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IN THE THURSTON COUNTY SUPERIOR COURT
STATE OF WASHINGTON

STATE OF WASHINGTON,)
)
) Plaintiff,) NO. 20-1-01569-34
)
) vs.) **Objection to Second Amended**
) **Information and Memorandum in**
) **Support**
)
 HELEN RICHARDSON)
) Defendant,)
 _____)

To: Thurston County Superior Court
And to: Beth McMullen and Heather Stone, Thurston County Prosecutor's Office

Comes now the Defendant, by and through her counsel of record Derek M. Smith, and files this formal objection to the second amended information filed January 15, 2021.

DECLARATION OF COUNSEL

I, Derek M. Smith, am counsel of record for Ms. Helen Richardson. I am over 18 years of age and competent to testify in this matter and declare the following under penalty of perjury.

Objection to Amendment and Memo in Support Page 1 of 8

The Law Offices of Smith & White PLLC



Derek M. Smith & James J. White
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1 1. I was notified by the Thurston County Public Defender that I was appointed counsel
2 for Ms. Richardson, the defendant on the above-entitled matter, on January 8, 2021, at
approximately 3:32 pm via email.

3 2. I received limited discovery (see Attached Exhibit A, Declaration of Danely Bravo,
4 detailing discovery received on January 8, 2021) and reviewed it all.

5 3. My offices are in Tacoma. The Thurston County Adult Rehabilitation Center
6 (Hereinafter referred to as "TC Jail") only allows professional visitation until 4:15 pm. I was
not able to visit Ms. Richardson on January 8, 2021.

7 4. On January 11, 2021, I left Tacoma to go to court and the TC Jail at approximately 8:10
8 am. As I was driving to the TC Jail, I was notified via email that the TC Jail was not allowing
9 professional visitation of any kind at all due to a COVID 19 outbreak.

10 5. I was present in person at the Thurston County Superior Court for Ms. Richardson's
11 arraignment on January 12, 2021. I was able to talk with her for about 30 minutes prior to her
12 arraignment about her options that morning. I believe she understood her options and
13 wanted to exercise her right to plead guilty. I was not able to fill out the required paperwork
14 for a guilty plea because of the COVID 19 lockdown at the TC Jail.

15 6. On January 15, 2021, defense counsel was provided with a First Amended Information
16 in this matter via email, and then almost immediately afterwards a Second Amended
17 Information correcting a scrivener's error in the RCW for Count 1. See Attached Exhibit B
18 (the First and Second Amended Informations).

19 Dated this 22nd day of January, 2021.

20 _____
21 Derek M. Smith

22 PROCEDURAL HISTORY

23 Ms. Richardson was arrested and in custody for this matter on December 30, 2020,
when she was heard on her preliminary appearance and ordered held on \$50,000 bail until
her arraignment on January 12, 2021. She was charged by original information with
Rendering Criminal Assistance in the First Degree. Counsel for Ms. Richardson was
assigned to her case on Friday January 8, 2021, at 3:32 pm.

On Monday, January 11, 2021, the TC Jail declared a total lockdown on professional
visitation.

Objection to Amendment and Memo in Support Page 2 of 8

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1 Ms. Richardson was before the court on January 12, 2021, for arraignment on the
2 original information charging one count of Rendering Criminal Assistance in the First
3 Degree. On this date, the defendant was being heard over video with her present at TC Jail
4 for arraignment pursuant to standard policy in Thurston County Superior Court and TC Jail,
5 however due to the COVID 19 outbreak counsel was not allowed to see her in person to fill
6 out the necessary statement of plea of guilty paperwork. Additionally, due to the COVID 19
7 outbreak at the TC Jail she was not allowed to be transported to an in-person hearing. Her
8 arraignment was continued to January 19, 2021. The order continuing hearing is attached as
9 Exhibit C.

10 The State filed the Second Amended Information on January 19, 2021. On that date,
11 Ms. Richardson was again not transported due to the COVID 19 outbreak and this matter
12 was set to February 2, 2021. Ms. Richardson is seeking to enter a plea to the Original
13 Information and objecting to the filing of the Second Amended Information.

