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6 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

7 THE STATE OF WASHINGTON,

Plaintiff,

8 v.

9 NAVEED AFZAL HAQ,

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11 Defendant.

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)  
) No. 06-1-06658-4 SEA

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) INFORMATION  
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12 COUNT I

13 I, Norm Maleng, Prosecuting Attorney for King County in the name and by the authority  
14 of the State of Washington, do accuse NAVEED AFZAL HAQ of the crime of **Aggravated  
Murder in the First Degree**, committed as follows:

15 That the defendant NAVEED AFZAL HAQ in King County, Washington on or about  
16 July 28, 2006, with premeditated intent to cause the death of another person, did cause the death  
17 of Pamela Waechter, a human being, who died on or about July 28, 2006; and that further,  
18 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;

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

20 And I, Norm Maleng, Prosecuting Attorney for King County in the name and by the  
21 authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at  
22 said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the  
23 authority of RCW 9A.510(3).

COUNT II

And I, Norm Maleng, 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 Cheryl Stumbo, a human being; 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, Norm Maleng, 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.510(3).

COUNT III

And I, Norm Maleng, 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; 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, Norm Maleng, 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.510(3).



COUNT IV

And I, Norm Maleng, 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; 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, Norm Maleng, 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.510(3).

COUNT V

And I, Norm Maleng, 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; 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, Norm Maleng, 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.510(3).



COUNT VI

And I, Norm Maleng, 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 Carol Goldman, a human being; 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, Norm Maleng, 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.510(3).

COUNT VII

And I, Norm Maleng, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Kidnapping 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, did intentionally abduct Kelsie Burkum, a human being, with intent to facilitate commission of the felony of Murder in the First or Second Degree, or Assault in the First or Second Degree and flight thereafter;

Contrary to RCW 9A.40.020(1)(b), and against the peace and dignity of the State of Washington.

And I, Norm Maleng, 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.510(3).

COUNT VIII

And I, Norm Maleng, 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 employees of the Jewish Federation, did cause physical injury to Cheryl Stumbo, Layla Bush, Christina Rexroad, Carol Goldman, Kelsie Burkum and Pamela Waechter, and threaten a specific person or specific group of persons, to-wit: employees of the Jewish Federation of Greater Seattle, and place that person or members of that group of persons in reasonable fear of harm to person and/or property;

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

And I, Norm Maleng, 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.510(3).

COUNT IX

And I, Norm Maleng, Prosecuting Attorney aforesaid further do accuse NAVEED AFZAL HAQ of the crime of **Burglary 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, did enter and remain unlawfully in a building located at 2031 3rd Avenue, Seattle, in said county and state, with intent to commit a crime against a person or property therein, and in entering, and while in such building and in immediate flight therefrom, the defendant was armed with a deadly weapon and did assault persons, to-wit: Pamela Waechter, Cheryl Stumbo, Layla Bush, Christina Rexroad, Dayna Klein, Carol Goldman, and Kelsie Burkum;

Contrary to RCW 9A.52.020, and against the peace and dignity of the State of Washington.



1 And I, Norm Maleng, Prosecuting Attorney for King County in the name and by the  
2 authority of the State of Washington further do accuse the defendant NAVEED AFZAL HAQ at  
3 said time of being armed with a handgun, a firearm as defined in RCW 9.41.010, under the  
4 authority of RCW 9.94A.510(3).

5  
6 NORM MALENG  
7 Prosecuting Attorney

8  
9 By:   
10 Donald J. Raz, WSBA #17287  
11 Senior Deputy Prosecuting Attorney  
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10 CAUSE NO. 06-1-06658-4 SEA

11 CERTIFICATION FOR DETERMINATION OF PROBABLE CAUSE  
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13 That Dana Duffy is a detective with the City of Seattle Police Department and has  
14 reviewed the investigation conducted in Seattle Police Department Case Number 06-313988:

15 There is probable cause to believe that Naveed Afzal Haq committed the crimes of  
16 Aggravated Murder in the First Degree, Attempted Murder in the First Degree, Burglary in the  
17 First Degree, Kidnapping in the First Degree, Assault in the First Degree, Assault in the Second  
Degree and Malicious Harassment, all committed with a firearm. This belief is predicated on the  
following facts and circumstances:

