

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

25 MAG 3584

UNITED STATES OF AMERICA

v.

PEDRO MANUEL LOPEZ MARTE,
JERRY LOPEZ PAULINO,
SERGIO DIAZ RAMIREZ,
PEDRO ROJAS,
JUSTIN MARTHA,
ERICK ROJAS CRUZ,
JOSE FERREIRA, and
RONALD ARIAS SANTOS,

Defendants.

COMPLAINT

Violations of 18 U.S.C. §§ 371, 1343,
1349, and 2

COUNTIES OF OFFENSE:
BRONX, NEW YORK, WESTCHESTER

SOUTHERN DISTRICT OF NEW YORK, ss.:

RAJEEV BHATIA, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”), and charges as follows:

COUNT ONE
(Conspiracy to Possess and Sell Stolen Vehicles)

1. From at least in or about March 2022 through at least in or about November 2025, in the Southern District of New York and elsewhere, PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, the receipt, possession, and sale of stolen vehicles, in violation of Title 18, United States Code, Section 2313.

2. It was a part and object of the conspiracy that PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, and others known and unknown, would and did intentionally and knowingly receive, possess, conceal, store, barter, sell, and dispose of stolen motor vehicles, which stolen motor vehicles had crossed a State boundary after being stolen, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2313, to wit, knowing the cars to be stolen, PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS agreed to and did sell multiple stolen cars in states other than the states in which they were stolen.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 14, 2023, in the Southern District of New York and elsewhere, PEDRO MANUEL LOPEZ MARTE and PEDRO ROJAS, the defendants, did transport in interstate and foreign commerce a motor vehicle, knowing the same to have been stolen, to wit, after LOPEZ MARTE communicated with a victim to arrange the sale, ROJAS drove a stolen vehicle to Maryland and sold it to a victim, after that car had been stolen within the Southern District of New York.

b. In or about December 2023, in the Southern District of New York and elsewhere, JOSE FERREIRA, the defendant, drove a stolen vehicle to Connecticut and sold it to a victim, after that car had been stolen in Brooklyn, New York.

c. In or about October 2023, in the Southern District of New York and elsewhere, SERGIO DIAZ RAMIREZ and PEDRO ROJAS, the defendants, did transport in interstate and foreign commerce a motor vehicle, knowing the same to have been stolen, to wit, DIAZ RAMIREZ and ROJAS drove a stolen vehicle to New Jersey and attempted to sell it to a victim, after that car had been stolen in Queens, New York.

d. On or about September 8, 2023, in the Southern District of New York and elsewhere, JUSTIN MARTHA, the defendant, drove a stolen vehicle to the Bronx, New York, knowing the vehicle to be stolen, after the vehicle had been stolen in Westchester County, New York.

e. On or about April 28, 2023, in the Southern District of New York and elsewhere, ERICK ROJAS CRUZ and PEDRO ROJAS, the defendants, did transport in interstate and foreign commerce a motor vehicle, knowing the same to have been stolen, to wit, ROJAS CRUZ, ROJAS, and another person drove a stolen vehicle to Connecticut and sold it to a victim, after the car had been stolen in Queens, New York.

f. On or about August 25 and August 26, 2022, in the Southern District of New York and elsewhere, JERRY LOPEZ PAULINO and RONALD ARIAS SANTOS, the defendants, did transport in interstate and foreign commerce a motor vehicle, knowing the same to have been stolen, to wit, LOPEZ PAULINO and ARIAS SANTOS drove a stolen vehicle to Virginia and sold it to a victim, after the car had been stolen in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO **(Conspiracy to Commit Wire Fraud)**

4. From at least in or about March 2022 through at least in or about November 2025, in the Southern District of New York and elsewhere, PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, and others

known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

5. It was a part and an object of the conspiracy that PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, LOPEZ MARTE, LOPEZ PAULINO, DIAZ RAMIREZ, ROJAS, MARTHA, ROJAS CRUZ, FERREIRA, and ARIAS SANTOS agreed to make, and caused to be made, false statements to multiple car purchasers in order to obtain payments in exchange for stolen cars, and sent and received, and caused others to send and receive, electronic communications to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Wire Fraud)

6. From at least in or about March 2022 through at least in or about November 2025, in the Southern District of New York and elsewhere, PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, LOPEZ MARTE, LOPEZ PAULINO, DIAZ RAMIREZ, ROJAS, MARTHA, ROJAS CRUZ, FERREIRA, and ARIAS SANTOS engaged in a scheme to make false statements to multiple car purchasers in order to fraudulently obtain payments in exchange for stolen vehicles, and sent and received, and caused others to send and receive, electronic communications to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

Background

7. I am a Special Agent with HSI and I have been personally involved in the investigation of this matter. My duties and responsibilities include the investigation of interstate vehicle thefts and related crimes.

8. I base this affidavit on my own personal experience and training, on my conversations with other law enforcement officials and others, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview of the Scheme

9. Since in or about August 2023, I have been involved in an investigation into PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, and others known and unknown, who conspired to (1) steal cars in and around the Bronx, New York, and Queens, New York, among other places; (2) alter, or “retag,” the cars’ vehicle identification numbers, or “VINs”¹; and (3) sell the stolen cars to unsuspecting buyers across the eastern United States. To date, law enforcement officers have identified more than approximately 100 stolen, retagged cars for which the defendants are responsible. By trafficking these stolen cars, the defendants harmed (1) the original owners of the cars (and their insurance companies, who often reimbursed the owners for losses) and (2) the victims who purchased the cars. In total, the value of the approximately 100 stolen cars that the defendants conspired to traffic is at least approximately \$4,000,000; moreover, the defendants obtained approximately millions of dollars from the victims to whom they sold these stolen cars. By way of overview, the scheme proceeded as follows:

a. **Car Thefts.** The defendants and their co-conspirators stole cars, primarily Honda, Acura, and Jeep vehicles. They were generally stolen while parked on the street in the Bronx or Queens, though some were stolen in other places. The defendants either participated in the car theft or obtained the stolen car within days after it was stolen. The defendants then left the stolen vehicles in particular locations for a period of days or weeks. Based on my training and experience, the defendants and their coconspirators leave stolen vehicles during a cooling-off period for several reasons, including (1) to ensure that the car does not contain a tracking device

¹ Automobile manufacturers display a vehicle identification number (“VIN”) in several places on a car. Each car generally has at least one public VIN, which is displayed on the dashboard area (the “Public VIN”), and one confidential VIN, which is engraved on the vehicle in an inconspicuous place (the “Confidential VIN”). Law enforcement officers regularly query an official database using a car’s VIN—for example, during car stops for traffic infractions or when towing cars for parking violations. If the vehicle has been reported stolen, then the officer will learn this information when querying the database. Similarly, before purchasing a used car, many prospective buyers query a commercially available database, like Carfax, Inc., (“Carfax”) using the car’s VIN. Carfax provides vehicle history reports with detailed information associated with that VIN—including, for example, information that the car has been reported stolen. The defendants retagged stolen cars before selling them, meaning that they replaced the original VIN on the car (the “True VIN”) with a new, fictitious VIN (the “Altered VIN”) to avoid detection by both law enforcement and would-be buyers. The presence of an Altered VIN on a vehicle generally indicates that the vehicle has been stolen.