14 LEGAL ARGUMENT

15 The defendant has a right to plea guilty at arraignment. *See CrR 4.2, State v. Conwell,*
16 *141 Wash.2d 901, 10 P.3d 1056 (2000).* The Court has obligations to make concerning whether
17 that right is knowing, intelligently and voluntarily made. *State v. Conwell, 141 Wash.2d at*
18 *907-08, 10 P.3d 1056.* The State has the right to amend the information only if two factors are
19 met, one factor a temporal one not relevant here, the other "if no substantial rights of the
20 defendant are prejudiced." *See CrR 2.1(d), State v. Ford, 125 Wash.2d 919, 928, 891 P.2d 712*
21 *(1995).*

22 Objection to Amendment and Memo in Support Page 3 of 8
23

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1 The first issue to address is why the arraignment could not take place on January 12,
2 2021. Clearly no responsibility can fall upon the defendant as she has no ability to transport
3 herself to court, nor does she have the ability to force TC Jail to allow her in person access to
4 her counsel to fill out the paperwork required by CrR 4.2 for the entry of the plea.

5 Additionally, she did not have the financial means to pay for the bail set at her preliminary
6 hearing. Counsel for Ms. Richardson indicated that she was making a knowing, intelligent,
7 and voluntary plea of guilty, but recognized that further action required by CrR 4.2 needed
8 to happen before a guilty plea could be taken. Both the Court and defense were willing to
9 continue with the plea if she should be transported to the Court, but the State prohibited that
10 when TC Jail indicated she was not allowed to be transported. Certainly, she was not
11 transported because of a COVID 19 outbreak, but it is also clear that she was not transported
12 because the State sought to keep Ms. Richardson in custody rather than allow her to appear
13 out of custody for her arraignment. Also, while the State cannot be faulted for causing
14 COVID 19, the State is 100% responsible for TC Jail health and safety and so its failure to
15 control the disease that caused Ms. Richardson not to be transported to enter her plea of
16 guilty to the Original Information.

17 However, there is another factor to consider into why she was unable to appear on
18 January 12, 2021, why she was in custody at all. Ms. Richardson was arrested and in jail for
19 her preliminary hearing because of the State. The State made the request for to remain based
20 on her posting a cash or bail bond amount. This was despite the the Pre-Trial Services Report
21 prepared in this case (*See Attached Exhibit D*) listing her as low risk and a request by defense
22

23 Objection to Amendment and Memo in Support Page 4 of 8

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1 for her release on personal recognizance (See Attached Exhibit E, Declaration of Danielle
2 Walker). This court set bail at \$50,000.

3 There are two cases that address the issue of excessive bail, both of them out of
4 Division 2 of the Court of Appeals. The first, *State v. Huckins*, 5 Wash.App.2d 457, 465-69, 426
5 P.3d 797 (2018), held that when setting bail the court must make specific findings that a less
6 restrictive condition than cash bail, there \$1,000 on a charge of assault in the second degree,
7 would not assume the safety of the community. The Court held that failure to do so is a
8 violation of the defendant's right. *State v. Huckins*, 5 Wash.App.2d at 469, 426 P.3d 797.
9 However, because the defendant did not seek a remedy, the Court just used that case to
10 remind trial court judges of their duties under the law. *Id.* at 470.

11 Then, in *State v. Ingram*, 9 Wash.App.2d 482, 447 P.3d 192 (2019) the court addressed
12 again the issue of cash bail. The Court first looked into whether the trial court properly
13 found that the defendant was not a good candidate based on the "release unit" report, the
14 defendant's criminal history, his history of failure to appear and escape and other factors.
15 *State v. Ingram*, 9 Wash.App.2d at 464-5, 447 P.3d 192. The Court found that the trial court
16 also properly found that Ingram was a danger to the community based on the charge, the
17 defendant's history of violent offense, history of mental health issues, and past violent
18 behavior with the victim of the case among other factors. *Id.* at 465-66. Despite these
19 findings, there the Court found that the setting of \$60,000 was excessive when the court failed
20 to consider less restrictive alternatives on the record including the ability of the defendant to
21 pay. *Id.* at 469. However, there the Court could do nothing to provide relief to the defendant.

22
23 Objection to Amendment and Memo in Support Page 5 of 8

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1 Here, Ms. Richardson has no failures to appear nor any criminal history at all in her 31
2 years of life. The crime she was originally charged with by the State is not classified as a
3 "violent offense" pursuant to RCW 9.94A.030(55) nor is it a "crime against persons" pursuant
4 to RCW 9.94.411. Her risk score by Pre-Trial Services was classified as "Low". She was
5 found to be indigent. Despite this, bail in the amount of \$50,000 was imposed on her and she
6 was not able to pay that, thus was in custody for her arraignment.

7 The appellate courts in *Huckins* and *Ingram* were not able to provide meaningful relief
8 to the defendants because by the time the cases got to them, their cases were resolved. Here
9 however the situation is far different. If Ms. Richardson had been out of custody and able to
10 meet with her counsel prior to appearing before the court, she would have been able to enter
11 a plea to the original Information and this is a remedy that the court can provide.

12 It is the State that filed the Original Information that Ms. Richardson wishes to plead
13 to. The only Statement of Probable Cause filed by the State in this matter was filed on
14 December 30, 2020. The defense notes that there is no new statement of probable cause
15 supporting the amended charges. It was the State that housed her and was charged to
16 protect her health. It was the State that refused to transport her to court to enter a plea of
17 guilty with the required paperwork.

18 Finally, back to the CrR 4.2 factors this court must consider to allow amendment of the
19 Information, there is the issue of prejudice to the defendant. Adding two class A felony
20 charges on her will certainly count as prejudice to Ms. Richardson, and a prejudice that a
21 person able to post bail would not have incurred. The State had choices when charging Ms.

22 Objection to Amendment and Memo in Support Page 6 of 8
23

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1 Richardson; first the State had was it could have charged her as other three of her co-
2 defendants were charged (*see* PC Statements filed in 20-1-01521-34, 20-1-01538-34, and 20-1-
3 01568-34 and in this matter attached as Exhibits F, G, and H). Obviously, that did not
4 happen, but it is significant to note that in 20-1-01568-34 it appears that the probable cause
5 statement submitted there is essentially identical to the one submitted in Ms. Richardson's
6 matter (see Exhibit I, the PC Statement to Helen Richardson's matter), and again no
7 supplemental probable cause statement was updated at all for the filing of the Second
8 Amended Information against Ms. Richardson. The State can explain its charging rational to
9 the court.

10 A second option would be to release Ms. Richardson until it knew exactly what the
11 case was and then re-arrest her. Third, it could charge her with a lesser charge and run the
12 risk she would plead guilty at arraignment. It chose the third and now the State seeks to flip
13 the table and reset.

14 Finally, there is the issue of what the Court can do to remedy this situation. The Court
15 has the option to allow her to plead guilty as charged to the Original Information. If the State
16 wants to then file an additional case after the plea, it is free to do so. Instead of this
17 procedure, what occurred was once she entered a plea of guilty to the Original Complaint as
18 charged, or at least expressed a desire to do so and was thwarted by the State in her doing so,
19 the State then decided to charge her with the two far more serious offenses. This is clear
20 prejudice to Ms. Richardson.
21

22
23 Objection to Amendment and Memo in Support Page 7 of 8

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1 As the discovery process is incomplete, the State is essentially requiring her to remain
2 in custody in detention at the same jail where she cannot talk to her counsel at the whim of
3 the State and where the State can place her in jeopardy of a disease which is both virulent
4 and potentially fatal and/or capable of inflicting apparently permanent harm, causing more
5 prejudice due to the delay again caused by the State. The choice to detain Ms. Richardson
6 and charge Ms. Richardson was and is completely up to the State. If allowed to amend
7 charges now after she was willing to enter a plea of guilty to the original charge because she
8 was not out of custody, she is substantially prejudiced in that she must now face two far
9 more serious Class A felonies than when the situation was as it was on January 12, 2021.

10
11 CONCLUSION

12 As outlined above, the Court has an alternative that can occur without prejudice to
13 Ms. Richardson and honor the first choice the State made in this matter, the Court can choose
14 to allow her to plead guilty as charged in the Original Information. Then if the State wishes
15 to file an additional case or cases after that, the State can so choose and deal with those
16 potential legal ramifications with its charging decisions based on that procedural posture.

17
18 Respectfully submitted this 22nd day of January, 2021.

19
20 

21 _____
22 Derek M. Smith WSBA#26036
23 Attorney for Helen Richardson

Objection to Amendment and Memo in Support Page 8 of 8

The Law Offices of Smith & White PLLC



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EXHIBIT A

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IN THE THURSTON COUNTY SUPERIOR COURT
IN AND FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Cause No. 20-1-01569-34

Plaintiff,

DECLARATION OF DANELY BRAVO

vs.

HELEN RICHARDSON,

Defendant,

TO: The Clerk of the Above- Entitled Court; and

AND TO: The Prosecuting Attorney

I, Danely Bravo, certify that I am over 18 years of age, am an employee at the Law Offices of Smith and White, PLLC and declare under penalty of perjury that the following is true and correct.

On January 8th, 2021 I received the following files via email from Thurston County Public

Defense:

1. BILLING FORM
2. CASE NOTES
3. CSI DETECTIVE REPORT GLENN 091520
4. OPD ARREST LOGS

The Law Offices of Smith & White PLLC



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www.smithandwhite.com

- 1 5. OPD MAJOR INCIDENT LOG.
- 2 6. OPD PROPERTY LIST
- 3 7. PS STATEMENT JARSTAD
- 4 8. PC STATEMENT LAURSEN
- 5 9. PC STATEMENT RICHARDSON AND BUTCSH
- 6 10. PHOTOS LOCATION OF BODY
- 7 11. SEARCH WARRANT ADDENDUM 122720
- 8 12. SUPPLEMENTAL ANDERSON 112420
- 9 13. SUPPLEMENTAL EDWARDS 121720
- 10 14. SUPPLEMENTAL HENRICHSEN 121720
- 11 15. SUPPLEMENTAL HOUSER 091520
- 12 16. SUPPLEMENTAL HUTNIK 091820
- 13 17. SUPPLEMENTAL JOHNSON 091520
- 14 18. SUPPLEMENTAL LEAVITT 091620
- 15 19. SUPPLEMENTAL MARCUSON 102220
- 16 20. SUPPLEMENTAL MISSING PERSON CONTACTS
- 17 21. SUPPLEMENTAL SCHMIDT 091520
- 18 22. SUPPLEMENTAL SPARKS 091520
- 19 23. WSP LAB REQUESTS

20 Dated this 22ND day of January, 2021.



Danely Bravo
Paralegal
The Law Offices of Smith and White, PLLC



EXHIBIT B

**IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THURSTON COUNTY**

STATE OF WASHINGTON,
Plaintiff,

vs.

HELEN O RICHARDSON
DESC: W/F/506/190/HAZ/BRN
DOB: 01/18/1990
DL: RICHAHO101BQ
SID: WA29875781; FBI: 6RX7MXCP5
BOOKING NO: C0217838
PCN: 767470681

Defendant.

NO. 20-1-01569-34

FIRST AMENDED INFORMATION

ELIZABETH MCMULLEN
Deputy Prosecuting Attorney

Jointly Charged with Co-Defendant(s):
KYLE G. JARSTAD 20-1-01521-34
JONATHAN M. CARROWAY 20-1-01538-34
JOSPEH R. LAURSEN 20-1-01568-34
ASHLEIGH N. BUTSCH 20-1-01565-34
BILLYJO L. RICHARDSON 20-1-01570-34

Comes now the Prosecuting Attorney in and for Thurston County, Washington, and charges the defendant with the following crime(s):

COUNT 1 -MURDER IN THE SECOND DEGREE/DOMESTIC VIOLENCE, RCW 9A.32.050(1)(b), RCW 10.99.020(4)(a), AND RCW 26.50.010(3)(b) AND (6), RCW 9A.28.020 – CLASS A FELONY:

In that the defendant, HELEN O RICHARDSON, in the State of Washington, on or between August 1, 2020 and September 4, 2020, as a principal or as an accomplice, committed or attempted to commit the crime of Assault in the Second Degree, a felony, and in the course of and in furtherance of said crime, the defendant or another participant caused the death of a person other than one of the participants, to wit: Shaun P Moore, a family or household member, pursuant to RCW 10.99.020(4)(a), and RCW 26.50.010(3)(b) and (6).

COUNT 2 – CONSPIRACY TO COMMIT MURDER IN THE SECOND DEGREE/DOMESTIC VIOLENCE, RCW 9A.32.050(1)(b), RCW 10.99.020(4)(a), AND RCW 26.50.010(3)(b) AND (6), RCW 9A.28.040 – CLASS B FELONY:

In that the defendant, HELEN O RICHARDSON, in the State of Washington, on or between August 1, 2020 and September 4, 2020, did conspire with another to commit or attempted to commit the crime of Assault in the Second Degree, a felony, and in the course of and in furtherance of said crime, the defendant or another participant caused the death of a person other than one of the participants, to wit: Shaun P Moore, a family or household member, pursuant to RCW 10.99.020(4)(a), and RCW 26.50.010(3)(b) and (6), and took a substantial step toward commission of this crime.

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COUNT 3 -RENDERING CRIMINAL ASSISTANCE IN THE FIRST DEGREE, RCW 9A.76.070 AND RCW 9A.08.020- CLASS B FELONY:

In that the defendant, HELEN O. RICHARDSON, in the State of Washington, on or between August 1, 2020 and September 4, 2020, as a principal or as an accomplice, rendered criminal assistance to a person who has committed or is being sought for murder in the first degree or any Class A felony or equivalent juvenile offense.

DATED this 15th day of January, 2021.



ELIZABETH MCMULLEN, WSBA #45207
Deputy Prosecuting Attorney

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT

01/15/2021 4:52:40 PM

Linda Myhre Enlow
Thurston County Clerk

**IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THURSTON COUNTY**

STATE OF WASHINGTON,
Plaintiff,

vs.

HELEN O RICHARDSON
DESC: W/F/506/190/HAZ/BRN
DOB: 01/18/1990
DL: RICHAHO101BQ
SID: WA29875781; FBI: 6RX7MXCP5
BOOKING NO: C0217838
PCN: 767470681

Defendant.

NO. 20-1-01569-34

SECOND AMENDED INFORMATION

ELIZABETH MCMULLEN
Deputy Prosecuting Attorney

Jointly Charged with Co-Defendant(s):

KYLE G. JARSTAD 20-1-01521-34
JONATHAN M. CARROWAY 20-1-01538-34
JOSPEH R. LAURSEN 20-1-01568-34
ASHLEIGH N. BUTSCH 20-1-01565-34
BILLYJO L. RICHARDSON 20-1-01570-34

Comes now the Prosecuting Attorney in and for Thurston County, Washington, and charges the defendant with the following crime(s):

COUNT 1 -MURDER IN THE SECOND DEGREE/DOMESTIC VIOLENCE, RCW 9A.32.050(1)(b), RCW 10.99.020(4)(a), AND RCW 26.50.010(3)(b) AND (6), RCW 9A.08.020 – CLASS A FELONY:

In that the defendant, HELEN O RICHARDSON, in the State of Washington, on or between August 1, 2020 and September 4, 2020, as a principal or as an accomplice, committed or attempted to commit the crime of Assault in the Second Degree, a felony, and in the course of and in furtherance of said crime, the defendant or another participant caused the death of a person other than one of the participants, to wit: Shaun P Moore, a family or household member, pursuant to RCW 10.99.020(4)(a), and RCW 26.50.010(3)(b) and (6).

COUNT 2 – CONSPIRACY TO COMMIT MURDER IN THE SECOND DEGREE/DOMESTIC VIOLENCE, RCW 9A.32.050(1)(b), RCW 10.99.020(4)(a), AND RCW 26.50.010(3)(b) AND (6), RCW 9A.28.040 – CLASS B FELONY:

In that the defendant, HELEN O RICHARDSON, in the State of Washington, on or between August 1, 2020 and September 4, 2020, did conspire with another to commit or attempted to commit the crime of Assault in the Second Degree, a felony, and in the course of and in furtherance of said crime, the defendant or another participant caused the death of a person other than one of the participants, to wit: Shaun P Moore, a family or household member, pursuant to RCW 10.99.020(4)(a), and RCW 26.50.010(3)(b) and (6), and took a substantial step toward commission of this crime.

SECOND AMENDED INFORMATION - 1

JON TUNHEIM
Thurston County Prosecuting Attorney
2000 Lakeridge Drive S.W.
Olympia, WA 98502
360/786-5540 Fax 360/754-3358

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**COUNT 3 -RENDERING CRIMINAL ASSISTANCE IN THE FIRST DEGREE, RCW 9A.76.070
AND RCW 9A.08.020- CLASS B FELONY:**

In that the defendant, HELEN O. RICHARDSON, in the State of Washington, on or between August 1, 2020 and September 4, 2020, as a principal or as an accomplice, rendered criminal assistance to a person who has committed or is being sought for murder in the first degree or any Class A felony or equivalent juvenile offense.

DATED this 15th day of January, 2021.


ELIZABETH MCMULLEN, WSBA #45207
Deputy Prosecuting Attorney

EXHIBIT C



FILED
SUPERIOR COURT
THURSTON COUNTY, WA

2021 JAN 12 PM 12:06

LINDA MYHRE ENLOW
THURSTON COUNTY CLERK

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THURSTON COUNTY

NO. 20-1-1569-34

STATE OF WASHINGTON,

Plaintiff,

ORDER CONTINUING HEARING

vs.

Helen Richardson

Defendant.

DOCKET # 18 9:00

FIRST OMNIBUS

CURRENT TRIAL DATE: ___/___/___ no trial date/not applicable]

This matter came before the court for Omnibus Plea Sentencing Diversion Review
 First Look Competency Tx Review Non-Comp. Arraignment

Other _____ on January 12, 2021.