18 On 7-28-2006, 14-year-old [REDACTED] was in Seattle attending an art camp. She had  
19 been staying with her aunt, Cheryl Stumbo, who worked at the Jewish Federation of Greater  
20 Seattle which is located at 2031 Third Ave, City of Seattle, County of King and State of  
21 Washington. At approximately 3:50 p.m., [REDACTED] approached the front entrance of the Jewish  
22 Federation. The Jewish Federation is located on the second floor of a secure building. To gain  
23 entry into this building, one must be let in by someone inside or enter the security code into a  
24 keypad at the building's front entrance on the west side of Third Avenue. As [REDACTED] approached  
25 the building's front entrance, Naveed Afzal Haq, DOB 9/23/75, who had been standing inside the  
building's vestibule, pulled out a gun, put it to [REDACTED] back and told her "open the door." With  
no options available to her, [REDACTED] buzzed the intercom and said she was Cheryl's niece. As  
[REDACTED] reached for the intercom button, Haq said "careful." She was let into the building. Haq,  
who had a second handgun, extra ammunition, and a knife, closely followed [REDACTED] into the  
building, his gun still pointed to the middle of her back. As they entered the building, Haq said,  
"I'm only doing this for a statement."

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Certification for Determination  
of Probable Cause



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4 Haq followed [REDACTED] up the stairs that led to the reception area for the Jewish Federation.  
5 When they reached Layla Bush's reception desk, Haq asked to see the manager. [REDACTED]  
6 continued walking, went into a nearby restroom and locked herself into a stall. A few moments  
7 later she heard gunshots and someone yelling call 911. Finding her aunt's cell phone in her bag,  
8 [REDACTED] called for help.

9 Haq turned his attention to receptionist Layla Bush. He asked for a manager. While Bush  
10 when back to get Marketing Director Cheryl Stumbo, Haq readied his gun and then followed. As  
11 Haq came up behind Bush, Stumbo told Carol Goldman, who was sitting in a cubicle nearby, to  
12 call 911. Before Goldman could make the call, Haq fired his gun at her, striking her in the knee.  
13 Goldman dove beneath her desk. Haq continued to shoot, hitting Bush in the abdomen and left  
14 shoulder and Stumbo in the abdomen. Moving through the office, Haq shot Christina Rexroad in  
15 the abdomen and shot Pamela Waechter in the left chest. Waechter ran toward the stairs, a hand  
16 clutched to her left chest. Haq followed Waechter to the top of the stairs. Extending his arm and  
17 gun over the railing, he took aim and fired. The bullet struck Waechter in the skull in the right ear,  
18 killing her. Waechter fell and came to rest on a landing in the stairwell. Associate King County  
19 Medical Examiner Dr. Aldo Fusaro determined the wound to Waechter's head was the cause of her  
20 death. Dr. Fusaro ruled Waechter's death a homicide.

21 Hearing the gunshots but not recognizing them as such, Dayna Klein got up from her desk  
22 and walked to her office door. Klein, who is 17 weeks pregnant, and Haq got to the door at the  
23 same time. Haq shot toward Klein's abdomen, the bullet struck her in her arm that she had a  
24 moment earlier put up to protect her unborn child. Klein crumbled to the floor and crawled over to  
25 her desk. Although she heard Haq announcing that "nobody better call 911", Klein dialed the  
phone. As Klein provided information to the 911 operator, Haq returned to Klein's office and put  
a gun to her head. Haq said "now you are my hostage because you didn't follow directions." Haq  
told Klein to have the 911 operator call CNN. He said he didn't care what happened to him. With  
the gun pointed directly at her, Klein asked Haq if he wanted to talk to the operator. Haq took the  
phone and began to talk

26 Haq told the operator that "this is a hostage situation, I have a hostage." When asked his  
27 name, he replied "This is Naveed Haq." He repeated that this was a hostage situation and said "I  
28 want these Jews to get out." He stated he was "at 2031, the Jewish Federation, on 3 Ave, I'm  
29 upstairs." Haq stated, "I'm not upset at the people, I'm upset at your foreign policy. These are  
30 Jews. I'm tired of getting pushed around, and our people getting pushed around by the situation in  
31 the Middle East." When asked again, Haq repeated his name as Naveed Haq and gave his social  
32 security number as 288-72-2466. He said, "I just want us to get out of Iraq, I'm an American too  
33 but I want our people out of Iraq." Haq said that he had his gun on one person, that she was scared  
34 and "I shot her once, I shot her in the arm."

