

**FILED**  
KING COUNTY, WASHINGTON

MAR 07 2018

SUPERIOR COURT CLERK  
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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 ////

COUNT VI

And I, Robert W. Ferguson, Attorney General aforesaid, do accuse SALVADOR SAHAGUN of the crime of Unlawful Use of Sales Suppression Software, based on a series of acts connected together with another crime 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:

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

DATED this 15th day of March 2018.

ROBERT W. FERGUSON
Attorney General

Andrew R. Hamilton

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

DEFENDANT INFORMATION: SALVADOR SAHAGUN
Address: 24204 23rd Avenue SE, Bothell, WA 98021
Height: 5-10 Weight: 235
Eyes: BRN DOL#: SAHAGSG402R5
SID #: DOC#:

Hair:
State: WA
FBI No.: