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6 CASE #: 23-1-04664-8 SEA

7 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

8 THE STATE OF WASHINGTON, )  
9 Plaintiff, )  
10 v. ) No. 23-C-04663-0 SEA  
11 ) 23-C-04664-8 SEA  
12 JESSY JAMES LEE KRIKORIAN, JR, ) 23-C-04665-6 SEA  
13 TIMOTHY G HERNANDEZ-EBANKS, AND ) 23-C-04666-4 SEA  
14 JAIQUAN J BURNETT, AND RAMON PEDRO )  
15 CHAVEZ JR ) INFORMATION  
16 AND EACH OF THEM, )  
17 Defendant.

18 I, Leesa Manion, Prosecuting Attorney for King County in the name and by the authority  
19 of the State of Washington, do accuse JESSY JAMES LEE KRIKORIAN, JR, AND TIMOTHY  
20 G HERNANDEZ-EBANKS, AND JAIQUAN J BURNETT, AND RAMON PEDRO CHAVEZ  
21 JR of the following crime[s], which are based on the same conduct or a series of acts connected  
22 together or constituting parts of a common scheme or plan: **Robbery In The First Degree,  
23 Unlawful Imprisonment, Theft Of Motor Vehicle, Escape In The First Degree, Escape In  
24 The First Degree, Escape In The First Degree, Escape In The First Degree**, committed as  
follows:

Count 1 Robbery In The First Degree

That the defendants TIMOTHY G HERNANDEZ-EBANKS AND JAIQUAN J  
BURNETT AND RAMON PEDRO CHAVEZ JR AND JESSY JAMES LEE KRIKORIAN JR  
and each of them in King County, Washington, on or about May 28, 2023, did unlawfully and  
with intent to commit theft take personal property of another, to-wit: cell phone, keys, from the  
person and in the presence of Megan M Krause, against her will, by the use or threatened use of  
immediate force, violence and fear of injury to such person or her property and to the person or  
property of another, and that such force or fear was used to obtain or retain possession of the  
property, to prevent or overcome resistance to the taking, and to prevent knowledge of the  
taking, and in the commission of and in immediate flight therefrom, the defendant inflicted  
bodily injury on Megan M Krause;

Contrary to RCW 9A.56.200(1)(a)(iii) and 9A.56.190, and against the peace and dignity  
of the State of Washington.

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Count 2 Unlawful Imprisonment

That the defendants TIMOTHY G HERNANDEZ-EBANKS AND JAIQUAN J BURNETT and each of them in King County, Washington, on or about May 28, 2023, did knowingly restrain Megan M Krause, a human being by knowingly restricting that person's movements in a manner that interfered substantially with his or her liberty, knowing that the restriction was without consent and knowing that the restriction was without legal authority;

Contrary to RCW 9A.40.010(6); RCW 9A.40.040, and against the peace and dignity of the State of Washington.

Count 3 Theft Of Motor Vehicle

That the defendants TIMOTHY G HERNANDEZ-EBANKS AND JAIQUAN J BURNETT AND RAMON PEDRO CHAVEZ JR AND JESSY JAMES LEE KRIKORIAN JR and each of them in King County, Washington, on or about May 28, 2023, with intent to deprive another of a motor vehicle, did wrongfully obtain such property, a white 2018 Chevrolet Equinox, WA/CEP1939, belonging to Megan M Krause;

Contrary to RCW 9A.56.065 and 9A.56.020(1), and against the peace and dignity of the State of Washington.

Count 4 Escape In The First Degree

That the defendants JESSY JAMES LEE KRIKORIAN JR and each of them in King County, Washington, on or about May 28, 2023, while being detained pursuant to a felony conviction for murder in the 2nd degree, did knowingly escape from a detention facility knowing that his actions would result in leaving confinement without permission;

Contrary to RCW 9A.76.110, and against the peace and dignity of the State of Washington.

Count 5 Escape In The First Degree

That the defendant TIMOTHY G HERNANDEZ-EBANKS in King County, Washington, on or about May 28, 2023, while being detained pursuant to a felony conviction for murder in the 1st degree, did knowingly escape from a detention facility knowing that his actions would result in leaving confinement without permission;

Contrary to RCW 9A.76.110, and against the peace and dignity of the State of Washington.

1 Count 6 Escape In The First Degree

2 That the defendant JAIQUAN J BURNETT in King County, Washington, on or about  
3 May 28, 2023, while being detained pursuant to a felony conviction for assault in the 2nd degree,  
4 did knowingly escape from a detention facility knowing that his actions would result in leaving  
5 confinement without permission;

6 Contrary to RCW 9A.76.110, and against the peace and dignity of the State of  
7 Washington.

8 Count 7 Escape In The First Degree

9 That the defendant RAMON PEDRO CHAVEZ JR in King County, Washington, on or  
10 about May 28, 2023, while being detained pursuant to a felony conviction for assault in the 1st  
11 degree, did knowingly escape from a detention facility knowing that his actions would result in  
12 leaving confinement without permission;

13 Contrary to RCW 9A.76.110, and against the peace and dignity of the State of  
14 Washington.

15 LEESA MANION (she/her)  
16 Prosecuting Attorney

17 By:

18 

19 Brynn N. H. Jacobson, WSBA #47820  
20 Senior Deputy Prosecuting Attorney

1  
2 CAUSE NO. 23-C-04664-8 SEA  
3 23-C-04665-6 SEA  
4 23-C-04666-4 SEA  
5 23-C-04663-0 SEA

6 PROSECUTING ATTORNEY CASE SUMMARY AND REQUEST FOR BAIL AND/OR  
7 CONDITIONS OF RELEASE

8 The State incorporates by reference the Certification for Determination of Probable Cause  
9 prepared by Detective Benjamin Blakeman of the King County Sheriff's Office for case number  
10 C23017636.

11 **DEFENDANT KRIKORIAN**

12 Pursuant to CrR 2.2(b)(2)(i) and (ii), the State requests that bail be set at one million  
13 dollars, based on the likelihood that the defendant will fail to appear in response to a summons  
14 and/or that he may commit a violent offense. Because the defendant is a juvenile, a probable  
15 cause and detention hearing was held in juvenile court on May 31, 2023. The court found  
16 probable cause and held the defendant pending a filing decision in juvenile court. No bail amount  
17 was set.

18 The defendant is 16 years old and is subject to the exclusive original jurisdiction of the adult  
19 court pursuant to RCW 13.04.030(1)(v)(e)(B) because he is charged with robbery 1<sup>st</sup> degree, a  
20 violent crime, as defined in RCW 9.94A.030(55) and his juvenile history consists of murder 2<sup>nd</sup>  
21 degree, a serious violent felony. The defendant's available felony convictions include murder 2<sup>nd</sup>  
22 degree, assault 2<sup>nd</sup> degree and assault 2<sup>nd</sup> degree (2022-JF). He has additional history that the  
23 State will seek to unseal upon the filing of this case. He has misdemeanor convictions for theft  
24 3<sup>rd</sup> degree and MIP (2021).

Prosecuting Attorney Case  
Summary and Request for Bail  
and/or Conditions of Release - 1

**Leesa Manion (she/her)**  
**Prosecuting Attorney**  
W554 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104-2385  
(206) 296-9000 FAX (206) 296-0955

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2 The defendant is a significant flight risk and a danger to the community. He is currently  
3 serving a sentence for murder 2<sup>nd</sup> degree as well as two counts of assault 2<sup>nd</sup> degree. The  
4 defendant assisted in distracting staff while co-defendants Burnett and D.B. hid in the bathroom.  
5 Once the victim was incapacitated by Burnett and D.B., the defendant came out of his cell and  
6 then fled with the group once they acquired the victim's keys. He was eventually located in  
7 Vancouver Washington.

8 The evidence suggests this escape was pre-planned at least several hours in advance, with  
9 all participants playing key roles. As soon as some of the participants attacked the victim security  
10 guard, the others sprang into action and moved quickly to finalize their escape. The group  
11 dragged the victim into the common area within view of all before forcibly dragging her back to  
12 a cell and locking her inside. They forcibly took her keys and cell phone and locked her in a cell  
13 with no way to call for help. Before leaving the cottage, members of the group damaged some of  
14 the staff equipment on the way out. The victim was not found for over an hour.

15 The evidence demonstrates that each member of this group was aware of this plan. The  
16 video shows the group communicating with each other at every stage – before the attack, during  
17 the attack, and on their way out of the cottage. The fact that not everyone in the cottage was  
18 released to join in the escape further demonstrates that those who escaped helped in the planning  
19 and execution of this brazen escape. The defendant and his co-conspirators have been sentenced  
20 to terms at Echo Glen for very serious crimes. Their behavior shows they are determined to  
21 avoid serving those sentences and are willing to execute a violent escape to avoid such  
22 consequences. The State believes the defendant is a proven flight risk and is a significant danger  
23 to the community and therefore requests bail be set in the amount of one million dollars.

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2 **DEFENDANT HERNANDEZ-EBANKS**

3 Pursuant to CrR 2.2(b)(2)(i) and (ii), the State requests that bail be set at one million  
4 dollars, based on the likelihood that the defendant will fail to appear in response to a summons  
5 and/or that he may commit a violent offense. Because the defendant is a juvenile, a probable  
6 cause and detention hearing was held in juvenile court on May 30, 2023. The court found  
7 probable cause and held the defendant pending a filing decision in juvenile court. No bail amount  
8 was set.

9 The Defendant is 17 years old and is subject to the exclusive original jurisdiction of the  
10 adult court pursuant to RCW 13.04.030(1)(v)(e)(B) because he is charged with robbery 1<sup>st</sup>  
11 degree, a violent crime, as defined in RCW 9.94A.030(55) and his juvenile history consists of  
12 murder 1<sup>st</sup> degree, a serious violent felony. The defendant has felony convictions for murder 1<sup>st</sup>  
13 degree and unlawful possession of a firearm 2<sup>nd</sup> degree (2020-JF), escape 1<sup>st</sup> degree and theft of  
14 a motor vehicle (2022-JF).

15 The defendant is a significant flight risk and a danger to the community. He is currently  
16 serving a sentence for murder 1<sup>st</sup> degree. This is the defendant's second escape attempt from  
17 Echo Glen in just over a year. He has all but assured the court that he will flee by any means  
18 necessary. Once the victim was incapacitated by Burnett and D.B., the defendant emerged from  
19 his cell fully dressed in clothing that was not permitted to be in the facility. He approached the  
20 door where the victim was locked inside of the cell, demanding to know her phone passcode and  
21 refusing to release her when she pleaded with him. The defendant fled with the group once they  
22 acquired the victim's keys. He was eventually located in Burien, Washington.

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2 The evidence suggests this escape was pre-planned at least several hours in advance, with  
3 all participants playing key roles. As soon as some of the participants attacked the victim security  
4 guard, the others sprang into action and moved quickly to finalize their escape. The group  
5 dragged the victim into the common area within view of all before forcibly dragging her back to  
6 a cell and locking her inside. They forcibly took her keys and cell phone and locked her in a cell  
7 with no way to call for help. Before leaving the cottage, members of the group damaged some of  
8 the staff equipment on the way out. The victim was not found for over an hour.

9 The evidence demonstrates that each member of this group was aware of this plan. The  
10 video shows the group communicating with each other at every stage – before the attack, during  
11 the attack, and on their way out of the cottage. The fact that not everyone in the cottage was  
12 released to join in the escape further demonstrates that those who escaped helped in the planning  
13 and execution of this brazen escape. The defendant and his co-conspirators have been sentenced  
14 to terms at Echo Glen for very serious crimes. Their behavior shows they are determined to  
15 avoid serving those sentences and are willing to execute a violent escape to avoid such  
16 consequences. The State believes the defendant is a proven flight risk and is a significant danger  
17 to the community and therefore requests bail be set in the amount of one million dollars.

