng material to t	rming a part of the insurance o	f, or in support laim; to wit: th	t of, an insurar	ice claim th	at contair	ned false, ii	efraud an insurer,di ncompleted or misl plete, or misleading	eading infor	mation



Docket Number:	Date Filed:	OTN/LiveScan I	Number	Complaint/Incident Nu IFS210061	mber			
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Defendant Name:	EDWARD		SAL	.DIVAR				
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PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone			
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conspires with another to pre claim that contains any false, or supports an amount claim	pare or make any statemen incomplete or misleading ir ed in excess of the actual lo tement(s) intended to be pr	t that is intended to be pre iformation concerning any t ss sustained by the claiman	sented to any insurer o fact or thing material to It to wit: the defendant	y insurer or self-insured, assist r self-insured in connection wi the claim, including informati did knowingly and with the in support of an insurance clain	th, or in support of, a on which documents tent to defraud			
Inchoate		☐ Conspiracy 18 903	Number of	Victims Age 60 or Older _				
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Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Title) Counts Interstate	☐ Safety Zone	☐ Work Zone			
(if applicable) Statute Description (inc	Number ———	ite or ordinance): TNSI						
other person file an application	on for insurance containing a It knowingly and with intent	any false information or cor to defraud an insurance co	nceal for the purpose of	to defraud any insurance com f misleading information conce tion for insurance containing f	erning any fact material			
	Callalettan	Commission						
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PennDOT Data	Section Subsection Accident	PA Statute (1	☐ Interstate	☐ Safety Zone	☐ Work Zone			
(if applicable) Statute Description (inc	Number ——— clude the name of statu	ite or ordinance): THE	FT BY DECEPTION	-				
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deception, created or reinfo	rced a false impression, incl nted false, incomplete or mi	uding false impressions as t sleading information mater	to law, value, intention ial to MV 426B title app	ntent to obtain or withhold pro or other state of mind; to wit: lication(s) for out-of-state ver umentation submitted to Penr	the defendant did nicles that were never			

Docket Number:	Date Filed:	R3967)3-8	n Number	Complaint/Incident Numb	er
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is facilitating a fraud o	r injury to be perpretated b to wit: the defendant, with	v anyone, the actor utters any v	vriting which he knows to ure anyone, and/or with k	defraud or injure anyone, or with be forged in a manner specified mowledge that he is facilitating an (2) of this section.	in paragraphs (1) or
	ttempt	1	Number of	Victims Age 60 or Older	
10 10 10 10 to	7121	of the 75		Grade NCIC Offense Code	UCR/NIBRS Code
Lead? Offense# PennDOT Data	Accident	ection PA Statute	☐ Interstate	☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description	on (include the name of	f statute or ordinance): FA	LISE APPLICATION FO	R CERTIFICATE OF TITLE OR	REGISTRATION
name or address or m	akes a material false stater	ent, or fails to disclose a securi	tv interest, or conceals ar	irst degree if the person uses a f ny other material fact in an applic aled any other material fact in an	ation for a
	Attempt ☐ Soli 18 901 A 18 9	Citation Conspiracy 18 903	Number o	f Victims Age 60 or Older	
O9 Lead? Offense#	7122 (3	of the 75 bsection PA Statu	그 왕도 보다는 생생님들이 가고 없어요 느꼈다.	M1 Grade NCIC Offense Code	UCR/NIBRS Code
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Statute Description	on (include the name	of statute or ordinance): A	LTERED, FORGED, OR (COUNTERFEIT DOCUMENTS	
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THE RESERVE TO SERVE THE PARTY OF THE PARTY	ollens In DOT I applica	Data :	ction Accident :: Number ::		PA Statute	T	Interstate	1	Safety Zone	☐ Work Zone
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Defendant Nar	ne F	DWARD					SALDI	VAR		
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										
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maintain, directly	Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a car dealership.									
Inchoate [Offense	Attempt 18 901 A	☐ Solicitation 18 902 A	on	☐ Conspire 18 903	acy		Numb	per of Victims	s Age 60 o	or Older
□ 14	911	(B)(3)	of the 18		1	F:	1			
Lead? Offenser		Subsection	PA S	tatute (Title)	Counts		Grade	NCIC Offense	Code	UCR/NIBRS Code
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Acts of the ac	cused associate	ed with this Offen In the conduct of such In a vehicle dealership	se: It shall be enterprise's aff	unlawful for a	any perso a pattern	n empl	loyed by or keteering a	ctivity, to wit:	: the defen	idant was an
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Lead? Offense		Subsection	PA S	Statute (Title)	Counts		Grade	NCIC Offense	Code	UCR/NIBRS Code
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		he name of statu	te or ordinan	ice): CORRU	PT ORGA	NIZAT.	IONS			
Acts of the ac (1), (2), or (3) or subsections (1),	f this subsection. To	ed with this Offer wit: the defendant o	ISE: It shall be conspired with o	unlawful for other individu	any perso als to eng	n to co	onspire to v a pattern o	violate any of of racketeering	the provisi g activity i	ions of paragraphs n violation of



				🎉 POL	ICE CRIMINAL COMPLAINT
Docket Number:	Date Filed:	R 39	TN/LiveScan Number		Complaint/Incident Number IFS210061
Defendant Name:	First: EDWARD		Middle:	Last SAL	: DIVAR
I ask that a warra made.	nt of arrest or a s	summons be i	ssued and that the de	fendant be	e required to answer the charges I have
 I verify that the father belief. This verification to unsworn falsification. 	cation is made su	ubject to the p	re true and correct to enalties of Section 49	the best o 04 of the C	f my knowledge or information and Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	onsists of the pre	ceding page(s	s) numbered $\underline{1}$ through	ı <u> </u> .	
I certify that this f System of Pennsy information and de	/Ivania that requi	th the provision re filing confid	ns of the <i>Case Record</i> ential information and	ds Public A document	Access Policy of the Unified Judicial ts differently that non-confidential

issuing authority, and attached.) (Year) (Date) I certify that the complaint has been properly completed and verified. AND NOW, on this date An affidavit of probable cause must be completed before a warrant can be issued 12-203 (Magisterial District Court Number)

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the

of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.



Docket Number:

Of U/23-3-3

Defendant Name:

Date Filed:

OTN/LiveScan Number

Docket Number:

Date Filed:

OTN/LiveScan Number

IFS210061

SALDIVAR

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:	Date Filed:	OTN/LiveScan No	umber Complaint/Incident Number
C/423.22	1215122	R376773-6	> IFS210061
	First:	Middle:	Last:
Defendant Name:	EDWARD		SALDIVAR

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

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

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

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

day of

Sworn to me and subscribed before me this

My commission expires first Monday of January

(Signature of Affiant)

, Magisteri**al District Judge**

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. Address: 50 Canal Street ADFI ATDA **MIRELIS MENDOZA** Last Name Ge First Name Middle Name Royalton, PA 17057 2816 N 11th Street Philadelphia, PA 19133 Telephone: (717)944-4463 NGIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Incident Number **Date Filed Complaint Number Docket Number** OTN/LiveScan Number Services? ☐YES ☐ NO 7 クーファー 25172 IFS210061 **GENDER** Co-Defendant(s) ров 08/19/1972 Add'I DOB Gen. ☐ Male First Name Middle Name Last Name **GARCIA** AKA **ADELAIDA** Unknown RACE ☐ White Asian ☐ Black Native American ETHNICITY X Hispanic Non-Hispanic Unknown SDY (Sandy) BRO (Brown) GRY (Gray) BLU (Blue) PLE (Purple) RED (Red/Aubn.) Hair PNK (Pink) BLK (Black) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) ONG (Orange) Color □ BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye THAZ (Hazel) MAR (Margon) PNK (Pink) Color MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO FBI Number **MNU Number** 794897FB0 OLN 26852517 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES 5 3 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth. NCIC Veh. Code Comm'i Veh. School Veh. Reg. State Haz Registration same Ind. mat Plate # Sticker (MM/YY) as Def. Model Style Color VIN Year Make (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. M I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

in DAUPHIN County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[22]

Harrisburg City
(Place-Political Subdivision)

(Subdivision Code)

on or about 2018 - PRESENT



ocket Numb						
December 1988		Date Filed:	OTN/LiveScan N 394803		Complaint/Inciden	t Number
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	AL AL	DELAIDA	MIRELIS		MENDOZA	
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Docket N	umber: 1	Date Filed: R	OTN/LiveScan No	ımber	Complaint/Incident Nu IFS210061	mber
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Docket Number:	ocket Nymber: Date Filed: OTN/LiveScan			Number Complaint/Incident Number IFS210061			
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Statute Description (incl	ude the name of	statute or ordina	ance): FORGERY				
Acts of the accused ass is facilitating a fraud or injury (2) of this subsection, to wit: forged in a manner specific in	to be perpretated by the defendant, with t	anyone, the actor under the intent to defraud	tters any writing whi	ich he knows to	be forged in	a manner specified i	n paragraphs (1) or
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Docket Numb		e Filed: (3 2)	316203-1	lumber		mplaint/Incident Nu S210061	mber
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Inchoate Offense	Attempt 18 901 A	Solicitation	Conspiracy	Num	ber of Victi	ms Age 60 or Older	
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Statute Descri	ption (include the	name of statute of	or ordinance): corr i	UPT ORGANIZA	TIONS		
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Deleii	ioanicina Ti		ADELAIDA	M	IRELIS		M	ENDOZA		
The a	acts cor	nmitted by the	accused are descr	ibed below wi	th each A	ct of Asser	mbly or	r statute alleg	edly viol	ated, if
appro	priate.	When there is	more than one offe	ense, each off	ense shou	uld be num	bered	chronological	lly.	
(Set fo violate	rth a <i>brie</i> d. withou	of summary of the f out more, is not suff	acts sufficient to advis- icient. In a summary ca	e the defendant o se. vou must cite	of the nature the specific	of the offens section(s) a	se(s) cha ind subs	rged. A citation t ection(s) of the s	to the statu statute(s) o	ite(s) allegedly ir ordinance(s)
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			control of a car dealers						<u></u>	•
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	vale		│	ion	☐ Conspir	асу		Number of Victi	me Ana Ai	n or Oider
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Docket Number: W 426-27	Date Filed:	R 39	TN/LiveScan Number		Complaint/Incident Number IFS210061
"我们是是我们的现在分词	First:		Middle:	Last:	
Defendant Name:	ADELAIDA		MIRELIS	MEN	NDOZA

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

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

			HO KIND
(Date)	(Year)		(Signature of Affiant)
AND NOW, on this date	12-6-22	I certify that the complaint has	been properly completed and verified
An affidavit of probable cause	must be completed before a warr	ant can be issued.	45 : 45 13 45 ## # 2 y .
/2-203 (Magisterial District Court Num	į,	Authority)	SEAL



| Defendant Name: | Description | Descriptio

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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Docket Number:	Date Filed:		an Number	Complaint/incident Number
11-42600	1215122	K. 346803-	(IFS210061
	First:	Middle:		Last:
Defendant Name:	ADELAIDA	MIRELI	S	MENDOZA

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

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

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

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

Sworn to me and subscribed before me this

)//2 \ Date

My commission expires first Monday of January,

(Signature of Affiant)

. Magisterial District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon, DAVID H. JUDY, Esa. (NAME and ADDRESS): **URENA-RECIO** Address: 50 Canal Street **ELIUD** First Name Middle Name Last Name Ge Royalton, PA 17057 1102 Longshore Avenue Philadelphia, PA 19111 Telephone: (717)944-4463 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT DENTIFICATION INFORMATION Request Lab **Incident Number Decket Number Date Filed** OTN/LiveScan Number **Complaint Number** Services? ☐ YES □ NO 5122 IFS210061 70 Co-Defendant(s) ров 06/16/1989 Add'I DOB POB Gen. Male Male First Name Middle Name Last Name ☐ Female ΔΚΔ RACE ☐ White Native American Unknown Black ☐ Asian ETHNICITY Mispanic Hispanic Unknown Non-Hispanic BRO (Brown) PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BRO (Brown) GRN (Green) BLU (Blue) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO FBI Number MNU Number OLN 31522837 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO 5 Fingerprint Classification: 1 DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh. Code Reg. State Registration Comm'l Veh. Haz Ind. same mat Plate # Sticker (MM/YY) as Def. Color Make Model Style VIN Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER 737643/BADGE # 736 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(Subdivision Code)

on or about 2018 - PRESENT

in DAUPHIN County

[22]

(County Code)



				450	POL	ICE CRIMINAL	
Docket Nur		Date Filed: 2/S/22 R	OTN/LiveSca	n Number		Complaint/Incident	Number
Defendant	FI	irst: LIUD	Middle:		Last: URE	NA-RECIO	
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		de the name of statu	ite or ordinance): D	EALING IN PRO	CEEDS 0	F UNLAWFUL ACTIVITY	Υ
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involved repr	Attempt 18 901 A	ds of unlawful activity wi	th the intent to promote Conspiracy 18 903	e the carrying on o	of said un	ncial transactions with kno lawful activity.	
□ 02	4117	(a)(1)	of the 18	1	F3		
Lead? Offe	nse# Section		PA Statut	e (Title) Coun	ts (Grade NCIC Offense Code	UCR/NIBRS Code
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(if appl Statute De		de the name of statu	te or ordinance): II	NSURANCE FRA	UD		<u></u>
namely, PA I false, incomp insurance ra request; to v	Deptartment of Trar plete or misleading i te filing, a motor ve vit: the defendant, l	nsportation (PennDOT), f information concerning a chicle insurance transacti	ile, present or cause to fact or thing material to on or other motor vehicl t to defraud the PA Dep	be filed or present the agency's det e insurance action	ted to the ermination which is	tent to defraud a State of e government agency a do in in approving or disappro required or filed in respon OOT), submitted applicatio	oving a motor vehicle use to an agency's
Inchoate Offense	Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Ni	ımber of	Victims Age 60 or Older	
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The second party of the second	OT Data	Accident Number		☐ Inter	state	☐ Safety Zone	☐ Work Zone
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presented to concerning a	an insurer a staten fact or thing mater	nent forming a part of, o	r in support of, an insur n; to wit: the defendant	ance claim that co	ntained f	t to defraud an insurer,did alse, incompleted or misle incomplete, or misleading	ading information



Defenda	CALLES TO SECURITION OF STREET		1	iled: /	OTN/LiveScan	Number	Complaint/Incident Nu	Mer The second second
	ant Nan	1 e :	First: ELIUD		Middle:	Las UR	et: LENA-RECIO	
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			lude the i	name of statute	or ordinance): INS	JRANCE FRAUD		
other perschereto; to nformatio	son file a to wit: th on to cor	ın applicatio e defendan	on for insura t knowingly ct material	ance containing an	y false information or collection of collections of the collection	nceal for the purpose on mpany, filed an application	t to defraud any insurance compf misleading information conceted ation for insurance containing factors for insurance containing factors are the containing factors and the containing factors are the containing	rning any fact materia
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Peni (if a	nDOT I ipplical	Data ole)	Accident Number			☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute	Descri	ption (inc	lude the	name of statute	e or ordinance): THE	FT BY DECEPTION		
	the acc	cused ass	sociated v	with this Offens	e: The defendant did kr	nowingly and with the i	ntent to obtain or withhold prop	perty of another by



Complaint/incident Number Docket Number: Date Filed: OTN/LiveScan Number V425-20 IFS210061 215172 78 Last: First: Defendant Name **ELIUD URENA-RECIO** Inchoate ☐ Solicitation ☐ Attempt ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense of the 1 M1 07 4101 18 П (a)(3) UCR/NIBRS Code **NCIC Offense Code** Offense# Section PA Statute (Title) Counts Grade Lead? Subsection PennDOT Data Accident ☐ Work Zone ☐ Safety Zone Interstate Number. (if applicable) Statute Description (include the name of statute or ordinance): FORGERY Acts of the accused associated with this Offense: A person is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpretated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, with the intent to defraud and/or injure anyone, and/or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, uttered a writing which he knows to be forged in a manner specific in paragraph (2) of this section. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense 1 M1 08 7121 of the 75 П UCR/NIBRS Code NCIC Offense Code Grade Offense# Section Subsection PA Statute (Title) Counts Lead? PennDOT Data Accident ☐ Work Zone ☐ Interstate ☐ Safety Zone (if applicable) Number Statute Description (include the name of statute or ordinance): FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION Acts of the accused associated with this Offense: A person is guility of a misdemeanor of the first degree if the person uses a false or ficticious name or address or makes a material false statement, or fails to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title. ☐ Attempt Inchoate ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 903 Offense 18 901 A 18 902 A of the 75 M1 09 7122 (3)Grade **NCIC Offense Code** UCR/NIBRS Code Counts Offense# Subsection PA Statute (Title) Lead? Section PennDOT Data Accident -☐ Work Zone ☐ Interstate ☐ Safety Zone Number Statute Description (include the name of statute or ordinance): ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fradulent intent, altered and/or forged any document issued or prepared for issue by the department.

Docke	Number		Date F		OTN/LiveScan	Number	WAT I OL	Complaint/Incident Nu	
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			ELIUD				UKE	INA-RECIO	
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	applicabl Descript		 Number Ide the na 	rotadil	or ordinance): UNS	WORN FA	LSIFICATION	N TO AUTHORITIES	
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course of	criminal co	onduct, in v	vhich he kn	owingly and intenti	: false statements mad onally signed (PA Dept ring notice that false s	. of Transp	ortation (Penn	To wit: the defendant engaginDOT)) forms thereby making le by law.	ed in a continuous written false
incho Offer		Attempt 18 901 A		Solicitation	Conspiracy		Number of \	/ictims Age 60 or Older	
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following False App they or o did agree	crimes: De plication for one or more with one	ealing in Pro Certificate of them wor more inc	oceeds of U e of Title or vill engage i lividuals, th	Inlawful Activity, W Registration, and L In conduct which co at one or more wo	ashing Vehicle Titles, D Insworn Falsification to Institutes such crime(s)	eceptive E Authoritie or an atte that consti	usiness Practions, did agree with the most or solicitate the afore	cilitating the commission of onces, Tampering with Public Reth such other person(s) and / tion to commit such crime(s); mentioned crime(s), or an att	cords or Information, or business(es) that to wit; the defendant
Inch Offe		☐ Attemp 18 901		Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Age 60 or Older _	
	12	911		(b)(1)	of the 18	(Title)	<u> </u>	F1 Grade NCIC Offense Cod	le UCR/NIBRS Code
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from a p proceeds received	attern of ra s of such in income de	cketeering come, in th rived, direc	activity in v	which such person on of any interest in ectly, from a patten	participated as a princi , or the establishment	pal, to use or operation	or invest, dire on of, any ente	sceived any income derived, d ctly or indirectly, any part of s erprise, to wit: the defendant directly, any part of this incor	such income, or the engaged in and



Docket Nur	mber:	Date Filed:	OTN/LiveSca	-1/1/20 /	I	plaint Nu 210061	mber Inc	cident Number		
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Defendant	Name · · · · · · · ·	ELIUD				URENA	A-RECIO			
appropriate	e. When there is rief summary of the fout more, is not sufficient	accused are descr more than one offe facts sufficient to advis icient. In a summary ca	ense, each offe e the defendant of	nse should	be numbe	ered chro	nologically.` A citation to the	e statute(s) allegedly		
Inchoate Offense	☐ Attempt 18 901 A	☐ Solicitat 18 902 A		Conspiracy 18 903		Numb	er of Victims A	lge 60 or Older		
□ 1 3	911	(B)(2)	of the 18		1	F1		A de LIODANIDO Codo		
Lead? Offer	nse# Section	Subsection	PA Str	atute (Title)	Counts	Grade	NCIC Offens			
ii (if appl	icable) Nu	mber			Interstate] Safety Zone	☐ Work Zone		
Acts of the	Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of a car dealership.									
Inchoate Offense	☐ Attempt 18 901 A	Solicitat 18 902 A	, <u> </u>	Conspiracy 18 903		Numb	per of Victims A	Age 60 or Older		
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(if appl		mber			Interstate	L	Safety Zone	☐ Work Zone		
Acts of the	accused associ	ated with this Offe y, in the conduct of suc with a vehicle dealership	nse: It shall be un	nlawful for any	person emp	loyed by or	ctivity, to wit: t	n any enterprise to conduct he defendant was an g activity.		
Inchoate Offense	☐ Attempt 18 901 A	Solicita 18 902 A		Conspiracy	,	Num	ber of Victims	Age 60 or Older		
□ 15	911	(B)(4)	of the 18	1	F	1				
	ense# Section	and stretching on a production.	PA Sta	tute (Title)	Counts	Grade	NCIC Offense C			
PennD (if app	NAME AND POST OF THE PARTY OF T	cident :: imber :::		□	Interstate		☐ Safety Zone	☐ Work Zone		
Statute Do	escription (includ	e the name of stat	ute or ordinanc	e): CORRUPT	ORGANIZAT	IONS		· -		
(1), (2), or (Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).									

Docket Number:	Date Filed:	R39	TN/LiveScan Number		Complaint/Incident Number IFS210061
Defendant Name:	First: ELIUD		Middle:	Last: URE	NA-RECIO

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

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

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the

(Date)

(Pear)

(Pate)

(Year)

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

(Magisterial District Court Number)

(Issuing Authority)

Docket Number:

OTN/LiveScan Number

Complaint/Incident Number

IFS210061

Defendant Name:

ELIUD

OTN/LiveScan Number

IFS210061

Last:

URENA-RECIO

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	ELIUD		URENA-RECIO

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

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

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

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

Sworn to me and subscribed before me this /

day of

(Signature of Affiant)

Magisterial District Judge

My commission expires first Monday of January,

SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. **ROSE** ALMASHAOBEH Address: 50 Canal Street MARGARETE Middle Name Last Name First Name Royalton, PA 17057 2139 E. Letterly Street Philadelphia, PA 19125 Telephone: (717)944-4463 NCIC Extradition Code Type 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States 1-Felony Full ☐ Distance: □ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANTIDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed OTN/LiveScan Number **Complaint Number** Incident Number Services? ☐ YES ☐ NO IFS210061 Co-Defendant(s) ров 06/20/1967 Add'l DOB Gen. First Name Middle Name Last Name ☐ Male AKA Unknown RACE White Black Native American ☐ Asian Unknown ETHNICITY ☐ Non-Hispanic ☐ Hispanic BRO (Brown) ☐ PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair ☐ PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) ☐ MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) **DNA Location** DNA ☐ YES ☐ NO FBI Number MNU Number OLN 22330040 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES □ NO Fingerprint Classification: 5 5 **DEFENDANT VEHICLE INFORMATION** Reg. Oth. NCIC Veh. School Veh. State Haz Registration Comm'l Veh. same Ind. mat Plate # Sticker (MM/YY) as Def. VIN Make Model Style Color 05 202 Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the atterney for the Commonwealth prior to files. See Re R. College R. to filing. See Pa.R.Crim.P. 507). Robert G. LaBar 12/05/2022 CDAG ROBERT LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) 737643/BADGE # 736 JEREMY BECKER (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision)

on or about 2018 - PRESENT

in DAUPHIN County

[22]

(County Code)



Dacket I	Number: 37-3033	Date Filed 12/5/86			/LiveScan N			Number		
Defenda	int Name:	First: MARGARE	TE	i	liddle: ROSE		_	ast: LMASHA	AQBEH	
			-	. 1 *						
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Acts of the accused associated with this Offense: The defendant did, knowingly and with intent to defraud an insurer, did present or cause to be presented to an insurer a statement forming a part of, or in support of, an insurance claim that contained false, incompleted or misleading information concerning a fact or thing material to the insurance claim; to wit: the defendant did make materially false, incomplete, or misleading statements or did cause such statements to be made in support of an insurance claim.										



	Number:		Date F	iled: 1 3032	OTN/LiveScar			Complaint/Incident Nu IFS210061	nber
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other pe thereto;	rson file ar to wit: the	application defendant	n for insur knowingly	ance containing any	false information or of defraud an insurance	conceal for the	e purpose of	to defraud any insurance com misleading information conce tion for insurance containing f	rning any fact material
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	Docket Number: Date Filed:				OTN/LiveScan I	Number		Complaint/Incident Num IFS210061	ber
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alters or prepared	Statute Description (include the name of statute or ordinance): ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fradulent intent, altered and/or forged any document issued or prepared for issue by the department.								



Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number IFS210061							umber					
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CILIFO CO.		ption (include the	name of state	ute or ord	dinan	ce): CORRU	PT ORGA	NIZAT	IONS					
Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3).														



Docket Number:	Date Filed: 12/5/892	OTN/LiveScan Number	1 IES210061
	First:	Middle:	Last:
Defendant Name:	MARGARETE	ROSE	ALMASHAQBEH

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

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



Docket Number: Date Filed: OTN/LiyeScan Number Complaint/Incident Number IFS210061

Defendant Name: MARGARETE ROSE Last: ALMASHAQBEH

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number: (R-427-2022	Date Filed: 12/5-13/32	OTN/LiveScan Number R 396864-2	Complaint/Incident Number IFS210061
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Defendant Name:	MARGARETE	ROSE	ALMASHAQBEH

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

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

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

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

day of

Sworn to me and subscribed before me this

11/2/2012 Date

My commission expires first Monday of January,

(Signature of Affiant)

ember

Magisterial District Judge

OF AT

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, ESQ. DEFENDANT: Address: 50 CANAL ST. INDALECIA VASOUEZ ROYALTON, PA 17057 703 BLUE HERON DRIVE ALLENTOWN, PA 18103 Telephone: (717)944-4463 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition MIsdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Request Lab Services? OTN/LiveScan Number Incident Number **Date Filed** Complaint Number ☐ YES ☐ NO IFS210061 12/05/2022 Co-Defendant(s) GENDER DOB 08/14/1998 Add'I DOB Gen. Last Name ☐ Male First Name Middle Name **X** Female **AKA** RACE Native American Unknown Astan Rinck ETHNICITY X Hispanic ☐ Non-Hispanic Unknown BRO (Brown) GRY (Grav) RED (Red/Aubn.) SDY (Sendy) BLU (Blue) PLE (Purple) Hair PNK (Plok) BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye BLK (Black) Color HAZ (Hazel) XXX (Unknown) MAR (Meroon) PNK (Pink) MUL (Multicolored) DNA WEIGHT (lbs.) **DNA Location** ☐ YE8 ☐ NO FBI Number MNU Number : OLN 32490834 Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Reg. School Veh. | Oth. NCIC Veh. Code Haz Registration Comm'l Veh. Ind. same as mat Plate # Sticker (MM/YY) Def. П Style Color VIN Make labotyl Office of the attorney for the Commonwealth Approved Disapproved because: (The altorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). OBERT G. LABAR (Signature of the altomey for the Commonwealth) 12/05/2022 ROBERT G. LABAR (Name of the attorney for the Commonwealth) (Date) 759307/#583 // 43799/#13 (PSP/MPOETC -Assigned Afflant ID Number & Badge # SA RACHEL A. STORY // DET. LINDSAY YETTER (Name of the Afflant) Lehigh County Detectives 1 PA 0391900 Pennsylvania Office of Attorney General PA0222400 (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. X I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) on or about 2018- PRESENT In DAUPHIN County [22] (County Code)

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decepti	on, created	or reinforced a	false impression	, including false	Impressions	as to law,	value, intent	ion or other		roperty of another by It; the defendant did
Inch Offe		Attempt 18 901 A	Solicit 18 902		Conspiracy 18 903		Numbe	r of Victims	Age 60 or Older	
	03	3925	(a)	of the	18		1	1:::::		LIOPAUDIG O.J.
	Offense nn DOT D	ata Ac	cident	ection	PA Statu		Counts	Grade	NGIG Offense C	ode UCR/NIBRS Code
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Statut	f applicat e Descrip	tion (include t	inber — the name of	— statute or ord	inance): Ri		☐ Interstate S STOLEN P		Safety Zone	☐ Work Zone
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	410 à		1518182	<u>R 3963</u>		IFS210061	
Detend	iant Name	Firat:		Middle:	La	: 3:	
Deleting	ia i i vali	INDA	NLECIA		VA	ZQUEZ	·
Acts of	f the accu	ised associate	d with this Offense	e: A person is cullby of th	eft if he intentionally	receives, retains, or disposes	of movable property of
another	knowled th	at it has been stol	en, or helleving that it	has probably been stoler	 unless the property 	is received, retained, or dispo	sed with intent to
restore If	It to the own	ner: to wit: The de	efendant did intentiona	iliv receive, retain or disp	ose of movable prope	erty, belonging to another, with	no intent to restore it
to the av	wner. knowi	ing that such prop	erty was stolen, or bel	leving that it had probab	ly been stolen, and ti	te property stolen is an autom	obile, airplane,
motorcy	cle, motorb	oat, or other moto	r propelled vehicle in	violation of Section 3925	(a) of the PA Crimes	Code.	
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		ita Accid			☐ Interstate	☐ Safety Zone	☐ Work Zone
	applicabl	e) was a Numb	遊廳		•		
Statute	e Descript	tion (include th	e name of statute	or ordinance): FALS	APPLICATION FO	R CERTIFICATE OF TITLE ()R REGISTRATION
Acte of	f the accu	eed seendate	d with this Offense	o' A norson le avillhe of o	misdemeanor of the	first degree if the person uses	a false or ficticious
name or	i il io diilli raddrom Ar	incu actualdi fekatem e sakem	faige statement or fel	o. n persur is gunty ut d le to disclose a comité b	masomodno or blo terest, or concesie s	ny other material fact in an ap	plication for a
ranse of	audiess Ul te of title or	manco a mausidi for a registration	to wit: the defendant	made a material false str	stement and/or conce	ealed any other material fact in	an application for a
	te of title.	· ·· · · · · · · · · · · · · · · · · ·	- said side Aplantary				- •
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		le) Nun	jper 11		☐ Interstate	☐ Safety Zone	CT AAOLY SOLIG
				or ordinance): ALTE	RED, FORGED, OR	COUNTERFEIT DOCUMENTS	3
Cululo		(- ,,, <u>,,,,</u>				
	***************************************					(2)	Maria de la Fallanda
Acts of	f the accu	ised associate	d with this Offense	e: A person is guilty of a	misdemeanor of the	first degree if the person, with	rraudulent intent,
	foraes an a	assignment of a co	rtificate of title, or an	assignment or release of	a security interest of	a certificate of title or any other	red for leave by the
alters or	to goo att		, to wit: the defendant	t, with fradulent intent, a	tered and/or torged	any document issued or prepa	isa in issue plane
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Prepared department of the control o	of for Issue Intent. of Offensell in DOT Descripe Descripe of the accurate the following the inconduct in conduct in conduct in the inconduct	Attempt 18 901 A 903 Section ata Accide Num tion (include the	Solicitation 18 902 A (a)(1) Subsection ent ber ————————————————————————————————————	18 903 on the 18 PA Statute (Ti PA Statute (Ti Or ordinance): CRIM e: Conspiracy: The defer te of Title or Registration of the following: leffers:	le) Counts Interstate INAL CONSTRACY Idant, with intent of particular in local constitutes such criminal crimina	Grade NCIC Offense Cod Grade NCIC Offense Cod Grade NCIC Offense Cod Safety Zone TO COMMIT THE ABOVE Offense Cod To Cod	Work Zone FFENSES mmission of one or a such other person(s) ton to commit such that one of more would
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POLICE CRIMINAL COMPLAINT OTN/LlyeScan Number 3 16 308 3 Complaint/incident Number Docket Number: Date Filed: IFS210061 410-20 a 12 15 IAOAG Last: First Middle: Defendant Name **INDALECIA VAZQUEZ** Inchoate ☐ Attempt ☐ Solicitation Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 F1 🚫 18 :07 (b)(1)UCRINIBRS Coc NCIC Offense Code Grade Offenses PennDOT Data ☐ Work Zone Safety Zone ☐ Interstate (if applicable) Number Statute Description (include the name of statute or ordinance); corrupt organizations Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds to operate 18J Car and Truck Sales, LLC. ☐ Solicitation Inchoate ☐ Attempt □ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 F1 08 911 (b)(2)18 UCR/NIBRS Code NCIC Offense Cod Offenset Section Subsection PA Statute (Title) Counts Grade Accident Number PennDOT Data ☐ Safety Zone ☐ Work Zone ☐ Interstate (if applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or Indirectly, interest in or control of J&J Car and Truck Sales, LLC. ☐ Solicitation ☐ Conspiracy Inchoate ☐ Attempt Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903

of the

and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

(b)(3)

Subsection

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

18

PA Statute (Title)

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

F3

Interstate

Grade

NCIC Offense Code

☐ Safety Zone

09

Offenset

PennDOT Data

(if applicable)

Lead?

911

Section

Accident Number ٧ : . .

