

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  
June 23, 2021

WILLIAM M. McCOOL, Clerk  
By Shawn Katter Deputy

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

UNITED STATES OF AMERICA,

No. CR21-107 JCC

Plaintiff,

**INDICTMENT**

v.

1. CESAR ARAMBULA,
2. JORGE AGUILAR DURAN, and
3. RAUL BARRETO BEJINES,

Defendants.

The Grand Jury charges that:

**COUNT 1**

***Conspiracy to Distribute Controlled Substances***

Beginning at a time unknown and continuing until on or about June 23, 2021, in King, Pierce, and Lewis Counties, within the Western District of Washington, and elsewhere, CESAR ARAMBULA, JORGE AGUILAR DURAN, and RAUL BARRETO BEJINES, and others known and unknown, including conspirators charged in separate indictments under the captions *United States v. Calvert-Majors et al.*, CR21-053 RSM, *United States v. Lumumba-Olabisi et al.*, CR21-056 RSM, *United States v. Snipes et al.*, CR21-057 RSM, and *United States v. McGee et al.*, CR21-058 RSM, and an indictment returned this same day in *United States v. Moreno Aguirre et al.*, did knowingly and intentionally conspire to distribute substances controlled under Title 21, United States

1 Code, Section 812, Schedules I and II, including cocaine, contrary to the provisions of  
2 Title 21, United States Code.

3 ***Specific Quantity Allegations as to Cocaine***

4 With respect to Defendant CESAR ARAMBULA, his conduct as a member of the  
5 conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of  
6 other members of the conspiracy charged in Count 1, involved five kilograms or more of  
7 a mixture or substance containing a detectable amount of cocaine, in violation of Title 21,  
8 United States Code, Section 841(b)(1)(A).

9 With respect to Defendant JORGE AGUILAR DURAN, his conduct as a member  
10 of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct  
11 of other members of the conspiracy charged in Count 1, involved 500 grams or more of a  
12 mixture or substance containing a detectable amount of cocaine, in violation of Title 21,  
13 United States Code, Section 841(b)(1)(B).

14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and  
15 846.

16 **COUNT 2**

17 ***Possession of Cocaine with Intent to Distribute***

18 On or about November 16, 2020, at Issaquah, Washington, in the Western District  
19 of Washington, JORGE AGUILAR DURAN knowingly and intentionally possessed with  
20 intent to distribute substances controlled under Title 21, United States Code, Section 812,  
21 to wit: cocaine.

22 The Grand Jury further alleges that this offense was committed during and in  
23 furtherance of the conspiracy charged in Count 1, above.

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

25 **COUNT 3**

26 ***Prohibited Person in Possession of a Firearm***

27 On or about November 16, 2020, at Issaquah, Washington, in the Western District  
28 of Washington, JORGE AGUILAR DURAN, knowing that he was an alien illegally or

Indictment

*United States v. Arambula et al. - 2*

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1 each forfeit to the United States, pursuant to Title 21, United States Code, Section 853,  
2 any property that constitutes or is traceable to proceeds of the offense, as well as any  
3 property that facilitated the offense. This property includes, but is not limited to:

- 4 a. \$32,558 in United States currency, seized on or about November 16, 2020,  
5 at 201 Mountain Park Blvd SW #C-202, Issaquah, from Jorge Aguilar  
6 Duran; and  
7 b. A sum of money reflecting the proceeds the relevant defendant obtained  
8 from the offense.

9 **Count 2**

10 ***Possession of Cocaine with Intent to Distribute***

11 Upon conviction of the offense alleged in Count 2, the defendant JORGE  
12 AGUILAR DURAN shall forfeit to the United States, pursuant to Title 21, United States  
13 Code, Section 853, any property that constitutes or is traceable to proceeds of the offense,  
14 as well as any property that facilitated the offense.

15 **Count 3**

16 ***Prohibited Person in Possession of a Firearm***

17 Upon conviction of the offense alleged in Count 3, JORGE AGUILAR DURAN  
18 shall forfeit to the United States, pursuant to Title 18, United States Code,  
19 Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms  
20 and associated ammunition that were involved in the offense.

21 **Count 4**

22 ***Possession of Cocaine with Intent to Distribute***

23 Upon conviction of the offense alleged in Count 4, the defendant CESAR  
24 ARAMBULA shall forfeit to the United States, pursuant to Title 21, United States Code,  
25 Section 853, any property that constitutes or is traceable to proceeds of the offense, as  
26 well as any property that facilitated the offense.

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

- 3        a.        cannot be located upon the exercise of due diligence;
- 4        b.        has been transferred or sold to, or deposited with, a third party;
- 5        c.        has been placed beyond the jurisdiction of the Court;
- 6        d.        has been substantially diminished in value; or,
- 7        e.        has been commingled with other property which cannot be divided without  
8        difficulty;

9        ///

10        ///

1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to  
3 Title 21, United States Code, Section 853(p).

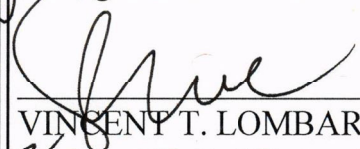
4  
5 A TRUE BILL:


6  
7 DATED: 6/23/2021

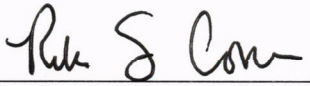
8 *Signature of the Foreperson redacted*  
9 *pursuant to the policy of the Judicial*  
10 *Conference of the United States*

11 \_\_\_\_\_  
12 FOREPERSON

13   
14 \_\_\_\_\_  
15 TESSA M. GORMAN  
16 Acting United States Attorney

17   
18 \_\_\_\_\_  
19 VINCENT T. LOMBARDI  
20 Assistant United States Attorney

21   
22 \_\_\_\_\_  
23 ERIN H. BECKER  
24 Assistant United States Attorney

25   
26 \_\_\_\_\_  
27 LYNDIE SCHMALZ  
28 Assistant United States Attorney