

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  
**December 9, 2020**

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WILLIAM M. McCOOL, Clerk

By \_\_\_\_\_ Deputy

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

UNITED STATES OF AMERICA,

CASE NO. CR20-217 RAJ

Plaintiff,

**INDICTMENT**

v.

- (1) CESAR VALDEZ-SANUDO,
  - (2) OMAR VAZQUEZ-LIMON,
  - (3) AARON ALARCON-CASTANEDA  
(aka SOBRINO),
  - (4) JOSE LUIS ARREDONDO-VALDEZ  
(aka PRIMO)
  - (5) YVETTE Y. OLGUIN,
  - (6) FAUSTO PAZ (aka GORDITO),
  - (7) GABRIEL VAZQUEZ-RUIZ,
  - (8) STEVEN R. DEL VECCHIO,
  - (9) TRACY HAWKINS,
  - (10) WAYNE A. J. FRISBY (aka MAC  
WAYNE), and
  - (11) KEITH A. SILVERSON,
- Defendants.

The Grand Jury charges that:

**COUNT 1**  
**(Conspiracy to Distribute Controlled Substances)**

Beginning at a time unknown and continuing until on or about December 9, 2020,  
at King, Snohomish, Lewis, and Pierce Counties, within the Western District of

1 Washington, and elsewhere, CESAR VALDEZ-SANUDO, OMAR VAZQUEZ-LIMON,  
2 AARON ALARCON-CASTANEDA, JOSE LUIS ARREDONDO-VALDEZ, YVETTE  
3 Y. OLGUIN, FAUSTO PAZ, GABRIEL VAZQUEZ-RUIZ, STEVEN R.  
4 DELVECCHIO, TRACY HAWKINS, WAYNE A. J. FRISBY, KEITH A.  
5 SILVERSON, and others known and unknown, did knowingly and intentionally conspire  
6 to distribute substances controlled under Title 21, United States Code, Section 812,  
7 Schedules I and II, to wit: heroin, methamphetamine, and cocaine, contrary to the  
8 provisions of Title 21, United States Code.

9 *Specific Quantity Allegations as to Methamphetamine*

10 The Grand Jury further alleges that with respect to CESAR VALDEZ-SANUDO,  
11 OMAR VAZQUEZ-LIMON, AARON ALARCON-CASTANEDA, JOSE LUIS  
12 ARREDONDO-VALDEZ, YVETTE Y. OLGUIN, FAUSTO PAZ, GABRIEL  
13 VAZQUEZ-RUIZ, STEVEN R. DELVECCHIO, TRACY HAWKINS, WAYNE A. J.  
14 FRISBY, and KEITH A. SILVERSON, their conduct as members of the conspiracy  
15 charged in Count 1, which includes the reasonably foreseeable conduct of the other  
16 members of the conspiracy charged in Count 1, involved 50 grams or more of  
17 methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a  
18 mixture or substance containing a detectable amount of methamphetamine, its salts,  
19 isomers, and salts of its isomers, in violation of Title 21, United States Code, Section  
20 841(b)(1)(A).

21 *Specific Quantity Allegations as to Heroin*

22 The Grand Jury further alleges that with respect to CESAR VALDEZ-SANUDO,  
23 OMAR VAZQUEZ-LIMON, JOSE LUIS ARREDONDO-VALDEZ, YVETTE Y.  
24 OLGUIN, and WAYNE A. J. FRISBY, their conduct as members of the conspiracy  
25 charged in Count 1, which includes the reasonably foreseeable conduct of other members  
26 of the conspiracy charged in Count 1, involved 1 kilogram or more of a mixture or  
27 substance containing a detectable amount of heroin, in violation of Title 21, United States  
28 Code, Section 841(b)(1)(A).

1 The Grand Jury further alleges that with respect to STEVEN R. DELVECCHIO  
2 and TRACY HAWKINS, their conduct as members of the conspiracy charged in Count  
3 1, which includes the reasonably foreseeable conduct of other members of the conspiracy  
4 charged in Count 1, involved 100 grams or more of a mixture or substance containing a  
5 detectable amount of heroin, in violation of Title 21, United States Code, Section  
6 841(b)(1)(B).

7 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and  
8 846.

9 *Specific Quantity Allegations as to Cocaine*

10 The Grand Jury further alleges that with respect to CESAR VALDEZ-SANUDO  
11 and GABRIEL VAZQUEZ-RUIZ, their conduct as members of the conspiracy charged in  
12 Count 1, which includes the reasonably foreseeable conduct of other members of the  
13 conspiracy charged in Count 1, involved 500 grams or more of a mixture or substance  
14 containing a detectable amount of cocaine, in violation of Title 21, United States Code,  
15 Section 841(b)(1)(B).

16 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and  
17 846.