UCR/NIBRS Code

☐ Work Zone

		430		INAL COMPLAINT
Docket Number: LR-410-3032	Date Filed: OTN/Liv	escan Number 31638-3	Complaint Number IFS210061	Incident Number
Defendant Name	First: INDALECIA	Middle:	Last: VASQUEZ	
	INDALECIA		ANJOULL	
appropriate. When there is	accused are described below more than one offense, each facte sufficient to advise the defend icient. In a summary case, you must	h offense should be r	umbered chronologics lense(s) charged. A citation	ally. to the statute(s) allegedly
inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of Viol	ims Age 60 or Older
□ 10 911	(B)(4) of the 1	8 1	F1	
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Plainte nescription (include	the name of statute or ordi	rance). CURRUPT URBA	CENT INAM	
Inchoate : ☐ Attempt	□ Solicitation	☐ Conspiracy	Number of Vici	lims Age 50 or Older
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	ident	PA Statute (Title) Counts Inter		
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2/8/file Describitot./Incide	s the name of statute of ordi	nance/.		
Acts of the accused associ	ated with this Offense:		4,481,444,444,444,444,444,444,444,444,44	
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Lead? Offenself Section PennDOT Date Ac	Subsection dent	PA Statute (Title) Count		nee Cade UCR/NBRS Code
(if applicable) Nu	mpec	☐ Inter	state Safety:	Zone
Statute Description (includ	e the name of statute or ordi	nance):		
Acts of the accused assoc	ated with this Offense:			<u> </u>
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Docket Number: - 100 303 3	Date Filed:	OTNILIV R.396	eScan Number	Complaint/incident Number	
Defendant Name:	First: INDALECIA	Midd		ast: AZQUEZ	

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

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

(Date)

(Year)

(Signature of Afficility)

AND NOW, on this date

(Signature of Afficility)

(Signature of Afficility)

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

(Issuing/Authority

战战	POLICE	CRIMINAL	COMPL	AINT
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			-		
Docket Number: CR - 4/0-303-2	Date Filed: 13/5/3032	OTN/LiveScan Number R 376308-3		Complaint/incident Number	
Defendant Name:	First:	Middle:	Last:		
Defendant Name)	INDALECIA		VASC	QUEZ	•

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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

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

1.	lgor	DRATCH	

- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH

- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ

- 21, Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ

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	Date Filed: R3	TN/LiveScan Numbe	e r	Complaint/Incident Number
FI	rst: NDALECIA	Middle:	Last VAS	QUEZ
31. Amatti Auto Sales LLC	38. MP Notary and	Tags LLC 4	5. Jessica's A	Auto Tags
32. Newroad Motors LLC	39. AMCO Auto Sale	es 4	6. JM Motor	\$
33. Grig LLC	40. Charo's Auto Sal	es 4	7. Saldivar G	iroup
34. Santos Auto Gallery	41. A2Z Auto Tags	4	8. Abby Auto	•
35. Perfect Touch Auto Repair	42. Docuservices	4	9. Carla Mat	tia LLC
and Sales LLC	43. Emma's Auto Ta	gs and 5	O. G&G Auto	Body and Auto
36. Pennsylvania Tag and Title	Multiservices, In	ic.	Salvage	
37. J&J Car & Truck Sales LLC	44. Wilfredo Auto R	epair 5	1. Mendoza	Auto Sales

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

I, SA RACHEL A. STORY // DET. LINDSAY YETTER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

			SA PLACALL	a Story	
			, (Sign	nature of Affiant)	
Sworn to me and subscribed before me this	SHI	day of	Serens	er 302	ンス
12/5 / 2022 Date			V)	rial District Judge	•
My commission expires first Monday of Janua	ary,				
•	,			SEAL	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 MDJ: Hon, DAVID H. JUDY, ESO. DEFENDANT: (NAME and ADDRESS): BEAKI. PEREZ Address: 50 CANAL ST. . ANTONIA Middle Name Last Name ROYALTON, PA 17057 · First Name 445 W. LIBERTY ST. ALLENTOWN, PA 18102 Telephone: (717)944-4463 NCIO Extradition Code Type ☑ 1-Felony Full □ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemagnor Full T E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition 4.64(0.00) BERENDANT DENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint Number Incident Number Request Lab Services? CR-413 ☐ YES ☐ NO 12/05/2022 IFS210061 Co-Defendant(s) GENDER DOB: 01/01/1969 POB Add'I DOB Gen. ☐ Male First Name Middle Name Last Name RACE White M Hispanic Black ☐ Unknowa Aslan Native American ETHNICITY Unknown ☐ Non-Hispanio BRO (Brown) · GRY (Grav) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purole) Hair PNK (Pink) BLK (Black) ONG (Orange) WHI (White) (bla8t.xxx (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) BLK (Black) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) Mult. (Multicolored) DNA WEIGHT (lbs. ☐ YES ☐ NO **DNA Location** FBI Number **MNU Number** OLN 29211447 Ft. HEIGHT In. Defendant Fingerprinted YES NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Comm'l Veh. Reg. State Haz Registration same as mat Ind. 🛘 Plate # Sticker (MM/YY) Def. Make VIN Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filling, See Pa.R.Crim.P. 507). 12/05/2022 ROBERT G. LABAR (Name of the afforney for the Commonwealth) (Dale) 759307/#583 // 43799/#13 SA RACHEL A. STORY // DET, LINDSAY YETTER (Name of the Afflant) (PSP/MPOETC -Assigned Afflant ID Number & Badge # Lehigh County Detectives Pennsylvania Office of Attorney General PA0222400 / DA 0391900 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. 🕅 I accuse the above named defendant who lives at the address set forth above I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jame Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) on or about 2018- PRESENT in DAUPHIN County [22] (County Code)

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POLICE CRIMINAL COMPLAINT Complaint/Incident Number Date Filed: OTN/LiveScan Number Docket Number: 396341-CR-413-2012 IFS210061 15]Ai a Middle: Last: Defendant Name PEREZ BEAKI **ANTONIA** Incheate Offense ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 903 18 901 A 18 902 A F1 07. 911 (b)(1) of the 18 7... PA Statute (Title) UCRINIBRS Code Offense Subsection Counts Grade NCIC Offense Cod PennDOT Data ☐ Safety Zone 📋 Work Zons ☐ Interstate (it applicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity. ☐ Solicitation ☐ Conspiracy Inchoate ☐ Attempt Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense * : ::* 08 911 F1 (b)(2)orthe 18 UCR/NIBRS Code Offenset NCIC Offense Code PA Statute (Title) Counte Grade Subsection PennDOT Data (if applicable) Accident Number ☐ Work Zone ☐ Interstate ☐ Safety Zone Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlewful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise; to wit: the defendant through a pattern of racketeering activity maintained, directly or indirectly, interest in or control of J&J Car & Truck Sales, LLC. Inchoate Offense ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 F3 911 09 (b)(3)PA Statute (Title) UCR/NIBRS Code NCIC Offense Code Offenset Count Lead? Section Subsection PerinDOT:Date Accident (If applicable) Number ☐ Interstate ☐ Safety Zone ☐ Work Zone Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

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Docket Number: CR -4/3-3684	Date Filed:	OTN/LiveScan Number R 3 16 341-1	Complaint/Incident Number IFS210061
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2. I ask that a warra	int of arrest or a si	immons be issued and that the defen	dant be required to answer the charges I have

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

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

;			SA Bachel Stry
(Date)	(Year)		(Signature of Affiant)
AND NOW, on this date	second yours		nt has been properly completed and verified
An affidavit of probable cause	must be completed before a warrant	can be issued.	V CONTINUE
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Defendant Name:	BEAKI	ANTONIA	PEREZ

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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

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

1.	lgor	DRATCH
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- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary BETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH

- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ
 GONZALEZ

- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-
 - **DEVANGELISTA**
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ

AOPC 411C - Rev. 12/21

Page 1 of ___

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, ESQ. DEFENDANT: (NAME and ADDRESS): Address: 50 CANAL ST. **PINEDA MARIA** Last Name ROYALTON, PA 17057 First Name 843 WHITTIER DR. **ALLENTOWN, PA 18103** Telephone: (717)944-4463 NCIC Extradition Gode Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION OTN/LiveScan Number Request Lab Services? Docket Number **Date Filed** Complaint Number Incident Number ☐ YES ☐ NO 12/05/2022 IFS210061 GENDER Co-Defendant(s) DOB 10/20/1981 Add'I DOB Gen. ☐ Male First Name Middle Name Last Name ☑ Female RACE Black ☐ Native American Unknown Asian ETHNICITY ☐ Non-Hispanic ☐ Unknown BRO (Brown) GRY (Gray) BLU (Blue) RED (Red/Aubn.) SDY (Sandy) PLE (Purple) Hair PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) **DNA Location** ☐ YES ☐ NO WEIGHT (lbs.) FBI Number **MNU Number** OLN 30987789 **Defendant Fingerprinted** TI YES TINO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth. NCIC Veh. Code Reg. State Comm'l Veh. School Veh. Haz Registration Ind. ame as mat DISTRICT COURT Plate # Sticker (MM/YY) Color VIN Make Model Style П Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). 12/05/2022 ROBERT G. LABAR OBERT G. LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) SA RACHEL A. STORY // DET. LINDSAY YETTER 759307/#583 // 43799/#13 (PSP/MPOETC -Assigned Afflant ID Number & Badge # (Name of the Affiant) Lehigh county Detectives Pennsylvania Office of Attorney General PA 0391900 PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Place-Political Subdivision) on or about 2018- PRESENT in DAUPHIN County [22](County Code)

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POLICE CRIMINAL COMPLAINT Docket Number: Date Filed: Complaint/Incident Number OTN/LiveScan Number 1. R-417-2022 396739-4 12/5/2022 IFS210061 Middle: Last Defendant Name: **MARIA PINEDA** Inchoate Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A Offense 18 902 A 18 903 04 7121 of the 75 M1 Offense# Section Subsection PA Statute (Title) NCIC Offense Code Grade **UCR/NIBRS Code** Counts PennDOT Data Accident ☐ interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number Statute Description (Include the name of statute or ordinance); FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION Acts of the accused associated with this Offense: A person is guility of a misdemeanor of the first degree if the person uses a false or ficticious name or address or makes a material false statement, or falls to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A Offense 18 903 05 of the 7122 (3)1 M1 Offense# Lead? Section PA Statute (Title) Counts Grade **NCIC Offense Code** UCR/NIBRS Code Subsection PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): ALTERED, FORGED, OR COUNTERFEIT DOCUMENTS Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fradulent intent, altered and/or forged any document issued or prepared for issue by the department. SHEET STREET, THE ACC.

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Acts of the accused associated with this Offense: The defendant made a written false statement which he did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; To wit: the defendant engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.

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maintain	, directly or	ised associat Indirectly, any i It in or control of	nterest in o	or control of a	any enterpri	e unlawful for se; to wit: the	any pe	ersor dant	through through	n a pa	attern d	of racketeering activity of racketeering activity of activity of the control of t	ty to acc y mainta	juire or lined, directly

Docke	t Numb	er: -3072	Date Fil	1	R^{0}	TN/LiveScar	Numb		Com	plaint/incident Nu 10061	imber
Defen	dant Na		First:	41-4121		Middle:			ast:		
			MARIA	•	·			<u> </u>	INEDA		
Incha Offer		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 3 903		Number	of Victims A	Age 60 or Older	
	10	911		(b)(3)	of the	18	·:.: · ··	1	F1		
Lead?	Offen	se#	Section	Subsection		PA Statute	(Title)	Counts	Grade	NCIC Offense Code	
lif	nnDOT applica	ible)	Accident Number	1				Interstate		Safety Zone	☐ Work Zone
Statute	Descr	iption (incl	ude the na	me of statut	e or ordi	nance); co f	RUPT O	RGANIZATI	ONS		Les Pro-
particina	te direct	ly or indirect	lv. in the con	th this Offen duct of such en rship and condi	iterorise's a	affairs through	a patten	n of racketee	ring activity,	to wit: the defendan	erprise to conduct or It was an operator
incho Offe	Activities and the second	☐ Attempt		Solicitation		onspiracy 8 903		Number	of Victims /	Age 60 or Older	
	11	911		(b)(4)	of the	18 PA Statute	CTH(a)	1 Counts	F1 Grade	NCIC Offense Code	uCR/NIBRS Code
	Offer nnDOT	Data	Section Accident	Subsection		FA Siziule	1	Interstate		Safety Zone	☐ Work Zone
Statute	applic Desc	able) ription (inc	Number lude the na	ame of statu	te or ordi	nance): COI	RRUPT (RGANIZAT	IONS		<u></u>
Acts of (2), or (2), and	of this	cused ass subsection.	ociated wi To wit: the d	th this Offen lefendant consp	se: It sha dred with o	ll be unlawful ther individua	for any p Is to enga	erson to cons age in a patte	pire to violal ern of rackets	te any of the provision eering activity in viola	ons of paragraphs (1), ation of subsections (1),
	oate ense	Attem		☐ Solicitation		Conspiracy 18 903		Numbe	er of Victims	s Age 60 or Older	
		::-:			of the						
Lead?		ense#	Section	Subsection		PA Statu	ite (Title)	Counts	Grade	NCIC Offense Co	de UCR/NIBRS Code
	ennDO if appli		Accider Numbe					☐ Interstate		Safety Zone	☐ Work Zone
Statut	e Desc	ription (inc	lude the n	ame of statu	te or ord	inance):					
Acts	of the a	ccused as	sociated w	ith this Offer	nse:						

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IFS210061
Defendant Name:	First:	Middle:	Last:
Delenuarit Marile:	MARIA		PINEDA

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

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

		dmo	way Jother
(Date)	(Year)	•••	(Signature of Affiant)
AND NOW, on this date	December 6, 2012	I certify that the complaint has been	properly completed and verified.
11	use must be completed before a war	g Authority)	SEAL

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number	
CR-417-2012	12/5/2012	K 396724-4			
Defendant Name:	First:	Middle:	Last:		
	MARIA		PINE	EDA	

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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

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

1.	igor	DKA	LH
_			

- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH

- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- . 18. Muhammad ALKURDI
 - 19. Edgar COLLADO
 - 20. Osiris FERNANDEZ GONZALEZ

- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28. Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ



Page ___ of ___

Docket Number: CR-417-3083	Date Filed:	OTN/LiveScan		Complaint/incident Number	r :
Defendant Name:	First: MARIA	Middle:		Last: PINEDA	
31. Amatti Auto Sales LLC	38. MP Notary	and Tags LLC	45. Jessi	ca's Auto Tags	
32. Newroad Motors LLC	39. AMCO Auto	o Sales	46. JM N	Motors	
33. Grig LLC	40. Charo's Au	to Sales	47. Saldi	var Group	
34. Santos Auto Gallery	41. A2Z Auto T	ags	48. Abby	Auto	
35. Perfect Touch Auto Repair	42. Docuservic	es	49. Carla	Mattia LLC	
and Sales LLC	43. Emma's Au	to Tags and	50. G&G	Auto Body and Auto	
36. Pennsylvania Tag and Title	Multiservio	es, Inc.	Salva	age	
37. J&J Car & Truck Sales LLC	44. Wilfredo A	uto Repair	51. Men	doza Auto Sales	

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

I, SA RACHEL A. STORY // DET. LINDSAY YETTER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

4	Lindsay y	WW.
	(Signature of Aff	iant)
Sworn to me and subscribed before me this	December	3002
1 a / c / go g 2 - Date	, Magisterial Distric	t Judge
My commission expires first Monday of January,	3	. 19
	SEA	
	No. of the second	

AOPC 412A - Rev.12/21

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 MDJ: Hon. DAVID H. JUDY, Esa. DEFENDANT: (NAME and ADDRESS): Address: 50 Canal Street LINDA SANDOVAL Royalton, PA 17057 First Name Middle Name Last Name Ge 1334 Glenview Street Telephone: (717)944-4463 Philadelphia, PA 19111 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number **Complaint Number** Incident Number Services? 14-402-22 R 396109-0 ☐ YES ☐ NO 1215122 IFS210061 **GENDER** ров 06/07/1986 POB Co-Defendant(s) Add'l DOB ☐ Male First Name Middle Name Last Name Gen. LINDA ΔΚΔ DOMINGUEZ RACE White Hispanic Hispanic White New Hispanic Ne ☐ Black ☐ Unknown __ Asian Unknown ☐ Native American ETHNICITY ☐ Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) ☐ BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) WHI (White) PNK (Pink) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) Eye BRO (Brown) GRN (Green) GRY (Gray) Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA **DNA Location** ☐ YES ☐ NO WEIGHT (lbs.) **FBI Number MNU Number** OLN 27869341 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 6 **DEFENDANT VEHICLE INFORMATION** State Haz Comm'l Veh. Registration School Veh. Oth, NCIC Veh, Code Reg. Plate # mat Ind. same Sticker (MM/YY) as Def. VIN Year Make Model Style Color Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). Robert G. LaBar CDAG ROBERT LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Date) JEREMY BECKER <u> 737643/BADGE # 736</u> (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have

on or about 2018 TO PRESENT

in DAUPHIN County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[22]

Harrisburg City

(Place-Political Subdivision)



,			990 P	OLICE CRIMINA	AL COMPLAINT
Docket Number:	Date Filed: 12 15 122	OTN/LiveScan R 39 6/09-0	Number	Complaint/Incider	nt Number
Defendant Name:	First:	Middle:		Last:	
	LINDA	M.		SANDOVAL MARTINE	Z-HERREKA
When there is more that (Set forth a brief summary of without more, is not sufficient The age of the victim at the t	an one offense, eacl f the facts sufficient to a nt. In a summary case, yo ime of the offense may b	scribed below with each offense should be nundwise the defendant of the nation must cite the specific sective included if known. In additioned, list only the last four di	nbered chronolo ure of the offense(s ion(s) and subsection on, social security n	gically.) charged. A citation to the s on(s) of the statute(s) or ordinumbers and financial inform	tatute(s) allegedly violated, nance(s) allegedly violated.
Inchoate	☐ Solicitation 18 902 A	on Conspiracy 18 903		Number of Victims Age 6	0 or Older
⊠ 0 1 5111	(a)(1)	of the 18	1	F1	
Lead? Offense Se	ection Subsection	PA Statute (Title) Counts	Grade NCIC Offense	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
	clude the name of st	atute or ordinance): DE	LING IN PROCEE	DS OF UNLAWFUL ACTIV	ITY
Inchoate	Solicitation 18 902 A	on ☐ Conspiracy 18 903		Number of Victims Age 6	0 or Older
□ 02 4117	(a)(1)	of the 18	1	F3	
Lead? Offense# S	ection Subsection	PA Statute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Acts of the accused as namely, PA Deptartment of false, incomplete or misleadi insurance rate filing, a moto	sociated with this O Fransportation (PennDOT ng information concernir r vehicle insurance transa nt, knowingly and with ir	ffense: The defendant did k f), file, present or cause to be g a fact or thing material to t action or other motor vehicle itent to defraud the PA Dept. rtaining to vehicles.	nowingly and with to filed or presented the filed agency's determing finsurance action whi	to the government agency a ination in approving or disap ich is required or filed in resp	document that contained proving a motor vehicle conse to an agency's
Inchoate ☐ Attem Offense 18 901			Numbe	er of Victims Age 60 or Old	er
□ 03 411	7 (a)(2)	of the 18	1	F3	**************************************
Lead? Offense# PennDOT Data	Section Subsection Subsection	processing process	1	Grade NCIC Offens	
(if applicable)	Number ——	- atuto or ordinance); was	☐ Interstate	Safety Zone	e ☐ Work Zone
Statute Description (Inc	side the name of Si	atute or ordinance): INS	OUKANCE FRAUD		
presented to an insurer a sta	atement forming a part o aterial to the insurance o	ffense: The defendant did, I f, or in support of, an insuran laim; to wit: the defendant di ce claim.	ce claim that contair	ned false, incompleted or mis	sleading information



