

September 14 2016 10:00 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 16-1-03648-3

STATE OF WASHINGTON  
PIERCE COUNTY SUPERIOR COURT

THE STATE OF WASHINGTON,

Plaintiff,

v.

RYAN JAMES LEWIS, an individual,  
and CLEANER PRESSURE  
WASHING, LLC, a Washington  
Limited Liability Company

Defendants.

NO. 16-1-03648-3

INFORMATION

I, Robert W. Ferguson, Attorney General of Washington, in the name and by the authority of the State of Washington, pursuant to RCW 43.10.232 and at the request of Mark Lindquist, Pierce County Prosecuting Attorney, hereby allege that RYAN JAMES LEWIS did commit the following crimes:

**COUNT I - DEFRAUDING A PUBLIC UTILITY IN THE FIRST DEGREE**

On or about January 2, 2016, in the State of Washington, Pierce County, RYAN JAMES LEWIS, did make, or cause to be made, a connection or reconnection with property owned or used by the utility to provide utility service without the authorization or consent of the utility; and/or did use or receive the direct benefit of all or a portion of the utility service with knowledge of, or reason to believe that, the diversion, or unauthorized connection existed at the time of the use or that the use or receipt was without the authorization or consent of the utility, in furtherance of criminal activity; contrary to RCW 9A.61.020,

1 RCW 9A.61.030, and RCW 9A.08.030(2)(b), and against the peace and dignity of the State of  
2 Washington. (Class B Felony with a maximum penalty of ten (10) years in prison and/or a  
3 \$20,000 fine pursuant to RCW 9A.20.021(1)(b), plus restitution and assessments.)

4 **COUNT II - DEFRAUDING A PUBLIC UTILITY IN THE FIRST DEGREE**

5 On or about September 24, 2013, in the State of Washington, Pierce County,  
6 RYAN JAMES LEWIS, did use or receive the direct benefit of all or a portion of the utility  
7 service with knowledge of, or reason to believe that, the diversion, or unauthorized connection  
8 existed at the time of the use or that the use or receipt was without the authorization or consent  
9 of the utility, in furtherance of criminal activity; contrary to RCW 9A.61.020,  
10 RCW 9A.61.030, and RCW 9A.08.030(2)(b), and against the peace and dignity of the State of  
11 Washington. (Class B Felony with a maximum penalty of ten (10) years in prison and/or a  
12 \$20,000 fine pursuant to RCW 9A.20.021(1)(b), plus restitution and assessments.)

13 **COUNT III - VIOLATION OF THE WATER POLLUTION CONTROL ACT**

14 On or about January 29, 2015, in the State of Washington, Pierce County,  
15 RYAN JAMES LEWIS, did throw, drain, run, or otherwise discharge, or did cause, permit, or  
16 allow to be thrown, run, drained, allowed to seep or otherwise discharged, into the waters of  
17 this state organic or inorganic matter that causes or tends to cause pollution of such waters; to  
18 wit: acid, contrary to RCW 90.48.080 and contrary to RCW 90.48.140. (Gross misdemeanor  
19 with a maximum penalty of 364 days imprisonment or \$10,000 fine, or both pursuant to  
20 RCW 90.48.140, plus restitution, assessments and court costs.)

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**COUNT IV - VIOLATION OF HAZARDOUS WASTE MANAGEMENT ACT**

On or about May 12, 2015, in the State of Washington, Pierce County, RYAN JAMES LEWIS, did knowingly transport, store, handle, or dispose of a hazardous substance, to wit: acid exhibiting characteristics of ignitability and/or corrosivity as stated in WAC 173-303-090, in violation of Ch. 70.105 RCW, to wit: implementing regulations WAC 173-303-145(3); contrary to RCW 70.105.085(1)(b) and 70.105.010. (Gross misdemeanor with a maximum penalty of 364 days imprisonment and/or a \$10,000 fine, pursuant to RCW 70.105.090, plus restitution, assessments and court costs.)

**COUNT V – RECKLESS ENDANGERMENT**

On or about May 8, 2015, in the State of Washington, Pierce County, RYAN JAMES LEWIS, did recklessly engage in conduct which did create a substantial risk of death or serious physical injury to another person, to wit: Daniel Wayne, contrary to RCW 9A.36.050(1). (Maximum Penalty 364 days in jail or \$5,000 fine, or both, pursuant to RCW 9A.36.050(2) and RCW 9A.20.021(2), plus restitution, assessments and court costs.)

DATED this 13th day of September, 2016.

ROBERT W. FERGUSON  
Attorney General

WILLIAM SHERMAN, WSBA # 29365  
Assistant Attorney General  
Attorney for Plaintiff