18  
19 **DEFENDANT CHAVEZ**

20 Pursuant to CrR 2.2(b)(2)(i) and (ii), the State requests that bail be set at \$500,000, based  
21 on the likelihood that the defendant will fail to appear in response to a summons and/or that he  
22 may commit a violent offense. Because the defendant is a juvenile, a probable cause and  
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2 detention hearing was held in juvenile court on May 31, 2023. The court found probable cause  
3 and held the defendant pending a filing decision in juvenile court. No bail amount was set.

4         The Defendant is 16 years old and is subject to the exclusive original jurisdiction of the  
5 adult court pursuant to RCW 13.04.030(1)(v)(e)(B) because he is charged with robbery 1<sup>st</sup>  
6 degree, a violent crime, as defined in RCW 9.94A.030(55) and his juvenile history consists of  
7 assault 1<sup>st</sup> degree, a serious violent felony. The defendant has felony convictions for assault 1<sup>st</sup>  
8 degree and robbery 1<sup>st</sup> degree (2022-JF). He has two convictions for misdemeanor harassment  
9 (2021).

10         The defendant is a significant flight risk and a danger to the community. He is currently  
11 serving a sentence for assault 1<sup>st</sup> degree and robbery 1<sup>st</sup> degree. The defendant assisted in  
12 distracting staff while Burnett and D.B. hid in the bathroom. Once the victim was incapacitated  
13 by Burnett and D.B., the defendant came out of his cell and then fled with the group once they  
14 acquired the victim's keys. He was eventually located in Vancouver Washington.

15         The evidence suggests this escape was pre-planned at least several hours in advance, with  
16 all participants playing key roles. As soon as some of the participants attacked the victim security  
17 guard, the others sprang into action and moved quickly to finalize their escape. The group  
18 dragged the victim into the common area within view of all before forcibly dragging her back to  
19 a cell and locking her inside. They forcibly took her keys and cell phone and locked her in a cell  
20 with no way to call for help. Before leaving the cottage, members of the group damaged some of  
21 the staff equipment on the way out. The victim was not found for over an hour.

22         The evidence demonstrates that each member of this group was aware of this plan. The  
23 video shows the group communicating with each other at every stage – before the attack, during



1  
2 the attack, and on their way out of the cottage. The fact that not everyone in the cottage was  
3 released to join in the escape further demonstrates that those who escaped helped in the planning  
4 and execution of this brazen escape. The defendant and his co-conspirators have been sentenced  
5 to terms at Echo Glen for very serious crimes. Their behavior shows they are determined to  
6 avoid serving those sentences and are willing to execute a violent escape to avoid such  
7 consequences. The State believes the defendant is a proven flight risk and is a significant danger  
8 to the community and therefore requests bail be set in the amount of \$500,000.  
9

10 **DEFENDANT BURNETT**

11 Pursuant to CrR 2.2(b)(2)(i) and (ii), the State requests that bail be set at one million  
12 dollars, based on the likelihood that the defendant will fail to appear in response to a summons  
13 and/or that he may commit a violent offense. Because the defendant is a juvenile, a probable  
14 cause and detention hearing was held in juvenile court on May 30, 2023. The court found  
15 probable cause and held the defendant pending a filing decision in juvenile court. No bail amount  
16 was set.

17 The Defendant is 16 years old and is subject to the exclusive original jurisdiction of the  
18 adult court pursuant to RCW 13.04.030(1)(v)(e)(B) because he is charged with robbery 1<sup>st</sup>  
19 degree, a violent crime, as defined in RCW 9.94A.030(55) and his juvenile history consists of at  
20 least three class B felonies committed after he turned 13 and prosecuted separately: residential  
21 burglary (2019), theft of motor vehicle (2020), possession of stolen vehicle (2021) and assault  
22 2<sup>nd</sup> degree, escape 1<sup>st</sup> degree and theft of motor vehicle (2022).  
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2 The defendant has felony convictions for theft 2<sup>nd</sup> degree (2018-JF), residential burglary  
3 (2018-JF), theft 2<sup>nd</sup> degree and theft of a motor vehicle (2019-JF), residential burglary (2019-JF),  
4 theft of a motor vehicle (2020-JF), possession of stolen vehicle (2021-JF) and assault 2<sup>nd</sup> degree,  
5 escape 1<sup>st</sup> degree, theft of motor vehicle and attempt to elude police (2022-JF). He has a  
6 misdemeanor conviction for reckless driving (2021).

