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| 5  |   |                        |                              |  |
| 6  | IN THE SUPERIOR COURT O   | F THE STATE OF         | WASHINGTON                   |  |
| 7  | IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON<br>IN AND FOR THE COUNTY OF FRANKLIN   |                        |                              |  |
| 8  | STATE OF WASHINGTON ,   | NO.                    |                              |  |
| 9  | Plaintiff,  | INFORMATION            | ٧                            |  |
| 10 | v.  |                        |                              |  |
| 11 | JUSTIN HERNANDEZ,<br>(DOB 07/28/87)   |                        |                              |  |
| 12 | DOB 07/28/87)<br>Defendant.   |                        |                              |  |
| 13 |   |                        |                              |  |
| 14 | CO-DEFS: Neo's Nation Animal Foundatior   | n, Franklin Co. Sup. ( | Ct No. ; Rebecca             |  |
| 15 | Howard, Franklin Co. Sup. Ct No.  |                        |                              |  |
| 16 |   |                        |                              |  |
| 17 | I, Robert W. Ferguson, Attorney General of  | Washington, in the n   | ame and by the authority of  |  |
| 18 | the State of Washington, pursuant to RCW 43.10.232 and at the request of Shawn Sant,<br>Franklin County Prosecuting Attorney, hereby allege JUSTIN HERNANDEZ did commit th  |                        |                              |  |
| 19 | following crimes:   |                        |                              |  |
| 20 | <u>Count 1</u> : FIRST DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, on one or more dates between on or about September 7, 2021, and on or<br>about November 11, 2021, acting with criminal negligence and without authority of law, did<br>starve an animal, to wit: Brandt, a domestic dog, and as a result caused substantial and<br>unjustifiable physical pain that extended for a period sufficient to cause considerable suffering |                        |                              |  |
| 21 |   |                        |                              |  |
| 22 |   |                        |                              |  |
| 23 | or death; proscribed by RCW 16.52.205(2), a felony. (Max penalty: 5 years confinement and \$10,000 fine)  |                        |                              |  |
| 24 |   |                        |                              |  |
|    | II<br>INFORMATION   | 1                      | ATTORNEY GENERAL OF WASHINGT |  |

| 1  | <u>Count 2</u> : FIRST DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, on one or more dates between on or about October 1, 2021, and on or   |  |  |  |  |
|----|--|--|--|--|--|
| 2  | $\frac{2}{2}$ about November 11, 2021, acting with criminal negligence and without authority of law, did   |  |  |  |  |
| 3  | starve an animal, to wit: Romeo, a domestic dog, and as a result caused substantial and unjustifiable physical pain that extended for a period sufficient to cause considerable suffering;   |  |  |  |  |
| 4  | proscribed by RCW 16.52.205(2), a felony. (Max penalty: 5 years confinement and \$10,000 fine)   |  |  |  |  |
| 5  | <u>Count 3</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:   |  |  |  |  |
| 6  | That the defendant, as owner of an animal, to wit: Cora, a domestic cat, on one or more dates between on or about August 26, 2021, and on or about November 11, 2021, acting knowingly,  |  |  |  |  |
| 7  | recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered unnecessary or   |  |  |  |  |
| 8  | unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)   |  |  |  |  |
| 9  |  |  |  |  |  |
| 10 | <u>Count 4</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: Curly, a domestic kitten, on one or more  |  |  |  |  |
| 11 | dates between on or about June 23, 2021, and on or about November 11, 2021, acting<br>knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary<br>sanitation, space, or medical attention, and as a result of the failure the animal suffered<br>unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross |  |  |  |  |
| 12 |  |  |  |  |  |
| 13 | misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)  |  |  |  |  |
| 14 | <u>Count 5</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: Ice, a domestic cat, on one or more dates   |  |  |  |  |
| 15 | between on or about October 1, 2021, and on or about November 11, 2021, acting knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation,  |  |  |  |  |
| 16 | space, or medical attention, and as a result of the failure the animal suffered unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max  |  |  |  |  |
| 17 | penalty: 364 days confinement and \$5,000 fine)  |  |  |  |  |
| 18 | <u>Count 6</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:   |  |  |  |  |
| 19 | That the defendant, as owner of an animal, to wit: Indigo, a domestic cat, on one or more dates between on or about October 1, 2021, and on or about November 11, 2021, acting knowingly,  |  |  |  |  |
| 20 | recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered unnecessary or   |  |  |  |  |
| 21 | unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)   |  |  |  |  |
| 22 | <u>Count 7</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:   |  |  |  |  |
| 23 | <u>Count 7</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: Jackie Chan, a domestic cat, on one or more<br>dates between on or about September 8, 2021, and on or about November 11, 2021, acting   |  |  |  |  |
| 24 | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary   |  |  |  |  |
| I  | INFORMATION 2 ATTORNEY GENERAL OF WASHINGTON   |  |  |  |  |

