FILED
2019 SEP 30
KING COUNTY
SUPERIOR COURT CLERK

CASE #: 19-1-06094-4 SEA

FILED
KING COUNTY, WASHINGTON
SEP 30 2019
DEPARTMENT OF
JUDICIAL ADMINISTRATION

STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

STATE OF WASHINGTON, Plaintiff, v. TRAVIS ANDREW JACKSON (AKA TRAVIS ANDREW BURNS), Defendant.	NO. 19-C-06094-4 SEA 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 Mr. Daniel Satterberg, King County Prosecuting Attorney, do accuse TRAVIS JACKSON and MARISSA BOND of the crimes of: Employer's False Reporting or Failure to Secure Payment of Compensation (1 count), Theft in the Second Degree (3 counts), and Theft in the Third Degree (21 counts) committed as follows:

COUNT I - EMPLOYER'S FALSE REPORTING OR FAILURE TO SECURE PAYMENT OF COMPENSATION

I, Robert W. Ferguson, Attorney General of Washington, in the name and by the authority of the State of Washington and pursuant to RCW 43.10.232, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Employer's False Reporting or Failure to Secure Payment of Compensation**, committed as follows:

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800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

On or about the period between March 27, 2017, and November 15, 2018, the Defendants, TRAVIS JACKSON and MARISSA BOND, an employer, with intent to evade determination and payment of the correct amount of premiums did knowingly make misrepresentations regarding payroll or employee hours; and/or did engage in employment covered under Title 51 RCW and, with intent to evade determination and payment of the correct amount of the premiums, did knowingly fail to report the payroll or employee hours related to that employment; and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.020(1)(a)(b), 9A.08.020 and 51.48.020(1)(b) and against the peace and dignity of the State of Washington. (Maximum Penalty - Five (5) years imprisonment and/or a $10,000 fine pursuant to RCW 51.48.020(1)(b) and RCW 9A.20.021(1)(c), plus restitution and assessments. In addition, pursuant to RCW 51.48.020(1)(c), the Defendant will be required to (Maximum Penalty - Five (5) years imprisonment and/or a $10,000 fine pursuant to RCW 51.48.020(1)(b) and RCW 9A.20.021(1)(c), plus restitution and assessments. In addition, pursuant to RCW 51.48.020(1)(c), the Defendant will be required to pay the premium due and owing, a penalty in the amount of one hundred percent of the premium due and owing, and interest on the premium and penalty from the time the premium was due until the date of payment.)

COUNT II – THEFT IN THE SECOND DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Second Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington, on or between October 1, 2017, through April 30, 2018, by color or aid of

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
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(206) 464-6430

deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Kristin Psaradelis, of an aggregate value exceeding $750, with intent to deprive such other of such property, and/or the Defendants, and TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.040(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 5 years and/or a $10,000 fine, pursuant to RCW 9A.56.040, 9A.20.021(1)(c)).

COUNT III – THEFT IN THE SECOND DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Second Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington, on or between February 26, 2018, through June 15, 2018, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Chantelle Jones aka Maher, of an aggregate value exceeding $750, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.040(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 5 years and/or a $10,000 fine, pursuant to RCW 9A.56.040, 9A.20.021(1)(c)).

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

COUNT IV – THEFT IN THE SECOND DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Second Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington, on or between June 1, 2018, through September 15, 2018, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Erika Arreola, of an aggregate value exceeding $750, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.040(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 5 years and/or a $10,000 fine, pursuant to RCW 9A.56.040, 9A.20.021(1)(c)).

COUNT V – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between April 20, 2018, through August 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully

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800 Fifth Avenue, Suite 2000
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(206) 464-6430

obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Christine Mantegna, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT VI – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between February 16, 2018, 2018 through May 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Sarah Thuston, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

COUNT VII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between May 2, 2018, and July 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Amanda Armstrong, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT VIII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between June 1, 2018, and August 30, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or

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800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Alexia Hendricks, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT IX – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between July 1, 2018 through September 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Regina Yazzie, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT X – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

connected together with another crime charged herein, 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, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between November 1, 2017, through January 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Angela Delisle, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XI – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between May 5, 2018, through August 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Jeanette Skinner, with intent to deprive such other of

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800 Fifth Avenue, Suite 2000
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such property, and/or the defendant, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between March 19, 2018, through June 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Monique Redding, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XIII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, and which crimes were so closely

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between November 3, 2017, through January 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Angela Canale, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XIV – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between March 1, 2018, through May 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Natalie Zilverberg, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XV – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between November 21, 2017, through January 31, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Brittany Baker, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XVI – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, and which crimes were so closely

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between February 19, 2018, through April 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Laura Hiller, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XVII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between May 10, 2018, through July 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Breeanna Clark, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XVIII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between April 10, 2018, through August 30, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Maleah Fulbright, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XIX – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, and which crimes were so closely

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between October 23, 2017, through January 30, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Briana Daniels, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XX – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between May 19, 2018, through July 31, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Brooke Winkler, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430

accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XXI – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between June 30, 2018, and August 30, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Lacey Cutitta, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XXII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, and which crimes were so closely

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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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between December 2, 2017, through January 30, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Deborah Lehman, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XXIII – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between December 4, 2017, through February 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Christina Pierson, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was

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an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XXIV – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, 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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between April 23, 2018, through June 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Sadieria Bash, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

COUNT XXV – THEFT IN THE THIRD DEGREE

I, Robert W. Ferguson, Attorney General aforesaid, do accuse TRAVIS JACKSON and MARISSA BOND of the crime of **Theft in the Third Degree**, based on a series of acts connected together with another crime charged herein, and which crimes were so closely

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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 Defendants, TRAVIS JACKSON and MARISSA BOND, in the State of Washington on or between February 26, 2018, through April 15, 2018, in a series of transactions which are part of a criminal episode or a common scheme or plan, by color or aid of deception, obtain control over property or services of another or value therefrom and/or did wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit: wages earned by Brianna Brodahl, with intent to deprive such other of such property, and/or the Defendants, TRAVIS JACKSON and/or MARISSA BOND, was an accomplice in the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a)(b), and 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty: 364 days and/or a $5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

DATED this 27th day of September, 2019.

ROBERT W. FERGUSON
Attorney General

TIENNEY MILNOR, WSBA #32701
Assistant Attorney General
Attorneys for the State of Washington

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800 Fifth Avenue, Suite 2000
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(206) 464-6430

SUPERFORM

CCN/JCN NUMBER	B/A NUMBER	PCN NUMBER

AGENCY: ☒ DEPT OF LABOR AND INDUSTRIES
☐ CITY OF

19-C-060944 SEA
CASE NUMBER FILE NUMBER

SUSPECT DATA

DATE OF ARREST/TIME	BOOKING DATE/TIME	ARREST LOCATION
N/A.	N/A	N/A.

NAME (LAST, FIRST, MIDDLE/JR., SR., 1ST, 2ND)	ALIAS, NICKNAMES
Jackson, Travis A	BURNS, TRAVIS A

IDENTITY IN DOUBT?	DOB	SEX	RACE	HGT	WGT	EYES	HAIR	SKIN TONE
YES ☐ NO ☒	11/15/1973	M	W	5'10	180	BRN	BRN	

SCARS, MARKS, TATTOOS, DEFORMITIES	ARMED/DANGEROUS
	YES ☐ NO ☐

LAST KNOWN ADDRESS CITY SATE ZIP	RESIDENCE PHONE	BUSINESS PHONE	CITIZENSHIP
12556 120TH AVE NE APT. 221 Kirkland WA 98034			

OCCUPATION	EMPLOYER, SCHOOL (ADDRESS,SHOP/UNION NUMBER)	SOCIAL SECURITY NUMBER
		[redacted]

DRIVER'S LICENSE #	STATE	AFIS #	FBI #	STATE ID #
[redacted]	WA			

VEHICLE LICENSE #	STATE	YEAR	MAKE	MODEL	VEHICLE LOCATION	TOW COMPANY

PERSON TO BE CONTACTED IN CASE OF EMERGENCY	RELATIONSHIP	ADDRESS	CITY	STATE	PHONE

OFFENSE DATA

		RCW/ORD#	COURT/CAU#	CITATION #
1) OFFENSE ☐ DV	Employer's False Reporting	51.48.020		
2) OFFENSE ☐ DV	Theft in the Second Degree	9A.56.040		
3) OFFENSE ☐ DV	Theft in the Second Degree	9A.56.040		
4) OFFENSE ☐ DV	Theft in the Second Degree	9A.56.040		

