

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
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Linda Myhre Enlow
Thurston County Clerk

SUPERIOR COURT OF WASHINGTON THURSTON COUNTY		
STATE OF WASHINGTON,	Plaintiff,	NO: 20-1-01569-34
vs.		DECLARATION OF PROSECUTOR SUPPORTING PROBABLE CAUSE
HELEN O RICHARDSON,	Defendant	

SCOTT M. JACKSON, Deputy Prosecuting Attorney for Thurston County, declares the following in support of probable cause for charges in the above-entitled cause:

I am a Deputy Prosecuting Attorney for Thurston County, Washington. I have reviewed the attached materials which consist of available law enforcement reports, statements, photographs, and/or other evidence. These materials establish probable cause to believe the above named defendant has committed the crime(s) of **RENDRING CRIMINAL ASSISTANCE IN THE FIRST DEGREE**

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct to the best of my knowledge. Signed on December 30, 2020, in Olympia, Washington.



SCOTT M. JACKSON
Deputy Prosecuting Attorney, WSBA # 26844



Olympia Police Department Detective Bureau

Probable Cause Statement

Investigator: Detective Eric Henrichsen

Case #: 2020-5441

Date of Report: December 29, 2020

Offense(s): Rendering Criminal Assistance 1st Degree RCW 9A.76.070

Date of Offense(s): August 9, 2020

Location of Offense(s): 119 7th Ave SE #107, Olympia, WA 98501

Suspect(s):
Ashleigh Butsch (12-27-88)
Helen O. Richardson (1-18-90)
Billyjo Richardson (6-19-65)

Victim(s): Shaun P. Moore (11-10-88)

STATEMENT OF PROBABLE CAUSE

On September 15, 2020, patrol was dispatched to a suspicious circumstance at the railroad tracks near the intersection of Plum St SE and Union St SE. Two subjects went to OPD Jail to report discovering possible human remains at the railroad tracks near Plum St SE and Union Ave SE.

An OPD patrol officer went to the area described by the witnesses and located a black plastic garbage bag containing what appeared to be bones and human remains. OPD Detectives were called out to process the scene and the area surrounding where the remains were located. As I walked down to the location where the remains were located, there was a strong obvious smell of death which I was able to identify from previous death investigations. The WSP Crime Lab also responded to the scene to analyze and collect any evidence they needed for processing. The Thurston County Coroner's Office also responded and confirmed the bones were human remains.

The remains were collected by the Thurston County Coroner's Office and later transported to their office. The remains were later transported up to the King County Medical Examiner's Office to be further examined by Forensic Anthropologist Kathy Taylor.

Based on Dr. Taylor's examination she was able to determine there was in excess approximately 12 broken ribs and a broken nose. Dr. Taylor advised Det. Johnstone she was able to determine the bones were broken perimortem, or near the time of death. Dr. Taylor was unable to find evidence in the bones to assist her in determining the cause or manner of death. Dr. Taylor narrowed the time of death to be between 2 weeks and 6 months from the time the remains were discovered.

The King County Medical Examiner's Office was able to pull three fingerprint exemplars from the right thumb, right index, and right middle finger of the remains. Donald Brannan who is a Forensic Scientist for WSP deemed the exemplars suitable for comparison. On 12-15-2020, the prints were searched through the WIN database and resulted positive for a match. All three of the prints were identified to belong to Shaun P. Moore (11-10-88).

At the scene there were multiple items collected by OPD for evidentiary purposes. There was a sheet wrapped around the remains as well as another sheet several feet to the north of the remains. There were four black plastic bags in the immediate vicinity of the remains that were used to transport and contain the remains. There were also three pieces of mail lying on the ground within approximately 150 feet of the remains.

The three pieces of mail in envelopes that were lying on the ground appeared to be either leading up to or leading away from the remains. All three pieces of mail were addressed to "BJ Richardson" with the address of 119 7th Ave SE #107, and one of the pieces of mail had FLEETWOOD APT #107 listed above the physical address.

I located Moore's last known address as well Moore's ex-girlfriend who he has a child in common with, Helen O. Richardson (1-18-90). The most up to date address for Moore and Helen is 119 7th Ave SE #119, Olympia, WA. I went to the Fleetwood Apartments and contacted the manager Kathy A. Turner.

Turner confirmed Moore had been living at in unit #107 for the past several months and he has not been seen since the beginning of August. Turner said near the middle to end of August for an approximate two-week period, there was heavy stench of death coming from unit #107. Turner stated the smell got so intense at one point several neighbors around #107 were complaining about the smell.

Turner told me she had a maintenance service company conduct an inspection of #107 and the neighboring unit #106 and during the inspection of #106 and #107 Servpro discovered a maggot infestation as well as thousands of flies. Servpro wrote up a small report reference the maggot infestation which I was provided a copy of. Turner advised me once the flies were discovered she called a pest control company who advised her the flies were "meat flies". Turner provided me an invoice from Sound Pest Management where the inspector noted at the bottom about the apartment, "Possible breeding area for house and flesh flies."

On December 16, 2020 I applied and was granted a search warrant for unit #107. The warrant was served on 12-17-2020 at approximately 0950 hours. Multiple people were inside the apartment and were later identified as Billyjo (BJ) L. Richardson, Ashleigh N. Butsch, Joseph (Jade) R. Laursen, Helen Richardson, Kyle G. Jarstad, and John M Carroway.

BJ, Helen, Butsch, Laursen, Jarstad, and Carroway were transported to OPD Main for interviews. Each person was interviewed independently and provided similar statements placing them at the scene during the time of Moore's death and admitting to storing Moore's remains in the shower for approximately two weeks. Each person provided statements explaining how Moore was repeatedly assaulted multiple times for multiple days up to the day of his death, and Laursen, Carroway and Jarstad were the primary ones who assaulted Moore.

Everyone admitted to assaulting Moore on several occasions as well as having knowledge of the severity of assaults Moore was receiving. Laursen, Butsch, and BJ described the assaults on Moore as being committed up to sometimes several times a day over a several week period, and considered the type of assaults and treatment to be abuse. Butsch and BJ both stated on several occasions observing Moore being "hogtied" for up to 8 hours, and Moore being imprisoned in the apartment from around May 2020 to the day he died. Butsch also stated everyone in the house on numerous occasions denied Moore access to food and prevented him from eating.

During Butsch's, Helen, and BJ's interview, they admitted to hitting and assaulting Moore a couple times within the last several weeks before Moore died. All three stated they witnessed numerous assaults to include the final assault leading up to Moore's death. All three females stated they witnessed Moore's body in the shower, as well as being left to decompose.

Butsch, Helen, and BJ stated they never attempted to call 9-1-1 or assist Moore during the period of abuse. Butsch, Helen, and BJ admitted to participating in the planning in the disposal of the body as well as coming up with a fake story to tell people in case people questioned Moore's whereabouts.

Based on all the evidence collected and statements provided I determined there was PC to arrest Butsch, Helen, and BJ for Rendering Criminal Assistance 1st Degree based on participating in assaults inflicted on Moore days leading up to his death along with the conspiring with others involved whose actions caused injuries resulting in the death of Moore.

I certify (declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct (RCW 9A.72.085).

Signature:

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