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HEIDI P. TOLY  
COUNTY CLERK  
SNOHOMISH CO. WASH

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

STATE OF WASHINGTON,  
Plaintiff,

v.

PEREZ, BLAYNE MICHAEL,  
Defendant.

No.

**23-1-00309-31**  
AFFIDAVIT OF PROBABLE CAUSE

AFFIDAVIT BY CERTIFICATION:

The undersigned certifies that I am an Assistant Attorney General for Washington, and make this affidavit in that capacity; that criminal charges have been filed against the above-named defendant in this cause, and that I believe probable cause exists for the arrest of the defendant on the charges because of the following facts and circumstances. This information is not based upon any independent or personal knowledge of these events, unless specifically noted.

In Snohomish County Washington, the Defendant committed the acts described in the attached synopsis attached hereto and incorporated herein by reference.

On January 19, 2022, an Everett resident reported to police that for two weeks her neighbor was repeatedly shooting and killing birds and squirrels and then displaying the carcasses around his property. The reporting party provided photos of the suspect pointing a long gun into the sky and trees, and of dead crows and squirrels gruesomely nailed or screwed into the back of a shed on the suspect's property at 2443 Columbia Ave. in Everett, WA. She further reported that some of the birds were still alive after being shot, before the suspect then shoved sticks down their throats to display them.

AFFIDAVIT OF PROBABLE CAUSE

1

No.

ATTORNEY GENERAL OF WASHINGTON  
Environmental Protection Division  
800 Fifth Avenue STE 2000  
Seattle, WA 98104  
(206) 464-7744

1 Officers later identified the suspect as Blayne M. Perez (DOB 02/21/89) based on Department  
2 of Licensing photos and address information, and prior jail booking photos. Perez's vehicle  
was also registered to his Columbia Ave. address.

3 A Washington Department of Fish and Wildlife (WDFW) officer observed Perez pointing his  
4 long gun into the sky and shooting at birds on February 5, 2022. During his plain-clothes walk  
by, Officer Barabasz heard a popping sound consistent with that of an air rifle as several crows  
5 responded by cawing and chittering excitedly. The discharge of any B.B. or air gun is a  
6 criminal violation of Everett Municipal Code Ch. 9.86. Barabasz photographed Perez walking  
slowly with his long gun pointed skyward. Hunting for crows without a game license, which  
7 Perez did not have, or out of season, which ran from September 1, 2021 to December 31, 2021,  
amounts to unlawful hunting of wild birds in violation of RCW 77.15.400.

8 On February 18, 2022, Everett Police Department and WDFW officers served a search warrant  
9 on Perez's property. Officers observed and photographed numerous dead wildlife. These  
10 included crows, squirrels, and multiple species of songbirds in various gruesome displays.  
Some of the birds were screwed to the back wall of Perez's shed, with their wings splayed  
11 open. Small songbirds were impaled on barbecue skewers and sticks. A deceased Stellar's jay  
appeared to have been used as live bait in a box trap in the yard, with another bird impaled on a  
12 stick tied to the trap. A wrench found on the back deck of Perez's residence had blood and  
feathers stuck to it, consistent with being used to inflict blunt force trauma on birds. Similarly,  
13 a golf club was used to impale another crow to the roof of the shed.

14 Officers removed two air rifles and more than a dozen deceased animals from Perez's property,  
15 not including others in advanced stages of decay. Some of the 8 crows removed had been  
impaled, screwed, or nailed to the shed or other surfaces in the backyard. Four small songbirds  
16 were removed, including chickadees and a junco. Two chickadees were impaled on the twin  
tines of a barbecue skewer. A squirrel had been nailed through its skull to the back wall of the  
17 shed, with the rest of its body hanging below. One crow was nailed to a log with its wings  
splayed open, and another crow next to it had its head removed. One WDFW officer present  
18 described Perez's property as the most disturbing and grotesque scene that he had encountered  
19 in his entire career.

