Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of 1 the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington. 2 November 3 Ravi Subramanian, Clerk By Deputy 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 NO. UNITED STATES OF AMERICA, CR23-171 RSM 11 Plaintiff 12 **INDICTMENT** 13 v. 14 1. MOSSES RAMOS, 15 aka MOSES RAMOS, 2. MICHAEL ANTHONY BARQUET, 16 aka ANTHONY MICHAEL BARQUET, aka "YG," 17 3. FRANCISCO MONTERO, 18 aka "Serio," 4. NECA SILVESTRE, 19 5. KATRINA CAZARES, 20 aka "Tay," and 6. KYARA ZEPEDA, 21 aka KYARA MONTERO, Defendants. 22 23 24 25 26 27

Indictment - 1 United States v. Ramos et al. USAO No. 2023R00645 UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970 1

The Grand Jury charges that:

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OVERVIEW

At all times material to this Indictment:

- 1. As set forth below, from at least in or about March 2023, up to and including at least May 2023, Defendants MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES, and KYARA ZEPEDA, together with others known and unknown, carried out a scheme involving bribery and the smuggling and distribution of controlled substances into and within the King County Correctional Facility (KCCF), a county jail in Seattle, Washington.
- 2. Specifically, from at least in or about March 2023, continuing until and including at least May 2023, RAMOS was a Correctional Officer at KCCF and introduced and attempted to introduce into KCCF controlled substances for the benefit of KCCF inmates BARQUET, MONTERO, and others known and unknown. The controlled substances included methamphetamines and fentanyl.
- 3. In return for introducing controlled substances into KCCF, Correctional Officer RAMOS solicited and received bribe payments directly or indirectly from inmates BARQUET, MONTERO, and others known and unknown, and the inmates' associates, including SILVESTRE, CAZARES, ZEPEDA, and others known and unknown.

RELEVANT ENTITIES AND THE DEFENDANTS

4. The King County Department of Adult and Juvenile Detention (KCDAJD) is a local government agency that operates detention facilities, including KCCF, in King County, Washington. KCDAJD received federal assistance in excess of \$10,000 during the one-year period beginning June 1, 2022 and ending June 1, 2023.

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- 5. Defendant MOSSES RAMOS was employed by and an agent of KCDAJD as a correctional officer at KCCF from approximately June 2006 until approximately September 2023. RAMOS' duties included monitoring adults in the King County Correctional Facility in Seattle, maintaining security and control of inmates and the detention facility, and instructing inmates on detention rules and regulations.
- 6. Defendant MICHAEL ANTHONY BARQUET, aka "YG," was an inmate at KCCF between approximately March 8, 2022 and July 18, 2023.
- 7. Defendant FRANCISCO MONTERO, aka "Serio," has been an inmate at KCCF since approximately July 2021.
 - 8. Defendant NECA SILVESTRE is an associate of MONTERO.
- 9. Defendant KATRINA CAZARES, aka "Tay," is an associate of BARQUET.
 - 10. Defendant KYARA ZEPEDA is an associate of MONTERO.

COUNT 1

Conspiracy to Engage in Bribery

- 11. Paragraphs 1 through 10 of this Indictment are incorporated by reference as if fully set forth herein.
- 12. Beginning at a time unknown but no later than March 14, 2023, and continuing through until at least May 3, 2023, in King County, within the Western District of Washington, Defendants MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES, and KYARA ZEPEDA, together with others known and unknown, willfully and knowingly conspired and agreed together and with each other, to commit offenses against the United States, that is, to corruptly solicit and demand, to accept and agree to accept, to offer and give anything of value, for the benefit of any person, with the intent to influence and reward an agent of an organization of a state and local government, and any

agency thereof, in connection with any business, transaction, and series of transactions of such organization, government, and agency, involving anything of value of \$5,000 or more, in violation of 18 U.S.C. §§ 666(a)(1)(B) and 666(a)(2).

13. The object of the conspiracy was for RAMOS, in exchange for payment from BARQUET, MONTERO, SILVESTRE, CAZARES, ZEPEDA, and others known and unknown, to use his position as a correctional officer at KCCF to smuggle controlled substances into KCCF so that BARQUET and MONTERO could distribute the controlled substances in the facility, as alleged in Count 4.

A. Manner and Means

The following conduct was part of the conspiracy:

- 14. Defendants RAMOS, BARQUET, MONTERO, SILVESTRE, CAZARES, and ZEPEDA, together with others known and unknown, introduced controlled substances into KCCF.
- 15. BARQUET and MONTERO aided, abetted, counseled, commanded, and induced SILVESTRE, CAZARES, and ZEPEDA to deliver controlled substances to RAMOS.
- 16. BARQUET and MONTERO aided, abetted, counseled, commanded, and induced SILVESTRE, CAZARES, and ZEPEDA to deliver payments to RAMOS.
- 17. RAMOS then smuggled controlled substances into KCCF and delivered the controlled substances to inmates BARQUET and MONTERO.

