

FILED
KING COUNTY, WASHINGTON

MAR 07 2018

SUPERIOR COURT CLERK
BY Shaylynn Nelson
DEPUTY

**STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

V.

SALVADOR SAHAGUN,
DOB: 12/25/1960

Defendant.

NO. 18-1-00591-1

INFORMATION

PA#
Report# 10761065
CTS. I-IV: RCW 9A.56.030(1)(a) and
9A.56.020(1)(a)
CTS. IV-VI: RCW 82.32.290(4)(a)

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 Daniel T. Satterberg, King County Prosecuting Attorney, do accuse SALVADOR SAHAGUN of the crimes of: **Theft in the First Degree (4 counts), and Unlawful Use of Sales Suppression Software (2 counts)**, committed as follows:

COUNT I

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:

1 That the defendant, SALVADOR SAHAGUN, in King County, State of Washington,
2 on or between **January 1, 2012** through **December 31, 2016**, in a series of transactions which
3 are part of a criminal episode or a common scheme or plan, as part of a continuing criminal
4 impulse and a continuing course of criminal conduct, and by color and aid of deception, did
5 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined
6 in RCW 9.41.010, to wit: sales tax collected from patrons at Tacos Guaymas of West Seattle
7 and owing to the Washington State Department of Revenue, of an aggregate value exceeding
8 \$5,000, with intent to deprive such said owner of such property; and contrary to
9 RCW 9A.56.030(1)(a), and 9A.56.020(1)(a), and against the peace and dignity of the State of
10 Washington. (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to
11 RCW 9A.56.030).

12 **COUNT II**

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 King County, State of Washington,
19 on or between **January 1, 2012** through **December 31, 2016**, in a series of transactions which
20 are part of a criminal episode or a common scheme or plan, as part of a continuing criminal
21 impulse and a continuing course of criminal conduct, and by color and aid of deception, did
22 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined
23 in RCW 9.41.010, to wit: sales tax collected from patrons at Tacos Guaymas Broadway and
24 owing to the Washington State Department of Revenue, of an aggregate value exceeding
25 \$5,000, with intent to deprive such said owner of such property; and contrary to
26 RCW 9A.56.030(1)(a), and 9A.56.020(1)(a), and against the peace and dignity of the State of

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

3 **COUNT III**

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

9 That the defendant, SALVADOR SAHAGUN, in King County, State of Washington,
10 on or between **January 1, 2012** through **December 31, 2016**, in a series of transactions which
11 are part of a criminal episode or a common scheme or plan, as part of a continuing criminal
12 impulse and a continuing course of criminal conduct, and by color and aid of deception, did
13 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined
14 in RCW 9.41.010, to wit: sales tax collected from patrons at Tacos Guaymas Greenlake and
15 owing to the Washington State Department of Revenue, of an aggregate value exceeding
16 \$5,000, with intent to deprive such said owner of such property; and contrary to
17 RCW 9A.56.030(1)(a), and 9A.56.020(1)(a), and against the peace and dignity of the State of
18 Washington. (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to
19 RCW 9A.56.030).

20 **COUNT IV**

21 And I, Robert W. Ferguson, Attorney General aforesaid, do accuse
22 SALVADOR SAHAGUN of the crime of **Theft in the First Degree**, based on a series of acts
23 connected together with other crimes charged herein, and which crimes were so closely
24 connected in respect to time, place, and occasion that it would be difficult to separate proof of
25 one charge from proof of the other, committed as follows:
26

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

12 **COUNT V**

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

18 That the defendant SALVADOR SAHAGUN, in King County, State of Washington, on
19 or on or between **January 1, 2012** through **December 31, 2016**, did knowingly use or possess
20 an automated sales suppression device or phantom-ware at Tacos Guaymas of West Seattle;
21 contrary to RCW 82.32.290(4)(a), and against the peace and dignity of the State of
22 Washington. (Maximum penalty: 5 years and/or a \$10,000 fine, contrary to
23 RCW 82.32.290(4)(a)).

24 ////
25 ////
26 ////

1 **COUNT VI**

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

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

13 DATED this 15th day of March 2018.

14
15 ROBERT W. FERGUSON
Attorney General

16 *Andrew R. Hamilton*

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

20 DEFENDANT INFORMATION: SALVADOR SAHAGUN
21 Address: 24204 23rd Avenue SE, Bothell, WA 98021
22 Height: 5-10 Weight: 235 Hair:
Eyes: BRN DOL#: SAHAGSG402R5 State: WA
23 SID #: DOC#: FBI No.: