

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

**SUPERIOR COURT OF WASHINGTON
THURSTON COUNTY**

STATE OF WASHINGTON,	Plaintiff,	NO: 21-1-00117-34
vs.		
CRISTHIAN CANIZAL VALENCIA,	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 believe that there is probable cause to believe that the above-named defendant has committed the crime(s) of **UNLAWFUL DELIVERY OF A CONTROLLED SUBSTANCE – HEROIN AND UNLAWFUL POSSESSION OF A CONTROLLED SUBSTANCE WITH INTENT TO DELIVER - HEROIN** based on the following information from the official investigative reports:

In January of 2021, the Grays Harbor Drug Task Force (herein after GHDTF) opened an investigation into methamphetamine and heroin distribution in Grays Harbor County related to an identified mid to upper level source of supply, Joseph “Joey” Jones. During the investigation, the GHDTF detectives identified an informant that was willing to provide information against their penal interest. The informant was an admitted drug user and familiar with the current drug culture occurring in the county. The informant provided information that he/she was familiar with Jones and is aware he distributes both heroin and methamphetamine in the Hoquiam and Aberdeen areas. The informant advised that Jones travels to Thurston County every couple of days to meet his source of supply and picks up bulk amounts of heroin. Det. Figg knew from previous surveillance details that Jones was in possession of a black and red Dodge Challenger which is registered to Cristhian C. Valencia. Det. Fog knew Valencia had been identified as an upper level source of supply in a previous large-scale investigation conducted by the GHDTF, The Joint Narcotics Enforcement Team in Lewis County and the DEA. The GHDTF also had an open case on Valencia and knew his current address to be 1534 Bedstone DR. SE in Olympia, WA.

During the last week in January, the GHDTF began conducting surveillance of Jones at his residence at 2417 Simpson Ave Hoquiam, WA. They observed a white Geo Prism at the residence that is registered to John Gardner, whom has an extensive VUCSA history. On January 28, 2021, Detectives observed Garner and Jones get into the white Geo Prism. When Jones exited the residence, he was carrying a black plastic bag in his right hand and got into the passenger side of the vehicle. Jones was holding the bag near the middle which showed a large bulge in the bottom. As detectives followed the vehicle, it made several short in duration stops where Jones and Gardner got out of the vehicle. At they continued to follow the vehicle, other detectives began surveillance at Valencia’s residence in Olympia.

DECLARATION OF PROSECUTOR SUPPORTING PROBABLE CAUSE

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

1 During one of the observe stops, Gardner and Jones were observed meeting with Troy Hodge. Det. Figg
2 was familiar with Hodge as he is originally from the Aberdeen/Hoquiam area and is an admitted drug
3 dealer/user. Hodge left after a short period of time and Jones was observed entering the trunk of the
4 Geo Prism and removed a black plastic bag that looked identical to the black plastic bag he had in his
5 hand when leaving Hoquiam and placed the bag in the vehicle's compartment. Next the vehicle went to
6 the Little Creek Casino and was parked for approximately 30-45 minutes. Jones and Garner eventually
7 drove to Buzz' Bar and Grill in Olympia, WA. Several detectives were set up to surveille the area.
8 Detectives observed Jones meeting with the occupant of a red car in the parking lot. Det. Haggerty was
9 able observe Jones had exited the front passenger seat and Cristhian Valencia identified at driver of the
10 vehicle. At this point, detectives approached the vehicles and detained the occupants of both vehicles
11 which were identified Joseph Jones, Cristhian Valencia, and John Gardner. When detectives spoke with
12 Valencia after being advised of Miranda Warnings, Valencia admitted to selling heroin to Jones for
13 \$4200.00. Valencia gave consent to search his Ford Focus. During the search, detectives recovered a
14 large sum of cash which was mostly in \$20 bills. Jones and Gardner gave consent to search the Geo
15 Prism. Prior to any search of the vehicle, a narcotic detection dog performed an exterior sniff and
16 altered on the front passenger door and front driver's door. During the search of the Geo Prism,
17 detectives located a baseball sized items wrapped in green cellophane on the back seat. The also located
18 a black plastic bag that contained three separate Ziplock and heat-sealed bags that contained what Det.
19 Figg recognized to be suspected methamphetamine. The baseball sized item in the green cellophane
20 appeared to be suspect heroin weighing approximately four ounces. The amount of suspect heroin was
21 relevant to the \$4200 Valencia claimed Jones give him. When Jones was arrested, he was searched, and
22 officers discovered a bag of white crystalline substance in Jones' coat pocket which Det. Figg
23 recognized to be suspected methamphetamine.

Valencia provided information on a warehouse in Shelton that may have a stolen firearm. He also seemed to want to direct detectives away from his residence and toward the warehouse. Detectives communicated this information to detectives conducting surveillance at Valencia's house to watch for any activity as they suspected Valencia wanted to somehow signal his wife at the house. Detectives learned there were surveillance cameras at the warehouse that could be sending images to the residence. Shortly after arriving at the warehouse, detectives observed Valencia's wife leaving the house with three children. She was contacted. Two detectives walked on a public walkway behind Valencia's house and observed a black and red soft sided cooler just over the fence of Valencia's residence in a public park. The cooler contained approximately three pounds of suspected heroin. Valencia's wife later admitted that she saw her husband in handcuffs at the warehouse. When she saw her husband on the camera, she went to his safe and took the contents of the safe in the cooler. She admitted she then threw it over the fence and then attempted to leave the residence.

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 February 3, 2021, in Olympia, Washington.



SCOTT M. JACKSON
Deputy Prosecuting Attorney, WSBA # 26844