

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2014 APR -1 P 5:29

JOHN A. DE LUCCIO
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. **14 - CR083**

ERICK SANCHEZ-PULIDO and
ISRAEL SANCHEZ-PULIDO,

[18 U.S.C. §§ 371, 513(a), and 2;
49 U.S.C. §§ 32703(2), 32705(a) and
32709(b)]

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

At times relevant to this indictment:

1. Defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido purchased high-mileage used motor vehicles at Wisconsin auto auctions, rolled back the vehicles' odometers, altered the mileage readings on the vehicles' titles, and sold the vehicles to unsuspecting consumers.

2. As used in this indictment, the following vehicle numbers refer to the vehicles identified below:

<u>Vehicle No.</u>	<u>Year/Make/Model</u>	<u>Vehicle Identification No.</u>
1	2003 Cadillac Escalade	3GYEK63N93G101980
2	2002 Chrysler Town & Country	2C8GT64L72R736566
3	2001 Jeep Grand Cherokee	1J4GW48SX1C507816

4	2004 GMC Yukon	1GKFK66U54J180663
5	2003 Chevrolet Express	1GCHG39U431188123
6	2003 Chevrolet K1500	3GNFK16ZX3G197783
7	2004 Chevrolet Suburban	1GNFK16Z04J330339
8	2006 Dodge Ram	1D7HU18266S552950
9	2002 Chevrolet Silverado	1GCHK29G42E273909
10	2004 GMC Envoy	1GKDT13SX42358037
11	2004 Chevrolet Malibu	1G1ZT54834F102500
12	2004 Chevrolet Silverado	1GCEK19T34E202696
13	2006 Chevrolet Express	1GCFG15XX61138181
14	2005 Dodge Magnum	2D4FV48T75H601266
15	2004 Acura	19UUA66294A013874

3. Beginning by at least October 8, 2009, and continuing through at least February 8, 2014, in the State and Eastern District of Wisconsin and elsewhere,

**ERICK SANCHEZ-PULIDO and
ISRAEL SANCHEZ-PULIDO**

conspired and agreed with each other, and other persons known and unknown to the grand jury, to commit offenses against the United States, that is:

(a) to knowingly and willfully reset and alter, and cause to be reset and altered, the odometers of used motor vehicles, intending to change the mileage registered by the odometers, in violation of Title 49, United States Code, Sections 32703(2) and 32709(b);

(b) to knowingly and willfully give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating

to the actual mileage of the vehicles, in violation of Title 49, United States Code, Sections 32705(a) and 32709(b); and

(c) with intent to deceive another person, organization, and government, to knowingly make, utter, and possess counterfeit and forged securities of the State of Wisconsin and the State of Illinois, in violation of Title 18, United States Code, Section 513(a).

Purpose, Manner & Means of the Conspiracy

4. The purpose of the conspiracy was to defraud and obtain money from the purchasers of used motor vehicles by rolling back the vehicles' odometers and thus causing both the immediate and subsequent buyers of the vehicles, including ultimate consumers, to pay more for the vehicles than they would have paid if they had known the vehicles' actual mileage.

5. The defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido purchased and caused to be purchased used, high mileage vehicles from auto auctions in Wisconsin. The defendants submitted false information to obtain the dealer's and buyer's licenses that are necessary to have access to the Wisconsin auto auctions.

6. After purchasing the vehicles, the defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido caused the vehicles' odometers to be rolled back to lower mileage figures. (Vehicles with such altered odometers are called "rolled-back vehicles" below.)

7. The defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido altered and caused to be altered vehicle titles and other ownership documents to show false low mileages for the rolled-back vehicles. For some of the vehicles, the defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido fraudulently used altered mileage statements on the existing vehicle titles to obtain new titles from the Wisconsin Department of Transportation and the Illinois Secretary of State that showed false low mileages for the rolled-back vehicles. The defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido used the fraudulently obtained titles that showed false

low mileages to sell the rolled-back vehicles to car dealerships and consumers in Wisconsin and elsewhere. For other vehicles, the defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido used altered mileage statements on the existing vehicle titles to sell the rolled-back vehicles without first obtaining a new title.

8. Over the course of this conspiracy, the defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido purchased at high mileage and resold at false, low mileage, at least 146 vehicles.

Overt Acts

In furtherance of the conspiracy, the defendants Erick Sanchez-Pulido and Israel Sanchez-Pulido, and others known and unknown to the grand jury, committed the following overt acts, in the State and Eastern District of Wisconsin and elsewhere:

9. On or about October 8, 2009, Erick Sanchez-Pulido purchased Vehicle 1 at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 152,308 miles.

