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**FILED**

**JUL 27 2021**

Scott G. Weber, Clerk, Clark Co.

1:46pm

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

STATE OF WASHINGTON,  
Plaintiff,  
v.  
ABRAN RAYA LEON,  
Defendant.

No. 21-1-01404-06

MOTION AND DECLARATION FOR  
ORDER AUTHORIZING ISSUANCE OF  
WARRANT OF ARREST



COMES NOW the Plaintiff, State of Washington, by and through the Prosecuting Attorney for Clark County. The Plaintiff filed an Information in the above-entitled cause charging ABRAN RAYA LEON with the following crime:

Ct.	Crime Date	Crime	RCW
01	7/23/2021	RENDER CRIMINAL ASSISTANCE IN THE FIRST DEGREE	9A.76.070(1)(2)(a)

The Plaintiff respectfully moves the Court for an Order authorizing the issuance of a warrant for the arrest and detention of the Defendant until the Defendant can be brought before the Court to answer the Information, or until further Order of the Court, or until release of the Defendant on such conditions as may be set by the Court.

This Motion is based upon the attached probable cause declaration authored by Vancouver Police Department Detective Neil Martin, dated July 27, 2021, under report number VPD 2021-15357, and upon Criminal Rule 2.2(a), which is incorporated by reference herein.

DATED this 27 day of July, 2021.

  
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Anthony F. Golik, WSBA #25172  
Prosecuting Attorney

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2 I, Anthony F. Golik, base this Motion on the attached probable cause declaration  
3 prepared by Vancouver Police Department Detective Neil Martin for the following crime:

Ct.	Crime Date	Crime	RCW
01	7/23/2021	RENDER CRIMINAL ASSISTANCE IN THE FIRST DEGREE	9A.76.070(1)(2)(a)

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5 which occurred in Clark County, Washington.

6 The defendant has been arrested and is currently incarcerated in Marion County,  
7 Oregon

8 I have attempted to ascertain the Defendant's address by causing a member of the  
9 Prosecuting Attorney's staff to conduct a check of the following databases: the Judicial  
10 Information System (JIS), the Department of Licenses (DOL) and the Department of Corrections  
11 (FORS). A search of those databases did not return a current valid address for the Defendant.

12 Your declarant respectfully requests that bail be set in the amount of NO BAIL in this  
13 matter.

The defendant is described as follows:

<b>NAME: ABRAN RAYA LEON</b>				
<b>RACE: W</b>	<b>SEX: M</b>	<b>DOB: 6/16/1993</b>	<b>FBI: 492778VD7</b>	<b>SID: OR20086649</b>
HOME - 373 SW VIEW ST, DALLAS OR 97338				
JIS - 373 SW VIEW ST, DALLAS OR 97338				
DOL - 373 SW VIEW ST, DALLAS OR 97338-1423				
FORS - NO RECORD				
JAIL - MARION COUNTY, SALEM OR				

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18 I certify and declare under penalty of perjury under the laws of the State of Washington  
19 that the foregoing is true and correct.

20 Executed at Vancouver, Washington on this 27 day of July, 2021.

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\_\_\_\_\_  
Anthony F. Golik, WSBA #25172  
Prosecuting Attorney

## **ARRESTING OFFICER'S DECLARATION OF PROBABLE CAUSE**

The undersigned law enforcement officer states that the person whose name appears on the reverse side of this Pre-book/Probable Cause sheet was arrested without a warrant on the date and time shown thereon for the crimes committed in Clark County, Washington based on the following circumstances. The reverse of this sheet is hereby incorporated by evidence.

My information is derived from:

**Involved 1: Raya Leon, Guillermo, DOB: 5/29/1995**

**Suspect 1: Raya Leon, Abran, DOB: 6/16/1993**

**Victim 1: Clark County Sheriff's Detective Jeremy Brown**

**Witness 1: Raya, Misty May**

**Witness 2: Kraabell, Lani Rene**

**Witness 3: Tristan Elfering**

**Officer 1: Vancouver Police Detective Rodrigo Osorio**

**Offense- Rendering Criminal Assistance First Degree-RCW 9A.76.070**

Vancouver Police Department case #: 2021-15357

**My investigation showed the following:**

On July 23, 2021, Clark County Sheriff's Office Detective Sergeant Jeremy Brown along with other law enforcement investigators were acting in an official capacity and conducting investigative surveillance at 3508 NE 109<sup>th</sup> Ave #P2, Vancouver, WA.

The subjects of their investigative surveillance were identified as Misty Raya, Abran Raya Leon aka "Junior" and Guillermo Raya Leon aka "Fish." The subjects were observed by investigators as they arrived at this apartment complex in a silver Toyota SUV driven by Lani Kraabell. Detective Sergeant Brown was conducting surveillance on the apartment unit from an unmarked maroon colored Jeep SUV parked in the parking lot.

