

**FILED**

**MAR 07 2018**

**SONYA KRASKI  
COUNTY CLERK  
SNOHOMISH CO. WASH**

**STATE OF WASHINGTON  
SNOHOMISH COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

SALVADOR SAHAGUN,  
DOB: 12/25/1960

Defendant.

NO. **18 1 00704 31**

INFORMATION

I, Robert W. Ferguson, Attorney General of Washington, in the name and by the authority of the State of Washington, pursuant to RCW 43.10.232 and at the request of Mark Roe, Snohomish County Prosecuting Attorney, do accuse SALVADOR SAHAGUN of the crimes of: **Theft in the First Degree (2 counts), and Unlawful Use of Sales Suppression Software (1 count)**, committed as follows:

**COUNT 1**

I, Robert W. Ferguson, Attorney General aforesaid, do accuse SALVADOR SAHAGUN of the crime of **Theft in the First Degree**, based on a series of acts connected together with other crimes charged herein, and which crimes were so closely connected in respect to time, place, and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

INFORMATION

1

ATTORNEY GENERAL'S OFFICE  
Criminal Justice Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-6430

1 That the defendant, SALVADOR SAHAGUN, in Snohomish County, State of  
2 Washington, on or between January 1, 2012 through December 31, 2016, in a series of  
3 transactions which are part of a criminal episode or a common scheme or plan, as part of a  
4 continuing criminal impulse and a continuing course of criminal conduct, and by color and aid  
5 of deception, did wrongfully obtain or exert unauthorized control over property, other than a  
6 firearm, as defined in RCW 9A.41.010, to wit: sales tax collected from patrons at  
7 Tacos Guaymas Lynnwood and owing to the Washington State Department of Revenue, of an  
8 aggregate value exceeding \$5,000, with intent to deprive such said owner of such property; and  
9 contrary to RCW 9A.56.030(1)(a), and 9A.56.020(1)(a), and against the peace and dignity of  
10 the State of Washington. (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to  
11 RCW 9A.56.030).

12 **COUNT 2**

13 And I, Robert W. Ferguson, Attorney General aforesaid, do accuse  
14 SALVADOR SAHAGUN of the crime of **Theft in the First Degree**, based on a series of acts  
15 connected together with other crimes charged herein, and which crimes were so closely  
16 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
17 one charge from proof of the other, committed as follows:

18 That the defendant, SALVADOR SAHAGUN, in Snohomish County, State of  
19 Washington, on or between January 1, 2012 through December 31, 2016, in a series of  
20 transactions which are part of a criminal episode or a common scheme or plan, as part of a  
21 continuing criminal impulse and a continuing course of criminal conduct, and by color and aid  
22 of deception, did wrongfully obtain or exert unauthorized control over property, other than a  
23 firearm, as defined in RCW 9A.41.010, to wit: sales tax collected from patrons at  
24 Tacos Guaymas of Marysville and owing to the Washington State Department of Revenue, of  
25 an aggregate value exceeding \$5,000, with intent to deprive such said owner of such property;  
26 and contrary to RCW 9A.56.030(1)(a), and 9A.56.020(1)(a), and against the peace and dignity

1 of the State of Washington. (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to  
2 RCW 9A.56.030).

3 **COUNT 3**

4 And I, Robert W. Ferguson, Attorney General aforesaid, do accuse  
5 SALVADOR SAHAGUN of the crime of Unlawful Use of Sales Suppression Software,  
6 based on a series of acts connected together with another crime charged herein, and which  
7 crimes were so closely connected in respect to time, place, and occasion that it would be  
8 difficult to separate proof of one charge from proof of the other, committed as follows:

9 That the defendant SALVADOR SAHAGUN, in Snohomish County, State of  
10 Washington, on or on or between January 1, 2012 through December 31, 2016, did  
11 knowingly use or possess an automated sales suppression device or phantom-ware at  
12 Tacos Guaymas of Marysville; contrary to RCW 82.32.290(4)(a), and against the peace and  
13 dignity of the State of Washington. (Maximum penalty: 5 years and/or a \$10,000 fine,  
14 contrary to RCW 82.32.290(4)(a)).

15 DATED this 1st day of March, 2018.

16  
17 ROBERT W. FERGUSON  
Attorney General

18 *Andrew R. Hamilton*

19  
20 ANDREW R. HAMILTON, WSBA # 8312  
Assistant Attorney General  
Attorney for the State of Washington  
21

22	Address: 24204 23rd Avenue	Bothell	WA	98021
23	HT: 5'10"	DOB: 12-25-1960	SID:	
24	WT: 235	SEX: M	FBI:	
25	EYES: BRN	RACE:	DOC:	
26	HAIR:	DOL: SAHAGSG402RS		
	ORIGINATING AGENCY: Wash Department of Revenue			AGENCY CASE#: 10761065