10. On or about October 21, 2009, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Janesville, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 1 had 92,475 miles.

11. On or about December 29, 2009, Erick Sanchez-Pulido purchased Vehicle 2 at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 210,576 miles.

12. On or about January 8, 2010, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Milwaukee, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 2 had 70,600 miles.

13. On or about March 11, 2010, Erick Sanchez-Pulido purchased Vehicle 3 at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 196,312 miles.

14. On or about March 18, 2010, Israel Sanchez-Pulido submitted altered vehicle title

documents to the Wisconsin Division of Motor Vehicles' office in Fond du Lac, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 3 had 96,314 miles.

15. On or about July 8, 2010, Israel Sanchez-Pulido purchased Vehicle 4 at an auto auction in Fond du Lac, Wisconsin, knowing that the vehicle had 182,660 miles.

16. On or about September 2, 2010, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Kenosha, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 4 had 84,357 miles.

17. On or about August 17, 2010, Erick Sanchez-Pulido purchased Vehicle 5 at an auto auction in Jefferson, Wisconsin, knowing that the vehicle had 226,699 miles.

18. On or about September 9, 2010, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Fond du Lac, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 5 had 87,122 miles.

19. On or about September 23, 2010, Erick Sanchez-Pulido provided a fraudulent Social Security number to obtain a buyer's license needed to gain access to Wisconsin auto auctions.

20. On or about December 21, 2010, Erick Sanchez-Pulido purchased Vehicle 6 at an auto auction in Jefferson, Wisconsin, knowing that the vehicle had 302,965 miles.

21. On or about January 6, 2011, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Milwaukee, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 6 had 94,018 miles.

22. On or about December 28, 2010, Erick Sanchez-Pulido purchased Vehicle 7 at an auto auction in Jefferson, Wisconsin, knowing that the vehicle had 201,951 miles.

23. On or about January 20, 2011, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Milwaukee, Wisconsin,

to obtain a Wisconsin title that falsely showed that Vehicle 7 had 92,180 miles.

24. On or about March 24, 2011, Erick Sanchez-Pulido purchased Vehicle 8 at an auto auction in Fond du Lac, Wisconsin, knowing that the vehicle had 137,435 miles.

25. On or about April 8, 2011, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Fond du Lac, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 8 had 104,678 miles.

26. On or about May 17, 2011, Israel Sanchez-Pulido purchased Vehicle 9 at an auto auction in Jefferson, Wisconsin, knowing that the vehicle had 266,413 miles.

27. On or about June 1, 2011, Israel Sanchez-Pulido submitted altered vehicle title documents to the Wisconsin Division of Motor Vehicles' office in Kenosha, Wisconsin, to obtain a Wisconsin title that falsely showed that Vehicle 9 had 86,450 miles.

28. On or about September 8, 2011, Erick Sanchez-Pulido purchased Vehicle 10 at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 203,143 miles.

29. On or about October 12, 2011, Erick Sanchez-Pulido submitted altered vehicle title documents to the Illinois Secretary of State to obtain an Illinois title that falsely showed that Vehicle 10 had 84,200 miles.

30. On or about November 29, 2011, Erick Sanchez-Pulido provided a fraudulent Social Security number to obtain a buyer's license needed to gain access to Wisconsin auto auctions.

31. On or about May 24, 2012, Erick Sanchez-Pulido and Israel Sanchez-Pulido caused Vehicle 11 to be purchased at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 177,948 miles.

32. On or about June 13, 2012, Israel Sanchez-Pulido sold Vehicle 11 to a consumer from Illinois, using an Illinois title that falsely showed that Vehicle 11 had 98,072 miles.

33. On or about September 13, 2012, Erick Sanchez-Pulido and Israel Sanchez-Pulido caused Vehicle 12 to be purchased at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 198,241 miles.

34. On or about September 28, 2012, Israel Sanchez-Pulido sold Vehicle 12 to a consumer from Indiana, using a Wisconsin title that falsely showed that Vehicle 12 had 98,543 miles.

35. On or about December 4, 2012, Erick Sanchez-Pulido purchased Vehicle 13 at an auto auction in De Pere, Wisconsin, knowing that the vehicle had 204,487 miles.

36. On or about February 26, 2013, Erick Sanchez-Pulido sold Vehicle 13 to a consumer from Wisconsin, using a Wisconsin title that falsely showed that Vehicle 13 had 86,120 miles.

37. On or about January 17, 2013, Erick Sanchez-Pulido and Israel Sanchez-Pulido caused Vehicle 14 to be purchased at an auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 243,016 miles.