ANY OTHER ADDITIONAL CHARGES	CRIMINAL TRAFFIC CITATION ATTACHED?	ACCOMPLICES
Theft in the Third Degree	YES ☐ NO ☐	Bond, Marissa

PROPERTY

LIST VALUABLE ITEMS OR PROPERTY LEFT FOR ARRESTEE AT JAIL

LIST VALUABLE ITEMS OR PROPERTY ENTERED INTO EVIDENCE
YES ☐ NO ☐ IF YES DESCRIBE:
(SIMPLE DESCRIPTION, IDENTIFYING MARKS, SERIAL #)

TOTAL CASH OF ARRESTEE	WAS CASH TAKEN INTO EVIDENCE?	SIGNATURE OF JAIL STAFF RECEIVING ITEMS/SERIAL #
$	YES ☐ NO ☐ AMOUNT: $	

OFF

ARRESTING OFFICER/SERIAL #	TRANSPORTING OFFICER/SERIAL #	SUPERVISOR SIGNATURE/SERIAL #

SUPERFORM COMPLETED BY (SIGNATURE/SERIAL #)	CONTACT PERSON FOR ADDITIONAL INFORMATION (NAME/SERIAL #/PHONE)
Kim Triplett-Kolerich	Kim Triplett-Kolerich (206) 496-7408

MISDEMEANOR BOOKINGS: Complete to this line. **FELONY BOOKINGS:** Complete both sides.
OBJECTION TO RELEASE (MISDEMEANOR OR FELONY) IS ON REVERSE SIDE.

COURT FILE

SUPERIOR COURT FILING INFO.		COURT CAUSE (STAMP OR WRITE)
☐	IN CUSTODY	
☐	AT LARGE	
☐	OUT ON BOND	

COURT/DIST. CT.NO.	DIST. CT. BOND $	SUP. CT. DATE	WARRANT NUMBER

WARRANT INFO./EXTRADITE

WARRANT DATE	OFF CODE OFFENSE	AMOUNT OF BAIL	FELONY ☐ MISD ☐	BENCH ☐ ARREST ☐
		$		

POLICE AGENCY ISSUING	COURT	WARRANT RELEASED TO: SERIAL UNIT DATE TIME

PERSON APPROVING EXTRADITION	SEAKING-LOCAL ONLY WACIC-STATE WIDE	NCIC-WILL EXTRADITE FROM ID & OR ONLY	NCIC-WILL EXTRADITE FROM OR,ID,MT,WY, CA, NV, UT, CO, AZ, NM, HI,AK	NCIC-WILL EXTRADITE FROM ALL 50 STATES
	☐	☐	☐	☐

ENTRY
CCN#_____ DOE_____
WAC#_____ TOE_____
NIC#_____ OP#_____

CLEARANCE
DOC_____
TOC_____
OP#_____

REV. 11/95

(PERFORATION/DO NOT DUPLICATE BELOW THIS LINE)

SUSPECT NAME: Jackson, Travis A

19-C-06094-4SEA
CASE NUMBER

NON DRUG CRIME PROBABLE CAUSE

STATEMENT OF PROBABLE CAUSE: NON-VUCSA FELONY

CONCISELY SET FORTH FACTS SHOW NG PROBABLE CAUSE FOR EACH ELEMENT OF THE OFFENSE AND THAT THE SUSPECT COMMITTED THE OFFENSE. IF NOT PROV DED, THE SUSPECT WILL BE AUTOMATICALLY RELEASED. INDICATE ANY WEAPON INVOLVED. (DRUG CR ME CERTIFICATE BELOW.)

ON AT , WITHIN THE , COUNTY OF KING, STATE OF WASHINGTON, THE FOLLOWING DID OCCUR:

In the State of Washington on or between March 27, 2017, through November 15, 2018, the Defendants, Marissa Bond and Travis Jackson, co-owners and operators of a cleaning business, committed the crime of employers false reporting or failure to secure payment of compensation for hiring numerous employees and failing to report their hours worked and failing to pay insurance premiums. Further, between October 1, 2017, through August 31, 2018, the Defendants committed the crimes of theft in the second and third degrees for failing to pay 24 employee wages, of which seven workers between $192 and under $750 and seventeen workers between $777 to $3,472, for services they rendered on behalf of the company after promises of pay for their services cleaning homes for Defendants companies.