that could cause them to be caught; and (2) to give them time to take steps to hide the fact that the vehicle has been stolen (*e.g.*, by changing the license plate and altering the VIN).

b. **Lay-Up Spots.** New York City Police Department (“NYPD”) officers routinely observed that stolen vehicles trafficked by the defendants were consistently left for this cooling-off period in several specific locations (the “Lay-Up Spots”). For example, NYPD officers regularly observed stolen vehicles in a Quik Park Montefiore parking garage, located in the Bronx, New York (the “Parking Garage”). As part of the ongoing investigation into these thefts and given the frequent presence of apparently stolen vehicles in the Lay-Up Spots over a period of more than two years, NYPD officers routinely surveilled the Lay-Up Spots, including the Parking Garage. NYPD officers observed vehicles in the Lay-Up Spots with pry marks around the driver’s door lock, with the door lock itself physically broken, and with broken windows. Based on my training and experience, I know that common methods for entering a vehicle to steal it include breaking the lock out of the driver’s side door and/or breaking a window. In addition to observing physical indicia of theft, officers have often realized or confirmed that vehicles at the Lay-Up Spots had been reported stolen based on their VINs and/or license plates.

c. **Altered VINs and Carfax Vehicle History Reports.** To traffic the stolen vehicles, the defendants and/or their co-conspirators usually altered their VINs. Then, the defendants and/or their co-conspirators often purchased Carfax vehicle history reports for the Altered VINs for the purpose of deceiving prospective buyers. Because these vehicle history reports were for the stolen vehicles’ Altered VINs, rather than their True VINs, they did not report that the vehicles had been stolen. To further limit suspicion, the defendants and their co-conspirators often obtained services for the vehicle—like an oil change—*after* altering the VIN. This ensured that the vehicle history report for the Altered VIN was not blank.

d. **Online Sales.** After altering the VIN of a stolen car, the defendants and their co-conspirators generally arranged to sell it by posting it for sale on an online marketplace offered by a social media application (“Platform-1,” which is offered by an online services provider “Provider-1”). They corresponded with potential buyers through electronic messages, both on Platform-1 and otherwise, as well as phone calls. These communications culminated in an in-person meeting between the buyer and one or more of the defendants, at which time the defendant(s) sold the stolen car for money. Throughout the sale process, the defendants lied and omitted material information—such as the fact that the car was stolen, and its VIN was altered—to trick victims into purchasing the vehicles. Many of the stolen vehicles were subsequently recovered by law enforcement and returned to their true owners, causing the buyers to lose the money they gave to the defendants and/or their co-conspirators.

The Marte Carfax Account

10. Based on my training and experience, I know that Carfax is a company that compiles information about car ownership, usage, and history. People who buy used cars often ask sellers to provide Carfax reports so that the buyer can see if the car has any hidden defects or history of accidents. Carfax reports also indicate whether the car had been reported as stolen.

11. Based on my involvement in the investigation and my review of records from Carfax, I have learned that the defendants used a particular Carfax account (the “Marte Carfax Account”) as part of the scheme. In particular, I have learned the following:

a. Carfax records show that PEDRO MANUEL LOPEZ MARTE, the defendant, is the user of a personal Carfax account (the “Marte Carfax Account”) linked to a particular electronic storage and email account provided and maintained by an online services provider (“Provider-2”). As described below, *infra* ¶ 12, that account is used by PEDRO MANUEL LOPEZ MARTE, the defendant.

b. The Marte Carfax Account was used to purchase scores of vehicle history reports from Carfax, using a payment method associated with Provider-2. I believe that more than three dozen of the VINs for which the Marte Carfax Account purchased vehicle history reports were Altered VINs affixed to stolen cars. Based on my training and experience and involvement in this investigation, I have learned to identify when a VIN is an Altered VIN. Here, some of the indicia of an Altered VIN are the following:

c. As described in more detail below, several of the Altered VINs queried by the Marte Carfax Account have been directly tied to stolen vehicles.

d. For other VINs queried by the Marte Carfax Account, I have learned that the VINs are not valid because no car with that VIN was issued by the corresponding automobile manufacturer.

e. For still other VINs, I believe they were likely affixed to stolen vehicles because the first entry in the Carfax vehicle history report shows that the car had been driven more than approximately 100 miles before any entry was made. Based on my training and experience, absent unusual circumstances the first entry in a Carfax vehicle history report corresponds to an administrative event (*e.g.*, issuance of a title) that occurs while the vehicle still has very low mileage. This suggests that these VINs, too, are Altered VINs.

The Marte Provider-2 Account

12. As noted above, the Marte Carfax Account is a personal account. That Carfax account is associated with a Provider-2 account with an email address that includes the name “manuelmarte” (the “Marte Provider-2 Account”). I believe the Marte Provider-2 Account is used by PEDRO MANUEL LOPEZ MARTE, the defendant, for several reasons, including the following:

a. The Marte Provider-2 Account appears to be named for LOPEZ MARTE, whose full name is “Pedro Manuel Lopez Marte”.

b. Records from Provider-2 list “Manuel Lopez” as the subscriber for the Marte Provider-2 Account—again, consistent with LOPEZ MARTE’s name.

c. Records from Provider-2 list a particular apartment in the Bronx as the subscriber’s address (“Marte’s Apartment”). LOPEZ MARTE provided this address to law enforcement when issued a summons on or about July 12, 2023.

d. Records from Provider-2 indicate that the subscriber to the Marte Provider-2 Account provided Provider-2 with multiple phone numbers belonging to the subscriber. For one of those numbers, ending -1089 (the “-1089 Number”), records from the telephone service provider indicate that the subscriber is “Pedro Manuel Lopez Marte” and that the subscriber resides at

Marte's Apartment. For another of those numbers (ending -5107), records from the telephone service provider indicate that the telephone subscriber is Peter Marte. Based on my training and experience, I know that "Peter" is a common translation or nickname for "Pedro."

13. Based on my review of the contents of the Marte Provider-2 Account, pursuant to a search warrant, and as described herein, I have learned that the Marte Provider-2 Account contains photos and messages that show several Altered VINs and license plates corresponding to stolen vehicles trafficked by the perpetrators. Indeed, the Marte Provider-2 Account contains more than 65 VINs that appear to have been altered. *See supra* ¶ 11 (explaining how to identify whether a VIN is legitimate).