7 The defendant is a significant flight risk and a danger to the community. He is currently  
8 serving a sentence for assault 2<sup>nd</sup> degree, escape 1<sup>st</sup> degree, theft of motor vehicle and attempt to  
9 elude (2022). The defendant already has a conviction for escape 1<sup>st</sup> degree and theft of a motor  
10 vehicle. The defendant hid in the bathroom for over two hours waiting to ambush and rob the  
11 victim. He and D.B. assaulted the victim by punching her in the head and face multiple times,  
12 leaving her bloody and bruised. When it was clear that D.B. had the victim under his control, the  
13 defendant ran to the command center to release the other escapees using the central computer  
14 system. He assisted in dragging the victim back to a cell and locking her inside. He located the  
15 victim's purse, pulled out her keys and displayed them to the group before fleeing in the victim's  
16 car. The defendant was located in Burien, Washington.

17 The evidence suggests this escape was pre-planned at least several hours in advance, with  
18 all participants playing key roles. As soon as some of the participants attacked the victim security  
19 guard, the others sprang into action and moved quickly to finalize their escape. The group  
20 dragged the victim into the common area within view of all before forcibly dragging her back to  
21 a cell and locking her inside. They forcibly took her keys and cell phone and locked her in a cell  
22 with no way to call for help. Before leaving the cottage, members of the group damaged some of  
23 the staff equipment on the way out. The victim was not found for over an hour.

1  
2 The evidence demonstrates that each member of this group was aware of this plan. The  
3 video shows the group communicating with each other at every stage – before the attack, during  
4 the attack, and on their way out of the cottage. The fact that not everyone in the cottage was  
5 released to join in the escape further demonstrates that those who escaped helped in the planning  
6 and execution of this brazen escape. The defendant and his co-conspirators have been sentenced  
7 to terms at Echo Glen for very serious crimes. Their behavior shows they are determined to  
8 avoid serving those sentences and are willing to execute a violent escape to avoid such  
9 consequences. The State believes the defendant is a proven flight risk and is a significant danger  
10 to the community and therefore requests bail be set in the amount of one million dollars.  
11

12 Signed and dated by me this 31st day of May, 2023.  
13  
14

15 

16 Brynn N. H. Jacobson, WSBA #47820  
17 Senior Deputy Prosecuting Attorney  
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23

1 CAUSE NO.

2 CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE

3 That Benjamin Blakeman is a (n) Detective with the King County  
4 Sheriff's Office and has reviewed the investigation conducted in the King  
County Sheriff's case number (s) C23017636;

5 There is probable cause to believe that ;

6 Diego Torres-Topete, 4/6/2007  
7 Daniel D. Navarro, 7/4/2007  
8 Jessy J.L. Krikorian JR., 12/31/2006  
9 Timothy G. Hernandez-Ebanks, 5/16/2006  
10 Ramon P. Chavez JR., 5/5/2007  
11 Jaiquan J. Burnett, 6/1/2006  
12 Detron Booker JR., 10/2/2006

13 committed the crimes (s) of RCW 9A.56.200 Robbery in the First Degree, RCW  
14 9A.40.020 Kidnapping in the First Degree, RCW 9A.36.031 Assault in the Third  
15 Degree, RCW 9A.76.110 Escape in the First Degree, and RCW 9A.56.065 Theft of  
16 a Motor Vehicle.