I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASH NGTON THAT THE FOREGOING IS TRUE AND CORRECT.

9/26/19 Tacoma, WA
DATE AND PLACE
Pierce County

KSTeva Kolmer / AGO
SIGNATURE/AGENCY

REQUEST 72-HOUR RUSH FILE? YES ☒ NO ☐
ANTICIPATED FILING DATE

DRUG CRIME CERTIFICATE

DRUG CRIME CERTIFICATE

Part I: On (DATE) **the suspect** (SUSPECT'S NAME) ☐ **DELIVERED** ☐ **POSSESSED WITH INTENT TO DELIVER/MANUFACTURE** ☐ **POSSESSED what the undersigned officer** (OFFICER'S NAME) **based on training and experience, believes to be (approximate quantity and type of controlled substance)** (QUANTITY AND TYPE OF SUBSTANCE). **Approximate street value of the controlled substance is (value of drug) $.**

Part II: FACTS INDICATING THE SUSPECT ☐ **DELIVERED** ☐ **POSSESSED WITH INTENT TO DELIVER/MANUFACTURE or** ☐ **POSSESSED THE CONTROLLED SUBSTANCE:**

On (date) at (time) within the , County of King, State of Washington,

My source of information about this crime (e.g., myself, other person with firsthand knowledge)

☐ Other Facts:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Date and Place: Signature/Agency:

REQUEST 72-HOUR RUSH FILE? YES ☐ NO ☐	SODA ZONE YES ☐ NO ☐	DRUG FREE ZONE? Exact location is required: YES ☐ NO ☐
ANTICIPATED FILING DATE	LAB WORK REQUESTED? (Date/Type)	

OBJECT TO RELEASE

LAW ENFORCEMENT OBJECT TO RELEASE? YES ☐ **NO** ☒. IF YES, EXPLAIN WHY SAFETY OF INDIVIDUAL OR PUBLIC WILL BE THREATENED IF SUSPECT IS RELEASED ON BAIL OR RECOGNIZANCE (CONSIDER HISTORY OF VIOLENCE, MENTAL ILLNESS, DRUG DEPENDENCY, DRUG DEALING, DOCUMENTED GANG MEMBER, FAILURE TO APPEAR, LACK OF TIES TO COMMUNITY). INCLUDE FARR GUIDELINES. DESCRIBE TYPE OF WEAPON. **BE SPECIFIC.**

TIES TO COMMUNITY (MARITAL STATUS, TIME IN COUNTY, ETC.)

CONVICTION RECORD: N/A

☐ SUBJECT ARMED/DANGEROUS ☐ SUSPECT IDENTITY IN QUESTION ☐ WARRANT(S) FOR FTA

☐ HISTORY OF FTA'S (LIST)

DPA

PREL MINARY APPEARANCE DATE	JUDGE	BAIL AMOUNT $		
RETURN DATE	CONDITIONS	P R. Y / N	RETURNED Y / N	EXCUSED Y / N

FILED
KING COUNTY, WASHINGTON
SEP 30 2019
DEPARTMENT OF
JUDICIAL ADMINISTRATION

STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

STATE OF WASHINGTON, Plaintiff, v. TRAVIS ANDREW JACKSON (AKA TRAVIS ANDREW BURNS), Defendant.	NO. 19-C-06094-4 SEA AFFIDAVIT FOR DETERMINATION OF PROBABLE CAUSE

Kim Triplett-Kolerich, being first duly sworn upon oath deposes and states:

Investigator Training, Experience, and Background:

Your affiant has been employed as an Investigator for the Attorney General's Office (AGO) since September 2014. Since March 2018, I have been a Senior Investigator in the AGO's Financial Crimes Unit (FCU). From September 2014, to February 2018, I was an Investigator in the AGO Medicaid Fraud Control Unit (MFCU).

Prior to joining the AGO, I worked as a Regional Security Manager with Bank of America from 2012, to 2014. There, I became familiar with banking records, including customer account records, signature cards, bank procedures, and state and federal banking laws and regulations.

From 1999, to 2006, I served as a Detective with the Washington State Patrol (WSP). In 2006, I was promoted to the rank of Sergeant. From 1987, to 1999, I served as a WSP State

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Trooper.