18 **COUNT 2**

19 **(Possession with Intent to Distribute – Methamphetamine)**

20 On or about November 11, 2020, at King, Snohomish, and Lewis Counties, within  
21 the Western District of Washington and elsewhere, CESAR VALDEZ-SANUDO,  
22 AARON ALARCON-CASTANEDA, and FAUSTO PAZ did knowingly and  
23 intentionally possess with the intent to distribute, and aid and abet the possession of with  
24 intent to distribute, methamphetamine, a substance controlled under Title 21, United  
25 States Code, Section 812.

26 The Grand Jury further alleges that this offense involved 50 grams or more of  
27 methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a  
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1 mixture or substance containing a detectable amount of methamphetamine, its salts,  
2 isomers, and salts of its isomers.

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

5 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
6 841(b)(1)(A), and Title 18, United States Code, Section 2.

7 **COUNT 3**  
8 **(Conspiracy to Commit Money Laundering)**

9 Beginning at a time unknown, but within the last five years, and continuing  
10 through December 9, 2020, in Snohomish County, within the Western District of  
11 Washington, and elsewhere, CESAR VALDEZ-SANUDO, YVETTE Y. OLGUIN, and  
12 others known and unknown, unlawfully and knowingly combined, conspired,  
13 confederated and agreed together and with each other to commit certain money  
14 laundering offenses under Title 18, United States Code, Section 1956, as follows:

15 **1956(a)(1)(B)(i)**

16 Did conduct and attempt to conduct financial transactions, that is: transactions  
17 involving the movement of funds by wire and other means affecting interstate and foreign  
18 commerce, which in fact involved the proceeds of specified unlawful activity, that is,  
19 conspiracy to distribute controlled substances, in violation of Title 21, United States  
20 Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or  
21 in part to conceal and disguise the nature, the location, the source, the ownership, and the  
22 control of the proceeds of the specified unlawful activity, in violation of Title 18, United  
23 States Code, Section 1956(a)(1)(B)(i); and

24 **1956(a)(1)(B)(ii)**

25 Did conduct and attempt to conduct financial transactions, that is: transactions  
26 involving the movement of funds by wire and other means affecting interstate and foreign  
27 commerce, which in fact involved the proceeds of specified unlawful activity, that is,  
28 conspiracy to distribute controlled substances, in violation of Title 21, United States

1 Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or  
2 in part to avoid a transaction reporting requirement under State and Federal Law, in  
3 violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

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

6 All in violation of Title 18, United States Code, Section 1956(h).

7 **FORFEITURE ALLEGATION**

8 All of the allegations contained in this Indictment are hereby re-alleged and  
9 incorporated by reference for the purpose of alleging forfeiture.

10 Upon conviction of the offense charged in Count 1, the defendants CESAR  
11 VALDEZ-SANUDO, OMAR VAZQUEZ-LIMON, AARON ALARCON-  
12 CASTANEDA, JOSE LUIS ARREDONDO-VALDEZ, YVETTE Y. OLGUIN,  
13 FAUSTO PAZ, GABRIEL VAZQUEZ-RUIZ, STEVEN R. DELVECCHIO, TRACY  
14 HAWKINS, WAYNE A. J. FRISBY, and KEITH A. SILVERSON shall each forfeit to  
15 the United States, pursuant to Title 21, United States Code, Section 853, any property that  
16 constitutes or is traceable to proceeds of the offense, as well as any property that  
17 facilitated the offense.

18 Upon conviction of the offense charged in Count 2, the defendants CESAR  
19 VALDEZ-SANUDO, AARON ALARCON-CASTANEDA, and FAUSTO PAZ shall  
20 forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any  
21 property that constitutes or is traceable to proceeds of the offense, as well as any property  
22 that facilitated the offense.

23 Upon conviction of the offense charged in Count 3, the defendants CESAR  
24 VALDEZ-SANUDO and YVETTE Y. OLGUIN shall each forfeit to the United States,  
25 pursuant to Title 18, United States Code, Section 982(a)(1), any property that constitutes  
26 or is traceable to proceeds of the offense, as well as any property that was involved in the  
27 offense.

1           **Substitute Assets.** If any of the property described above, as a result of any act or  
2 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  
8               without difficulty,

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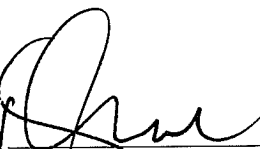
1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p), to seek the forfeiture of any other property of the defendants up to the value of  
3 the above-described forfeitable property.

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5 A TRUE BILL:

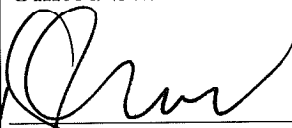
6 DATED: 12/9/2020

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

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FOREPERSON



BRIAN T. MORAN  
United States Attorney



VINCENT T. LOMBARDI  
Assistant United States Attorney



AMY JAQUETTE  
Assistant United States Attorney



MARCI L. ELLSWORTH  
Assistant United States Attorney