Docket Number:	Date Filed:	OTN/LiveScan			int/Incident Number					
Defendant Name:	First: LINDA	Middle: M.		ast: SANDOVAL MARTIN	IEZ-HERRERA					
Inchoate ☐ Attempt Offense 18 901 A	☐ Solicitat 18 902 A	on Conspiracy 18 903	Number	of Victims Age 60 or Old	der					
04 4117	(a)(3)	of the 18	Title) Counts	F3 NCIC Offen	se Code UCR/NIBRS Code					
PennDOT Data (if applicable)	Accident Number	_	☐ Interstate	☐ Safety Zone						
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD										
conspires with another to pre claim that contains any false, or supports an amount claims	pare or make any state incomplete or misleadied in excess of the actunent(s) intended to be	Offense: Knowingly and with ment that is intended to be pring information concerning any all loss sustained by the claima presented to the insurer in con	esented to any insure fact or thing materia nt to wit: the defend	er or self-insured in conne al to the claim, including ir ant did knowingly and wit	ction with, or in support of, a Iformation which documents If the intent to defraud an					
Inchoate		, — • •	Numbe	r of Victims Age 60 or O	lder					
□ 05 4117 Lead? Offense#	7 (b)(4	Charles of the Control of the Contro	(Title) Counts	Grade NCIC Offe	nse Code UCR/NIBRS Code					
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zo	ne 🔲 Work Zone					
Statute Description (inc	lude the name of	statute or ordinance): INS	SURANCE FRAUD							
other person file an application	on for insurance contain t knowingly and with in	itent to defraud an insurance o	onceal for the purpos	e of misleading informatio	nce company, self-insured or on concerning any fact material taining false and/or misleading					
Inchoate	l —	, - • •	Number	of Victims Age 60 or Ol	der					
☐ 06 3922 Lead? Offense#	(a)(1)		1 Title) Counts	F3 Grade NCIC Offer	ise Code UCR/NIBRS Code					
PennDOT Data (if applicable)	Accident		☐ Interstate	☐ Safety Zon	e					
	clude the name of	statute or ordinance): THI	EFT BY DECEPTION	l	,					
defendant did present or cau	ise to present, false, in As a result of the defe possessed the VIN nu	ndant's deception, the fraudule mbers of stolen vehicles. In fu	ation material to vehi ant paperwork enable	cle title application(s) to t d Pennsylvania vehicle titl	he Pennsylvania Department of les to be obtained for					

Docket N	Number:	Date Filed:		OTN/I ives	can Numbe		Comple	aint/Inciden			
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		LINDA		M.	, 	Si	ANDOVAL	MARIINE	Z-HER	KEKA	
Inchoa	ete	nt 🗆 🗀 s	Solicitation	☐ Conspira	CV	Number	. of Victims A	no 60 or Olde			
Offens			8 902 A	18 903		Number	Of Victims A	ge 00 01 Old	31		
	07 410		(a)(3)	of the 18		1	M1	NCIC Offens	- Codo	UCR/NIBRS O	Code
A STATE OF THE PARTY AND ADDRESS.	Offense# nD@T Data	Section Accident	Subsection	PA S	tatute (Title)	Counts Interstate	Grade	Safety Zone		☐ Work Zor	
	i pplicable) Description (inc	Number	o of statute	or ordinanco)				Culoty Zona			
(2) of this	ng a fraud or injur subsection, to wit a manner specific i	: the defendant, i	with the intent	tne actor utters a to defraud or wit	ny writing wh h knowledge t	icn ne knows hat he is faci	to be forged i	n a manner s I, uttered a w	pecined riting wi	in paragraphs (nich he knows t	io be
Inchoa Offens			olicitation 902 A	☐ Conspirac	у	Number	of Victims Ag	e 60 or Olde	ř		
П	08 7121			of the 75		1	M1				
Lead?	Offense#	Section	Subsection		atute (Title)	Counts	Grade	NCIC Offense	Code	UCR/NIBRS C	ode
	nDOT Data pplicable)	Accident Number				Interstate		Safety Zone		☐ Work Zon	ie
	Description (inc	and the second of the second property in the second of	e of statute	or ordinance)	FALSE APP	LICATION F	OR CERTIFI	CATE OF TIT	LE OR	REGISTRATIO	N
name or a	d.	n material false st gistration, to wit:	atement, or fai	ls to disclose a se	ecurity interest	, or conceals nt and/or con	any other ma	terial fact in a	n applic	ation for a	
Offen	se 18 901	A 1	18 902 A	18 903							
	09 712		(3)	of the 75	Statute (Title)	1 Counts	M1 Grade	NCIC Offens	se Code	UCR/NIBRS	Code
1. 15 (Fig. 1) 15 (Fig. 1)	Offense# nnDOT Data applicable)	Section Accident Number	Subsection	PA:	1	interstate	1	Safety Zone		☐ Work Zo	
	Description (in	clude the nan	ne of statute	or ordinance)	: ALTERED,	FORGED, OI	R COUNTERF	EIT DOCUM	ENTS		
alters or t	the accused as forges an assignme for issue by the de ent.	ent of a certificate	e of title, or an	assignment or re	lease of a sec	urity interest	on a certificat	e of title or a	ny other	document issue	ed or



Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incl CR - 402-22 1213122 R 396109-0 IFS210061 First: Middle: Last:								A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	nt Num	ber		
Defend	ant Name	LIN		M.		-		L MARTINE	Z-HEF	RRERA		
Inchor Offens	\$1000 AND THE	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number	of Victims A	ge 60 or Olde	er			
Lead?	10 Offense#	4904 Section	(b) Subsection	of the 18	(Title)	1 Counts	M3 Grade	NCIC Offense	Code	UCR/NIBRS Code		
Pen	nDOT Da	ta Acci	dent :	FA Statute		Interstate		Safety Zone		☐ Work Zone		
	i pplicabl e Descripti	Printed to the State of the Party of the Par	ACCOUNT OF THE PARTY OF THE PAR	e or ordinance): uns	WORN F	ALSIFICAT	TON TO AU	THORITIES				
to a form course of	Acts of the accused associated with this Offense: The defendant made a written false statement which he did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; To wit: the defendant engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.											
	Inchoate											
Lead?	11 Offense#	5111 Section	(a)(1) Subsection	of the 18	(Title)	1 Counts	F1 Grade	NCIC Offense	Code	UCR/NIBRS Code		
Pen	nDOT Da	ta Acci	dent dent dent	7 A diatate		Interstate		Safety Zone		□ Work Zone		
	Descripti	to 1984, Philipse Share, series in Add a selective Chandle (1985)	ARREST ARREST W	e or ordinance): CRI	MINAL C	ONSPIRAC	Y - DEALIN	G IN PROCEE	DS OF	UNLAWFUL		
following False App they or or did agree	crimes: De lication for ne or more with one o	aling in Proceeds Certificate of Titl of them will enga r more individual	of Unlawful Activity, e or Registration, an age in conduct which s, that one or more	se: The defendant, with Washing Vehicle Titles, Ed Unsworn Falsification to a constitutes such crime(s) would engage in conduct an overt act in pursuance	Deceptive Authoriti or an att that const	Business Praces, did agreetempt or soli titutes the afficiency	actices, Tamp e with such o icitation to co	pering with Pub other person(s) ommit such crin	lic Recor and / or ne(s); to	rds or Information, r business(es) that o wit; the defendant		
				•								
Incho Offer	CONTRACTOR DESCRIPTION TO THE PERSON NAMED IN COLUMN TWO IN COLUMN TO THE PERSON NAMED IN COLUMN	☐ Attempt 18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903		Numbe	r of Victims	Age 60 or Old	er			
Lead?	12 Offense	911 # Section	(b)(1) Subsection	of the 18	a (Title)	1 Counts	F1 Grade	NCIC Offens	se Code	UCR/NIBRS Code		
Pei	nnDOT D applicab	ata Ac	cident	177 Gazada		Interstate		☐ Safety Zone		☐ Work Zone		
			- spannight and Sind Sind	te or ordinance): cor	RRUPT O	RGANIZAT	IONS		k.			
from a pa proceeds received i	attern of rac of such inc income der	cketeering activit come, in the acqu	y in which such pers iisition of any interes ndirectly, from a pat	ISE: It shall be unlawful from participated as a princiting tin, or the establishment tern of racketeering activities.	ipal, to us or operat	e or invest, any e	directly or inc enterprise, to	directly, any pa wit: the defen	rt of suc dant eng	ch income, or the gaged in and		



POLICE CRIMINAL COMPLAINT Complaint Number Incident Number

A D	- 40°	}-72	121	51 22	- 8		9610		TES	321	0061	11301				
			First:	2100			<i>l</i> iddle:	<u>/ U</u>	11.		Last:					
Defend	lant Nan	1 e	LINDA	4		M	1.				SANDO	VAL MA	RTI	NEZ-I	HERRERA	
The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a <i>brief</i> 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																
Offen	18-50 s - 1 -	18 901 A		∐ Solici 18 902			18 903				Numbe	er of Victin	ns Ag	Age 60 or Older		
	13 Offense#	911 Section		B)(2) Subsection	of the	18	Statute (Title	1	Counts	F	1 Grade	NCIC Of	fense	Code	UCR/NIBRS Code	
	inDOT C applicat	ata Acc	dent nber .	aupsection		FA	Statute (1186		nterstate		T	Safety Zo			☐ Work Zone	
		iption (include	the na	me of sta	atute or ord	dinan	ce): CORF	RUPT OF	RGANIZAT	TIOI	NS					
maintair directly	n, directly or indirec	cused associa or indirectly, and tly, interest in or	interest	in or contro	ol of any ente lership.	all be erprise	e; to wit: th	ne defen	erson thro	ough	n a patter	n of rackete	teering eering	activity	y to acquire or maintained,	
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F	2 <i> 5 22 4</i> irst: INDA	396109-0 Middle:	Last:	IFS210061
SPERIOR AND COME OF THE TOTAL THE		M.	SANI	DOVAL MARTINEZ-HERRERA
2. I ask that a warrant made.	of arrest or a summor	ns be issued and that th	e defendant be	required to answer the charges I have
3. I verify that the facts belief. This verificat to unsworn falsificat	ion is made subject to	laint are true and corre the penalties of Section	ct to the best of n 4904 of the Cr	my knowledge or information and rimes Code (18 Pa.C.S. § 4904) relating
4. This complaint cons	ists of the preceding r	page(s) numbered 1 the	ough .	
System of Pennsylva information and doc	ania that require filing uments.	confidential informatior	and documents	ccess Policy of the Unified Judicial differently that non-confidential e and dignity of the Commonwealth
of Pennsylvania and w	ere contrary to the Ac	t(s) of the Assembly, o	r in violation of tl	he statutes cited.
issuing authority, an	arrest can be issued d attached.) 	, an amidavit of proba	e cause must	be completed, sworn to before the
(Date)	(Ye	ear)		Gignature of Amariti)
AND NOW, on this date	Dec. 5.	2042 I certify t	hat the complaint	has been properly completed and verified.
AND NOV, on ans date				



Docket Number:

CH -402-22

Date Filed:

OTN/LiveScan Number

J3 | S | 109-0

Defendant Name:

LINDA

Date Filed:

OTN/LiveScan Number

J3 | S | S | S | S | S |

Complaint/Incident Number

IFS210061

Last:

SANDOVAL MARTINEZ-HERRERA

AFFIDAVIT of PROBABLE CAUSE

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

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

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

Docket Number:	Date Filed:	OTN/LiveSca	an Number Complaint/Incident Number
CR-402-22	1215122	R 396109-	-O IFS210061
	First:	Middle:	Last:
Defendant Name:	LINDA	M.	SANDOVAL MARTINEZ-HERRERA

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

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

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

Ho day of

, Magisterial District Judge

My commission expires first Monday of January,

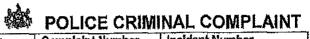
2 /5/202A Date

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-03 VS. (NAME and ADDRESS): MDJ: Hon, DAVID H. JUDY, ESO. **OTANEZ-DELOOR** Address: 50 CANAL ST. SOMARY **IBETH** :: Middle Name First Name Last Name ROYALTON, PA 17057 703 BLUE HERON DRIVE ALLENTOWN, PA 18103 Telephone: (717)944-4463 NGIC Extradition Code Type X 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Dislance: ☐ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ■ B-Misdemeanor Limited DEFENDANT DENTIFICATION INFORMATION OTN/LiveScan Number R 396291-C Incident Number Request Lab Services? **Docket Number** Date Filed Complaint Number ☐ YES ☐ NO CR-412-IFS210061 12/05/2022 Co-Defendant(s) GENDER DOB 09/11/1993 Add'I DOB Gen. ☐ Male First Name Middle Name Last Name ☑ Female AKA RACE Unknown Native American X White Black X Hispanic ETHNICITY :: Non-Hispanic Unknown BRO (Brown) PLE (Purple) GRY (Grav) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair PNK (Pink) BLK (Black) ONG (Orange) WHI (While) XXX (Unk./Bald) GRN (Green) Color -BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Color . [] HAZ (Hazel) MAR (Maroon) PNK (Pink) T XXX (Unknown) MUL (Multicolored) WEIGHT (lbs.) DNA : **DNA Location** ☐ YES ☐ NO FBI Number **MNU Number** OLN 33220938 FL HEIGHT In. ☐ YES ☐ NO Defendant Fingerprinted... Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Reg. Oth, NCIC Veh. Code Comm'l Veh. School Veh. State Haz Registration same as Ind. mat Plate # Sticker (MNVYY) Def. Color Style VIN Make Model Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crlm.P. 507). 12/05/2022 ROBERT G. LABAR ROBERT G. LABAR (Name of the attorney for the Commonwealth) SA RACHEL A. STORY // DET. LINDSAY YETTER (Name of the Affiant) / Lebicit County Detectings 759307/#583 // 43799/#13 (PSP/MPOETC -Assigned Affiant ID Number & Badge # Lehigh County Detectives PA0391900 PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] on or about 2018- PRESENT In DAUPHIN County [22](County Code)

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Defendant Name:	SOMARY		IBETH		0	TANEZ-	DELOOR	
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another knowing that it	has been stolen, or to wit: The defenda hat such property v	belleving that it ant did intentiona was stolen, or bel	has probably been stol lly receive, retain or dis leving that it had proba	en, unless spose of m ably been :	the proper novable prop stolen, and	ly is receive perty, below the proper	ed, retained, or disp nging to another, wil	IN NO INTENT TO restore R
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Acts of the accused associated with this Offense: A person is guility of a misdemeanor of the first degree if the person uses a false or ficticious name or address or makes a material false statement, or falls to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title.								
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Statute Description (include the name of statute or ordinance): CRIMINAL CONSIRACY TO COMMIT THE ABOVE OFFENSES Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: Dealin in Proceeds of Unlawful Activity, Theft by Deception, Receiving Stolen Property, False Application for Certificate of Title or Registration, Altered, Forced, or Counterfeit Documents, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Jefferson Loor Valet and/or J&J Car & Truck Sales, LLC), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.								

Docket	Number	r:	Date File	ed:	OTN/LiveSca	n Num	ber			iaint/incident Nu 10061	mber .
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and/or v	vas assoc	ciated with a	vehicle deal	ership and cond	ducted the enterprise's	affairs t	hrough	a patteri	n of rackete	ering activity.	



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COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, Esq. (NAME and ADDRESS): Address: 50 Canal Street **ANGEL** MENDEZ First Name Middle Name Last Name Royalton, PA 17057 7423 LAWNDALE AVE. PHILADELPHIA, PA 19111 Telephone: (717)944-4463 NCIC Extradition Code Type ☑ 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number Complaint Number Incident Number Services? 440-2022 ☐ YES ☐ NO 12/05/2022 IFS210061 GENDER DOB 01/19/1980 Co-Defendant(s) Add'l DOB Male Male First Name Middle Name Last Name Gen. ☐ Female AKA ☐ White ☐ Hispanic RACE Black ☐ Native American Unknown ETHNICITY WAS TO ☐ Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Grav) ☐ HAZ (Hazel) Color. MAR (Maroon) PNK (Plnk) ☐ MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'i Veh. School Veh. Oth, NCIC Veh. Code Reg. mat Ind. same Plate# Sticker (MM/YY) as Def. VIN Year Make Model Style Golor Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). CDAG ROBERT LABAR ROBERT G. LABAR (Signature of the attorney for the Commonwealth) 12/05/2022 (Name of the altorney for the Commonwealth) (Date) RACHEL A. STORY 1759307/#583 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) in DAUPHIN County on or about 2018-PRESENT [22]

(County Code)



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POLICE CRIMINAL COMPLAINT Docket Number: Date Filed: OTN/LiveScan Number Complaint/incident Number 396932-4 -4 415 - 2022 12 15 12032 IFS210061 Middle: l ast: Defendant Name: **ANGEL** MENDEZ Acts of the accused associated with this Offense: The defendant, did knowingly and with intent make a false entry in, or false alteration of, any record, documents or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; To wit: the defendant made false entries in, and/or false alterations of, records, documents, or things belonging to, or received or kept by PennDOT. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 7121 M1 Offense# Lead? Section Subsection PA Statute (Title) Counte Grade NCIC Offense Code **UCR/NIBRS** Code PennDOT Data Accident ☐ Interstate (if applicable) Number ☐ Safety Zone ☐ Work Zone Statute Description (include the name of statute or ordinance): FALSE APPLICATION FOR CERTIFICATE OF TITLE OR REGISTRATION Acts of the accused associated with this Offense: A person is guility of a misdemeanor of the first degree if the person uses a false or fictidous name or address or makes a material false statement, or falls to disclose a security interest, or conceals any other material fact in an application for a certificate of title or for a registration, to wit: the defendant made a material false statement and/or concealed any other material fact in an application for a certificate of title. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 903 05 of the (a)(1)Offense# Lead? Section Subsection PA Statute (Title) Grade Counts NCIC Offense Code **UCRANIBRS** Code PennDOT Data Accident ☐ Interstate Number ☐ Safety Zone ☐ Work Zone Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY TO COMMIT THE ABOVE OFFENSES Acts of the accused associated with this Offense: The defendant, with Intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Jorge Santos/Santos-Hernandez and/or Santos Auto Gallery), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act. Inchoate Offense ☐ Attempt ☐ Solicitation □ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 06 911 (b)(3)18 1 F1 Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code **UCR/NIBRS** Code PennDOT Data Accident Number ☐ Interstate (if applicable) ☐ Safety Zone ☐ Work Zone Statute Description (include the name of statute or ordinance): corrupt organizations Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity.