Based upon agreement of the parties and/or good cause shown, it is ORDERED that the defendant
appear for a Omnibus Hearing Plea Hearing Sentencing Hearing Diversion Review
 First Look Competency Tx Review Non-Comp. Arraignment

Other _____ on January 19, 2021 at

- 8:30 a.m. ~~9:00 a.m.~~ 9:30 a.m. 10:00 a.m. 10:30 a.m.
- 11:00 a.m. 11:30 a.m. 1:00 p.m. 1:30 p.m. 2:00 p.m.
- 2:30 p.m. 3:00 p.m. 3:30 p.m. _____ a.m./p.m.

FAILURE TO APPEAR MAY RESULT IN A WARRANT FOR YOUR ARREST AND SUBJECT YOU TO FURTHER CRIMINAL CHARGES.

DATED: January 12, 2021

Carol Murphy
JUDGE

CAROL MURPHY

Wayne M. G. L.
Deputy Prosecuting Attorney, WSBA# 31453

Copy Received:

[Signature]
Attorney for Defendant, WSBA# 26036

In-custody
Defendant

exercised right to plead
guilty at today's hearing

EXHIBIT D

**THURSTON COUNTY PRETRIAL SERVICES
 SCREENING AND RECOMMENDATION**

Name: RICHARDSON, HELEN OLIVIA	Defense Attorney:
Date of Birth: 1/18/1990	Competency Concerns: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>

AKA: _____ **Case Number(s)**
 20-1-1569-34
Charges:
 1 CT(S) RENDERING CRIMINAL ASSISTANCE 1ST DEGREE

Probable Cause Warrant First Appearance Warrant Extradition

Felony FTAs - Last 2 years: 0 Total: 0	Misdemeanor FTAs - Last 2 years: 0 Total: 0
Home Phone: (360) 705-2082	
Mobile Phone: (360) 522-1791	
Home Address: 119 7TH AVE SE APT 107, OLYMPIA, WA 98501	Third Party Verified (for DV, SO, animal cruelty and violent cases): Residence exists Y <input type="checkbox"/> N <input type="checkbox"/> Owner/Tenant Agrees Y <input type="checkbox"/> N <input type="checkbox"/> Def. may reside until case resolves Y <input type="checkbox"/> N <input type="checkbox"/> Minor(s) in the home Y <input type="checkbox"/> N <input type="checkbox"/> Pet(s) in the home Y <input type="checkbox"/> N <input type="checkbox"/> Alleged victim(s) in the home Y <input type="checkbox"/> N <input type="checkbox"/> SOR Registration notified Y <input type="checkbox"/> N <input type="checkbox"/> Conflict with DOC Y <input type="checkbox"/> N <input type="checkbox"/>
Length of time at address: 2 years with mother and co defendants	
# of Children: 1	
Custody Status: Aunt/Uncle	
Pretrial Services: Officer/Status: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	
DOC or other Probation: Officer/Status: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	
Other Open Cases: None	
Employer: Unemployed	Status:
Military Status: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Possible Veterans Court candidate: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Veteran: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	
History of mental health treatment: Y <input type="checkbox"/>	Possible Mental Health Court candidate: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>

History of substance use treatment: Y <input type="checkbox"/>	Possible Drug/DUI Court candidate: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Interested in Behavioral Health Treatment Services: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	

Risk Score: Low

Criminal History

Date	Charges	Jurisdiction	Case Number
12/30/2020	No Known Criminal Convictions	WACIC/III	N/A

Additional information: the defendant explained that she resides at the above listed address with co defendant's Butsh, Ashleigh; Laursen, Joseph; and her mother Richardson, Billy Jo. She could not provide an alternate address.

According to the police report, the incident occurred at the above listed address. Also, the defendant explained that she resides at this address with co-defendants.

Recommendations: cash/bond with pretrial supervision. Electronic Home Monitoring (EHM); no contact with co-defendants, and address verification. Cannot reside at 119th 7th Avenue apartment 107 Olympia WA.

Release on Personal Recognizance

Release on previously imposed conditions

Pretrial Services supervision

Text reminders only

Alcohol monitoring device

Urinalysis testing

Designated Crisis Responder evaluation prior to release

Do not drive without a valid license, insurance & ignition interlock

Cash / Bond

Revocation of Conditions of Release

Release not recommended

DATE: 12/30/2020 NAME: Roman Rideout, Pretrial Services


Signature

EXHIBIT E

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IN THE THURSTON COUNTY SUPERIOR COURT
IN AND FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Cause No. 20-1-01569-34

Plaintiff,

DECLARATION OF DANIELLE WALKER

vs.