The Platform-1 Accounts

14. Based on my involvement in the investigation, I have learned that the defendants regularly offered stolen vehicles for sale through the Platform-1 social media platform. The defendants used several different Platform-1 accounts to do so.

15. Based on my participation in the investigation, conversations with other law enforcement officers, and my review of surveillance video footage and other law enforcement records, I have learned that one of the accounts used by the defendants to perpetrate the scheme is a particular Platform-1 account with a URL containing the name "Peter Lopez" and operating at times under the display name "Peter Nunez" and at other times under the display name "Manu Nunez" (the "Peter Lopez Account").²

Car-1

16. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-1 is a 2022 Honda Pilot to which the manufacturer assigned a VIN ending in -5124; the defendants and their coconspirators later changed Car-1's Public VIN to 5FNYF5H20NB023517.

b. Based on my review of law enforcement records, I know that the owner of Car-1 reported that Car-1 was stolen in the Bronx on or about the night between August 9, 2023, and August 10, 2023.

c. Based on my review of a vehicle history report maintained by Carfax, I have learned that on August 12, 2023, Car-1 was taken to a commercial establishment that offers oil change services in Yonkers, New York (the "Oil Change Establishment").

d. Records from the Oil Change Establishment reflect that by the time Car-1 was brought to the Oil Change Establishment, its license plate had been changed: its new plate

² Provider-1 accounts are associated with specific URLs. Each Provider-1 account also has a display name for the account, which is sometimes referred to as the account's "vanity." URLs are unique; display names are not necessarily unique. Display names can be changed by the user.

was a particular New Jersey license plate, which is a dealer license plate. Based on my training and experience, I know that a dealer license plate is a plate issued to a car dealer that the dealer may affix to cars that are available for sale, prior to their being sold to a consumer.

e. Surveillance video footage from the Oil Change Establishment shows that a particular individual drove Car-1 to the Oil Change Establishment (the “Driver”). I have reviewed the surveillance video footage, as well as a booking photo taken by law enforcement when PEDRO MANUEL LOPEZ MARTE, the defendant, was arrested on or about August 28, 2016, for driving under the influence. Based on my involvement in this investigation, the Driver in the surveillance video footage matches the visual appearance of LOPEZ MARTE in the booking photo.

f. On or about August 16, 2023, an NYPD detective observed Car-1 at one of the Lay-Up Spots, in the vicinity of Tibbett Avenue between West 238th Street and West 240th Streets, near Manhattan College, bearing the Altered VIN and a particular Massachusetts license plate number. The detective queried a database maintained by the National Insurance Crime Bureau (the “Database”) and learned that the Altered VIN on Car-1 was registered to a front-wheel drive model, but Car-1 was an all-wheel drive model. The detective also observed that there was no record showing that a vehicle bearing this Altered VIN had been shipped out from the factory where it was manufactured. Based on my training and experience, this is unusual; before a Honda Pilot is sold to an end user, it is usually shipped in a manner that results in a shipping notification in the Database.

g. On or about September 12, 2023, Victim-1 saw that Car-1 was being offered for sale on Platform-1 by the Peter Lopez Account. The Peter Lopez Account offered to sell Car-1 for \$22,000, a price that was significantly lower than the approximate value of a 2022 Honda Pilot at that time.

h. Victim-1 initially contacted the Peter Lopez Account by Platform-1 Messenger and subsequently communicated by phone. The user of the Peter Lopez Account provided a particular phone number to Victim-1 for this purpose, ending -2786 (the “-2786 Number”). The user of the -2786 Number told Victim-1 that he would send his driver to deliver Car-1 to Victim-1 on September 14, 2023.

i. On or about September 14, 2023, as the user of the -2786 Number had stated, someone drove Car-1 to Victim-1, who was located in Maryland. Based on their voices, Victim-1 observed that the user of the -2786 Number and the person who conducted the sale in Maryland were different. Victim-1 paid \$22,000 in exchange for Car-1.

j. Law enforcement thereafter conducted a double-blind photo array, in which Victim-1 identified a photograph of PEDRO ROJAS, the defendant, stating that ROJAS had sold Car-1 to her.

k. Based on Carfax records, I know that the Marte Carfax Account purchased a vehicle history report for the Altered VIN displayed on Car-1.

l. Based on the contents of the Marte Provider-2 Account, I know that the Altered VIN displayed on Car-1 appears in a photograph contained in the Marte Provider-2 Account.

Car-2

17. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-2 is a 2021 Honda CRV to which the manufacturer assigned a VIN ending -3682; the defendants and their coconspirators later changed Car-2's Public VIN to 2HKRW2H82NH124471. As described below, this Altered VIN was used by the defendants on multiple stolen vehicles. *See infra* ¶¶ 22, 23, 25.

b. Based on my review of law enforcement records, I know that the owner of Car-2 reported that Car-2 was stolen in New York, New York, on or about November 25, 2023.

c. On or about November 29, 2023, a law enforcement officer observed Car-2 in the Parking Garage, still bearing the True VIN and the original New Jersey license plate (W83NUK).

d. Records from the Oil Change Establishment show that, on or about December 29, 2023, Car-2 was serviced at the Oil Change Establishment in Uniondale, New York. Based on my comparison of video surveillance footage from the Oil Change Establishment with an arrest photo for RONALD ARIAS SANTOS, the defendant, the person driving Car-2 appears to be ARIAS SANTOS. Oil Change Establishment Records reflect that the person driving Car-2 provided the name "Maxi Arias"; "Maxi" is ARIAS SANTOS's middle name.

e. On or about February 2, 2024, pursuant to a warrant, a law enforcement officer affixed a global positioning system ("GPS") tracking device to Car-2, which was in the Parking Garage at that time.

f. In or about February 2024, Victim-2 observed that a particular account had listed Car-2 was for sale on Platform-1.³ Victim-2 communicated with the seller through Platform-1 and then by phone; the seller used a phone number ending -3681 (the "-3681 Number") and another ending -7191 (the "-7191 Number").

g. Based on records from the service provider for the -3681 Number, I know that, between in or about January 17, 2024 and February 12, 2024, the -3681 Number has communicated approximately 13 times with a number ending in -4582 (the "-4582 Number"), which ERICK ROJAS CRUZ, the defendant, provided to NYPD officers when he was arrested on or about November 17, 2023, and October 19, 2024.

h. Based on records from the service provider for the -7191 Number, I know that, between in or about February 6, 2024, and February 17, 2024, the -7191 Phone communicated approximately 2 times with a phone number ending -1660 that JERRY LOPEZ PAULINO