INFORMATION

| 1        | sanitation, space, or medical attention, and as a result of the failure the animal suffered unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross   |
|----------|---|
| 2        | misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)   |
| 3        | <u>Count 8</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:  |
| 4        | That the defendant, as owner of an animal, to wit: Jackson, a domestic cat, on one or more dates between on or about June 26, 2021, and on or about November 11, 2021, acting   |
| 5        | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered  |
| 6        | unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)   |
| 7        | Count 9: SECOND DEGREE ANIMAL CRUELTY, committed as follows:  |
| 8        | That the defendant, as owner of an animal, to wit: Loverboi, a domestic cat, on one or more dates between on or about October 1, 2021, and on or about November 11, 2021, acting  |
| 9        | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered  |
| 10       | unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)   |
| 11       |   |
| 12       | <u>Count 10</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: Nacho, a domestic cat, on one or more   |
| 13       | dates between on or about August 11, 2021, and on or about October 13, 2021, acting knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary  |
| 14<br>15 | sanitation, space, or medical attention, and as a result of the failure the animal suffered<br>unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross<br>misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine) |
| 16       | Count 11: SECOND DEGREE ANIMAL CRUELTY, committed as follows:   |
| 17       | That the defendant, as owner of an animal, to wit: Nubbins, a domestic cat, on one or more dates between on or about September 28, 2021, and on or about October 14, 2021, acting   |
|          | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary  |
| 18       | sanitation, space, or medical attention, and as a result of the failure the animal suffered unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross   |
| 19       | misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)   |
| 20       | <u>Count 12</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: Ronnie, a domestic cat, on one or more dates  |
| 21       | between on or about October 2, 2021, and on or about November 11, 2021, acting knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation,   |
| 22       | space, or medical attention, and as a result of the failure the animal suffered unnecessary or  |
| 23       | unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)  |
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| 1        | <u>Count 13</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: Ryder, a domestic kitten, on one or more   |
|----------|--|
| 2        | dates between on or about October 1, 2021, and on or about November 11, 2021, acting   |
| 3        | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered   |
| 4        | unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)  |
| 5        | Count 14: SECOND DEGREE ANIMAL CRUELTY, committed as follows:  |
| 6        | That the defendant, as owner of an animal, to wit: Serrano, a domestic cat, on one or more dates between on or about October 1, 2021, and on or about November 11, 2021, acting  |
| 7        | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross |
| 8        | misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)  |
| 9        | Count 15: SECOND DEGREE ANIMAL CRUELTY, committed as follows:  |
| 10       | That the defendant, as owner of an animal, to wit: Sweetheart, a domestic cat, on one or more dates between on or about October 1, 2021, and on or about November 11, 2021, acting   |
| 11<br>12 | knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered   |
| 12       | unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)  |
| 14       | <u>Count 16</u> : SECOND DEGREE ANIMAL CRUELTY, committed as follows:<br>That the defendant, as owner of an animal, to wit: (unnamed abscess kitten), a domestic   |
| 15       | kitten, on one or more dates between on or about October 1, 2021, and on or about November 11, 2021, acting knowingly, recklessly or with criminal negligence, failed to provide the   |
| 16       | animal with necessary sanitation, space, or medical attention, and as a result of the failure the animal suffered unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2),  |
| 17       | a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)  |
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| I        | INFORMATION 4 ATTORNEY GENERAL OF WASHINGTON   |

| 1  | DATED this 21st day of September, 2023. |  |                           |
|----|---|--|---------------------------|
| 2  |   | ROBERT W. FERGUSON<br>Attorney General of Washi                  |                           |
| 3  |   |  | ngton                     |
| 4  |   | Juli   | 1                         |
| 5  |   | SCOTT HALLORAN, WS<br>Assistant Attorney General                 |                           |
| 6  |   | Washington Office of the A<br>Environmental Protection I         | Division                  |
| 7  |   | 800 5 <sup>th</sup> Avenue, Suite 2000<br>Seattle, WA 98104-3188 | , TB-14                   |
| 8  |   | Tel: (206) 464-7744<br>Fax: (206) 587-5088                       |                           |
| 9  |   | Email: <u>Scott.Halloran@atg</u>                                 | .wa.gov                   |
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|    | I<br>INFORMATION                        | 5 ATTOR  | NEY GENERAL OF WASHINGTON |

Environmental Protection Division 800 Fifth Avenue STE 2000 Seattle, WA 98104 (206) 464-7744

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| 11 | Address(es):               | T APT B32, Pasco, WA 99 | 201 4077  |
| 12 |                            |                         |   |
| 13 | HT: 6' 02"<br>WT: 230      | SEX: Male               | SID: WA48557932<br>FBI: EN7WML9TN   |
| 14 | EYES: Brown<br>HAIR: Black | RACE: W<br>DOL:         | DOC:<br>DOL STATE: WA   |
| 15 | DOL REPORT COE             | DES:                    |   |
| 16 | ORIGINATING AG             | ENCY: PASCO PD          | AGENCY CASE#: 21-32265  |
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|    | INFORMATION                | 6                       | ATTORNEY GENERAL OF WASHINGTON<br>Environmental Protection Division<br>800 Fifth Avenue STE 2000<br>Seattle, WA 98104<br>(206) 464-7744 |