17 This belief is predicated on the following facts and circumstances:

18 On 5/28/2023 at 0021 hours the King County Sheriff's Office received a 911  
19 call from the Echo Glen Children's Center. The Echo Glen Children's Center is  
20 located at 33010 SE 99th ST, Snoqualmie, King County, WA and is a State owned  
21 and operated detention facility for juvenile inmates who have been convicted  
22 of felony crimes. Echo Glen staff members reported that approximately an hour  
23 prior 7 inmates had escaped from their cells, assaulted a staff member and  
locked her inside one of the cells, stolen her car and escaped from the  
facility.

24 KCSO Deputies and Snoqualmie Police Department Officers arrived at the  
25 facility within a few minutes. They were advised that at approximately 2315  
hours 7 total inmates had escaped from their cells and attacked the security  
guard who was in their building, referred to as a "cottage". The victim was  
identified as Megan M. Krause, 6/7/1986, who is a security guard at the  
facility. The inmates had severely assaulted her, causing visible injuries to  
her face, head and hands. The inmates had then stolen her cell phone and car  
keys from her, used her facility keys to escape their building and then had  
run to the employee parking lot where they had stolen her car and used it to  
escape the facility. Their location at that time was unknown.

26 KCSO Deputies spoke with Krause and saw lacerations and bruising all over her  
27 face and head, and had her transported to the Snoqualmie Valley Hospital for  
28 medical care. Patrick Levens, the Living Unit Manager for the "Willapa  
29 Cottage" that the inmates had escaped from, identified the escaped inmates as  
30 being;

31 Diego Torres-Topete, 4/6/2007  
32 Daniel D. Navarro, 7/4/2007  
33 Jessy J.L. Krikorian JR., 12/31/2006  
34 Timothy G. Hernandez-Ebanks, 5/16/2006  
35 Ramon P. Chavez JR., 5/5/2007

Certification for Determination  
of Probable Cause

*Prosecuting Attorney*  
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1 Jaiquan J. Burnett, 6/1/2006  
Detron Booker JR., 10/2/2006

2 Hernandez-Ebanks has previously escaped from Echo Glen in a very similar  
3 incident, where he and a group of inmates ambushed and assaulted a female  
4 staff member and stole her vehicle. He was eventually captured and returned  
5 to Echo Glen.

6 Krause's stolen vehicle was identified as being a white 2018 Chevrolet  
7 Equinox, WA/CEP1939.

8 I, Detective Benjamin Blakeman, arrived at the facility at approximately 0230  
9 hours. I went into the facility with Levens. He explained that the Willapa  
10 Cottage currently houses 15 inmates and that one of them is currently in the  
11 hospital, leaving 14 in the cottage. Each inmate is housed in an individual  
12 cell and the cottage has a 2-door system to leave the building and gain  
13 access to the open-air complex. The inmates are supposed to be locked in  
14 their cells overnight with no access to the common area of the cottage.

15 He lead me to Booker and Burnett's cell's and pointed out how both of them  
16 had constructed a replica sleeping person on their beds using clothing,  
17 bedding and pillows so that if a staff member looked into their cell via the  
18 door window it would look like someone was asleep on the bed. The staff desk  
19 inside of the cottage, which has the control module for locking and unlocking  
20 the individual cells, appeared to have been trashed by the inmates during the  
21 escape, with one of the computer monitors having been thrown onto the ground.  
22 Immediately across the hallway from Booker's cell is a common bathroom.

23 Inside of the bathroom in the shower area I observed a laptop computer that  
24 Levens advised each inmate is issued. I opened the laptop and discovered that  
25 it was powered on and the username on the screen showed as being "BookerD".  
Inside of Booker's cell, where Krause had been locked inside of after being  
assaulted, I observed apparent blood stains on the pillow on the bed.  
I then viewed the CCTV recordings of the incident. There are 4 different  
cameras inside of the cottage that captured the entire incident. I watched  
the recordings with Levens who identified the 7 escaped inmates in the  
recordings. He also provided me with their intake photos which I used to  
confirm their identities in the CCTV recordings.