While serving as a WSP Detective, I was assigned to the Social Security Administration Office of the Inspector General Fraud Task Force, the Auto Theft Task Force, and the Out of State License Task Force (where I investigated fraudulent out-of-state vehicle registration in which car owners avoided state tax). As a member of the Auto Theft Task Force, I received the National Investigator of the Year award for my work on a complex auto theft and drug distribution investigation. During my assignments to the Auto Theft Task Force and Out of State License Task Force, I became very familiar with WA automobile sales and the auto sales industry.

My education includes a Bachelor's Degree in Law and Justice from Central Washington University and an Associate's Degree in General Studies from Green River Community College. In addition to my education, I have received extensive training in white collar investigations from the AGO, WSP, the National Association of Medicaid Fraud Control Units, the National Attorneys General Training & Research Institute, state, local, and federal tax authorities, and other professional groups.

My training includes forensic interviewing techniques, all levels of financial crimes investigations, and hundreds of hours of training on all types of fraud schemes perpetrated against the State of Washington and the federal government. Because of my education, training, and experience, I am familiar with numerous types of financial documents, including Department of Revenue's Combined Excise Tax Report forms (CETRs), auto sales contracts, auto financing documents, IRS Federal Income Tax Return forms (FITRs), bank account statements, accounting software reports, and other financial records.

As a Senior Investigator with the Washington State Attorney General's Office - Financial Crimes Unit (AGO-FCU), one of my primary responsibilities is the investigation of wage theft on behalf of the Department of Labor and Industries (LNI).

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Seattle, WA 98104
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Investigation:

In June of 2017, LNI started receiving wage complaints from workers of Advanced Cleaning Solutions (ACS) and later, Washington Cleaning Solutions (WCS). Neither business has an LNI industrial insurance account, which is required for companies with employees. On May 30, 2018, the AGO-FCU received a referral to investigate Travis A. Jackson (JACKSON), doing business as ACS, in collaboration with LNI regarding wage theft and industrial insurance employer's false reporting. On June 18, 2018, AGO-FCU received concurrent authority from King County Prosecuting Attorney Daniel T. Satterberg to investigate and conduct any prosecution arising from the investigation of ACS. I was assigned to work the investigation along with LNI Investigator Russell Wood (Investigators).

Based upon the investigation, there is probable cause to believe that Marissa Bond (BOND) and JACKSON, co-owners of ACS/WCS (house cleaning companies), working together as principal or accomplice, in the State of Washington, committed 24 counts of Theft in the Second and Third Degree by failing to pay 24 workers for $192-$3,472 in services rendered (totaling over $33,000 in wages), contrary to RCW 9A.56.040 and .050; and one count of Employers False Reporting or Failure to Secure Payment of Compensation between March 27, 2017, and November 15, 2018, by failing to take out Washington LNI insurance premiums from employee checks, failing to report employee hours worked in Washington, and failing to pay Washington insurance premiums, all contrary to RCW 51.48.020. Each worker reported the following unpaid services rendered and agreed upon rates, in theft value order:

Worker Name	**Dates worked/not pay**	**Hrs wk'd**	**Hrly Pay**	**Value of Services**
Brianna "Brie" Brodahl	2/26/2018 (3 houses)	12	$16	$192
Sadieria Bash	4/23/18 to 4/30/18	25	$16	$400
Christina Pierson	12/4/17 to 12/29/17	28	$16	$448
Deborah Lehman	12/2/17 to12/15/17	39	$16	$624
Lacey Cutitta	6/30/18 to 7/8/18	36	$18	$648

