

1 Count 2: FIRST DEGREE ANIMAL CRUELTY, committed as follows:

2 That the defendant, on one or more dates between on or about October 1, 2021, and on or
3 about November 11, 2021, acting with criminal negligence and without authority of law, did
4 starve an animal, to wit: Romeo, a domestic dog, and as a result caused substantial and
5 unjustifiable physical pain that extended for a period sufficient to cause considerable suffering;
6 proscribed by RCW 16.52.205(2), a felony. (Max penalty: 5 years confinement and \$10,000
7 fine)

8 Count 3: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

9 That the defendant, as owner of an animal, to wit: Cora, a domestic cat, on one or more dates
10 between on or about August 26, 2021, and on or about November 11, 2021, acting knowingly,
11 recklessly or with criminal negligence, failed to provide the animal with necessary sanitation,
12 space, or medical attention, and as a result of the failure the animal suffered unnecessary or
13 unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max
14 penalty: 364 days confinement and \$5,000 fine)

15 Count 4: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

16 That the defendant, as owner of an animal, to wit: Curly, a domestic kitten, on one or more
17 dates between on or about June 23, 2021, and on or about November 11, 2021, acting
18 knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary
19 sanitation, space, or medical attention, and as a result of the failure the animal suffered
20 unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross
21 misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

22 Count 5: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

23 That the defendant, as owner of an animal, to wit: Ice, a domestic cat, on one or more dates
24 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,
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
penalty: 364 days confinement and \$5,000 fine)

Count 6: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

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,
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 misdemeanor. (Max
penalty: 364 days confinement and \$5,000 fine)

Count 7: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

That the defendant, as owner of an animal, to wit: Jackie Chan, a domestic cat, on one or more
dates between on or about September 8, 2021, and on or about November 11, 2021, acting
knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary

1 sanitation, space, or medical attention, and as a result of the failure the animal suffered
2 unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross
misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

3 Count 8: 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
5 dates between on or about June 26, 2021, and on or about November 11, 2021, acting
6 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
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
9 dates between on or about October 1, 2021, and on or about November 11, 2021, acting
10 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
misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

11 Count 10: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

12 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
14 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
misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

15 Count 11: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

16 That the defendant, as owner of an animal, to wit: Nubbins, a domestic cat, on one or more
17 dates between on or about September 28, 2021, and on or about October 14, 2021, acting
18 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
misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

19 Count 12: SECOND DEGREE ANIMAL CRUELTY, committed as follows:

20 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,
22 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
23 unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross misdemeanor. (Max
penalty: 364 days confinement and \$5,000 fine)

1 Count 13: SECOND DEGREE ANIMAL CRUELTY, committed as follows:
2 That the defendant, as owner of an animal, to wit: Ryder, a domestic kitten, on one or more
3 dates between on or about October 1, 2021, and on or about November 11, 2021, acting
4 knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary
5 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
7 misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

8 Count 14: SECOND DEGREE ANIMAL CRUELTY, committed as follows:
9 That the defendant, as owner of an animal, to wit: Serrano, a domestic cat, on one or more
10 dates between on or about October 1, 2021, and on or about November 11, 2021, acting
11 knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary
12 sanitation, space, or medical attention, and as a result of the failure the animal suffered
13 unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross
14 misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

15 Count 15: SECOND DEGREE ANIMAL CRUELTY, committed as follows:
16 That the defendant, as owner of an animal, to wit: Sweetheart, a domestic cat, on one or more
17 dates between on or about October 1, 2021, and on or about November 11, 2021, acting
18 knowingly, recklessly or with criminal negligence, failed to provide the animal with necessary
19 sanitation, space, or medical attention, and as a result of the failure the animal suffered
20 unnecessary or unjustifiable physical pain; proscribed by RCW 16.52.207(2), a gross
21 misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

22 Count 16: SECOND DEGREE ANIMAL CRUELTY, committed as follows:
23 That the defendant, as owner of an animal, to wit: (unnamed abscess kitten), a domestic
24 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
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 misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine)

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1 DATED this 21st day of September, 2023.

2 ROBERT W. FERGUSON
3 Attorney General of Washington

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HT: 6' 02"
WT: 230
EYES: Brown
HAIR: Black

DOB: 07/28/1987
SEX: Male
RACE: W
DOL:

SID: WA48557932
FBI: EN7WML9TN
DOC:
DOL STATE: WA

DOL REPORT CODES:

ORIGINATING AGENCY: PASCO PD

AGENCY CASE#: 21-32265
