

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

November 1 20 23
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR23-171 RSM

INDICTMENT

v.

- 1. MOSSES RAMOS,
aka MOSES RAMOS,
- 2. MICHAEL ANTHONY BARQUET,
aka ANTHONY MICHAEL BARQUET,
aka "YG,"
- 3. FRANCISCO MONTERO,
aka "Serio,"
- 4. NECA SILVESTRE,
- 5. KATRINA CAZARES,
aka "Tay," and
- 6. KYARA ZEPEDA,
aka KYARA MONTERO,
Defendants.

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1 The Grand Jury charges that:

2 **OVERVIEW**

3 At all times material to this Indictment:

4 1. As set forth below, from at least in or about March 2023, up to and
5 including at least May 2023, Defendants MOSSES RAMOS, MICHAEL ANTHONY
6 BARQUET, FRANCISCO MONTERO, NECA SILVESTRE, KATRINA CAZARES,
7 and KYARA ZEPEDA, together with others known and unknown, carried out a scheme
8 involving bribery and the smuggling and distribution of controlled substances into and
9 within the King County Correctional Facility (KCCF), a county jail in Seattle,
10 Washington.

11 2. Specifically, from at least in or about March 2023, continuing until and
12 including at least May 2023, RAMOS was a Correctional Officer at KCCF and
13 introduced and attempted to introduce into KCCF controlled substances for the benefit of
14 KCCF inmates BARQUET, MONTERO, and others known and unknown. The
15 controlled substances included methamphetamines and fentanyl.

16 3. In return for introducing controlled substances into KCCF, Correctional
17 Officer RAMOS solicited and received bribe payments directly or indirectly from
18 inmates BARQUET, MONTERO, and others known and unknown, and the inmates'
19 associates, including SILVESTRE, CAZARES, ZEPEDA, and others known and
20 unknown.

21 **RELEVANT ENTITIES AND THE DEFENDANTS**

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

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

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

9 **A. Manner and Means**

10 The following conduct was part of the conspiracy:

11 14. Defendants RAMOS, BARQUET, MONTERO, SILVESTRE, CAZARES,
12 and ZEPEDA, together with others known and unknown, introduced controlled
13 substances into KCCF.

14 15. BARQUET and MONTERO aided, abetted, counseled, commanded, and
15 induced SILVESTRE, CAZARES, and ZEPEDA to deliver controlled substances to
16 RAMOS.

17 16. BARQUET and MONTERO aided, abetted, counseled, commanded, and
18 induced SILVESTRE, CAZARES, and ZEPEDA to deliver payments to RAMOS.

19 17. RAMOS then smuggled controlled substances into KCCF and delivered the
20 controlled substances to inmates BARQUET and MONTERO.

21 **B. Overt Acts**

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

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
27

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.

- 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;
- 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: *Yes*

DATED: *November 1, 2023*

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON

[Signature]

TESSA M. GORMAN
Acting United States Attorney

[Signature]

SETH WILKINSON
Assistant United States Attorney

[Signature]

CINDY CHANG
Assistant United States Attorney

[Signature]

VINCE T. LOMBARDI
Assistant United States Attorney