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Brooke Winkler	5/19/18 to 6/16/18	40.5	$16	$648
Briana Daniels	10/23/17 to 12/15/17	45.45	$16	$727
Maleah Fulbright	4/10/18 to 7/11/18	salary	$16	$777.38
Breeanna Clark	5/10/18 to 6/5/18	50	$16	$800
Laura Hiller	2/19/18 to 3/5/18	50.3	$16	$804.80
Brittany Baker	11/21/17 to 12/14/17	52	$16	$840
Natalie Zilverberg	3/1/2018 to 3/31/2018	72	$15	$1,080
Angela Canale	11/3/17 to 11/29/17	70	$16	$1,120
Monique Redding	3/19/18 to 4/17/18	71.5	$16	$1,144
Jeanette Skinner	5/5/18 to 6/17/18	75.5	$17	$1,284.35
Angela Delisle	11/1/17 to 11/30/17	83	$16	$1,328
Regina Yazzie	7/1/18 to 7/27/18	85	$17	$1,445
Alexia Hendricks	6/1/18 to 7/13/18	174.3	$17	$2,019.50
Amanda Armstrong	5/2/18 to 5/30/18	130	$16	$2,080
Sarah Thuston	2/16/18 to 3/31/18	181	$18	$2,499
Christine Mantegna	4/20/18 to 6/19/18	194.5	$16	$2,844
Erika Arreola	6/1/18 to 7/20/18	188	$16	$3,008
Chantelle Jones (Maher)	2/26/18 to 4/19/18	237	$17	$3065
Kristin Psaradelis	10/1/17 to 3/10/18	217	$16	$3,472

Relevant Revised Code of Washington in addition To Theft Under RCW 9A.56:

1) **RCW 49.48.010 Payment of wages due to employee ceasing work to be at end of pay period—Exceptions—Authorized deductions or withholdings.** When any employee shall cease to work for an employer, whether by discharge or by voluntary withdrawal, the wages due him or her on account of his or her employment shall be paid to him or her at the end of the established pay period. Violation of this provision is a misdemeanor (RCW 49.48.020).

2) **RCW 51.48.020 Employer's false reporting or failure to secure payment of compensation—False information by claimants—Unlawful actions—Penalties.** An employer is guilty of a class C felony if the employer, with intent to evade determination and payment of the correct amount of the industrial insurance premiums, knowingly makes misrepresentations regarding payroll or employee hours or if the employer, with intent to evade determination and payment of the correct amount of premiums, knowingly fails to secure payment of compensation under this title or knowingly fails to report the payroll or employee hours related to that employment.

Investigation involved interviews of 35 employees of ACS and WSC, interviews of homeowners, interviews of LNI employees and other civilian witnesses, suspect interviews,

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review of banking records, review of LNI records, and review of public records. The completed investigation revealed the following facts.

Involved Company Business Licenses/Names:

The two businesses involved in this investigation are ACS & WSC. Secretary of State documents show on March 27, 2017, Advanced Services Group LLC, UBI 604106783, was formed doing business as Advanced Cleaning Services LLC (ACS). On April 16, 2018, Washington Cleaning Solutions LLC (WCS), UBI 604271361 was formed. The listed governing parties for both companies are JACKSON and BOND.

Business Structure of ACS/WCS:

JACKSON and BOND were in an intimate relationship when ACS/WCS were operational between March 27, 2017, and August 2018. They lived in an apartment in Auburn, Washington and utilized a business address at a mail forwarding service in King County (akin to a post office or UPS Store). They did not have a business office aside from their apartment. When they met, BOND was working as a house cleaner.

ACS and WCS were house-cleaning businesses owned and operated by BOND and JACKSON. BOND and workers reported that JACKSON ran the business side of the company, while BOND was responsible for the workers, their activities, and scheduling jobs. ACS/WCS employed house cleaners (workers/employees) to clean private homes. Homeowners typically purchased clean services at a standardized rate which generally broke down to an hourly rate of $30-35. The agreed hourly rate for ACS/WCS workers (house cleaners) was $15-17 for cleaning those homes. Workers were not paid for commute time to/from the homes but were supposed to be reimbursed for parking fees for Seattle homes, receive tips and bonuses. Homeowners would pay for the services through an email invoice via Square or prepay via Amazon.

BOND reported they started hiring house cleaners so she and JACKSON could make more money from their house cleaning business. To hire workers for ACS/WCS, JACKSON

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placed employment ads on Facebook and Craigslist. These ads included the rate of pay and details about the job. After the worker contacted them, BOND, or later a hiring manager, arranged to meet with them for a 15-minute interview (approx.), at which most were hired. Workers and BOND reported in the beginning of their business BOND hired, fired, trained, and interacted with workers. Numerous workers reported BOND interviewed them at an Auburn area Starbucks for the cleaner's position. All workers were female per JACKSON's direction. Workers were told they were contract workers per JACKSON's direction. Workers stated BOND required them to use organic, Method brand cleaning supplies to clean the houses ACS/WCS scheduled them to clean. All the workers interviewed indicated they were provided the same type of supplies and equipment to use while cleaning, but most, if paid, were charged $100 from their first three paychecks for the supplies/equipment. All cleaning jobs occurred in Washington along the I-5 corridor but the businesses were operated from BOND and JACKSON's apartment in King County. BOND utilized a business cell phone to text message the workers their assigned jobs, the address/owner name/contact information. Later, BOND opened a Google account and scheduled workers via a shared Google calendar. Workers were required to have a Google account and monitor the shared schedule for their job assignments daily at a minimum.