B. Overt Acts

18. In furtherance of the conspiracy and to accomplish one or more of its objects, the Defendants, and others known and unknown, undertook, and caused to be undertaken, one or more of the following acts in King County, within the Western District of Washington:

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1	a. In about March 2023, RAMOS communicated that he would
2	smuggle controlled substances into KCCF for inmates BARQUET and MONTERO, in
3	exchange for approximately \$5,000.
4	b. On or about March 23, 2023, BARQUET and CAZARES spoke by
5	phone to coordinate delivery of controlled substances and a bribe payment to RAMOS.
6	c. On or about March 24, 2023, MONTERO called CAZARES to
7	coordinate delivery of controlled substances and a bribe payment to RAMOS.
8	d. On or about March 24, 2023, MONTERO and ZEPEDA spoke by
9	phone to coordinate delivery of controlled substances and a bribe payment to RAMOS.
10	e. On or about March 24, 2023, CAZARES provided controlled
11	substances and cash for a bribe payment to ZEPEDA.
12	f. On or about March 24, 2023, ZEPEDA gave RAMOS controlled
13	substances and cash for a bribe payment, including the controlled substances and cash
14	CAZARES provided ZEPEDA earlier in the day.
15	g. On or about March 24, 2023, SILVESTRE made a bribe payment in
16	the form of a Cash App transfer to an account specified by RAMOS.
17	h. On or about March 25, 2023, RAMOS introduced controlled
18	substances into KCCF.
19	All in violation of Title 18, United States Code, Section 371.
20	COUNT 2
21	Bribery
22	19. Paragraphs 1 through 18 of this Indictment are incorporated by reference as
23	if fully set forth herein.
24	20. On or about March 24, 2023, in King County, within the Western District
25	of Washington, Defendant MOSSES RAMOS did corruptly solicit, demand, accept and
26	agree to accept a thing of value from a person, intending to be influenced and rewarded in
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1	connection with the business, transaction, and series of transactions of the King County
2	Department of Adult and Juvenile Detention, involving \$5,000 or more.
3	21. This offense was committed during and in furtherance of the offenses
4	alleged in Counts 1 (Conspiracy to Engage in Bribery) and 4 (Conspiracy to Distribute
5	Controlled Substances).
6	All in violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.
7	COUNT 3
8	Bribery
9	22. Paragraphs 1 through 21 of this Indictment are incorporated by reference as
10	if fully set forth herein.
11	23. On or about March 24, 2023, in King County, and within the Western
12	District of Washington, Defendants MICHAEL ANTHONY BARQUET, FRANCISCO
13	MONTERO, NECA SILVESTRE, KATRINA CAZARES, and KYARA ZEPEDA did,
14	corruptly give, offer, and agree to give a thing of value to any person intending to
15	influence and reward Defendant MOSSES RAMOS in connection with the business,
16	transaction, and series of transactions of the King County Department of Adult and
17	Juvenile Detention, involving \$5,000 or more.
18	24. This offense was committed during and in furtherance of the offenses
19	alleged in Counts 1 (Conspiracy to Engage in Bribery) and 4 (Conspiracy to Distribute
20	Controlled Substances).
21	All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.
22	COUNT 4
23	Conspiracy to Distribute Controlled Substances
24	25. Paragraphs 1 through 24 of this Indictment are incorporated by reference as
25	if fully set forth herein.
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- 26. Beginning at a time unknown but no later than on or about March 15, 2023, and continuing until at least May 3, 2023, in King County, within the Western District of Washington, Defendants MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES, KYARA ZEPEDA, and others known and unknown, did knowingly and intentionally conspire to distribute controlled substances including methamphetamine, a substance controlled under Title 21, United States Code.
- 27. The Grand Jury further alleges that with respect to MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, their conduct as members of this conspiracy charged in Count 4, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 4, involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT 5

Possession of Controlled Substances with Intent to Distribute

- 28. Paragraphs 1 through 27 of this Indictment are incorporated by reference as if fully set forth herein.
- 29. On or about May 3, 2023, in King County, within the Western District of Washington, Defendants MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES, KYARA ZEPEDA, and others known and unknown, did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: methamphetamine, a substance controlled under Title 21, United States Code.

- 30. The Grand Jury further alleges that with respect to MOSSES RAMOS, MICHAEL BARQUET, and FRANCISCO MONTERO, the offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers.
- 31. This offense was committed during and in furtherance of the offense alleged in Count 4 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 842(b)(1)(C) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 5 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1 through 3 of this Indictment, MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES, and KYARA ZEPEDA shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), any property that constitutes or is traceable to proceeds of the offense. This property includes, but is not limited to, a sum of money reflecting the proceeds the defendant personally obtained from the offense.

Upon conviction of any of the offenses alleged in Counts 4 and 5, MOSSES RAMOS, MICHAEL ANTHONY BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES, and KYARA ZEPEDA, and shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to, a sum of money reflecting the proceeds the defendant personally obtained from the offense.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

 a. cannot be located upon the exercise of due diligence; b. has been transferred or sold to, or deposited with, a third party; c. has been placed beyond the jurisdiction of the Court;
c has been placed beyond the jurisdiction of the Court:
c. has been placed beyond the jurisdiction of the court,
d. has been substantially diminished in value; or,
e. has been commingled with other property which cannot be divided
without difficulty,
it is the intent of the United States to seek the forfeiture of any other property of the
defendant, up to the value of the above-described forfeitable property, pursuant to
Title 21, United States Code, Section 853(p).
A TRUE BILL: Wes
DATED: Yovember 1, 2023
Signature of Foreperson redacted pursuant
to the policy of the Judicial Conference of the United States.
FOREPERSON
TESSA M. GORMAN
Acting United States Attorney
SETHWILKINSON
Assistant United States Attorney
indiscling
CINDY CHANG Assistant United States Attorney
Assistant Officer States Attorney
VINCE T LOMPARDI
Assistant United States Attorney

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