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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF FRANKLIN**

STATE OF WASHINGTON ,  
  
Plaintiff,

NO.  
  
INFORMATION

v.

NEO’S NATION ANIMAL  
FOUNDATION,  
A WA NONPROFIT PROFESSIONAL  
SERVICE CORPORATION,  
  
Defendant.

CO-DEFS: Rebecca Howard, Franklin Co. Sup. Ct No. ;  
Justin Hernandez, Franklin Co. Sup. Ct No.

I, Robert W. Ferguson, Attorney General of Washington, in the name and by the authority of the State of Washington, pursuant to RCW 43.10.232 and at the request of Shawn Sant, Franklin County Prosecuting Attorney, hereby allege NEO’S NATION ANIMAL FOUNDATION did commit the following crimes:

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

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

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)

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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  
18 dates between on or about September 28, 2021, and on or about October 14, 2021, acting  
19 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)

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

21 That the defendant, as owner of an animal, to wit: Ronnie, a domestic cat, on one or more dates  
22 between on or about October 2, 2021, and on or about November 11, 2021, acting knowingly,  
23 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  
24 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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