POLICE CRIMINAL COMPLAINT Docket Number: Date Filed: Complaint/Incident Number OTN/LiveScan Number CR441 2027 396932-1215 12022 IFS210061 First: Middle: Last: Defendant Name: **ANGEL MENDEZ** Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 911 07 (b)(4) of the F1 Offense# Lead? Section Subsection PA Statute (Title) Counts **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident Number ☐ Safety Zone ☐ Interstate ☐ Work Zone (If applicable) Statute Description (include the name of statute or ordinance): corrupt organization Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3). Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 Lead? Offense# Section Subsection PA Statute (Title) **NCIC Offense Code** Grade UCR/NIBRS Code Counts PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense: Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 903 18 902 A

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number
CR-440-1022	121512002	R 396932-4	IFS210061
	First:	Middle:	Last:
Defendant Name;	ANGEL		MENDEZ

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

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

Docket Number: CRM40-2042	Date Filed: 12 5 3032 R	OTN/LiveScan Number 346 932-4	Complaint/Incident Number
Defendant Name:	First: ANGEL	Middle:	Last: MENDEZ

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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

			POLICE CRIMINAL COMPLAINT
Docket Number:	Date Filed:	OTN/LiveScan Nymber	Complaint/Incident Number
CR-440-2022	12/5/2014	R 396932.4	IFS210061
Defendant Name:	First:	Middle:	Last:
peler (uarit wallie	ANGEL		MENDEZ

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

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

	SH hachela stry
, , 1	(Signature of Afflant)
Sworn to me and subscribed before me this day of	December 2072
12/6/2017 Date	, Magisterial District Judge
My commission expires first Monday of January,	
2024	
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COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: DAUPHIN Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, ESQ. DEFENDANT: **JIMINAN** CHARLIE Address: 50 CANAL ST. Last Name. Middle Name ROYALTON, PA 17057 117 N. GILBERT ST. SHENANDOAH, PA 17976 Telephone: (717)944-4463 NCIC Extradition Code Type C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition ☐ Distance D-Misdemeanor No Extradition 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION AND ASSESSMENT OF THE PROPERTY OF THE PRO OTN/LiveScan Number R 396375 Request Lab Services? Incident Number Complaint Number **Docket Number** Date Filed ☐ YES ☐ NO IFS210061 12/05/2022 Co-Defendant(s) Add'i DOB GENDER pos 11/28/1985 Gen. Last Name **⊠** Male First Name **Widdle Name** ☐ Female AKA Unknown Native American ₩hite Hispanic Black RACE Asian ☐ Non-Hispanic Unknown ETHNICITY BRO (Brown) PLE (Purple) BLU (Blue) RED (Rad/Aubn.) SDY (Sandy) GRY (Gray) Hair PNK (Pink) WHI (White) XXX (Unk./Bald) GRN (Green) BLK (Black) ONG (Orange) Color BLN (Blonde / Strawberry) GRY (Gray) BRO (Brown) GRN (Green) BLK (Black) BLU (Blue) Eye XXX (Unknown) Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) WEIGHT (lbs.) 1.4.4. **DNA Location** TINA ☐ YES ☐ NO FBI Number **** MNU Number. OLN 28683336 Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code Reg. Comm'i Veh. School Veh. State Registration same as Ind. mat Sticker (MM/YY) Plate # Def. Color Style Model VIN Year Make Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing, See Pa.R.Crim.P. 507). 12/05/2022 ROBERT G. LABAR (Name of the allorney for the Commonwealth) 759307/#583 // 43799/#13 (PSP/MPOETC -Assigned Afflant ID Number & Badge # SA RACHEL A. STORY // DET. LINDSAY YETTER (Name of the Afflant) Lehigh County Detectives PA02224002039900 Pennsylvania Office of Attorney General (Identily Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. | accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) on or about 2018- PRESENT in DAUPHIN County [22] (County Code)

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POLICE CRIMINAL COMPL Complaint/Incident Number Docket Number: Date Filed: OTN/LiveScan Number -416-22 IFS210061 96372 15172 First: Middle: Last: **CHARLIE JIMINIAN** Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 18 (a)(1)NCIC Offense Code UCR/NIBRS Code Offenset Lead? Subsection PennDOT Data TI Work Zone ☐ Safety Zone ☐ Interstate (If applicable) Number Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY TO COMMIT THE ABOVE OFFENSES Acts of the accused associated with this Offense: The defendant, with Intent of promoting or facilitating the commission of one or more of the following crimes: Dealing in Proceeds of Unlawful Activity, Theft by Deception, Receiving Stien Property, False Application for Certificate of Title or Registration, Altered, Forged, or Counterfelt Documents, Unsworn Falsification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more individuals (of the following: Jefferson Loor Valey and/or J&J Car & Truck Sales LLC), that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act. Inchoate Offense Attempt ☐ Solicitation Conspiracy Number of Victims Age 60 or Older 18 902 A 18 903 08. 911 (b)(1) 18 NCIC Offense Code **UCR/NIBRS Code** Lead? Offenseil Subsection PA Statute (Title Counta PennDOT Date ☐ Work Zone ☐ Safety Zone ((fapplicable) Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity in which such person participated as a principal, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise, to wit: the defendant engaged in and received income derived, directly or indirectly, from a pattern of racketeering activity and used, directly or indirectly, any part of this income and/or its proceeds. Inchoate ☐ Solicitation ☐ Conspiracy ☐ Attempt Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 (b)(2)FI 09 911 18 UCR/NIBRS Code NCIC Offense Gode Offenset Subsection PA Statute (Title) Lead? Section PennDOT Data (if applicable) ☐ Safety Zone ☐ Work Zone ☐ Interstate

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

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

POLICE CRIMINAL COMPLAINT Docket Number: CR-416-22 Complaint/Incident Number Date Filed: OTN/LiveScan Number IFS210061 First: Last: Defendant Name **CHARLIE NAINIMIL** inchoate Offense ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 911 F1 ... 10 Offense# UCR/NIBRS Code Lead? Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code PennDOT Data Accident :
Number ☐ Safely Zone ☐ Work Zone ☐ Interstate (if applicable) Statute Description (include the name of statute or ordinance); corrupt organizations Acts of the accused associated with this Offense: It shall be unlawful for any person employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, to wit: the defendant was an operator and/or was associated with a vehicle dealership and conducted the enterprise's affairs through a pattern of racketeering activity. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victima Age 60 of Older Offense 18 901 A 18 902 A 18 903 No. 27 (1) 911 (b)(4)Offense# NGIG Offense Code UCR/NIBRS Code Lead? Subsection Counts Grada PennDOT Data (If applicable) Accident Number ☐ Safety Zone ■ Work Zone Interstate Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS Acts of the accused associated with this Offense: It shall be unlawful for any person to conspire to violate any of the provisions of paragraphs (1), (2), or (3) of this subsection. To wit: the defendant conspired with other individuals to engage in a pattern of racketeering activity in violation of subsections (1), (2), and/or (3). Inchoate Offense ☐ Attempt ☐ Salicitation □ Conspiracy Number of Victims Age 60 or Older 18 902 A 18 903 18 901 A UCR/NIBRS Code NCIC Offense Code Offense# Grade PA Statule (Title) Counts Subsection Accident Number PennDOT Data (if applicable) ☐ Work Zone ☐ Safety Zone Interstate Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:

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Docket Number:	Date Filed:	@TN/LiveScan Number	- conthiguismoide	nt Number
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	First:	Middle:	Last:	
Defendant:Name:	CHARLIE		JIMINIAN	•

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

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

		SA furched Sty	
(Date)	(Year)	(Signature of Affight)	
AND NOW, on this date	12/5/22	I certify that the complaint has been properly completed and verif	le
An affidavit of probable cause	must be completed before a warr	rant can be issued.	
		A Property of the second of th	
(Magisterial District Court Nun	iber) (jśśulny	ng Authority) SEAL	

		Andres.		STATE OCHER PLANKE
Docket Number:	Date Filed:	G 396372-4	Complaint/ir	roident Number
Defendant Name:	First: CHARLIF	Middle:	Last: JIMINAN	•

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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

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

1.	Igor DRATCH
2.	Oleg ŻELENKO
3,	David MORRISON
4.	Angel MENDEZ
5.	Jefferson LOOR VALET
6.	Maria PINEDA
7.	Indalecia VASQUEZ

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 Beaki Antonia PEREZ

10. Charlie JiMINAN
11. Margarete ALMSAHAQBEH

 Eulid URENA
 Adelaida GARCIA aka Adelaida MENDOZA
 Edward SALDIVAR
 Alberto LUCIANO
 Mohamed KERDI
 Muhammad ALKURDI
 Edgar COLLADO
 Osiris FERNANDEZ GONZALEZ

12. Linda SANDOVAL-MARTINEZ-HERERRA 21. Juana BELEN-VALDEZ
22. Juana BELENDEVANGELISTA
23. Rafael SANTIAGOPACHECO
24. Jean AQUINO
25. Aristeds AQUINO
26. Ahmed LOPEZ

28. Jimmy RODRIGEZ Sr. 29. Nora RODRIGUEZ 30. Roberto GOMEZ

27. Jessica ENGELKE

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Mägisterial District Number: 12-2-03 VS. MDJ: Hon. DAVID H. JUDY, ESQ. (NAME and ADDRESS): Address: 50 CANAL ST. LOOR-VALET First Name Middle Name Last Name ROYALTON, PA 17057 703 BLUE HERON DRIVE Telephone: (717)944-4463 ALLENTOWN, PA 18103 NCIC Extradition Code Type 1-Felony Full □ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Contain Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited F-Misdemeanor Pending Extradition DEFENDANT DENTIFICATION INFORMATION Request Lab Services? **Qocket Number** Date Filed Complaint Number Incident Number ☐ YES ☐ NO 12/05/2022 IFS210061 Co-Defendant(s) GÉNDER DOB 09/12/1985 POB Add'l DOB **⊠** Male First Name Middle Name Last Name Gen. ☐ Female AKA ⊠ White ⊠ Hispanic Black Unknown RACE Asian Native American Unknown ETHNICITY :: 1 ☐ Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) DLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color. . ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) GRN (Green) GRY (Gray) BRO (Brown) Color . HAZ (Hezel) MAR (Mercon) PNK (Pink) XXX (Unknown) MUL (Multicolored) DNA WEIGHT (lbs.) YES NO DNA Location FBI Number 983309FC8 MNU Number OLN 28183745 Defendant Fingerprinted ☐ YES Ft. HEIGHT in. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION ... Comm'l Veh. Reg. School Veh. Oth, NCIC Veh, Code State Registration Haz mat same as Plate# Sticker (MM/YY) Def. VIN Year Wake Model Style Color \Box Office of the attorney for the Commonwealth Approved Disapproved because: (The alterney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing, See Pa.R.Crim.P. 507). ROBERT G. LABAR 12/05/2022 (Name of the attorney for the Commonwealth) (Dale) 759307/#583 // 43799/#13 SA RACHEL A. STORY // DET. LINDSAY YETTER (PSP/MPOETC -Assigned Afflant ID Number & Badge # (Name of the Affiant) Lenign county Detectives Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) PA0222400 PA 03919 00 (Police Agency ORI Number) do hereby state: (check appropriate box) 1. If I accuse the above named defendant who lives at the address set forth above □ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Place-Political Subdivision) in DAUPHIN County 1221 on or about 2018- PRESENT (County Code)

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POLICE CRIMINAL COMPLAINT Complaint/Incident Number Date Filed: OTN/LiveScan Number 6310:5 IFS210061 Last: First: Defendant Name LOOR-VALET **JEFFERSON** inchoate Offense ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 80 or Older 18 901 A 18 902 A 18 903 07 3925 NCIC Offense Code **UCRINIBRS** Code Offensetl PA Statute (Title PeriniDOT/Data ☐ Safety Zone ☐ Interstate ☐ Work Zone (if applicable) Statute Description (include the name of statute or ordinance); RECEIVING STOLEN PROPERTY Acts of the accused associated with this Offense: A person is guilty of theft if he intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner; to wit: The defendant did intentionally receive, retain or dispose of movable property, belonging to another, with no intent to restore it to the owner, knowing that such property was stolen, or believing that it had probably been stolen, and the property stolen is an automobile, airplane, motorcycle, motorboat, or other motor propelled vehicle in violation of Section 3925(a) of the PA Crimes Code ☐ Attempt ☐ Solicitation ☐ Conspiracy Inchoate Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 4101 **M1** 08 (a)(3) of the 18 NCIC Offense Code HCR/MBRS Code Subsection PA Statute Grade PennDOT Data ☐ Work Zone ☐ Interstate ☐ Safety Zone (if applicable) Number Statute Description (include the name of statute or ordinance); FORGERY Acts of the accused associated with this Offense: A person is guilty of forgery if, with intent to defraud or injure anyone, or with knowledge that he

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is facilitating a fraud or injury to be perpretated by anyone, the actor utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection, to wit: the defendant, with the intent to defraud and/or injure anyone, and/or with knowledge that he is facilitating a fraud or injury to

be perpetrated by anyone, uttered a writing which he knows to be forged in a manner specific in paragraph (2) of this section.

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



Docket	Number	: Date	Filed:	OTN/LiveScan	n Number Complaint/incident Number IFS210061				
Defend	lant Nam	First: JEFFE	RSON	Middle:		1	ast: .OOR-VAI		
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Incho: Offen		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number	of Victims	Age 60 or Older	
	10	7122	(3)	of the 75	Till -1	1.	M1 Grade	NCIC Offense Code	UCR/NIBRS Code
	Offense# nnDOT Da applicabl	ita Accide		FA GMIDIE (Interstate		Safety Zone	☐ Work Zone
			name of statute	or ordinance): ALTE	RED, O	RGED, OR	COUNTERF	EIT DOCUMENTS	
or forges	an assignment of the second se	nent of a certificate	of title, or an assign	A person is guilty of a ment or release of a sec , with fradulent intent, a	urity inte	erest on a ce	ertificate of ti	tle or any other docum	nent issued or
Incho Offen		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number	of Victims	Age 60 or Older	
	11	4904	(b)	of the 18		1	МЗ	Water Officer Code	UCR/NIBRS Code
	Offenset applicable	ata Accide		PA Statute (Counts Interstate	Grade [NCIC Offense Code Safety Zone	□ Work Zone
				or ordinance): UNS	WORN I	'ALSIFICA'	IA OT NOE	THORITIES	
to a form	bearing no	otice, authorized by onduct, in which he	law, to the effect the knowingly and inten-	8: The defendant made at false statements mad klonally signed (PA Depl earing notice that false s	e thereir of Trar	are punisha sportation (able; To wit: PennDOT)) 1	the defendant engage forms thereby making	ed in a continuous
Incho Offer		Attempt 18 901 A	Solicitation	Conspiracy		Numbe	er of Victims	s Age 60 or Older	
	12	903	(a)(1)	of the 18		1	F1		
	Offensi nnDOT D applicat	ata Acci	Subsection dent ber	PA Statute	T	Counts Interstate	Grade	NCIC Offense Cod Safety Zone	UCR/NIBRS Code Work Zone
Statute	Descrip			or ordinance): CRI	MINAL (ONSPIRA	CY/ UNSW	ORN FALISIFICATIO	N TO AUTHORITIES
following Fraud, Tr businessi wit: the o	crimes: Fa heft by Dec (es) that the defendant of Beaki Anto	alse Application for (eption, Receiving S ley or one or more a did agree with one on ania Perez, MP Nota	Certificate of Title or Itolen Property, Forgo of them will engage or more individuals (ry & Tags, Inc., and/	e: The defendant, with Registration, Unsworn F ery, Altered, Forged, or In conduct which constit of the following: Maria F or Charlie Jiminan), that s(s). One or more of the	alsification Counterfutes such Pineda, Ji Ione of r	on to Author eft Documen n crime(s) or 3J Car & Tru nore would (ittes, Dealing its did agree r an attempt ick Sales LLC angage in co	j in Proceeds of Unlaw with such other perso or solicitation to come , Indalecia Vasquez, S	Iful Activity, Insurance In(s) and / or Insurance Info Info Info Info Info Info Info Info



Docke	t Numl	oer: -30-	Pate Filed:	OTN/LiveSca			npiaint Nu 210061	mber Incid	lent Number
	dant N		First	Mid	<u>103/03</u> dle:	TLO	Last:		
	ACTURATE OF		JEFFERSON			· · · · · · · · · · · · · · · · · · ·	LOOR-	VALET	
approp Set fort	priate. th <i>a bria</i>	When there is f summary of the it more, is not suf	accused are descri more than one offe facts sufficient to advis- ficient. In a summary ca-	nse, each offe the defendant of	nse should	be numb	ered chroi	nologically. A citation to the si	tatute(s) allegedly
ncho Offen		Attempt 18 901 A	☐ Solicitati 18 902 A	on E	Conspirac ₎ 18 903		Numb	er of Victims Age	80 or Older
	13	911	(B)(1)	of the 18		1	F1 '		
ead?	Offense in DOT		Subsection ddent	PA SI	alule (Title)	Counts	Grade	NCIC Offense C	
	applica	ible) Nu	mber e the name of statu			Interstate] Safety Zone	☐ Work Zone
roceed	ls to ope	rate J&J Car & Tr	or indirectly, from a pati uck Sales, LLC.		l Conspiracy	,			
Offen		18 901 A	18 902 A		18 903		Numb	er of Victims Age	60 of Older
	14	911	ハーハーノ	of the 18	1		1	NCIC Offense Code	UCRINIBRS Code
	Offensi TOD n	Data Ao	öldeni	PA SIAN	1	Counts Interstate	Grade	Safety Zone	Work Zone □
Statute Acts o	f the a	ription (included) coused associately and included in the coused associately associatel	e the name of statu lated with this Offen ly interest in or control or r control of J&J Car & Tr	se: It shall be un f any enterprise; t	lawful for any	person thro	ugh a patte	rn of racketeering n of racketeering a	activity to acquire or activity maintained,
incho Offen		☐ Attempt 18 901 A		on C] Conspiracy 10 903	· · · · · · · · · · · · · · · · · · ·	Numb	er of Victims Ago	e 60 or Older
	15	911	(B)(3)	crine 18	1	F	1		
.ead?	Опере	# Section	Subsection	PA Stat		Counts	Grade	NCIO Offense Code	
if Statut	applio e Des	Data Ac able) Nu pription (includ	mber e the name of statu	te or ordinance		Interstate ORGANIZAT		Safely Zone	☐ Work Zone
	2 44	ccused assoc						**************************************	



