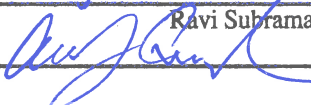


Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

August 2 20 23
Ravi Subramanian, Clerk
By  Deputy

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

CESAR LEONEL CONTRERAS-ARIAS,
Defendant.

NO. **CR 23-5234 RJB**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Unlawful Possession of a Firearm)

On or about February 2, 2023, in Pierce County, within the Western District of Washington, CESAR LEONEL CONTRERAS-ARIAS, knowing he had been convicted of the following crime punishable by a term of imprisonment exceeding one year:

- i. *Violation of Post-Conviction Protection Order*, in Benton County Superior Court, under case number 16-1-01149-1, on or about November 30, 2016;

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is: a Ruger Model SR-22P .22LR caliber handgun; and a Colt Model Anaconda 44

1 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
2 is: a Ruger Model SR-22P .22LR caliber handgun; and a Colt Model Anaconda 44
3 magnum revolver, that had been shipped and transported in interstate and foreign
4 commerce.

5 All in violation of Title 18, United States Code, Section 922(g)(1).

6 **COUNT 2**

7 **(Possession of a Controlled Substance with Intent to Distribute)**

8 On or about February 2, 2023, in Pierce County, within the Western District of
9 Washington, CESAR LEONEL CONTRERAS-ARIAS did knowingly and intentionally
10 possess, with the intent to distribute, a controlled substance, including: methamphetamine
11 and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), substances
12 controlled under Title 21, United States Code.

13 The Grand Jury further alleges that the offense involved 50 grams or more of
14 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a
15 mixture or substance containing a detectable amount of methamphetamine, its salts,
16 isomers, or salts of its isomers.

17 The Grand Jury further alleges that the offense involved 400 grams or more of a
18 mixture or substance containing a detectable amount of fentanyl.

19 All in violation of Title 21, United States Code, Sections 841(a)(1) and
20 841(b)(1)(A).

21 **COUNT 3**

22 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

23 On or about February 2, 2023, in Pierce County, within the Western District of
24 Washington, CESAR LEONEL CONTRERAS-ARIAS knowingly possessed a firearm,
25 that is: a Glock Model 43X 9mm semi-automatic handgun; a Sig Sauer Model P365 9mm
26 handgun; a Springfield Armory Model Hellcat 9mm handgun; and an Aces Tactical
27

1 Model Pro Series S 12 gauge shotgun, in furtherance of a drug trafficking crime for
2 which the defendant may be prosecuted in a court of the United States, that is, *Possession*
3 *of Controlled Substances with Intent to Distribute*, as alleged in Count 2 above.

4 All in violation of Title 18, United States Code, Section 924(c).

5 **FORFEITURE ALLEGATIONS**

6 The allegations contained in Counts 1 through 3 of this Indictment are hereby
7 realleged and incorporated by reference for the purpose of alleging forfeiture.

8 Upon conviction of either of the offenses alleged in Counts 1 and 3, CESAR
9 LEONEL CONTRERAS-ARIAS shall forfeit to the United States, pursuant to Title 18,
10 United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section
11 2461(c), any firearms and associated ammunition that were involved in the offense.

12 Upon conviction of the offense alleged in Count 2, CESAR LEONEL
13 CONTRERAS-ARIAS shall forfeit to the United States, pursuant to Title 21, United
14 States Code, Section 853, any property that constitutes or is traceable to proceeds of the
15 offense, as well as any property that facilitated the offense.

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

- 18 a. cannot be located upon the exercise of due diligence;
- 19 b. has been transferred or sold to, or deposited with, a third party;
- 20 c. has been placed beyond the jurisdiction of the Court;
- 21 d. has been substantially diminished in value; or,
- 22 e. has been commingled with other property which cannot be divided
23 without difficulty,

24 //

25 //

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 DATED: 8/2/23

7
8 *Signature of Foreperson redacted pursuant*
9 *to the policy of the Judicial Conference of*
10 *the United States.*

11
12 _____
13 FOREPERSON

14
15 _____
16 TESSA M. GORMAN
17 Acting United States Attorney

18
19 _____
20 MARCIL L. ELLSWORTH
21 Assistant United States Attorney