³ Based on my review of screenshots provided by Victim-2, I believe the account was a Platform-1 account with display name Joshua Pena (the "Joshua Pena Account"). In particular, the screenshots show that Victim-2 referred to the user of the account as "Joshua," and the profile photo of the account matches the profile photo of the Joshua Pena Account, which has also trafficked other stolen cars. *See infra* ¶ 22.

provided to NYPD officers when LOPEZ PAULINO was issued a summons on or about October 25, 2019 (the “-1660 Number”)

i. On or about February 8, 2024, Victim-2 purchased Car-2 from a seller in Brooklyn, New York. Victim-2 paid \$19,000 in exchange for Car-2.

j. Victim-2 later drove Car-2 to the New Jersey Motor Vehicle Commission and attempted to register the vehicle. The New Jersey Motor Vehicle Commission informed Victim-2 that the title for Car-2 (which the seller had provided to Victim-2 during the sale) was forged and that Car-2 had been reported stolen. Law enforcement therefore seized Car-2.

k. GPS data obtained from the tracking device that officers affixed to Car-2, pursuant to a warrant, confirms that Car-2 was driven to Brooklyn and subsequently to New Jersey.

l. Based on Carfax records, I know that on or about July 8, 2023, the Marte Carfax Account purchased a vehicle history report for the Altered VIN displayed on Car-2.

m. The Altered VIN displayed on Car-2 is visible in a photograph contained in the Marte Provider-2 Account.

Car-3

18. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-3 is a 2022 Honda CRV to which the manufacturer assigned a VIN ending -9148; the defendants and their coconspirators later changed Car-3’s Public VIN to 2HKRW2H86NH667886.

b. Based on my review of law enforcement records, I know that the owner of Car-3 reported that Car-3 was stolen in Brooklyn, New York, on or about December 8 or December 9, 2023.

c. Based on my review of the Carfax vehicle history report for the Altered VIN for Car-3, the first entry on the report was an oil change at the Oil Change Establishment in the Bronx, New York, on or about December 14, 2023.

d. Based on Oil Change Establishment records, the invoice for services provided for Car-3 was issued to “Manuel Lopez” at a particular address in the Bronx, New York. I have been to that address. Based on my review of the Peter Lopez Account—i.e., a Platform-1 account used to perpetrate some of the sales—and my familiarity with the area, I know that many of the photos of stolen vehicles that were posted to the Peter Lopez Account were taken in the vicinity of this address.

e. In December 2023, Victim-3 saw that Car-3 was being offered for sale on Platform-1. Victim-3 initially contacted the seller by Platform-1 Messenger and subsequently communicated by phone. The seller provided a particular phone number to Victim-3 for this purpose, ending -3785 (the “-3785 Number”).

f. In December 2023, Victim-3 met an individual at the Danbury Mall in Danbury, Connecticut, and purchased Car-3 from that person for \$20,000.

g. Law enforcement subsequently conducted a double-blind photo array, in which Victim-3 identified a photograph of JOSE FERREIRA, the defendant, stating that FERREIRA had sold Car-3 to him.

Car-4

19. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-4 is a 2021 Honda CRV to which the manufacturer assigned a VIN ending -7904; the defendants and their coconspirators later changed Car-4's Public VIN to 2HKRW2H82NH759903.

b. Based on my review of law enforcement records, I know that the owner of Car-4 reported that Car-4 was stolen in Queens, New York, on or about July 5 or July 6, 2023.

c. Based on my review of the Carfax vehicle history report for the Altered VIN for Car-4, the first entry on the report was an oil change at the Oil Change Establishment in Waldorf, Maryland on or about August 9, 2023.

d. On or about October 6, 2023, a law enforcement officer observed that a Platform-1 account with the display name "Yan Ramirez" (the "Yan Ramirez Account") had posted a photograph of Car-4 (bearing the Altered VIN) for sale.

e. Based on an NYPD report from January 2019, I learned that a complainant provided "Yan Ramirez" as the Platform-1 username for SERGIO DIAZ RAMIREZ, the defendant.

f. In or about late September or early October 2023, a person (the "Deposit Victim") saw that Car-4 was being offered for sale on Platform-1. Victim-4 initially contacted the seller by Platform-1 Messenger and subsequently communicated by phone. The seller communicated with the Deposit Victim using two phone numbers; one ending in -9985 (the "-9985 Number"), and the other was the -2786 Number.

g. In or about October 2023, the seller asked the Deposit Victim to meet him near a particular residence in Passaic, New Jersey (the "Passaic Residence"); the seller brought Car-4. The Deposit Victim told the seller that he wanted Car-4 to be examined by a Honda dealer he trusts; therefore, the Deposit Victim paid the seller a \$1,000 deposit and asked the seller to bring Car-4 to a Honda dealership in Lakewood, New Jersey.

h. Two would-be sellers brought Car-4 to the Honda dealership. At the time the license plate affixed to Car-4 was a particular Florida transporter license plate (the "Florida License Plate"). A photograph of this license plate appears in the Marte Provider-2 Account. As noted below, *infra* ¶¶ 20-21, the defendants used the same license plate for Car-5 and Car-6.

i. The Honda dealership recommended that Victim-4 not purchase Car-4, so the Deposit Victim did not purchase Car-4. The would-be sellers refused to refund the \$1,000 deposit paid by the Deposit Victim.

j. Still images taken from surveillance video footage at the Honda dealership depict the two sellers who attempted to sell Car-4 to the Deposit Victim.

k. A law enforcement officer who otherwise has no involvement in this investigation displayed to the Deposit Victim approximately four pages of photographs. Each page contained six photographs of individuals sharing similar appearances. One of the pages contained a photograph of SERGIO DIAZ RAMIREZ, the defendant, and photographs of five other men of a similar appearance; another of the pages contained a photograph of PEDRO ROJAS, the defendant, and photographs of five other men of a similar appearance. The Deposit Victim identified two photographs, saying that the men shown in those photographs were the men who attempted to sell Car-4 him. The photographs he identified were the photographs of DIAZ RAMIREZ and ROJAS.

l. The Marte Carfax Account obtained Carfax vehicle history reports for Car-4's Altered VIN in or about September 2023.

m. In or about October 2023, another person ("Victim-4") saw that Car-4 was being offered for sale on Platform-1. Victim-4 initially contacted the seller by Platform-1 Messenger and subsequently communicated by phone. The would-be seller communicated with Victim-4 using two phone numbers; one was the -9985 Number (*i.e.*, one of the numbers that was also used to communicate with Victim-1), and the other ended in -3824 (the "-3824 Number").

n. Based on records from the service provider for the -3824 Number, on or about December 5, 2023, the -3824 Number communicated once with the -9985 Number, and on or about December 29, 2023, the -3824 Number communicated approximately 4 times with the -1089 Number (which, as noted above, is associated with PEDRO MANUEL LOPEZ MARTE, the defendant).

o. On or about October 10, 2023, a seller met Victim-4 in Queens, New York. The seller provided Victim-4 with a vehicle inspection report obtained from the Lakewood Honda dealer; the vehicle inspection report contained identifying information for the Deposit Victim. Victim-4 purchased Car-4 for \$17,000.

p. Based on Carfax records, I know that on or about September 10, 2023, the Marte Carfax Account purchased a vehicle history report for the Altered VIN displayed on Car-4.