Dogket Number:	Date Filed:	OTN/LiveScan N	lumber		olaint Number 10061	Incide	lent Number	
Detendant Name	Firet: JEFFERSON	Middle) 11 32	Last; LOOR-VALI	<u></u>		
The acts committed by the appropriate, When there is set forth a <i>brief</i> summary of the riotated, without more, is not su liegedly violated.)	s more than one offe	nse, each offense	should be	numbe	red chronolog charged. A cita	pically. Non to the stat	utels) allegedly	
Inchoate	Solicitation 18 902 A		onepiracy 903		Number of \	/ictims Age 6	0 or Older	
□ 1 6 911		ar the 18	1		F1.			
ead? Offense# Section PeninDOT Data Ac (if applicable) N	cident	PA Statute	(Title) C	ounis ratale	Grade NC ☐ Şafe	IC Offense God ty Zone	e <u>UCR/NIBRS Code</u> ☐ Work Zone	
octs of the accused associty, (2), or (3) of this subsection absections (1), (2), and/or (3).	. To wit: the defendant o	onspired with other in	dividuals to en	gage in a	pattern of racke	teering activity	In violation of	
nchoate	Solicitation 18 902 A		onepiracy 903		Number of	/ictims Age 6	0 or Older	
	108	if the						
	n Subsection Gident Imber:	PA Statute (Title) Coun ☐ Inte		irade NCIC (☐ Safe	Offense Code Ay Zone	UCR/NIBRS Code Work Zone	
Statute Description (includ							,	
Acts of the accused assoc	ated with this Offen	se;						
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nchoate Attempt Offense 18 901 A	☐ Solicitati 18 902 A		onspiracy 1903		Number of	Victims Age 6	0 or Older	
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	3 129	oj (Ine)						
ead? Offensell Section	n Subsection	PA Statute (Title) Coun			Offense Code bly Zone	UCR/NIBRS Code Work Zone	
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				POLICE CRIMINAL COMPLAIN
ocket Number:	Date Filed:	12 396	NJLiveScan Number ろんご	Complaint/Incident Number IFS210061
efendant Name:	First: JEFFERSON		Middle:	Last: LOOR-VALET
I ask that a warrar made.	nt of arrest or a su	mmons be is:	ued and that the defe	ndant be required to answer the charges I have
I verify that the factory belief. This verificate to unsworn falsification.	ation is made subj	ect to the pe	e true and correct to the naities of Section 4904	e best of my knowledge or information and of the Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	nsists of the prece	ding page(s)	numbered 1 through _	¹
5. I certify that this fil System of Pennsyl information and do	vania that require	the provision filing confide	e of the <i>Case Records</i> ntial information and de	Public Access Policy of the Unified Judicial ocuments differently that non-confidential
		- linkaal maak t	parathe unan analant	the reason and dispile of the Commenwealth
of Pennsylvania and	were contrary to the	he Act(s) of t	ne Assembly, or in viol	the peace and dignity of the Commonwealth ation of the statutes cited. Ise must be completed, sworn to before the
issuing authority, a		succ, an am	mavikoi bionavia ear	ise titiet be completed; swom to balois me
•				dimenan cutti
(Date)		(Year)		(Signature of Affant)
AND NOW, on this date	125	-22-	I certify that the	complaint has been properly completed and verified.
An affidavit of probable	cause must be com	pleted before	a warrani can be issued.	
(Magisterial District Co	Urt Number)		ssupp Authority)	SEAL
				10087 49 10087 49 11 08184

		· -	
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
Cr-411.22	1215122	R396310-5	
	First:	Middle:	Last:
Defendant Name:	JEFFERSON		LOOR-VALET

AFFIDAVIT of PROBABLE CAUSE

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

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

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

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

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

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- 2. Oleg ZELENKO
- 3. David MORRISON
- 4. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 6. Maria PINEDA
- 7. Indalecia VASQUEZ
- 8. Somary IBETH Otanez De LOOR
- 9. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- 11. Margarete ALMSAHAQBEH

- 12. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulld URENA
- 14. Adelaida GARCIA aka Adelaida MENDOZA
- 15, Edward SALDIVAR
- 16. Alberto LUCIANO
- 17. Mohamed KERDI
- 18. Muhammad ALKURDI
- 19. Edgar COLLADO
- 20. Osiris FERNANDEZ GONZALEZ

- 21. Juana BELEN-VALDEZ
- 22. Juana BELEN-DEVANGELISTA
- 23. Rafael SANTIAGO-PACHECO
- 24. Jean AQUINO
- 25. Aristeds AQUINO
- 26. Ahmed LOPEZ
- 27. Jessica ENGELKE
- 28, Jimmy RODRIGEZ Sr.
- 29. Nora RODRIGUEZ
- 30. Roberto GOMEZ

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-2-03 (NAME and ADDRESS): MDJ: Hon. DAVID H. JUDY, Esq. **ZELENKO OLEG** Address: 50 Canal Street Last Name First Name Middle Name Royalton, PA 17057 209 LIBERTY DR. LANGHORNE, PA 19047 Telephone: (717)234-0949 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number** Date Filed OTN/LiveScan Number Complaint Number Incident Number Services? ☐ YES ☐ NO 12/05/2022 IFS210061 Co-Defendant(s) GENDER ров 07/22/1981 Add'l DOB **⊠** Male First Name Middle Name Last Name Gen. Female AKA ☐ Unknown RACE Native American ☐ Asian Black ETHNICITY Hispanic Non-Hispanic Unknown BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair PNK (Pink) BLK (Black) XXX (Unk./Bald) GRN (Green) ONG (Orange) ☐ WHI (White) Color BLN (Bionde / Strawberry) GRN (Green) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO **FBI Number** MNU Number Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth. NCIC Veh. Code Reg. State Registration Comm'l Veh. School Veh. Haz same mat Ind. П Plate# Sticker (MM/YY) as Def. VIN Make Model Style Color Year Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). 12/05/2022 CDAG ROBERT LABAR <u>ROBERT G. LABAR</u> (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) #583 RACHEL A. STORY (PSP/MPOETC -Assigned Afflant ID Number & Badge # (Name of the Afflant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] Subdivision Codes in DAUPHIN County on or about 2018-PRESENT (County Code)

						•	黎 P			COMPLAINT
Docket N	umber: 37- <i>80</i> 32	Date F	iled: <i> aúa</i> 3		TN/LiveSc 9690	an Numk	er		mplaint/incident N 3210061	lumber
Defendan		First:	1 2000	~~	Middle:	·	1 1	Last:		
		OLEG						ZELENK	<u>J</u>	•
When the (Set forth a without mo	ere is more than brief summary of we. is not sufficien	in one of the facts s it. In a sum ime of the c	fense, each o ufficient to advis mary case, you i offense may be in	offense si se the defer must cite the ncluded if k	nould be indent of the ne specific : mown, in a	numbere nature of i section(s) a idition, soc	i chronolo he offense(s nd subsection lal security r	gically.) charged. on(s) of the numbers ar	A citation to the state statute(s) or ordinan ad financial information	ated, if appropriate. Ite(s) allegedly violated, ce(s) allegedly violated. on (e.g. PINs) should not
Inchoate Offense	Attempt 18 901 A		☐ Solicitation 18 902 A		Conspiracy 8 903			Number	of Victims Age 60 o	r Older
	01 911	4.2 j. 4 3	(B)(1)	of the	18		1	F1		
Lead?	Offense Se	ection	Subsection		PA Stat	ute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	DOT Data plicable)	Accident Nu	ımber	-			Interstate		☐ Safety Zone	☐ Work Zone
	Description (inc	dude the	name of statu	ute or ord	linance):	CORRUPT	ORGANIZA	TIONS		
	o operate Amatti A	Auto Sales L			Conspiracy				tiy, any part of this in	
····		1		of the	18		71	F1		
Lead? O	<u> </u>	ection	(b)(3) Subsection		a	tute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
Penni	DOT Data	Accident N	umber			-T	Interstate		☐ Safety Zone	☐ Work Zone
	plicable) Description (inc	clude the	name of state	ute or ord	linance):	CORRUPT	ORGANIZA	ATIONS		1
narticipate	he accused as , directly or indirec s associated with a	ctiv. in the	conduct of such	enterprise's	affairs thro	ough a patt	ern of racket	eering acti	vity, to wit: the defen	enterprise to conduct or idant was an operator
Inchoa Offens			☐ Solicitation 18 902 A		Conspirac 18 903	у	Numb	er of Victi	ns Age 60 or Older	
П	03 911		(b)(4)	of the	18	4. 3	1	F1		
Lead?	Offense#	Section	Subsection	5000 B 5000	177. B	atute (Title)	Counts	Grad	e NCIC Offense C	Code UCR/NIBRS Code
(if a	nDOT Data pplicable)	Accide Numb	er				☐ Interstate		☐ Safety Zone	☐ Work Zone
		-			44					
Statute I	Description (inc	clude the	name of stat	ute or ord	dinance):	CORRUPT	ORGANIZ/	ATIONS		

Pocket Number: Date Filed: 12.15 1303 Perendant Name: Date Filed: 12.15 1303 First: OLEG	OTN/LiveScan		Complaint/Incident Nu IFS210061 NKO	mber
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Inchoate ☐ Attempt ☐ Solid Offense 18 901 A 18 9		Number of Vic	tims Age 60 or Older	
	(1) of the 18	1 F3	ade NCIC Offense Code	LICERSTEPPE Code
Lead? Offense# Section Su PennDOT Data Accident (Iff.applicable) Number —	bsection PA Statute (T	Itle) Counts Gr	Ade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
Statute Description (include the name	of statute or ordinance): INSU	JRANCE FRAUD		
Acts of the accused associated with the namely, PA Deptartment of Transportation (Penfalse, incomplete or misleading information confusurance rate filling, a motor vehicle insurance request; to wit: the defendant, knowingly and vehicle information about the dealerships in	nDOT), file, present or cause to be i cerning a fact or thing material to th transaction or other motor vehicle in with intent to defraud the PA Dept. o	filed or presented to the g e agency's determination Isurance action which is re	overnment agency a docum in approving or disapproving equired or filed in response t	ent that contained g a motor vehicle to an agency's
1 2300000 (40000000000000000000000000000000	icitation	Number of V	ictims Age 60 or Older _	
)(2) of the 18	1 F3	<u> </u>	
Lead? Offense# Section S PennDOT Data Accident (If applicable) Number	ubsection PA Statute (Title) Counts C	Prade NCIC Offense Code ☐ Safety Zone	UCR/NIBRS Code Work Zone
Statute Description (include the name	of statute or ordinance): INSU	JRANCE FRAUD		
Acts of the accused associated with the presented to an insurer a statement forming a processing a fact or thing material to the insural such statements to be made in support of an in	part of, or in support of, an insurance claim; to wit: the defendant did	e claim that contained fals	se, incompleted or misleadin	g information
Inchoate	citation Conspiracy 02 A 18 903	Number of Vio	ctims Age 60 or Older	
□ 06 4117 (a))(3) of the 18	1 F3		
PennDOT Data Acadent	bsection PA Statute (T	itle) Counts Gr ☐ Interstate	ade NGIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
Number	of statute or ordinance): INS	URANCE FRAUD		
Acts of the accused associated with the conspires with another to prepare or make any claim that contains any false, incomplete or mistor supports an amount claimed in excess of the aninsurer, made material statement(s) intended and/or incomplete and/or misleading information	statement that is intended to be pre- sleading information concerning any actual loss sustained by the claiman I to be presented to the insurer in co	esented to any insurer or a fact or thing material to the nt to wit: the defendant di	self-insured in connection wi he claim, including informati id knowingly and with the in	th, or in support of, a on which documents tent to defraud

Docket	Number: 437-30.	. 1	Filed: 51 AUAA			VLiveScan	Numbe -/	r		IFS2	plaint/Incident Nun 210061	nber
Defend	lant Name:	First: OLEG		Middle:					Last: ZELENKO			
Incho	A 100 A	ittempt	☐ Solici			onspiracy		Γ	Number o	of Victims	Age 60 or Older	
Offer	nse 1	8 901 A	18 902	A	18	903						
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Lead?	Offense# nnDOT Data	Section Accid		ection		PA Statute			Counts	Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone
	applicable)								terstate		Galety Zone	□ Work Zone
Statute	Description	n (include the	name or	statute or	orain	ance): INS	URANC	E M	(AUD			
thereto;	to wit: the def	endant knowing any fact materia	ly and with	Intent to defr	aud ai	n insurance o	ompany,	file	d an applic	ation for I	ing Information concernsurance containing fa	lse and/or misleading
Incho Offen		tempt 901 A	Solicita 18 902		Cor 18 9	nspiracy 903		[Number of	Victims /	Age 60 or Older	transferência (194
	08 3	3922	(a)(1) of th	e	18		1		- 3		
Lead?	Offense#	Section	Subse	A SECRETARY		PA Statute (Title)		ounts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nnDOT Data applicable)	Accide Numb						inte	erstate] Safety Zone	☐ Work Zone
		n (include the		statute or	ordin	ance): THE	FT BY C	EC	EPTION			
deceptio	n, created or or cause to be	reinforced a fals	e impressio	n, including fa Company, fal	olise im se, inc	ipressions as	to law, v	alu	e, intention formation n	or other naterial to	btain or withhold prop state of mind; to wit: t an application for insu	he defendant did
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Lead?	Offense#	Section	Sub	section		PA Statute	(Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nnDOT Data (applicable)		ent oer —] In	terstate		☐ Safety Zone	☐ Work Zone
			***************************************	statute or	ordir	nance): FAL	SE APP	LIC	IO NOITA	TITLE C	R REGISTRATION	
name or certifical	r address or ma	akes a material	false statem	ent, or falls to	o discl	ose a securit	v Interest	, or	conceals a	any other i	ee if the person uses a material fact in an app other material fact in a	ication for a

Docket Number		Filed: 5/3/32	OTN/LiveScan	Number	Complaint/Incident Number IFS210061			
Defendant Nam	e: OLEG		Middle.		ZELENKO			
Inchoate □	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy	Numb	er of Victims	Age 60 or Older		
10 Lead? Offense#	4904 Section	(b) Subsection	the 18 PA Statute (Title) Counts	M1 Grade	NCIC Offense Cod	B UCR/NIBRS Code	
PennDOT Da	ata Accide	nt	FA Sidule	Interstate		Safety Zone	☐ Work Zone	
(if applicable) Statute Descript		name of statute or	r ordinance): ALTE	RED, FORGED, C	R COUNTER	FEIT DOCUMENTS		
		****		··········				
to a form bearing no course of criminal co	otice, authorized by onduct, in which he	with this Offense: law, to the effect that i knowingly and intentio be true, on forms bear	false statements mad nally signed (PA Dept	e therein are punis :, of Transportation	hable; To wit: (PennDOT)) f	the defendant engagorms thereby making	be true, on or pursuant ged in a continuous g written false	
Inchoate Offense	Attempt 18 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903	Numb	er of Victims	Age 60 or Older _		
Lead? Offense#	4904 Section	(b) Subsection	the 18 PA Statute (Title) Counts	M1 Grade	NCIC Offense Cod	e UCR/NIBRS Code	
PennDOT Da (If applicable	A Company of the Comp			☐ Interstate] Safety Zone	☐ Work Zone	
	4 1 2 1 1 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1	name of statute or	ordinance): uns	WORN FALSIFIC	ATION TO AL	THORITIES .		
following crimes: Fall business(es) that the wit: the defendant d	lse Application for C ey or one or more o lid agree with one o In conduct that con	with this Offense: ertificate of Title or Re f them will engage in c r more individuals (of t stitutes the aforementi	gistration, Unswom F onduct which constitu he following: Igor Dra	alsification to Auth utes such crime(s) atch, Oleg Zelenko	orities, did agn or an attempt Amatti Auto S	ee with such other p or solicitation to com Jales LLC, and/or Gri	erson(s) and / or nmit such crime(s); to g LLC), that one of	
Inchoate [Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy	Num	per of Victims	Age 60 or Older		
12 Lead? Offense	7121 # Section	Subsection	of the 75	10	M 1	NCIC Offense Co	de UCR/NIBRS Code	
Lead? Offense PennDOT D (if applicab)	ata Accid	ent	PA Statute	☐ Intersta		☐ Safety Zone	☐ Work Zone	
		name of statute o	r ordinance): CRI	VINAL CONSPIR	ACY TO COM	MIT ABOVE OFFEN	SES	
following crimes: Fall business(es) that the wit: the defendant d	lse Application for C ey or one or more o lid agree with one o of more would enga	with this Offense: certificate of Title or Re of them will engage in c or more individuals (of t ge in conduct that con	gistration, Unsworn F conduct which constitution the following: Igor Dr	alsification to Auth utes such crime(s) atch, David Morriso	orities, did agr or an attempt on, Amatti Auto	ee with such other p or solicitation to con Sales LLC, Newroad	erson(s) and / or nmit such crime(s); to	