As the business progressed, JACKSON applied with Amazon Home Services (Amazon) and became a house-cleaning vendor for Amazon. This created an instant increase in work. BOND and JACKSON hired managers to hire new workers, answer the business cell phone, and run supplies to cleaners. JACKSON and BOND trained the managers on how to hire new workers and provided them with the paperwork to give to new workers. BOND also relinquished primary responsibility to train new workers to senior cleaners.

During 2017, through 2018, BOND and JACKSON hired Maleah Fulbright, Sarah Thuston, and Tiffany McKay as managers. Each reported a similar business structure and job responsibilities. Thuston reported BOND hired her on July 19, 2017, she signed hiring

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paperwork on July 22, 2017, and stopped working on March 31, 2018. JACKSON hired Fulbright as a manager for ACS/WCS on April 10, 2018, and she worked until July 11, 2018. Tiffany McKay was interviewed/hired by JACKSON and Fulbright. McKay stated she found the job posting on Facebook and worked for ACS/WCS from approximately July 2018, to the first week of October 2018. Each reported BOND and JACKSON owned and controlled the companies and all of their direction came from BOND and JACKSON. Managers did not handle financial matters. Rather, managers interviewed/hired new workers and managed workers' day-to-day schedules. Each used Google calendars to schedule workers for jobs acquired by JACKSON from Amazon. Primary communication with the workers occurred via the "manager's phone" which was passed between the managers and BOND. Each manager attended JACKSON and BOND's managers meeting held by every two weeks at the Kent Panera Bread in King County, WA.

While the managers were responsible for day-to-day communications, JACKSON would send out emails to workers under his name or under the pen names of "Karen Baker" or "Ann Quinn." Workers were unaware that Baker and Quinn were fictional assistants.

Workers had numerous terms of employment and were required to complete numerous tasks as a condition of their employment. For each house they were scheduled by ACS/WCS to clean, they were required to clock in and out of work via text message, fill out a preprinted checklist of cleaning tasks completed, and send a picture of the completed checklist.

Each worker was told, verbally or in writing, that the pay periods were the 1st of the month to the 15th and then the 16th to the 31st. To be compensated, each worker was required to submit her hours worked for each pay period (akin to a handwritten timesheet). Upon receipt of those hours worked, BOND said she wrote the checks for their pay. BOND reported that the paychecks included worker tips and reimbursements for the parking fees when they cleaned homes in Seattle. In the checks reviewed, BOND's name appeared as the signatory. BOND

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reported JACKSON created the invoice form that was included in the paychecks envelope that outlined how much each worker was paid for hours worked, pay rate, tips, parking reimbursements, deductions and fees. The memo line of each check listed dates of services performed. Checks were mailed via USPS.

After ACS became an Amazon vendor, many business practices changed:

- Shorter employment interviews;
- Move from BOND text messaging job details to BOND/managers placing jobs in the Google calendar appointments;
- Hiring "managers" to interview and track the jobs;
- Many checks no longer were mailed to workers and workers stopped being paid;
- A few workers received checks that were refused for insufficient funds (NSF) in the company's bank account; and
- Managers told to run interference about workers not receiving their paychecks.

Overall, for the first six months ACS was in business, most workers were paid[1]. However by October 2017, except hiring managers, almost all workers were not paid despite an overall increase in the number of house cleaning jobs and new hires. Once the managers expressed concern about the company's failure to pay employees or expressed a desire to leave, ACS stopped paying them. Of the 38 workers/managers that were interviewed, all reported they quit or were fired because they did not get their paychecks, expressed concern about not getting paid and/or tried repeatedly to be paid. Some workers filed wage complaints with LNI.