38. On or about February 13, 2013, Israel Sanchez-Pulido sold Vehicle 14 to a consumer from Illinois, using a Wisconsin title that falsely showed that Vehicle 14 had 94,020 miles.

39. On or about August 29, 2013, Erick Sanchez-Pulido provided a fraudulent Social Security number to attempt to obtain a buyer's license needed to gain access to Wisconsin auto auctions.

40. On or about August 29, 2013, Israel Sanchez-Pulido provided a fraudulent Social Security number to attempt to obtain a buyer's license needed to gain access to Wisconsin auto auctions.

41. On or about January 16, 2014, Erick Sanchez-Pulido purchased Vehicle 15 at an

auto auction in Milwaukee, Wisconsin, knowing that the vehicle had 191,708 miles.

42. On or about February 8, 2014, Israel Sanchez-Pulido sold Vehicle 15 to a consumer from Wisconsin, using an Illinois title that falsely showed that the vehicle had 101,708 miles as of January 16, 2014.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH SIXTEEN

THE GRAND JURY FURTHER CHARGES:

43. Paragraphs 1 - 2 of Count One are incorporated here.

44. On or about the dates listed below, in the State and Eastern District of Wisconsin and elsewhere,

**ERICK SANCHEZ-PULIDO and
ISRAEL SANCHEZ-PULIDO**

the defendants herein, did knowingly and willfully reset and alter, and cause to be reset and altered, the odometers of the motor vehicles listed below, with the intent to change the number of miles indicated on said odometers, each such instance constituting a separate count of this indictment:

Count	Date of Purchase	Vehicle No.	High Mileage	False Mileage
2	October 8, 2009	1	152,308	92,475
3	December 29, 2009	2	210,576	71,036
4	March 11, 2010	3	196,312	96,645
5	July 8, 2010	4	182,660	85,394
6	August 17, 2010	5	226,699	102,056
7	December 21, 2010	6	302,965	97,231
8	December 28, 2010	7	201,951	94,000
9	March 24, 2011	8	137,435	104,894
10	May 17, 2011	9	266,413	86,795
11	September 8, 2011	10	203,143	89,879
12	May 24, 2012	11	177,948	98,072
13	September 13, 2012	12	198,241	98,543

14	December 4, 2012	13	204,487	86,120
15	January 17, 2013	14	243,016	94,020
16	January 16, 2014	15	191,708	101,708

All in violation of Title 49, United States Code, Sections 32703(2) and 32709(b), and Title 18, United States Code, Section 2.

COUNTS SEVENTEEN THROUGH TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES:

45. Paragraphs 1 - 2 of Count One are incorporated here.

46. On or about the dates listed below, in the State and Eastern District of Wisconsin and elsewhere,

**ERICK SANCHEZ-PULIDO and
ISRAEL SANCHEZ-PULIDO**

did knowingly make, utter, and possess, and cause to be made, uttered, and possessed, forged and counterfeited securities of the State of Wisconsin – namely, certificates of title relating to the motor vehicles listed below – with the intent to deceive other persons, organizations, and governments, each such instance constituting a separate count of this indictment:

Count	Date	Vehicle No.
17	January 8, 2010	2
18	March 18, 2010	3
19	September 2, 2010	4
20	September 9, 2010	5
21	January 6, 2011	6
22	January 20, 2011	7
23	April 8, 2011	8
24	June 1, 2011	9

All in violation of Title 18, United States Code, Sections 513(a) and 2.

COUNTS TWENTY-FIVE THROUGH TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES:

- 47. Paragraphs 1 - 2 of Count One are incorporated here.
- 48. On or about the dates listed below, in the State and Eastern District of Wisconsin,

**ERICK SANCHEZ-PULIDO and
ISRAEL SANCHEZ-PULIDO**

did knowingly and willfully give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating to the cumulative mileage registered on the odometers of the motor vehicles listed below when in fact the odometers of the vehicles had registered the approximate high mileage listed below when the defendants acquired the vehicles, each such instance constituting a separate count of this indictment:

Count	Vehicle No.	Date of Sale	High Mileage	False Mileage
25	5	January 16, 2011	226,699	102,056
26	6	January 6, 2011	302,965	97,231
27	9	June 2, 2011	266,413	86,795
28	13	February 26, 2013	204,487	86,120

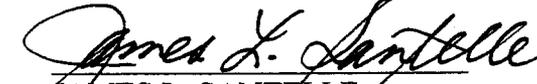
All in violation of Title 49, United States Code, Sections 32705(a) and 32709(b), and Title 18, United States Code, Section 2.

A TRUE BILL:



FOREPERSON

Dated: 4/1/2014


JAMES L. SANTELLE
United States Attorney