HELEN RICHARDSON,

Defendant,

TO: The Clerk of the Above- Entitled Court; and

AND TO: The Prosecuting Attorney

I, Danielle Walker, am above the age 18 and declare under penalty of perjury that the following is true and correct.

1. On December 30, 2020, I was the attorney handling Preliminary Hearings for Thurston County Public Defense. I received the following files via email from Thurston County Public Defense.

2. For the above matter, at the defendant’s preliminary hearing when the issue of continued detention was raised I argued that the defendant should be released on personal recognizance due to the fact that she was not charged with a violent offense, she had no previous criminal history, she had



1 cooperated with the police during this event showing that she was not a danger to fail to appear, and
2 that age and nature of the offense indicated that she was not a threat to any member of the public.

3 Dated this 22nd day of January, 2021.

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6 Signed in Olympia, Thurston County, Washington.

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Danielle Walker WSBA #42784

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EXHIBIT F

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20-1-01521-34

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
12/18/2020 11:20:41 AM
Linda Myhre Enlow
Thurston County Clerk

**SUPERIOR COURT OF WASHINGTON
THURSTON COUNTY**

STATE OF WASHINGTON,

Plaintiff,

NO: 20-1-01521-34

vs.

**DECLARATION OF PROSECUTOR
SUPPORTING PROBABLE CAUSE**

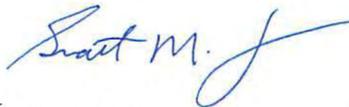
KYLE GENE JARSTAD,

Defendant

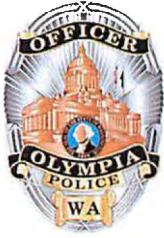
SCOTT M. JACKSON, Deputy Prosecuting Attorney for Thurston County, declares the following in support of probable cause for charges in the above-entitled cause:

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 **MURDER IN THE SECOND 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 18, 2020, in Olympia, Washington.



SCOTT M. JACKSON
Deputy Prosecuting Attorney, WSBA # 26844



**Olympia Police Department
Detective Bureau**



Probable Cause Statement

Investigator: Detective Eric Henriksen

Case #: 2020-5441

Date of Report: December 17, 2020

Offense(s): Manslaughter 2nd Degree RCW 9A.32.070

Date of Offense(s): August 9, 2020

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

Suspect(s): Kyle G. Jarstad (8-31-88)

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.

BJ, Helen, Butsch, Laursen and Carroway all stated Jarstad inflicted the most injury to Moore. Each stated Jarstad had slammed Moore into the shower hard enough to cause dents and cracks into the liner of the shower, and approximately three days prior to the day Moore died had beaten Moore numerous times with a cane. Everyone also all identified Jarstad as the only person to assault Moore the night of his death. Everyone else stated minutes prior to Moore's death, Jarstad had punched Moore in the head.

All statements identified Jarstad and Carroway as the two subjects who placed Moore's remains into a garbage bag, and Carroway and Laursen were the ones who dumped the body at the railroad tracks.

During Jarstad's interview he was very callous and showed no remorse. Jarstad was extremely upset I was investigating Moore's death and repeatedly told me, "Why are you even wasting your time investigating this? He was a fucking asshole." Jarstad also repeatedly mentioned how Moore "Deserved what he got".

Based on all the evidence collected and statements provided I determined there was PC to arrest Jarstad for Manslaughter 2nd Degree based on the severe assaults he inflicted on Moore days leading up to his death along with being the only person to assault Moore minutes before Moore died.

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:

DETECTIVE ERIC HENRICHSEN
OLYMPIA POLICE DEPARTMENT
601 4th Avenue East
Olympia, WA 98501
(360) 753-8413
chenrich@ci.olympia.wa.us

EXHIBIT G

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20-1-01538-34

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
12/23/2020 11:04:16 AM
Linda Myhre Enlow
Thurston County Clerk

**SUPERIOR COURT OF WASHINGTON
THURSTON COUNTY**

STATE OF WASHINGTON,

Plaintiff,

NO: 20-1-01538-34

vs.

**DECLARATION OF PROSECUTOR
SUPPORTING PROBABLE CAUSE**

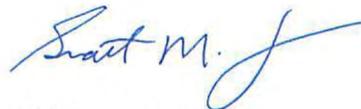
JONATHAN MICHAEL CARROWAY,

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 **MURDER IN THE SECOND 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 23, 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 22, 2020

Offense(s): Manslaughter 2nd Degree RCW 9A.32.070

Date of Offense(s): August 9, 2020

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

Suspect(s): Jonathan M. Carroway (7-14-81)

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.

BJ, Helen, Butsch, Laursen and Carroway all stated Carroway inflicted serious injury to Moore over the past couple weeks prior to Moore dieing. Butsch and Laursen both stated Carroway punched Moore hard enough to knock one of his teeth out as well as slam Moore hard enough into the shower that cracks and holes were left behind from Moore impacting the surface. During Carroway's interview he stated he assaulted Moore a couple times to include hitting Moore with a belt during one of the events.

All statements identified Jarstad and Carroway as the two subjects who placed Moore's remains into a garbage bag, and Carroway and Laursen were the ones who dumped the body at the railroad tracks.

On 12-20-2020 I was contacted by Carroway's best friend Bob Shipe who advised me he had information related to Moore and knowledge of how he died. Shipe also stated he had messages from Carroway admitting to being the person to hitting Moore the final time before Moore died. Shipe provided a taped statement telling me Carroway called him for help to get rid of Moore's remains and told Shipe he had punched Moore and his punch was the final hit before Moore died. Shipe provided me consent to search his messages and there is a text message on there from Shipe to his girlfriend telling her about Carroway admitting to him about being the one who threw the final punch.

Based on all the evidence collected and statements provided I determined there was PC to arrest Carroway for Murder 2nd Degree based on the severe assaults he inflicted on Moore days leading up to his death along with the others involved and those 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:

DETECTIVE ERIC HENRICHSEN
OLYMPIA POLICE DEPARTMENT
601 4th Avenue East
Olympia, WA 98501
(360) 753-8413
ehenrich@ci.olympia.wa.us

EXHIBIT H

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20-1-01568-34

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
12/30/2020 11:23:18 AM
Linda Myhre Enlow
Thurston County Clerk

**SUPERIOR COURT OF WASHINGTON
THURSTON COUNTY**

STATE OF WASHINGTON,

Plaintiff,

NO: 20-1-01568-34

vs.

JOSEPH REGINALD LAURSEN,

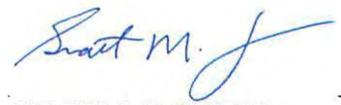
Defendant

**DECLARATION OF PROSECUTOR
SUPPORTING PROBABLE CAUSE**

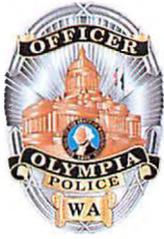
SCOTT M. JACKSON, Deputy Prosecuting Attorney for Thurston County, declares the following in support of probable cause for charges in the above-entitled cause:

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 MURDER IN THE SECOND 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): Murder 2nd Degree RCW 9A.32.050

Date of Offense(s): August 9, 2020

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

Suspect(s): Joseph R. Laursen (3-17-93)

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.

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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 several weeks, and considered the type of assaults and treatment to be abuse. Butsch, BJ and Laursen all stated on several occasions observing Moore being "hogtied" for up to 8-12 hours, and Moore was 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 Laursen's interview, he admitted to punching and assaulting Moore several times within the last two weeks before Moore died. One of the assaults Laursen described was pushing Moore into the shower hard enough to create a hole in the wall.

All statements identified Carroway and Laursen were the ones who dumped the body at the railroad tracks. Helen, Carroway and a neighbor who is close to the family all identify Laursen as the "leader" of the family, and Laursen is the overall decision maker on issues related to the family. Helen and Carroway both stated in their interviews it was Laursen's decision to dispose of the body.

Based on all the evidence collected and statements provided I determined there was PC to arrest Laursen for Murder 2nd Degree based on the severe assaults he inflicted on Moore days leading up to his death along with the others involved and those injuries resulting in the death of Moore, and participating in disposing of Moore's remains.

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:

DETECTIVE ERIC HENRICHSEN
OLYMPIA POLICE DEPARTMENT
601 4th Avenue East
Olympia, WA 98501
(360) 753-8413
ehenrich@ci.olympia.wa.us

EXHIBIT I

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20-1-01569-34

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
12/30/2020 11:23:24 AM
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**

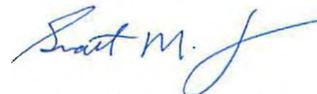
HELEN O RICHARDSON,

Defendant

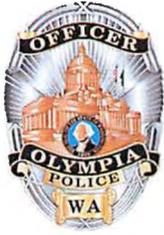
SCOTT M. JACKSON, Deputy Prosecuting Attorney for Thurston County, declares the following in support of probable cause for charges in the above-entitled cause:

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 **RENDERING 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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