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4 When asked what he wanted the 911 operator to do, Haq said he wanted them to call the  
5 media. When told he couldn't get us out of Iraq by doing this, Haq said "Call the media, This will  
6 make a point." When the 911 operator said they needed to talk with Haq before they could call the  
7 media, Haq responded "I have this gun pointed at her head." He said he didn't give a shit about  
8 what happened to him. Haq told the operator that the woman was still conscious and had told him  
9 that she was pregnant. Haq said that the Muslims are very upset at you (U.S.) sending bombs to  
10 Israel and very upset that you (U.S.) stay in Iraq. Haq told the 911 operators he was "acting  
alone", and that he had not been drinking that day. Haq reiterated that he just wanting to make a  
point and was tired of everyone not listening to our point of view. He said he was sick and tired of  
Jewish politicians being in favor of the war. Haq said he wanted there to be some fairness in this  
country.

11 Haq asked to be connected to CNN. When told that the operator had no ability to connect  
12 him, Haq said that he would give himself up. Haq described his clothes for the operator and told  
13 the operator that he had put down his gun. Haq allowed Klein to confirm that Haq had put down  
14 his gun. Indicating his willingness to walk out, Haq, following the operator instructions, put his  
15 hands on this head, walked out of the Federation's offices, down the stairs, and out the doors he  
16 had came in. As instructed, Haq laid facedown on the sidewalk and was immediately handcuffed  
and arrested by Seattle police. Officers recovered a loaded .45 caliber magazine from Haq's pants  
pocket.


17 Police read Haq his Miranda rights which Haq indicated he understood. When asked, Haq  
18 told officers that he had a white Mazda B2500 pick-up truck parked over by Bed Bath and Beyond.  
19 A pickup truck registered to Haq was located in that area. Detectives Al Cruise and Russ Weklych  
20 transported Haq to the Seattle Police Homicide unit. In route, when asked, Haq indicated that he  
21 was not hurt. Subsequent visual inspection of Haq confirmed this. Haq said that he acted alone.  
22 He said that he had two guns and a knife and he had dropped all three of those weapons back at the  
23 Federation's offices. Haq then said "I am making a statement OK, That's what this is all about."  
24 Haq said "This is about the Jews and what they are doing. The Jews are running the country. This  
is about getting the US out of Iraq. I am an American and I got no problem with America but we  
have to get out of Iraq. But we give bombs and guns and bunker buster bombs to Israel and we  
shouldn't be doing it, it's got to stop, that's what this is all about." When he arrived at the  
Homicide Unit, Detective Dave Duty asked Haq why he had been brought in. Haq replied "I shot  
somebody and I think I killed them." He further said that he had just driven over from Pasco to do  
this.

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5 Seattle police detectives recovered two semi-automatic handguns at the scene of the  
6 shooting: one .40 caliber and one .45 caliber. Detectives also recovered a knife that Haq had  
7 brought with him. Detectives collected 8 spent .40 caliber shell casings at the scene along with 13  
8 live .40 caliber rounds, 8 on the floor, 4 in the .40 caliber gun and 1 in an ammunition box  
recovered at the scene. Police recovered 43 total .45 calibers rounds, 34 in an ammunition box, 2  
live rounds on the floor, and 7 live rounds in the .45 caliber gun.

9 Currently, Bush, Stombo, and Rexroad remain in serious condition at Harborview Medical  
10 Center. All required live-saving surgery and await further surgery to repair their internal organs.  
11 A bone in Klein's arm was shattered by the bullet's impact. Goldman was treated for a gunshot  
wound to the knee.

12 Under penalty of perjury under the laws of the State of Washington, I certify that the  
13 foregoing is true and correct. Signed and dated by me this 1st day of August, 2006,  
at Seattle, Washington.

14  #6218  
15 Detective Dana Duffy

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7 CAUSE NO. 06-1-06658-4 SEA

8 PROSECUTING ATTORNEY CASE SUMMARY AND REQUEST FOR BAIL AND/OR  
9 CONDITIONS OF RELEASE

10 The State incorporates by reference the Certification for Determination of Probable  
11 Cause signed by City of Seattle Homicide Detective Dana Duffy under Seattle Police  
Department number 06-313989 on August 1, 2006.

12 REQUEST FOR BAIL

13 The State requests, per CrR 3.2 (g), that no bail be allowed as a crime charged herein is a  
14 capital offense.

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Donald J. Raz, WSBA #172870