Car-5

20. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-5 is a 2022 Acura TLX to which the manufacturer assigned a VIN ending -3284; the defendants and their coconspirators later changed Car-5's Public VIN to 19UUB5F50NA008890.

b. Based on my review of law enforcement records, I know that the owner of Car-5 reported that Car-5 was stolen in Queens, New York, on or about September 14 or September 15, 2023.

c. Based on my review of the Carfax vehicle history report for the Altered VIN for Car-5, the first entry on the report was an oil change at the Oil Change Establishment in Yonkers, New York, on or about September 17, 2023. Based on my review of surveillance video footage from the Oil Change Establishment and my comparison of that footage with an arrest photo for SERGIO DIAZ RAMIREZ, the defendant, the person who brought Car-5 to the Oil Change Establishment on or about September 17, 2023, matches the appearance of DIAZ RAMIREZ. The Oil Change Establishment invoice for this oil change for Car-5 likewise lists DIAZ RAMIREZ's name and address. Surveillance video footage from the Oil Change Establishment shows that, when DIAZ RAMIREZ brought Car-5 to the Oil Change Establishment, an object shaped like Batman (the "Batman Air Freshener") was hanging from the rear-view mirror of Car-5. Affixed to Car-5 was the Florida License Plate. As noted above and below, *supra* ¶ 19, *infra* ¶ 21, the defendants used this same license plate for Car-4 and Car-6.

d. On or about September 18, 2023, a law enforcement officer observed Car-5 in the Parking Garage, bearing the Altered VIN. The Batman Air Freshener was still hanging from the rear-view mirror, but the license plate had been changed; Car-5 was affixed with a particular Massachusetts license plate.

e. On or about October 4, 2023, a law enforcement officer observed that an Acura TLX matching the appearance of Car-5, including the presence of the Batman Air Freshener on the rear-view mirror, was listed for sale on Platform-1 by the Joshua Pena Account (*see supra* ¶ 17 & n.3); the listing stated that the car was for sale in West Hartford, Connecticut.

f. On or about October 6, 2023, a law enforcement officer observed that an Acura TLX matching the appearance of Car-5, including the presence of the Batman Air Freshener on the rear-view mirror, was listed for sale on Platform-1 by a Platform-1 account with the display name Yan Ramirez (the "Yan Ramirez Account"); the listing stated that the car was for sale in Washington, D.C. At least some of the photos posted in the Yan Ramirez Account's listing were identical to photos posted in the Joshua Pena Account's listing.

g. Based on my review of Platform-1 records, on or about November 2, 2023, the Joshua Pena Account sent a direct message to an intended victim, offering to sell a black 2022 Acura TLX for \$27,000. The listing contains a photo of a vehicle with an appearance matching Car-5, including the presence of the Batman Air Freshener hanging from the rear-view mirror. Based on service provider records, I know that the -1660 Number is the "verified cell" number for the Joshua Pena Account. JERRY LOPEZ PAULINO, the defendant, provided the -1660 Number to NYPD officers when LOPEZ PAULINO was issued a summons on or about October 25, 2019.

h. On or about November 7, 2023, law enforcement officers in the Bronx, New York, seized Car-5. The driver of Car-5 at the time was DIAZ RAMIREZ. ERICK ROJAS CRUZ, the defendant, was one of the passengers in Car-5. At the time of the arrest, Car-5 was affixed with a particular Florida transporter plate (the "Florida License Plate").

i. The Marte Carfax Account requested a Carfax report for the Altered VIN for Car-5 on or about September 18, 2023.

Car-6

21. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-6 is a 2021 Acura TLX to which the manufacturer assigned a VIN ending -3816; the defendants and their coconspirators later changed Car-6's Public VIN to 19UUB5F50NA203405.

b. Based on my review of law enforcement records, I know that the owner of Car-6 reported that Car-6 was stolen in Queens, New York, on or about September 17 or September 18, 2023.

c. On or about September 25, 2023, a law enforcement officer observed Car-6 in the Parking Garage, bearing the Altered VIN. A genuine inspection sticker was also affixed to Car-6. Based on New York State vehicle inspection records, the law enforcement officer was able to confirm that the correct VIN for Car-6 was the True VIN, not the Altered VIN.

d. Based on my review of the Carfax vehicle history report for the Altered VIN, the first entry on the report was an oil change at the Oil Change Establishment in Yonkers, New York, on or about September 27, 2023. Based on my review of surveillance video footage from the Oil Change Establishment and my comparison of that footage with an arrest photo for SERGIO DIAZ RAMIREZ, the defendant, the person who brought Car-6 to the Oil Change Establishment on or about September 27, 2023, matches the appearance of DIAZ RAMIREZ. Surveillance video footage from the Oil Change Establishment shows that, when DIAZ RAMIREZ brought Car-6 to the Oil Change Establishment, affixed to Car-6 was the Florida License Plate. As noted above, *supra* ¶¶ 19-20, the defendants used this same license plate for Car-4 and Car-5.

e. On October 4, 2023, a law enforcement officer observed that an Acura TLX matching the appearance of Car-6, including the same Florida transporter plate, and was listed for sale on Platform-1 by the Joshua Pena Account. The Joshua Pena Account listing stated that the car was for sale in Baltic, Connecticut.

f. On October 6, 2023, a law enforcement officer observed that an Acura TLX matching the appearance of Car-6 was listed for sale on Platform-1 by the Yan Ramirez Account; the Yan Ramirez Account listing stated that the car was for sale in Sag Harbor, New York.

g. Based on my review of Platform-1 records, I have learned that on or about October 5, 2023, the Joshua Pena Account sent a direct message to an intended victim concerning the intended sale of Car-6. The direct message contained a screenshot of a partial Carfax vehicle history report containing the identifying information for Car-6, including the year, make, model, and Altered VIN.

h. On or about October 10, 2023, a law enforcement officer observed than an Acura TLX matching the appearance of Car-6 was listed for sale on Platform-1 by a Platform-1

account with display name Oscar Fernandez (the “Oscar Fernandez Account”). The officer messaged the Oscar Fernandez Account and requested the car’s VIN, and the Oscar Fernandez Account responded with the Altered VIN for Car-6. The officer arranged to meet the seller at a particular time on October 10, 2023, at a particular location in Paterson, New Jersey, to purchase Car-6.

- i. DIAZ RAMIREZ arrived at the planned time and place, driving Car-6.