During the surveillance operation, investigators heard several possible gunshots in the area and then observed the same silver Toyota SUV, occupied by two males, believed to be Guillermo and Abran, and one female, believed to be Misty, flee the complex at a high rate of speed. Detective Rodrigo Osorio said he identified the driver of the vehicle fleeing the area of the gunshots as Abran Raya Leon. Further, I am aware that Witness Tristan Elfering told Detective Ripp that the larger of the two Hispanic males was the driver of the vehicle that fled after he heard gunshots. It is important to note that Abran Raya Leon is physically noted as being 5-8/250lbs. His brother (Guillermo) is described as 5-07/160lbs. Tristan's observation corroborates Det. Osorio's statement that Abran Raya Leon was the driver of the vehicle that fled the scene.

Witness Lani Kraabell also said that "Fish" and "Junior" got into the Sequoia and started to leave the area without Misty. Misty ran to the vehicle, and eventually got inside, at which point Junior, Fish, and Misty left the area.

It was later discovered that Guillermo Raya Leon shot and killed CCSO Detective Jeremy Brown who was pronounced deceased at the SWWMC (Vancouver Hospital). The subsequent arrest of Guillermo for the crime of Aggravated Murder in the 1<sup>st</sup> Degree-RCW 9A.32.030/10.95.020(1) was based upon witness interviews, physical evidence recovered during the course of this investigation, and later (Post Miranda) admissions by Guillermo Raya Leon to shooting Det. Brown.

Responding law enforcement officers eventually located the same silver Toyota SUV crashed and abandoned in the vicinity of I-205 and Padden Parkway. Law enforcement officers conducted a search for the occupants/suspects and eventually located Misty and Abran in the backyard of an unoccupied residence and took them into custody.

Abran Raya Leon was contacted and interviewed by Det. Mills. Abran Raya Leon admitted, Post Miranda, that his brother told him about the shooting as they fled the area. Abran Raya Leon also told Det. Mills he knew Guillermo to be in possession of a large, silver in color revolver. Abran Raya Leon, however, denied driving the Toyota Sequoia away from the scene after the shooting and lied to Det. Mills stating that he had gotten in the back of the truck. When confronted by Det. Mills about the fact that they had left without Misty and had to stop to get her (she got in the back of the truck) he stated that he got into the passenger seat. Misty Raya also told Det Mills during her interview that (Guillermo) was the driver not her husband. It is reasonable to believe Misty is trying to protect her husband (Abran) over Guillermo by providing false information regarding whom drove away from the scene.

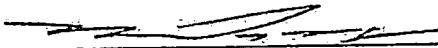
During a subsequent search of the backyard of the residence where Misty and Abran were taken into custody, investigators located a large, silver revolver. It should be noted that there were no shell casings located on the ground outside of Detective Sergeant Brown's vehicle, which indicated to investigators that a revolver was likely used to shoot Detective Sergeant Brown. Based on my knowledge, training, and experience, I am aware that a revolver does not expend a shell casing upon being fired and remains in the cylinder. It is also believed that Guillermo Raya Leon stole a Toyota Prius passenger car from this residence and fled to the State of Oregon in it.

I know that on July 25<sup>th</sup>, 2021, Guillermo was arrested in Salem, Oregon for this crime. Det Mills and I traveled to Salem, Oregon and spoke to Guillermo about this investigation. Guillermo Raya Leon was advised of his Constitutional Rights (Miranda) prior to the interview. During the interview, Guillermo told us that after the shooting, he fled the area in a khaki-colored Toyota Sequoia that was driven by his brother (Abran). Guillermo thought his brother had heard the gunshots and was coming from the apartment towards the truck to meet him. Guillermo also told us that he told his brother about the shooting and changed clothing (clothes provided to him by Misty Raya from within the Sequoia). Guillermo said both of these events occurred after fleeing the shooting but before the police began chasing them. He said Abran fled from the police and ultimately crashed the Sequoia near I-205 at which time they fled to a residence and he stole a Prius.

**Based on the forgoing information and witness statements, it is believed that Abran Raya Leon intentionally prevented, hindered or delayed the apprehension of Guillermo Raya Leon (who was wanted for the crime of Murder I) and that Abran knew Guillermo Raya Leon was wanted for a crime and he (Abran) provided him transportation away from such crime (via vehicle) and attempted to harbor or conceal him from apprehension and as such there is Probable Cause to believe Abran Raya committed the crime of Rendering Criminal Assistance in the First Degree.**

The undersigned declares and certifies under penalty of perjury under the laws of the State of Washington that the preceding statement is true and correct to the best of his knowledge.

Signed this 07/27/2021 at 1145 hours in Vancouver, Clark County, Washington.

  
Signature 1326 PSN

The undersigned Judge/Magistrate/Commissioner hereby certifies that I have read or had read to me the above statement of probable cause to arrest and that I find probable cause to arrest is  established  not established (release defendant).

Signed this 27 day of July, 2021 in Vancouver, Clark County, Washington

  
Judge/Magistrate Time: 1:40pm