

FILED
 KING COUNTY, WASHINGTON

OCT 16 2008

SUPERIOR COURT CLERK
 JENNIFER L. SCHNARR
 DEPUTY

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,)
) Plaintiff,)
 v.) No. 06-1-06658-4 SEA
)
 NAVEED AFZAL HAQ,) FOURTH AMENDED INFORMATION
)
)
)
)
 Defendant.)

COUNT I

I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington, do accuse NAVEED AFZAL HAQ of the crime of **Aggravated Murder in the First Degree**, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, with premeditated intent to cause the death of another person, did cause the death of Pamela Waechter, a human being, who died on or about July 28, 2006; and that further, aggravated circumstances exist, to wit: the murder was committed in the course of, in furtherance of, or in the immediate flight from the following crimes: Burglary in the First or Second Degree;

Contrary to RCW 9A.32.030(1)(a), 9A.32.030(1)(a) and 10.95.020(11)(c), and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

FOURTH AMENDED INFORMATION - 1

Daniel T. Satterberg, Prosecuting Attorney
 W554 King County Courthouse
 516 Third Avenue
 Seattle, Washington 98104
 (206) 296-9000, FAX (206) 296-0955

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

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Attempted Murder in the Second Degree**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, with intent to cause the death of another person, did attempt to cause the death of Carol Goldman, a human being, who died on or about July 28, 2006; attempt as used in the above charge means that the defendant committed an act which was a substantial step towards the commission of the above described crime with the intent to commit that crime;

Contrary to RCW 9A.28.020 and RCW 9A.32.050(1)(a), and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

COUNT III

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Attempted Murder in the Second Degree**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, with intent to cause the death of another person, did attempt to cause the death of Cheryl Stumbo, a human being, who died on or about July 28, 2006; attempt as used in the above charge means that the defendant committed an act which was a substantial step towards the commission of the above described crime with the intent to commit that crime;

Contrary to RCW 9A.28.020 and RCW 9A.32.050(1)(a), and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

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

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Attempted Murder in the First Degree**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, with premeditated intent to cause the death of another person, did attempt to cause the death of Dayna Klein, a human being, who died on or about July 28, 2006; attempt as used in the above charge means that the defendant committed an act which was a substantial step towards the commission of the above described crime with the intent to commit that crime;

Contrary to RCW 9A.28.020 and RCW 9A.32.030(1)(a), and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

COUNT V

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Attempted Murder in the First Degree**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, with premeditated intent to cause the death of another person, did attempt to cause the death of Layla Bush, a human being, who died on or about July 28, 2006; attempt as used in the above charge means that the defendant committed an act which was a substantial step towards the commission of the above described crime with the intent to commit that crime;

Contrary to RCW 9A.28.020 and RCW 9A.32.030(1)(a), and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

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

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Attempted Murder in the First Degree**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, with premeditated intent to cause the death of another person, did attempt to cause the death of Christina Rexroad, a human being, who died on or about July 28, 2006; attempt as used in the above charge means that the defendant committed an act which was a substantial step towards the commission of the above described crime with the intent to commit that crime;

Contrary to RCW 9A.28.020 and RCW 9A.32.030(1)(a), and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).

COUNT VII

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Unlawful Imprisonment**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, did knowingly restrain Dayna Klein, a human being;

Contrary to RCW 9A.40.040, and against the peace and dignity of the State of Washington.

And I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the authority of RCW 9.94A.533(3).


COUNT VIII

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Malicious Harassment**, a crime of the same or similar character as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

That the defendant NAVEED AFZAL HAQ in King County, Washington, on or about July 28, 2006, did maliciously and intentionally and because of his perception of the religion of the employees of the Jewish Federation to include, Pam Waechter, Carol Goldman, Cheryl Stumbo, Dayna Klein, Layla Bush and Christina Rexroad, did cause physical injury to Pam Waechter, Carol Goldman, Cheryl Stumbo, Dayna Klein, Layla Bush and Christina Rexroad;

Contrary to RCW 9A.36.080(1)(a)(b) or (c), and against the peace and dignity of the State of Washington.

DANIEL T. SATTERBERG
Prosecuting Attorney

By: 
Donald J. Raz, WSBA #1287
Senior Deputy Prosecuting Attorney