20 Perez was not home when the warrant was served. WDFW Officer Stephanie Tank called  
21 Perez's cell phone during service of the warrant, and left him a message on his voicemail.  
Perez called Tank back that evening and engaged in a 45 minute conversation. Perez  
22 considered the birds and wildlife to be pests that were, "fucking up my shit." Each of the  
aforementioned killings violated Washington criminal wildlife statutes; none of the bird or  
23 animal killings were authorized by law.

24 In the telephone call with Officer Tank, Perez said he began shooting the birds around the big  
25 snowfall in December (of 2021). Officer Tank was aware that snow event began around  
December 24, which additional accumulation occurring into the first week of January, 2022,  
26

1 before melting. The original reporting party contacted police on January 19, 2022, saying her  
2 neighbor (later identified as Perez) had been shooting and displaying birds for the past two  
3 weeks. No snow is on the ground on the pictures the reporting party took, making that timeline  
consistent with January 5<sup>th</sup> onward.

4 Additionally, the number of dead birds and wildlife gruesomely displayed on Perez's shed and  
5 property increased over time. Three to 5 birds are visible in the original reporting party  
6 pictures. Officer Barabasz saw Perez shooting at more birds two weeks later on February 5,  
2022. Photographs taken during service of the warrant on February 18 show even more killed  
and displayed birds and wildlife, compared to a month earlier.

7 In the telephone call with Officer Tank, Perez said that he displayed the birds and animals he  
8 killed as a deterrent to any remaining birds, similar to a scarecrow. He described using the bird  
9 in the live trap as bait for an opossum which he saw in the yard. Perez denied any of the birds  
10 were alive after he shot them, stating that the reason he got a more powerful air rifle was for  
quicker kills when he shot them.

11 The backyard where Perez killed and displayed the dead birds and animals is 20 to 60 feet  
12 from neighboring homes. The Sunrise View Assisted Living Facility is approximately 160 feet  
13 away, and the Broadway Grocery is also close by. Perez's backyard killing and gruesome  
displays were plainly visible to the surrounding community, as confirmed by multiple witness  
statements.

14 In April of 2022, officers were notified of a dead squirrel impaled through its skull to a tree at  
15 the entrance to the Interurban Trail in Everett. Officers recognized the manner of display as  
16 very similar to those impaled on Perez's shed months earlier. Officers trying to contact Perez  
17 about the squirrel were met by multiple neighbors, including from the assisted living facility,  
18 who described seeing Perez continuing to shoot and kill birds and squirrels as recently as the  
day before. Neighbors described their anguish at having to remove all their bird feeders to  
avoid Perez turning their yards into a killing field.

19 The U.S. National Fish and Wildlife Forensics Laboratory conducted necropsies on 14 of the  
20 animals recovered from the search of Perez's property. Among the results, the veterinary  
21 pathologist determined that 3 of the birds (Lab-6, Lab-7, Lab-9) suffered non-fatal wing  
22 fracture injuries that immediately prevented flight. Those birds were later killed by trauma  
inflicted after they could no longer fly away. Similarly, Lab-8 suffered a non-fatal body  
gunshot, which likely stunned it prior to it being killed by inflicted head trauma.

23 One of the impaled chickadees, Lab-12, was killed by inflicted trauma, with no trace of  
24 projectile metal or distinct gunshot wound tract. The squirrel (Lab-5) that Perez nailed to his  
25 shed was shot four times, including a non-fatal injury to the right forelimb where the air gun  
26 pellet remained embedded.

1 On August 17, 2022, Everett police responded to a report of a man shooting at squirrels and  
2 dismembering them with a knife in Lowell Riverfront Park. An officer heading toward the park  
3 saw an older white Subaru station wagon go by with an animal pelt attached to the roof above  
4 the driver's door. Based on witness descriptions, police determined that the suspect in the park  
5 matched Perez. When contacted, Perez admitted to shooting at squirrels in the park, and  
6 skinning a rabbit there. Perez said he thought the 10-minute drive to the park was far enough  
7 from his residence to evade the neighbor's attention the way shooting animals at home did.