From approximately 2000 to 2030 hours all 7 of the escaped inmates are seen  
clearly interacting with each other, waiting until staff members are not near  
them in order to whisper to each other, while others in the group interact  
with the staff in what is an apparent strategy to distract the staff members.  
The recordings make it apparent that the inmates have successfully  
manipulated the staff members as the two staff members are seen casually  
interacting with the inmates, hugging several of them, allowing another to  
take the cordless phone off of the control desk without repercussion,  
allowing an inmate to use their flashlight, allowing inmates to pretend that  
spray bottles are guns and point them at the staff members' heads, allowing  
the inmates to chase each other around the building and wrestle with each  
other. At numerous points in time the staff leave the control desk with the  
computer that locks and unlocks cells unattended while inmates have access to  
it.

At approximately 2030 hours Booker is seen going into the bathroom across the  
hallway from his cell and Navarro is seen immediately closing the door to  
Booker's cell, in what appears to be an intentional attempt to make it appear

Certification for Determination  
of Probable Cause

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1 as if Booker is inside of his cell as the cell doors are kept open and  
2 unlocked when the inmates are not inside of them. Navarro is then seen  
3 sitting down in the middle of the common area and appears to be watching the  
4 one staff member still inside of the cottage, giving obvious handsignals to  
5 several of the other inmates whenever the staff member is not looking. At  
6 this same time Krikorian and Chavez are seen going to the other end of the  
7 building and wrestling with each other, and Chavez is seen intentionally  
8 falling to the ground and pretending to be injured, drawing the attention of  
9 the staff members.

10 At approximately 2041 hours a staff member is seen knocking on Booker's cell  
11 door and then unlocking it, and Booker is then seen coming out of the  
12 bathroom and speaking with the staff member. As soon as the staff member  
13 walks away Booker is again seen going into the bathroom and Navarro again is  
14 seen walking over to Booker's cell and closing the door, automatically  
15 locking it.

16 At approximately 2047 hours Burnett is seen standing near the entrance to the  
17 hallway to Booker's cell and the bathroom that Booker is inside of. The staff  
18 members are seen facing away and Navarro, who is standing in the common area,  
19 is seen giving Burnett a hand sign and Burnett then immediately goes into the  
20 bathroom, with Booker. Just prior to this Burnett was recorded closing the  
21 door to his cell. Throughout this time Hernandez-Ebanks is seen walking  
22 around the common area wearing his inmate uniform.

23 At approximately 2315 hours Krause is seen walking down the hallway that  
24 Booker, Navarro and Hernandez-Ebanks' cells are in and the bathroom that  
25 Booker and Burnett are inside of. She is not seen wearing her radio or  
emergency distress beacon. As she reaches the far end of the hallway Booker  
and Burnett are seen exiting the bathroom and running up to Krause and  
tackling her into the wall. Both of them are then seen striking her in the  
head and face with closed fists dozens of times, while holding her against  
the wall. Krause is seen trying to cover her head with her hands and kicking  
back at the attackers but she is unable to defender herself or stop the  
attack.

After approximately a minute Booker is seen pinning Krause against the wall  
while continuing to punch her, and Burnett is seen running to the control  
station in the common area where he is seen interacting with the cell release  
computer, showing that he apparently knows how to use the control station.  
Navarro is then seen exiting his cell and forcefully taking Krause's cell  
phone from her hand and running into the common area. Booker is then seen  
dragging Krause into the common area and forcing her to sit in a chair.  
Navarro is seen letting Hernandez-Ebanks out of his cell and Hernandez-Ebanks  
is seen wearing a baseball cap, black tank top and dark colored sweatpants,  
all of which are contraband inside of the facility.

Torres-Topete, Chavez and Krikorian are all seen exiting their cells and  
joining the rest of the group in the common area. Navarro, Booker, Burnett  
and Torres-Topete are then all seen dragging Krause to Booker's cell and  
forcing her inside and locking the cell door. Burnett is then seen retrieving  
Krause's vehicle keys from her purse and holding them up to show the rest of  
the group. The whole group is then seen exiting the cottage. Krause remained  
locked inside of the cell for over an hour until another staff member found  
her during a check of the building.