2 . H. O			•
	POLICE	CRIMINAL	COMPLAINT

Docket Number: -437-3012	12/3/2022	OTN/LiveScan Number 8396901-/	Complaint/Incident Number
Defendant Name	First:	Middle:	Last:
Definition (144)	OLEG		ZELENKO

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

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

		SA	rache a stry
(Date)	(Year)		(Signature of Afflant)
AND NOW, on this date	December 6, 200	2 I certify that the complaint has been	properly completed and verified.
An affidavit of probable co	ause must be completed before	·· · · · · · · · · · · · · · · · · · ·	
Magisterial District Court	-	ssuing Arthority	SEAL

	POLICE	CRIMINAL	COMPLAINT
(A)	PULICE	CKIIMIIMWE	COMILTWIN

		- Arcellibria.	I OFICE CITIZING IN COMM. TO WAY
Docket Number: CR-437-303 2	Date Filed: 121512022	OTN/LiveScan Number R 396901-1	Complaint/Incident Number IFS210061
	First:	Middle:	Last:
Defendant Name:	OLEG		ZELENKO

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

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

		SA boche a Str	<u> </u>
	\mathcal{A}	(Signature of Aff	Y
Sworn to me and subscribed before me this	loth pay of	December	3032
/1/6/3012 Date	T The Land	, Magisterial Distric	t Judge
My commission expires first Monday of Janu	any	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
my commission expires mat monday or output	ary, 20 by V	SEA	

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: DAUPHIN Magisterial District Number: 12-02-03 (NAME and ADDRESS): MDJ: Hon, DAVID H. JUDY, ESQ. MORRISON Address: 50 CANAL ST. ROYALTON, PA 17057 DAVID Last Name Ge Middle Name First Name 542 Newport Cir. Feasterville Trevose, PA 19053 Telephone: (717)944-4463 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition 1-Felony Full ☐ Distance: ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ F-Misdemeanor Pending Extradition 1 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION 303 (0) 30 (0) (0) (E) Request Lab OTN/LiveScan Number Incident Number **Complaint Number Date Flied Docket Number** Services? ☐ YES ☐ NO 12/05/2022 FS210061 Co-Defendant(s) **GENDER** Add'I DOB DOB 08/23/1973 Gen. Last Name Middle Name ☑ Male First Name ☐ Female Unknown Native American White ☐ Hispanic Black Asian RACE ETHNICITY Non-Hispanic Unknown BRO (Brown) BLU (Blue) PLE (Purple) RED (Red/Aubn.) SDY (Sandy) GRY (Gray) Háir PNK (Plnk) XXX (Unk/Bald) GRN (Green) ☐ WHI (White) BLK (Black) ONG (Orange) Color BLN (Blonde / Strawberry) GRY (Gray) BLU (Blue) BRO (Brown) GRN (Green) BLK (Black) Eye PNK (Pink) XXX (Unknown) MAR (Maroon) MUL (Multicolored) ☐ HAZ (Hazel) Color WEIGHT (lbs.) DNA **DNA Location** ☐ YES ☐ NO FBI Number MNU Number Ft. HEIGHT In. ☐ YES ☐ NO Defendant Fingerprinted Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Reg. Comm'l Veh. School Veh. Oth. NCIC Veh. Code State Haz Registration same mat Plate# Sticker (MM/YY) as Def. Model Style Color Make VIN Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). ROBERT G. LABAR 12/05/2022 CDAG ROBERT G. LABAR (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) 759307/#583 RACHEL A. STORY (PSP/MPOETC -Assigned Afflant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency OR! Number) do hereby state: (check appropriate box) 1. ⊠ I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Subdivision Code) (Place-Political Subdivision) on or about 2018-PRESENT in DAUPHIN County (County Code)

Docket Number:				AND			COMPLAINT
CR-432-2023	Date Fil 2 / 2/5/	led: 2022	OTN/LiveScan No	4-4	IFS2	laint/Incident N 10061	umber
Defendant Name:	First: DAVID	•	Middle:	-	.ast: 4ORRISON	1	
- Condesidad							
The acts committed When there is more (Set forth a brief summar without more, is not suffithe age of the victim at the listed. If the identity of	than one offer y of the facts su cient. In a summer the time of the off	ense, each offen: fficient to advise the nary case, you must fense may be includ	se should be numb defendant of the natur cite the specific section ed if known. In addition	ered Chronolog o of the offense(s) (s) and subsection of social security n	giCally.) charged. A c n(s) of the sta umbers and fi	itation to the statu tute(s) or ordinand nancial informatio	te(s) allegedly violated, :e(s) allegedly violated.
Inchoate		Solicitation 18 902 A	Conspiracy 18 903		Number of \	/Ictims Age 60 or	Older
		(b)(1) of t	he 18	1	F1		
Lead? Offense	Section	Subsection	PA Statute (Tit	le) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Nur	nber		☐ Interstate		Safety Zone	☐ Work Zone
Statute Description (include the r	name of statute of	or ordinance): CORR	UPT ORGANIZA	TIONS		
from a pattern of rackete proceeds of such income, received income derived, proceeds to operate New	, in the acquisition , in the	on of any interest in, ectly, from a pattern	or the establishment of racketeering activity	r en neren icus en . esci	or indirectly,	any part of this in	come and/or its
Inchoate	1	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of	Victims Age 60 o	r Older
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□ 02 91:	1	The contract of the contract o		lie) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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Lead? Offense# PennDOT Data (If applicable)	Section Accident Nu	Subsection mixer		☐ Interstate		Safety Zone	☐ Work Zone
Lead? Offense# PennDOT Data	Section Accident Nu (include the restly, any interestly, any interest.)	Subsection mber name of statute of the statute of	or ordinance): CORI	☐ Interstate RUPT ORGANIZA	ATIONS	of racketeering ac	livity to acquire or
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PennDOT Data (If applicable) Statute Description Acts of the accused maintain, directly or indirectly, interest in continuous conti	Section Accident Nu (include the r I associated v rectly, any intereor control of Nev tempt 901 A	Subsection moer name of statute	or ordinance): CORI : It shall be unlawful for one enterprise; to wit: the Conspiracy 18 903	Interstate RUPT ORGANIZA r any person through the defendant throug	arrions ligh a pattern of pattern of Victims F1 Grade	of racketeering act	tivity to acquire or vity maintained, directly
PennDOT Data [If applicable] Statute Description Acts of the accused maintain, directly or indirectly, interest in continuous conti	Section Accident Nu (include the rectly, any interestry, any interestry control of New tempt 901 A Accident Nu Accident Number	Subsection miber name of statute of statut	cr ordinance): CORI : It shall be unlawful for any enterprise; to wit: the conspiracy 18 903 of the 18	Interstate RUPT ORGANIZA r any person through the defendant throug	arrions ligh a pattern gh a pattern er of Victims F1 Grade	of racketeering act	divity to acquire or ivity maintained, directly

	Number: 432 - 7022	Date 12 IS	Filed: 13032	OTN/LiveScan	Number			laint/incident N 0061	lumber
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Incho Offen	***************************************		☐ Solicitation 18 902 A	Conspiracy 18 903		Number of	Victims Ag	ge 60 or Older	
	04 911	<u> </u>		of the 18			F1 Grade	NCIC Offense Co	de UCR/NIBRS Code
artifactor of worth Colorest	Offense# inDOT Data applicable)	Section Accider Numbe		PA Statute (Counts Interstate	- I	Safety Zone	☐ Work Zone
	Statute Description (include the name of statute or ordinance): CORRUPT ORGANIZATIONS								
	, ,								
(2), or (3	the accused a solution of this subsection and/or (3).	ssociated n. To wit: th	with this Offense e defendant conspire	e: It shall be unlawful ed with other individua	for any pe Is to engag	rson to consp ge in a patter	ire to violate n of rackete	e any of the prov ering activity in v	islons of paragraphs (1), Holation of subsections
Incho Offer			☐ Solicitation 18 902 A	Conspiracy 18 903		Number	of Victims A	Age 60 or Older	
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	Offense# nnDOT Data	Section Accide		PA Statute	Ţ	Counts		Safety Zone	☐ Work Zone
Statute	applicable) Description (i	Numb nclude the		or ordinance): UN	SWORN I	FALSIFICAT	ION TO AU	THORITIES	
pursuani	Acts of the accused associated with this Offense: The defendant made a written false statement which he did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; To wit: the defendant engaged in a continuous course of criminal conduct, in which he knowingly and intentionally signed (PA Dept. of Transportation (PennDOT)) forms thereby making written false statements which he did not believe to be true, on forms bearing notice that false statements were punishable by law.								
Incho	ate 🗌 🗀 Atten		☐ Solicitation	☐ Conspiracy		Number o	f Victims A	ge 60 or Older	
Offer	ise 18 90°	1 A	18 902 A	18 903			٠٠٠٠١ ا	**************************************	
Lead?	06 712 Offense#	21 Section	Subsection	of the 75 PA Statute	(Title)	1 Counts	MZ M/	NCIC Offense Co	
Pe	nnDOT Data applicable)	Accide Numb	nt			Interstate		Safety Zone	☐ Work Zone
Statuti	Description (or ordinance): FA	LSE APPI	ICATION FO	OR CERTIF	ICATE OF TITL	E
name or certifica	- addrese or make	e a material f	isles etstament or fa	alle to disclose a securi	h, interest	, or conceals a	anv otner m	laterial fact in an	ses a faise or ficticious application for a t in an application for a

	ate Filed:	OTN/LiveScan N R 39686	can Number Complaint/Incident Number IFS210061			
Fin		Middle:		ast: MORRISON		
UA	VID		3,	IONNION		
Inchoate	Solicitation 18 902 A	⊠ Conspiracy 18 903	Number	of Victims Age 60 or Older		
O7 7121		of the PA Statute (Ti	(le) Counts	Grade NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data Ac	cident		☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include		or ordinance): cons	SPIRACY/FALSE	APPLICATION FOR CERTIFICA	TE OF TITLE, ETC.	
Acts of the accused associated with this Offense: The defendant, with intent of promoting or facilitating the commission of one or more of the following crimes: False Application for Certificate of Title or Registration, Unsworn Faisification to Authorities, did agree with such other person(s) and / or business(es) that they or one or more of them will engage in conduct which constitutes such crime(s) or an attempt or solicitation to commit such crime(s); to wit: the defendant did agree with one or more of the following: Igor Dratch, Oleg Zelenko, Amatti Auto Sales LLC, and/or Grig LLC, that one of more would engage in conduct that constitutes the aforementioned crime(s), or an attempt or solicitation to commit such crime(s). One or more of them engaged in an overt act.						
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Numbe	r of Victims Age 60 or Older		
Lead? Offense# Seaffs	on Subsection	of the PA Statute (Grade NCiC Offense Cod	e UCR/NIBRS Code	
PennDOT Data A	coldent	17. Outline	☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include		or ordinance):				
Acts of the accused associa	ated with this Offens	ə:				
				1 - V	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Inchoate	☐ Solicitation	☐ Conspiracy	Number	of Victims Age 60 or Older		
Offense 18 901 A	18 902 A	18 903				
Lead? Offense# Section		of the PA Statute (T	Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data A	cident umber ———		☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (include		or ordinance):				
Acts of the accused associ	ated with this Offens	e:				
Wors of the annuser associ	awa willi una Onolia	•				

Docket Number: CR-432-3082	11 11-10-10	OTN/LiveScan Number 396869-4	Complaint/incident Number
Defendant Name:	First: DAVID	Middle:	Last: MORRISON

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

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

		SA J	Rachula Stry (Signature of Affiant)
(Date)	(Year)		(Signature or Amant)
AND NOW, on this date	December 4, 2002	certify that the complaint has be	en properly completed and verified.
An affidavit of probable car	use must be completed before a warra	ınt can be issyed.	
12-2-0 (Magisterial District Court		Authority)	
(Wagisterial District Court)	(adding		SEAL

		· -	
Docket Number:	Date Filed:	QTN/LiveScan Number	
(K-432-2632	121512022	R 396809-4	IFS210061
Defendant Name:	First:	Middle:	Last:
Derendant Name:	DAVID		MORRISON

AFFIDAVIT of PROBABLE CAUSE

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

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

1.	1	DRA'	~~ 1

- 2. Oleg ZELENKO
- 3. David MORRISON
- 1. Angel MENDEZ
- 5. Jefferson LOOR VALET
- 5. Maria PINEDA
- 7. Indalecia VASQUEZ
- 3. Somary IBETH Otanez De LOOR
- 3. Beaki Antonia PEREZ
- 10. Charlie JIMINAN
- L1. Margarete ALMSAHAQBEH
- L2. Linda SANDOVAL-MARTINEZ-HERERRA
- 13. Eulid URENA
- L4. Adelaida GARCIA aka Adelaida MENDOZA
- L5. Edward SALDIVAR
- L6. Alberto LUCIANO
- 17. Mohamed KERDI

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

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

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

	POLICE	CRIMINAL	COMPL	AIN7
shouldenest.		AND FEDERAL ALL FRANCE		

Page __ of __

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

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

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

	sh hadhy a Stry
, , A	(Signature of Affiant)
Sworn to me and subscribed before me this day of	Secember 2022
18/6/3037 Date	, Magisterial District Judge
My commission expires first Monday of January, 2014	
tall collimination explices and monday or agricultally 60 940	SEAL

AOPC 412A - Rev.12/21

COMMONW COUNTY OF Magisterial Dist MDJ: Hon. DAV Address: 50 Co	E:DAUPHIN rict Number: VID H. JUD ANAL ST. F	12-02 Y, ES ROYAI	2-03 6Q. LTON,	, PA 1	7057 Pending E	I(F) 9 P NGIC	Extradition on .	wden hia, I n Code	COM St. PA 19115 Type C-Misdemen	A. Middle	VEALTH (NAME &	OF PEN /S. und ADDRI DRAT Last No	CH	
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RACE	☐ White			Asian			• • • • • • • • • • • • • • • • • • • •	TC207	ick		Vative Ameri	an	Unknown	
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Office of the a	ttorney for t	1e Co	mmor	wealth	Apr	orove	d 🛮 Dis	sappro	ved becau	ıse:			ICT COURT	
(The attorney for to filing. See Pa.I			ay requ	ire that	he comple	aint, ar	rest warrar	nt affida	vit, or both b	e approv	ed by the a	torney for th	ne Commonwea	ith prior
CDAG ROBERT (Name of the attorne		inwealth	ı)		Ì	ROB (Sign	ERT O	attorne	IBAR For the Comm	onwealth)				2022 Date)
I, RACHEL A									759307/4 (PSP/MI		Assigned A	ffiant ID Nu	mber & Badge #	; ` <u>;</u>
(Identify Depart do hereby s 1. ⊠ I accus	tate: (check	cy Rep appro name	resente opriate ed def	d and P e box) endani	olitical Sul who live	bdivision	the addr		(Police /	ove) RI Number))		
☐ I accus therefor		dant w	vhose John D	name	and pop	oular o	designati	ion or	nickname	are unl	Harri	sburg City	vhom I have / subdivision)	
in DAUP	HIN County	f	*	22]	`nria\	(on or abo	out 2)18-PRES	ENT				