Car-7

22. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

- a. Car-7 is a 2021 Honda CRV to which the manufacturer assigned a VIN ending -9715; the defendants and their coconspirators later changed Car-7’s Public VIN to 2HKRW2H82NH124471. As described above and below, the same Altered VIN also appeared on other stolen cars that the defendants trafficked or attempted to traffic. *Supra* ¶ 17; *infra* ¶¶ 23, 25.

- b. Based on my review of law enforcement records, I know that the owner of Car-7 reported that Car-7 was stolen in the Bronx, New York, on or about June 21 or June 22, 2023.

- c. Based on my review of the Carfax vehicle history report for the Altered VIN for Car-7, the first entry on the report is a New York State safety inspection performed on or about June 30, 2023.

- d. On or about June 30, 2023, law enforcement officers observed Car-7 in the Bronx, New York. After observing that Car-7 had no front plate and had a rear license plate that was registered to a 2022 Toyota Tundra, not a 2021 Honda CRV, officers conducted an investigative stop. The driver identified himself as “Jerry Lopez” and provided a particular date of birth; based on my review of arrest and criminal history information for JERRY LOPEZ PAULINO, the defendant, this date of birth matches the date of birth for LOPEZ PAULINO.

- e. Officers observed that the Public VIN appeared to be altered based on the fact that it was crooked. PAULINO verbally consented to a search of the vehicle and provided officers with a key fob for a Kia. Despite the fact that the key fob was for a Kia, rather than a Honda, it opened the door to Car-7.

- f. While searching Car-7, officers observed that the Public VIN did not match the Confidential VIN and confirmed, based on the Confidential VIN (*i.e.*, the True VIN) that Car-7 had been reported stolen. Officers observed broken glass on the passenger-side carpet.

- g. PAULINO told officers that he did not own Car-7 and said that he worked for a company that cleans vehicles for customers, pointing to a car cleaning business. At the time, the business that PAULINO pointed to was closed. Officers did not tell PAULINO that Car-7 had been reported stolen. After that day, to my knowledge, law enforcement officers have not seen Car-7.

h. On or about July 8, 2023, the Marte Carfax Account requested a Carfax report for the Altered VIN for Car-7.

Car-8

23. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-8 is a 2021 Honda CRV to which the manufacturer assigned a VIN ending -6237; the defendants and their coconspirators later changed Car-8's Public VIN to 2HKRW2H82NH124471. As described above and below, the same Altered VIN also appeared on other stolen cars that the defendants trafficked or attempted to traffic. *Supra* ¶¶ 17, 22; *infra* ¶ 25.

b. Based on my review of law enforcement records, I know that the owner of Car-8 reported that Car-8 was stolen in Westchester County, New York, on or about August 23 or August 24, 2023.

c. On or about August 30, 2023, a law enforcement officer observed Car-8 in the Parking Garage; it was still bearing the True VIN, allowing the officer to confirm that it had been reported stolen. Also affixed to Car-8 was a particular New Jersey license plate. On or about August 31, 2023, pursuant to a warrant, a law enforcement officer affixed a GPS tracking device to Car-8.

d. On or about September 2, 2023, a law enforcement officer observed Car-8 inside the Parking Garage bearing the same New Jersey license plate but now bearing the Altered VIN.

e. On or about September 8, 2023, law enforcement officers observed Car-8 driving up and down streets in the "Country Club" neighborhood of the Bronx in a grid-like pattern. Based on their training and experience, the law enforcement officers who observed this believed that this driving pattern was consistent with canvassing for other cars to steal.

f. Based on data from the GPS tracker affixed to Car-8, I have learned that less than approximately 45 minutes later, Car-8 was driven to a particular building materials store ("Store-1") in the Bronx, New York. Surveillance video from Store-1 shows the driver of Car-8 as he enters and exits the store. Based on my comparison of stills from that video footage with an arrest photo for JUSTIN MARTHA, the defendant, the driver of Car-8 on September 8, 2023, matches the appearance of MARTHA. The footage also shows that the driver had certain distinctive tattoos, which match tattoos visible on MARTHA when he was treated in a hospital in or about September 2025 after suffering a gunshot wound.

g. Based on data from the GPS tracker affixed to Car-8, I have learned that on or about the morning of September 13, 2023, Car-8 was present in Yonkers, New York. I have learned from a stolen vehicle report that at approximately that same time and within approximately 50 yards away from Car-8, a white 2020 Honda Accord was also stolen. License plate reader records from around that time show that Car-8 and the stolen 2020 Honda Accord drove around that area in tandem at around that time, which is consistent with driving Car-8 to the site of another car theft.

h. On or about that same day, the white 2020 Honda Accord, in turn, was present in a particular neighborhood in the Bronx, New York, where a 2018 Jeep Grand Cherokee was stolen. The owner of the 2018 Jeep Grand Cherokee reported that he reviewed video surveillance footage taken by a neighbor's camera system; based on his review of that video, the owner of the 2018 Jeep Grand Cherokee reported that the perpetrators of the theft had been driving a white Honda Accord.

i. The stolen 2018 Jeep Grand Cherokee, in turn, was observed inside the Parking Garage on or about September 16, 2023, and was seized by law enforcement.

j. The 2020 Honda Accord was subsequently seized by law enforcement in Pennsylvania.⁴

k. On or about September 14, 2023, law enforcement officers observed that a person matching the build and physical features of MARTHA was standing next to the open passenger front door of Car-8 while speaking with a person who was sitting in the passenger seat.

l. On or about July 8, 2023, the Marte Carfax Account requested a report for the Altered-VIN for Car-8.

m. On or about November 7, 2023, law enforcement officers seized Car-8 in New Jersey. Someone subsequently called the police to anonymously report that officers had stolen his car (*i.e.*, Car-8) and he wanted it back, but when officers offered to meet with that person, he refused.

Car-9 and Car-10

24. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-9 is a 2022 Honda CRV to which the manufacturer assigned a VIN ending -6299; the defendants and their coconspirators later changed Car-9's Public VIN to 2HKRW2H88NH255923.

b. Based on my review of law enforcement records, I know that the owner of Car-9 reported that Car-9 was stolen in Queens County, New York, on or about March 23, 2023.

c. In or about March or April 2023, Victim-9 observed that Car-9 was being offered for sale on Platform-1. Victim-9 corresponded with the seller first on Platform-1 and later using a phone number the seller provided, which ended -7204 (the "-7204 Number").

d. On or about April 28, 2023, Victim-9 met three sellers in person in Danbury, Connecticut, and purchased Car-9 for \$19,000. The sale was recorded on video. During the sale,

⁴ On or about September 13, 2023, when the 2020 Honda Accord was stolen, Car-8 was affixed with a particular Pennsylvania license plate. A co-conspirator not named herein ("CC-1") was subsequently arrested in a different car with an Altered VIN affixed with that same Pennsylvania license plate.

Victim-9 asked the sellers to show him photo identification and one of the sellers showed him an image on his phone of what appeared to be a New York State driver's license in the name of Samuel Alejandro Rojas Oriach. Victim-9 took a photograph of this image.

e. Based on my comparison of the video footage taken by Victim-9 and an arrest photo for ERICK ROJAS CRUZ, the defendant, the appearance of the person who showed this photograph of a driver's license to Victim-9 is consistent with the appearance of ROJAS CRUZ. ROJAS CRUZ has also used the alias "Samual Rojas" on another occasion: he provided that name to law enforcement on or about December 10, 2022, when he was arrested in Charles County, Maryland, after attempting to sell a stolen vehicle to an undercover law enforcement officer.

f. Based on my comparison of the video footage taken by Victim-9 and a New York State Department of Motor Vehicle photo of PEDRO ROJAS, the defendant, as well as an arrest photo for ROJAS, the appearance of one of the other sellers is consistent with the appearance of ROJAS.

g. Car-10 is a 2021 Honda CRV to which the manufacturer assigned a VIN ending -0665; the defendants and their coconspirators later changed Car-10's Public VIN to 2HKRW2H85MH321133.

h. Based on my review of law enforcement records, I know that the owner of Car-10 reported that Car-10 was stolen in Wallingboro, New Jersey, on or about May 28, 2023.

i. In or about June of 2023, Victim-10 was employed by Victim-9. After Victim-9 purchased Car-9, Victim-9 provided the -7204 Number to Victim-10. Victim-10 contacted the user(s) of the -7204 Number, seeking to purchase a vehicle. On or about June 14, 2023, Victim-10 purchased Car-10 from one or more sellers in Danbury, Connecticut, for \$17,500.

j. Based on my review of service provider records, I know that a photograph showing the Altered VIN for Car-10 is present in the Marte Provider-2 Account. The -7204 Number was also stored as a contact in the Marte Provider-2 Account.

k. Based on my review of service provider records, I know that the -7204 Number was provided to a potential buyer of a different car on Platform-1 by the user of the Peter Lopez Platform-1 account. On or about November 7, 2024, a victim in Massachusetts, who had purchased a different stolen car, informed law enforcement that he had purchased the car through Platform-1 and had communicated with the seller using the -7204 Number.

l. Law enforcement officers conducted a double-blind photo array with Victim-10. Victim-10 identified a photograph of PEDRO MANUEL LOPEZ MARTE, the defendant, as the person who sold him Car-10.

Car-11

25. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-11 is a 2020 Honda CRV to which the manufacturer assigned a VIN ending -6877; the defendants and their coconspirators later changed Car-11's Public VIN to 2HKRW2H82NH124471. As described above, the same Altered VIN also appeared on other stolen cars that the defendants trafficked or attempted to traffic. *Supra* ¶¶ 17, 22, 23.

b. Based on my review of law enforcement records, I know that the owner of Car-11 reported that Car-11 was stolen in Norwalk, Connecticut, on or about August 10, 2023.

c. In or about August 2023, Victim-11 mentioned to an acquaintance that she was interested in purchasing a car. The acquaintance introduced Victim-11 to RONALD ARIAS SANTOS, the defendant; ARIAS SANTOS used his own name.

d. Victim-11 purchased Car-11 from ARIAS SANTOS for a total of \$23,000, to be paid in installments. ARIAS SANTOS told Victim-11 that he would provide her with the title to Car-11 once he received it. Victim-11 made several installment payments to ARIAS SANTOS, totaling \$19,000. On multiple occasions, when Victim-11 asked ARIAS SANTOS for the title to Car-11, he offered excuses as to why he did not yet have it. After Victim-11 informed ARIAS SANTOS that she would make no more payments until she received the title, ARIAS SANTOS blocked Victim-11 on social media and stopped taking Victim-11's calls.

e. Law enforcement officers later impounded Car-11 because it was unregistered, at which time officers learned that Car-11 had been retagged and was stolen.

f. After Car-11 had been impounded, ARIAS SANTOS came to Victim-11's workplace and demanded the remainder of the payment for Car-11. Victim-11 told ARIAS SANTOS that she was telling the police that ARIAS SANTOS had sold her the car and was refusing to provide the title. ARIAS SANTOS told Victim-11 that if she paid him another \$1000, he would give her the title to a 2023 Hyundai Santa Fe, with VIN 5NMS24AJ2PH484751 (the "2023 Hyundai"), as "collateral" until he could provide the title for Car-11.

g. On or about January 29, 2024, Victim-11 learned ARIAS SANTOS's location from a social media post and went there to confront him. Law enforcement officers later responded to reports concerning the dispute. They observed ARIAS SANTOS operating the 2023 Hyundai, and they learned that law enforcement officers in Clifton, New Jersey, had reported the 2023 Hyundai as stolen after the vehicle was at the scene of a non-fatal shooting.

Car-12, Car-13, Car-14, and Car-15

26. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Between in or about June 2022 and September 2022, in Springfield, Virginia, Victim-12 purchased approximately thirteen stolen cars from the defendants. Victim-12 first met the defendants through Platform-1 and purchased a Honda CRV from them.

b. Victim-12 stated that the same two people generally came to sell the cars to him, sometimes accompanied by a third person. Victim-12's wife recorded videos of some of the

vehicle sales, and the men visible on the video footage appear to be JERRY LOPEZ PAULINO and RONALD ARIAS SANTOS, the defendants.

c. One of the phone numbers used by Victim-12 to communicate with the defendants, ending -0519 (the “-0519 Number”), was provided by ARIAS SANTOS to the NYPD in 2022 when ARIAS SANTOS filed a complaint.

d. The -0519 Number has also communicated with the -4582 Number (which, as noted above, ERICK ROJAS CRUZ, the defendant, provided to NYPD officers on two separate occasions when he was arrested.

e. In or about August 2022, one of the sellers told Victim-12 that he had recently been arrested after a car accident with a New York City bus. Consistent with this, on or about August 1, 2022, LOPEZ PAULINO was arrested for recklessly discharging a firearm at a vehicle in Manhattan.⁵

f. Some examples of stolen cars sold by the defendants to Victim-12 are below:

i. Car-12 is a 2021 Honda Odyssey to which the manufacturer assigned a VIN ending -6184; the defendants and their coconspirators later changed Car-12’s Public VIN to 5FNRL6H7XNB113112. Based on my review of law enforcement records, I know that the owner of Car-12 reported that Car-12 was stolen in the Bronx, New York, on or about August 25 or 26, 2022. Victim-12 purchased Car-12 from ARIAS SANTOS and LOPEZ PAULINO in or about September 2022 for \$25,000.