1 Krause's cell phone was later found at a nearby construction site by Echo  
2 Glen staff, apparently left by the escaped inmates.

3 At 1230 hours KCSO received information that three of the escaped inmates,  
4 including Hernandez-Ebanks, were at The Montrose Apartments located at 214 S  
5 152 ST, Burien. KCSO Deputies surrounded the area and then observed  
6 Hernandez-Ebanks, Torres-Topete and Burnett walking away from the complex. As  
7 KCSO Deputies approached them they all began running away and KCSO deputies  
8 engaged in a foot pursuit with the three escaped inmates. All three  
9 eventually ran onto the shoulder of SR-509 just west of the complex where  
10 they were surrounded by Washington State Patrol Troopers and KCSO Deputies  
11 and taken into custody. Hernandez-Ebanks, Torres-Topete and Burnette were  
12 booked into the King County Juvenile Detention Center at approximately 1530  
13 hours.

14 At 1530 hours KCSO was contacted by an informant who's identity is known to  
15 KCSO by name and date of birth and relationship to one of the suspects, who  
16 advised that Booker and several of the other inmates had been seen at their  
17 family home in Vancouver, WA at approximately 0240 hours, approximately 3  
18 hours after the escape. At 1830 hours KCSO was advised by the Vancouver  
19 Police Department that Krause's stolen vehicle had been located, unoccupied,  
20 in Vancouver.

21 On 5/29/2023 at 2210 hours I was notified that the Clark County Sheriff's  
22 Office had just arrested Navarro, Chavez, Krikorian and Booker. CCSO Sgt.  
23 Agar advised that they had gone to Booker's family home and then were  
24 contacted nearby by CCSO Deputies. All four inmates ran and were eventually  
25 caught after a foot pursuit. They have been booked into the Clark County  
26 Juvenile Detention Facility pending transportation to the King County  
27 Juvenile Detention Center.

28 Torres-Topete is currently serving a sentence for a conviction of Robbery 1st  
29 Degree. Navarro is currently serving a sentence for a conviction of Assault  
30 1st Degree and Unlawful Possession of a Firearm 2nd Degree. Krikorian is  
31 currently serving a sentence for a conviction of Murder 2nd Degree and 2x  
32 counts of Assault 2nd Degree. Hernandez-Ebanks is currently serving a  
33 sentence for a conviction of Murder 1st Degree and Unlawful Possession of a  
34 Firearm 2nd Degree. Chavez is currently serving a sentence for a conviction  
35 of Assault 1st Degree and Robbery 1st Degree. Burnett is currently serving a  
36 sentence for a conviction of Possession of Stolen Motor Vehicle, Assault 2nd  
37 Degree, Theft of a Motor Vehicle, Escape 1st Degree and Eluding. Booker is  
38 currently serving a sentence for a conviction of Possession of a Firearm 2nd  
39 Degree.

40 Based on all of the foregoing information there is Probable Cause that all 7  
41 of the inmates worked together to execute a carefully planned attack on a  
42 corrections facility staff member and subsequent escape from the corrections  
43 facility, and that Torres-Topete, Navarro, Krikorian, Hernandez-Ebanks,  
44 Chavez, Burnett and Booker be charged with Robbery in the First Degree,  
45 Kidnapping in the First Degree, Assault in the Third Degree, Escape in the  
46 First Degree and Theft of a Motor Vehicle.

47 Under penalty of perjury under the laws of the State of Washington,  
48 I certify that the foregoing is true and correct. Signed and dated by me  
49 this 30th day of May, 2023, at Renton, Washington.

50 Certification for Determination  
51 of Probable Cause

*Prosecuting Attorney*  
52 *W 554 King County Courthouse*  
53 *Seattle, Washington 98104-2312*  
54 *(206)296-9000*

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A handwritten signature in black ink, appearing to read "B. J. [unclear]", positioned in the upper right quadrant of the page.

Certification for Determination  
of Probable Cause

*Prosecuting Attorney  
W 554 King County Courthouse  
Seattle, Washington 98104-2312  
(206) 296-9000*