8 Around 8:15 am on September 25, 2022, Sean and Sarah Moore were gardening and drinking  
9 coffee in their yard at 6426 Lombard Ave in Everett. Their-eight-month-old-cat, Hades, played  
10 on the other side of the fence near the street. Sean Moore noticed an older white Subaru station  
11 wagon slowly pull up the street. Sean then heard a popping noise, followed by Hades  
12 frantically climbing the fence, crying in pain and bleeding from an apparent eye injury. Sarah  
13 Moore yelled at the driver as the Subaru first drove away, then circled the block before fleeing  
14 the area. Sarah observed part of the license plate, which matched the one registered to Perez's  
15 address.

16 One of the initial responding officers recognized that the description of the driver and the white  
17 Subaru matched Perez, from the prior contacts involving shooting animals in Everett. Police  
18 took Sean and Sarah Moore to where Perez's vehicle was located at his residence. Both  
19 positively identified the Subaru as the one present when Hades was shot. Subsequently  
20 obtained video from their neighbor's security cameras also confirmed that Perez's Subaru was  
21 the one involved in the shooting of Hades. Perez can be seen driving the Subaru in one of the  
22 related security camera videos.

23 Officers peering into the Subaru in Perez's driveway observed air gun pellets on the front  
24 driver and passenger seats. Although the door was open and the television could be heard, no  
25 one responded to the multiple knocks of police identifying themselves at Perez's residence.  
26 When contacted by police at his residence later that day, Perez initially denied any  
involvement in shooting Hades, insisting that he was in Lynnwood at the time, despite videos  
placing him at the scene of the shooting in Everett. Perez claimed he had poor eyesight and  
was not shooting at anything that morning.

Officers arrested Perez. While being handcuffed, Perez stated, "Since we already got me lying,  
can I stand here and tell you the truth in front of my girlfriend?" Police first read Perez his  
constitutional Miranda rights, as captured on their body cameras. Perez confirmed that he  
understood those rights, but wished to waive them and speak to the officers. Perez then  
admitted driving around the neighborhood slowly and shooting at birds and various wild  
animals. He denied knowingly shooting a cat. Perez said he was out driving early enough that  
he thought no one would see him shooting animals. Multiple neighbors of Perez gave written  
statements saying he continuously shot birds and animals for several months, despite them  
repeatedly asking him to stop his killings.

1 Sean and Sarah Moore's cat suffered extensive injuries. Hades's retina was damaged beyond  
2 repair, necessitating surgery to remove his eye. Metal fragments were surgically removed,  
3 including below his right ear. His right mandible (lower jaw) was fractured, extending to the  
4 temporal mandibular joint. Hades' extensive injuries from the shooting have resulted in  
5 veterinary care and medical bills costing the Moore family \$9,000 or more.

6 State's Motion To Set Conditions of Release - The State moves the Court to order the  
7 Defendant to not own, care for, or reside with any animals during the pendency of this case.  
8 The State further moves the Court to order the defendant to have no criminal law violations.  
9 Should the Defendant be convicted of Animal Cruelty in the First Degree, he would be  
10 permanently prohibited from possessing or residing with animals pursuant to RCW  
11 16.52.200(4)(b).

12 Based upon a review of databases maintained by state and federal agencies, the Prosecutor's  
13 understanding of the defendant's criminal history is set forth in Appendix A, attached hereto  
14 and incorporated herein by reference.

15 I certify (or declare) under penalty of perjury under the laws of the State of Washington that  
16 the foregoing is true and correct.

17 DATED the 6th day of March, 2023 at the Snohomish County Prosecuting Attorney's Office  
18 in Snohomish County, Washington

19 ROBERT W. FERGUSON  
20 ATTORNEY GENERAL

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