							4	於 P	OL	ICE	CRIMINA	L COM	PLAINT
Docket N	lumber: 129-202:	Date	Filed: 5 / 2022		N/LiyeSca						plaint/incident 210061	Number	
Defendar		First:	101921-7		Middle:	<u> </u>			Last: DRA				
		IGOR		l	Α				UNA	icn			
·····			***************************************			 							
			sed are describ								te allegedly vio	lated, if a	opropriate.
Dat facile	a belafatimmae	v at the factor	ffense, each offe sufficient to advise t	ha dafan	dant of the r	aphiro c	of the n	ffang <i>ol</i> e	:Tehar	A han	citation to the sta	tute(s) alleg	edly violated,
ulthout me	ore le not suffi	cient. In a sun	mary case, you mu offense may be incli	et cita the	specific se	ction(s) and s	uhsectic	onisì c	of the s	tatuteis) or ordina	nce(s) alleg	ediy violated.
i ne age oi se listed. I	r the victim at the firm of the identity of	an account m	onense may be incu rust be established,	list only t	he last four	digits.	204 PA	.Code §	§ 213.	1 – 213	3.7.)	aon torair i ir	0,000000
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Inchoate Offense	2000	1	Solicitation 18 902 A		onspiracy 903				Nun	nber o	f Victims Age 60	or Older _	· · · · · · · · · · · · · · · · · · ·
Olialise								13 10 1	L				**********
L	01 911		(b)(1) 0	the	18		1		F1		NCIC Offense		
Leady	Offense ` #	Section	Subsection		PA Statut	e (Title)	(Counts	G	rade	Code	UCR/N	IBRS Code
	DOT Data plicable)	Accident N	umber			ι	☐ Inte	state			Safety Zone	\	Vork Zone
		include the	name of statute	or ordi	nance): C	ORRUI	PT OR	SANIZA	ATION	IS			
acts of t	he accused	associated	with this Offens	e: It shal	be unlawfu	d for ar	ny pers	on who	has re	ceived	any income derive	ed, directly o	or indirectly,
roceeds c	of such income.	in the acquist	n which such person ition of any interest l	n. or the	establishme	ent or o	peratio	n of, an	y ente	rprise,	to wit: the defend	lant engage	in and
eceived in	ncome derived,	directly or ind	irectly, from a patter	m of rack	eteering ac	tivity an	nd used	, directl	y or in	directi	y, any part of this	income and	or its
roceeds t	to operate Grig	шс.											
Inchoate	44500		Solicitation		onspiracy 8 903				Nur	nber o	f Victims Age 60	or Older _	
Offense	18 901	<u> </u>	18 902 A	10	903				<u> </u>				
	2 911		(b)(2)	fthe	18		1		F1				
	Offense#	Section	Subsection		PA Statu	te (Title)	(Counts	G	rade	NGIC Offense Code	UCR/N	IBRS Code
CHARLES THE STATE OF	DOT Data plicable)	Accident N	lumber			1	☐ Inte	rstate			Safety Zone	ים ו	Work Zone
		include the	name of statute	or ordi	nance): c	ORRU	PT OR	GANIZA	OTTA	NS			
	•	•											
Acts of t	the accused	associated	with this Offens	e: It sha	ll be unlawf	ul for a	ny pers	on thro	ugh a	patterr	of racketeering a	ctivity to acc	uire or
maintain,	directly or indir	ectly, any inte	rest in or control of	any enter	prise; to wi	t: the d	lefenda	nt throu	igh a p	attern	of racketeering a	tivity maint	alned, directly
or indirect	dy, interest in o	r control or a	car dealersnip.										
												, , , , , , , , , , , , , , , , , , ,	
Inchoa	ite 🗆 🗆 Att	empt	☐ Solicitation		onspiracy			Numb	er of	Victim	s Age 60 or Olde	*	
Offens	se 18 !	901 A	18 902 A	1	8 903							·	··· ···
П	03 9	11	(b)(3)	of the	18	7 - 3		1	F	1			
Lead?	Offense#	Section	Subsection		\$	ute (Title		Counts		Grade	NCIC Offense	Code U	CR/NIBRS Code
	nDOT Data	Accid				1		nterstate	е		☐ Safety Zone		Work Zone
Statute	applicable) Description	Numb	e name of statute	or ordi	inance): c	ORRU	PT OR	GANIZ	ATIO	VS			
~(UIUIO)	- oon that	first the state of the	, , or bandle						- - -				
Acts of I	the accused	associated	with this Offens	e: It sha	ll be unlawf	ul for a	ny pers	on emp	loyed	by or a	associated with an	y enterprise	to conduct or
narticinale	e, directiv or inc	lipachic in the		hammulaala	AP 4 44		_ Ă&	e malia		- antivi	ty to wit the defe	endant was :	an operator
·	e, and a	inecuy, in the	conduct or such en	erprise s	affairs throu	ıgnap	attern i	N Tacke	reeriiq	t acan	cy, to mic the uch apring activity	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	an operation
and/or we	as associated w	ith a vehicle d	econduct or such envi lealership and condu	cted the	affairs throi enterprise's	ıgn a p affairs	attern through	a patte	ern of	racket	eering activity.	23 5747-21 15 4 5 444-2	as operation
and/or wa	as associated w	ith a vehicle d	ealership and condu	cted the	affairs throi enterprise's	ıgn a pı affairs	attern through	n a patte	ern of	racket	eering activity.		#1 open

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	POLICE	CRIMINAL	COMPL	AINT

Docket	Number:		Filed: 5/8/84 /	OTN/LiveScan R 3968 a 1-5	Number		Complaint/incident Nu IFS210061	mber
	ant Name	First:		Middle:		Last:		
Detellor	III. Name	IGOR		Α.		DRA	TCH	
Inchos Offens		Attempt 18 901 A	Solicitation 18 902 A	Gonspiracy 18 903		lumber of Vi	ctims Age 60 or Older	
Lead?	04 Offense#	911 Section	(b)(4) Subsection	Filia 18 PA Statute (1	1 C	F1	rade NCIC Offense Code	UCR/NIBRS Code
Pen	nDOT Da pplicabl	ta Accide	nt		☐ Inte		☐ Safety Zone	☐ Work Zone
Statute	Descript	ion (include the	name of statute	or ordinance): COR	RUPT ORG	ANIZATION	S	
(2), or (3)	the accu) of this su and/or (3).	bsection. To wit: t	I with this Offense he defendant conspire	: It shall be unlawful fo d with other individuals	or any perso s to engage I	n to conspire in a pattern o	to violate any of the provision fracketeering activity in viola	ns of paragraphs (1), ation of subsections
Incho Offen		Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903		Number of \	/ictims Age 60 or Older	
Lead?	05 Offense	5111 Section	(a)(1) Subsection	of the 18	(Title)	F	I Grade NCIC Offense Code	e UCR/NIBRS Code
Per	inDOT Di	ata Acck	ent			lerstate	☐ Safety Zone	☐ Work Zone
	applicab Descript			or ordinance): DEA	LING IN PI	ROCEEDS OF	, F UNLAWFUL ACTIVITIES	
knowledg	e that the promote th	property involved, se carrying on of the	including stolen or ille te unlawful activity. To	gally obtained property	, represents peatedly eng	the proceeds aged in finan	if the person conducts a final sof unlawful activity, the per cial transactions with knowle awful activity.	son acts with the
Inchoa Offen		Attempt 18 901 A	☐ Solicitation 18 902 A	Conspiracy		Number of Vi	ctims Age 60 or Older	
	06	4118		of the 18	1	F3		
	Offense# inDOT Da applicabl			PA Statute (ritte) C		rade NCIC Offense Code	UCR/NIBRS Code Work Zone
			· · · · · · · · · · · · · · · · · · ·	or ordinance): WA	SHING VEH	ILE TITLES		
knowledg made an	ge that the	person is facilititing for a certificate of	g a deception to be per f title for a motor vehic	erpretated by anyone o	oncerning the erially false o	e true mileag or ficticious in	if, with the intent to deceive ge of a motor vehile, the pers formation to wit: with intent I materially false or ficticious	on makes/causes to be to deceive anyone, the

POLICE CRIMINAL COMPLAINT

mber | Complaint/Incident Number

CR	-47	-10a2		-11ed:	R3	NLIVESCAT	//-5	r 	, .	lainvincident Ni 10061	uniber
Defend	ant Na	me:	First: IGOR		i	Middle: A.	•	La: DF	st: RATCH		
Inchoi Offen		Attemp		☐ Solicitation 18 902 A		nspiracy 903		Number o	f Victims Ag	ge 60 or Older	
∐ Lead?	07 Offens	4117	Section	(a)(1)	of the	18 PA Statute		1 Counts	Grade	NCIC Offense Code	e UCR/NIBRS Code
Pen	nDOT	Data ==	Accider Numbe	t 🌣	P-P-1	FA Statute		nterstate	1	Safety Zone	☐ Work Zone
				name of state	ute or ordin	nance): IN	SURANCE	FRAUD			
namely, I false, inco insurance request;	PA Deptomplete rate fil to wit: I	artment of or misleadi ing, a moto he defenda	ransportating informat vehicle ins nt, knowing	ion (PennDOT), fition concerning a surance transaction	ile, present of fact or thing on or other not to defraud	or cause to be a material to the notor vehicle	e filed or po the agency insurance	resented to ti 's determinat action which	he governme tion in appro is required o	ent agency a docur wing or disapprovir or filed in response	al government agency, nent that contained ng a motor vehicle to an agency's o PennDOT containing
Incho Offer		Attem 18 901		☐ Solicitation 18 902 A		onspiracy 3 903		Number	of Victims A	lge 60 or Older _	
	08	410	1	(a)(3)	of the	18		1	F2 ::		
Lead? Per	Offer In DOT		Section Accide	Subsection	1 annual contractions	PA Statute	T	Counts	Grade	NCIC Offense Co	
(if	applic	able)	Numb		the experience			Interstate		Safety Zone	☐ Work Zone
is facilitate (2) of this	ting a fr s subse	aud or injuration, to wit	to be pend the the	pretated by anyo	ne, the actor ent to defrau	utters any w id and/or inju	riting which are anyone	h he knows t , and/or with	to be forged knowledge	in a manner specif that he is facilitating	with knowledge that he ied in paragraphs (1) or ng a fraud or injury to
Incho Offen		☐ Attemp		☐ Solicitation 18 902 A		nspiracy 903		Number o	f Victims Aç	ge 60 or Older	
	09	7121			of the	75			MZMI		HODBIDECO
	Offens in DOT applica	Data	Section Accider Numbe			PA Statute		Counts Interstate	Grade	NCIC Offense Code Safety Zone	e UCR/NIBRS Code ☐ Work Zone
Statute	Desc	ription (in			ute or ordi	nance): FA	LSE APPL	ICATION FO	OR CERTIF	CATE OF TITLE	<u> </u>
name or	address e of title	or makes a or for a rea	material fa	ilse statement, o	r falls to disci	lose a securit	y interest.	or conceals a	any other ma	aterial fact in an ap	a false or ficticious plication for a n an application for a

POLICE CRIMINAL COMPLAINT Complaint/Incident Number Date Filed: QTN/LiveScap Number **Docket Number:** 39600 IFS210061 12151202 Last: First: Defendant Name **IGOR** DRATCH Inchoate :: ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 903 Offense 18 902 A 7122 of the 75 M1 10 (3) NCIC Offense Code UCR/NIBRS Code Section Offense# Subsection PA Statute (Title Counts Grade PennDOT Data Accident ☐ interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) Statute Description (include the name of statute or ordinance): ALTERED, FORGED OR COUNTERFEIT DOCUMENTS Acts of the accused associated with this Offense: A person is guilty of a misdemeanor of the first degree if the person, with fraudulent intent, alters or forges an assignment of a certificate of title, or an assignment or release of a security interest on a certificate of title or any other document issued or prepared for issue by the department, to wit: the defendant, with fradulent intent, altered and/or forged any document issued or prepared for issue by the deparmtent. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense 11 4904 of the M2 (b) 18 UCR/NIBRS Code Grade **NCIC Offense Code** Offense# Subsection PA Statute (Title) Counts Lead? Section PennDOT Data Accident ☐ Safety Zone ☐ Work Zone ☐ Interstate Number (if applicable) Statute Description (include the name of statute or ordinance): UNSWORN FALSIFICATION TO AUTHORITIES Acts of the accused associated with this Offense: A person commits a misdemeanor of the third degree if he makes a written false statement which he does not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable; to wit: the defendant made a written false statement to PennDOT which he did not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable by law Inchoate ☐ Attempt □ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense **F**3 4117 of the 18 1 12 (a)(2) UCR/NIBRS Code NCIC Offense Code PA Statute (Title) Offenset Section Subsection Counts PennDOT Data Accident

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

☐ Interstate

(if applicable)

Number

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

☐ Work Zone

☐ Safety Zone

CR	t Numbe -439-	2022	Date Fil 12/5/ First:			N/LiveSca 3968 Middle:				Last:		laint/incident N 10061		
Defend	lant Nar	1e:	IGOR			Α.				DRA	TCH			
								!						
Incho Offen		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 903			Numb	er of V	ictims A	ge 60 or Older _		
	13 Offense	4117	cilon	(a)(3) Subsection	of the	18 PA Statut	a /Tilla\		Counts	F3	irade	NCIC Offense Co	de	UCR/NIBRS Code
	inDOT C applicat	ata	Accident Number	Subsection		174 04244	1		nterstate			Safety Zone		☐ Work Zone
			de the na	me of statute	or ordir	nance): IN	SURA	VCE F	RAUD					
conspires claim tha supports made ma	with ano t contains an amour terial stat	ther to prepar any false, inc at claimed in a	re or make complete or excess of the anded to be	any statement misleading info	that is inter ormation constained by	nded to be p oncerning an the claiman	oresent ny fact nt to wil	ed to a or thir or the	any insu Ig mater defenda	rer or s ial to th nt did k	elf-Insur ne claim, nowingh	self-insured, assised in connection vincluding information and with the interior claim that con	vitn, or tion wh int to d	in support or, a ich documents or efraud aninsurer,
incho Offen		Attempt 18 901 A		Solicitation 18 902 A		onspiracy 1903			Numb	er of V	ictims A	ge 60 or Older .		
Lead?	14 Offense	4117	ction	(b)(4) Subsection	of the	18 PA Statut	te (Title)		1 Counts	M:	1 Grade	NCIC Offense Co	de	UCR/NIBRS Code
Pei	INDOT E)ata 💮	Accident Number						nterstate)		Safety Zone		☐ Work Zone
Statute	the acc	otion (inclu	de the na	ime of statut	se. A ners	on may not l	knowin	alv an	d with in	ntent to	defraud	any insurance co	mpany,	self-insured or
other per thereto;	son file a to wit: the	n application e defendant k	for insuran nowingly a	re containing ar	ny false info o defraud a	ormation or i	concea	i for ti	he numo	ise of m	nisleadin	g information conc surance containing	erning	any ract material
Inch Offe		Attempt		Solicitation		Conspiracy 18 903	·		Num	ber of	Victims	Age 60 or Older		
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	Offen nnDOT fapplica	Data	Section Acciden Number			PA Stat	tute (Tit		Coun		Grade	NCIC Offense C Safety Zone	Code	UCR/NIBRS Code Work Zone
Statute	Descri	otion (inclu	1 1111111111111111111111111111111111111	ame of statu	e or ordi	nance): Ti	HEFT E	Y DE	CEPTIC	ON			<u></u>	
doonatio	n crosta	Lor reinforce	ad a falca in	nnreccion inclu	ding false i	moressions :	as to la	w. va	ue. inte	ntion or	· other st	tain or withhold p rate of mind; to wi an application for I	ic me i	rerendant did

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			PO	LICE CRIMINAL	
Docket Number:	Date Filed:	OTN/LiveScan Nu R 3968 a		Complaint/incident N	lumber
Defendant Name:	First:	Middle:	Las	••	
	IGOR		I DR	ATCH	
The acts committed by When there is more that (Set forth a brief summary of without more, is not sufficient the age of the victim at the the listed. If the identity of an	i the facts sufficient to advise nt. In a summary case, you mu ime of the offense may be inc	ense should be numbe the defendant of the nature ist cite the specific section luded if known. In addition,	ered chronologic of the offense(s) ch s) and subsection(s) social security num	ally. arged. A citation to the statu) of the statute(s) or ordinan- bers and financial informatio	ite(s) allegedly violated, ce(s) allegedly violated.
Inchoate	Solicitation 18 902 A	☑ Conspiracy 18 903	Nu	imber of Victims Age 60 or	Older
□ 1 6 7121		of the 75	10	MI	
#	ction Subsection	PA Stalute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	lude the name of statute	e or ordinance): cons	TRACY/FALSE API	PLICATION FOR CERTIFIC	CATE OF TITLE, ETC.
Acts of the accused as: following crimes: False Applic business(es) that they or one wit: the defendant dld agree Grig LLC), that one of more with more of them engaged in an	cation for Certificate of Title or or more of them will engage with one or more individuals would engage in conduct that	r Registration, Unsworn Fals in conduct which constitute (of the following: Oleg Zele	ification to Authoritic is such crime(s) or a nko, David Morrison,	es, did agree with such other n attempt or solicitation to o Amatti Auto Sales LLC, New	r person(s) and / or ommit such crime(s); to road Motors LLC, and/or
Inchoate	t Solicitation	☐ Conspiracy			
Offense 18 901		18 903	Number of	Victims Age 60 or Older	
		of the			
Lead? Offense# PennDOT Data	Section Subsection Accident	PA Statute (Tit		Grade NCIC Offense Co	
(if applicable) Statute Description (inc	Number ——	ar ordinanas):	☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	idde the hame of statute	or orumance).			
Acts of the accused ass	sociated with this Offens	se:			
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		, , , , , , , , , , , , , , , , , , ,	<u></u>		
Inchoate		Conspiracy 18 903	Number o	f Victims Age 60 or Older	
п		of the			
Lead? Offense#	Section Subsection	PA Statute (Tit	e) Counts	Grade NCIC Offense C	ode UCR/NIBRS Code
PennDOT Data (if applicable)	Accident		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute Description (inc	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	e or ordinance):			
Anto of the annual	anished with the Off	·			
Acts of the accused ass	sociated with this Offens	5 U .			
<u> </u>					

Docket Number: CR 439-3032	Date Filed: CO	TN/LiveScan Number 396821-5	Complaint/Incident Number IFS210061
Defendant Name	First:	(· · · · · · · · · · · · · · · · · · ·	Last:
	IGOR	A	DRATCH

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

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

(Date)

(Year)

(Signature of Affiant)

(Signature of Affiant)

(Now, on this date

(Year)

(Signature of Affiant)

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

(Magisterial District Court Number)

(Issuing Authority)

SEAL

		•	
Docket Number:	Date Filed:	, OTN/LiyeScan Number	Complaint/Incident Number
CR-424-2022	121512020	R 396821-5	IFS210061
	First:	Middle:	Last:
Derendant Name:	IGOR	A.	DRATCH

AFFIDAVIT of PROBABLE CAUSE

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

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

- L. Igor DRATCH
- 2. Oleg ZELENKO
- 3. David MORRISON
- 1. Angel MENDEZ
- 3. Jefferson LOOR VALET
- 5. Maria PINEDA
- 7. Indalecia VASQUEZ
- 3. Somary IBETH Otanez De LOOR
-). Beaki Antonia PEREZ
- LO. Charlie JIMINAN
- L1. Margarete ALMSAHAQBEH
- L2. Linda SANDOVAL-MARTINEZ-
- HERERRA
- L3, Eulid URENA
- L4. Adelaida GARCIA aka Adelaida MENDOZA
- 15. Edward SALDIVAR
- L6. Alberto LUCIANO
- 17. Mohamed KERDI

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

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

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



Docket Number: CR ~ 439-3833	Date Filed: 12 15 13032	OTN/LiveScan Numb	
Defendant Name	First:	Middle:	Last:
Derengant Name.	IGOR	. A.	DRATCH

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

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

	SA hache a stry
1	(Signature of Affiant)
Sworn to me and subscribed before me this	December 2022
12/6/1001 Date	, Magisterial District Judge
My commission expires first Monday of January, 200	SEAL