ii. Car-13 is a 2021 Honda Accord to which the manufacturer assigned a VIN ending -7316; the defendants and their coconspirators later changed Car-13’s Public VIN to 1HGCV2F35MA045125. Based on my review of law enforcement records, I know that the owner of Car-13 reported that Car-13 was stolen in the Bronx, New York, on or about July 12 or 13, 2022. Victim-12 purchased Car-13 from ARIAS SANTOS and LOPEZ PAULINO in or about August 2022 for \$23,000.

iii. Car-14 is a 2021 Honda Accord to which the manufacturer assigned a VIN ending -4428; the defendants and their coconspirators later changed Car-14’s Public VIN to 1HGCV1F42NA052134. Based on my review of law enforcement records, I know that the owner of Car-14 reported that Car-14 was stolen in the Bronx, New York, on or about July 19 or 20, 2022. Victim-12 purchased Car-14 from ARIAS SANTOS and LOPEZ PAULINO in or about August 2022 for \$23,000.

iv. Car-15 is a 2022 Honda CRV to which the manufacturer assigned VIN 2HKRW2H8XNH614396; the defendants and their coconspirators later changed Car-15’s Public VIN to 7FARW2H50NE005522. Based on my review of law enforcement records, I know that the owner of Car-15 reported that Car-15 was stolen in the Bronx, New York, on or about July

⁵ After the shooting, LOPEZ PAULINO fled the scene in a Jeep Wrangler bearing an Altered VIN. The same Altered VIN was observed on a different occasion on a different vehicle inside the Parking Garage.

19 or 20, 2022. Victim-12 purchased Car-15 from ARIAS SANTOS and LOPEZ PAULINO in or about August 2022 for \$23,000.

Car-16

27. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-16 is a 2022 Honda Accord to which the manufacturer assigned a VIN ending -1122; the defendants and their coconspirators later changed Car-16's Public VIN to 1HGCV1F37NA478909.

b. Based on my review of law enforcement records, I know that the owner of Car-16 reported that Car-16 was stolen in New York, New York, on or about March 14 or 15, 2024.

c. Victim-16 saw a Platform-1 posting offering Car-16 for sale.⁶ Victim-16 was living in Massachusetts at the time, and the seller asked Victim-16 to meet him at the Danbury Mall in Danbury, Connecticut, for the purchase, which Victim-16 did. On or about April 7, 2024, Victim-16 purchased Car-16 for \$17,200.

d. In a double-blind photo array, Victim-16 identified JOSE FERREIRA, the defendant, as the person who sold Car-16, and stated that FERREIRA's facial hair had changed between the photograph and the day of the sale.

e. On or about March 27, 2024, the Marte Carfax Account requested a vehicle history report on the Altered VIN affixed to Car-16.

Car-17 and Car-18

28. Based on my involvement in the investigation, including my review of law enforcement records and other records and my communications with victims, witnesses, and other members of law enforcement, I have learned the following:

a. Car-17 is a 2022 Honda CRV to which the manufacturer assigned a VIN ending -7522; the defendants and their coconspirators later changed Car-17's Public VIN to 2HKRW2H86NH578903.

b. Based on my review of law enforcement records, I know that the owner of Car-17 reported that Car-17 was stolen in Brooklyn, New York, on or about December 8 or 9, 2023.

⁶ Victim-13 through Victim-15 have been intentionally omitted so that the numbering of victims and cars continues to match.

c. Victim-17 saw a Platform-1 posting offering Car-17 for sale. The seller asked Victim-17 to meet him at the Danbury Mall in Danbury, Connecticut, for the purchase, which Victim-17 did. On or about December 15, 2023, Victim-17 purchased Car-17 for \$22,000.

d. In a double-blind photo array, Victim-17 identified JOSE FERREIRA, the defendant, as the person who sold Car-17.

e. Carfax records show that Car-17 was serviced at the Oil Change Establishment in Yonkers, New York, on or about December 10, 2023. Based on surveillance video obtained from the Oil Change Establishment, the person who drove Car-17 to the Oil Change Establishment to obtain the oil change was FERREIRA.

f. Car-18 is a 2022 Honda CRV to which the manufacturer assigned a VIN ending -0493; the defendants and their coconspirators later changed Car-18's Public VIN to 5J6RW2H80NA543209.

g. Based on my review of law enforcement records, I know that the owner of Car-18 reported that Car-18 was stolen in Brooklyn, New York, on or about February 6 or 7, 2024.

h. Victim-17—the same person who purchased Car-17 from FERREIRA—saw a Platform-1 posting offering Car-18 for sale. The seller asked Victim-17 to meet him at the Danbury Mall in Danbury, Connecticut, for the purchase, which Victim-17 did. On or about March 28, 2024, Victim-17 purchased Car-18 for \$20,000.

i. Victim-17 told law enforcement officers that he found Car-17 and Car-18 listed by two different accounts on Platform-1 and communicated with the seller using two different phone numbers. Toll records are consistent with this, showing that Victim-17 corresponded with the -3785 Number in December 2023, in advance of the purchase of Car-17,⁷ and then communicated with a number ending -4940 (the “-4940 Number”) in March 2024, in advance of the purchase of Car-18.⁸

j. Carfax records show that Car-18 was serviced at the Oil Change Establishment in Yonkers, New York, on or about March 8, 2024. Based on surveillance video obtained from the Oil Change Establishment, the person who drove Car-17 to the Oil Change Establishment to obtain the oil change was an unidentified Hispanic male.

k. Despite the fact that Victim-17 found Car-17 and Car-18 through two different Platform-1 accounts and communicated with the sellers using two different phone numbers, the person who arrived to sell Car-18 was the same person who had sold Car-17: FERREIRA.

⁷ As noted above, the -3785 Number was also used to sell Car-3.

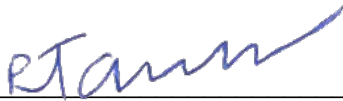
⁸ Service provider records show that a particular Platform-1 user (1) negotiated with Victim-17 concerning price for a vehicle in March 2023, before Victim-17 provided a phone number the seller could use to contact him; and (2) provided the -4940 Number to a different potential purchaser on a different occasion in March 2024.

WHEREFORE, I respectfully request that warrants be issued for the arrest of PEDRO MANUEL LOPEZ MARTE, JERRY LOPEZ PAULINO, SERGIO DIAZ RAMIREZ, PEDRO ROJAS, JUSTIN MARTHA, ERICK ROJAS CRUZ, JOSE FERREIRA, and RONALD ARIAS SANTOS, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

/s/ Rajeev Bhatia, by the Court with permission

Rajeev Bhatia
Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to me by reliable electronic
means (telephone), this 11th day of November, 2025.



THE HONORABLE ROBYN F. TARNOFSKY
United States Magistrate Judge
Southern District of New York