Hiring Paperwork:

When hired, some of the workers were given a hiring packet to sign. The hiring packet primarily contained conditions of their employment, pay period information and a "Company Acknowledgment Agreement." Workers given hiring packets were required to sign and return those hiring packet. While some workers maintained and provided copies of their hiring packets,

[1]Three other workers filed wage complaints pre October 2017 (in June - July 2017), but each was paid in full after BOND/JACKSON were contacted by LNI.

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others signed and returned the packet to BOND or a hiring manager without retaining a copy. Not all workers reported they read or understood the materials in the packet.

The conditions of employment in the "Company Acknowledgement Agreement" varied but included pay periods as well as rules workers had to follow. Sanctions for noncompliance with rules included monetary penalties (often $5,000) and termination of employment. Rules included ensuring no bad reviews were posted online, no complaining about not receiving payment for services performed, not taking too many sick days, and failing to appear at a scheduled job (regardless of payment status). For example, Manager Sarah Thuston's July 2017 Company Acknowledgement Agreement said:

> I understand that when I'm working for the company, I am representing the company . . . I understand that if I do not give a 2-week notice when terminating my work with the company, I will forfeit all tips and bonuses from all remaining pay periods . . . I acknowledge that I must follow the company policies and procedures at all times. I understand all of the company policies and agree to abide by them. I agree that my service with Advanced Cleaning Services can be terminated at any time, for any reason.

Further, it stated:

> I acknowledge that my paydays are on the 7th and 22nd of each month. I understand that my check for the 7th will include all work completed from the 16th to the last day of the month, and my check for the 22nd will include all the work completed from the 1st to the 15th. I understand that checks are mailed out on or around the paydays.

Worker Erika Arreola's January 2018 agreement read:

> Pay: I acknowledge that because of my status as an independent contractor, I do not have specific or determined paydays. I understand that my pay is considered an invoice and the company mails out checks to pay independent contractor invoices around the 10th of each month (for work completed from the 16th to the last day of the month) and around the 25th of each month (for work completed from the 1st to the 15th day of the month). I understand that checks are mailed out through regular postal mail and will not be delivered to me in person. I acknowledge that I should receive 2 checks each month, sent out about 2 weeks apart, regardless of the date. I acknowledge that I will not have taxes deducted from my earnings, as detailed in the "Independent Contractor - Agreement," which I have signed. I understand that any tips that I receive from clients will be accepted in person and will not be included with the checks that I receive from the company. **I agree that I will not make inquiries, question, or harass the company or its representatives at any time about my checks and when they will be received. I understand that if I refuse to work because I haven't**

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(206) 464-6430

received a check then I will be terminated immediately. I acknowledge that if the company suffers a financial loss due to my refusal of work, my check will have deductions for the amount that was lost from each specific cleaning, which can cause my check to be held by the company. (Emphasis added)

Unpaid Wages and Attempts To Get Paid:

Each worker reported she alerted a manager(s) and/or owner(s) that she was not paid for the services she rendered. Often workers first went to the managers about not receiving payment for their services. Managers relayed the messages about nonpayment of wages to BOND and JACKSON. However, in lieu of payment, BOND and JACKSON directed managers how to respond to workers. For example, BOND and JACKSON usually instructed Fulbright to tell cleaners "the check is in the mail" or "the check was coming." Some workers emailed JACKSON directly requesting to be paid or called/texted BOND's personal cell phone. When unpaid workers texted BOND or the "manager's phone" demanding to be paid, workers reported that they were ignored, told the check is in the mail, or told they asked too many times and therefore were fired. Many workers reported they begged to no avail on text or voicemails about not having enough money to buy food or gas to keep going to the jobs after not having been paid for two pay cycles (a full month). Some reported they lost their own housing because they were not paid and thereby not able to pay rent. Typically, these pleas for payment for services rendered were ignored.

Eventually, the texts between the workers and BOND or JACKSON became personal, aggressive, punitive, and threatening. For example, worker Chantelle Jones reported, and provided, four threatening voicemails from JACKSON, using an "unknown number," wherein he yelled and degraded her about her work ethic. He blamed her for the company receiving bad online reviews because she posted online that she was not paid. He stated that he was not going to pay her even though he knows he has to pay her. At times, when workers complained about late payment, BOND and JACKSON would invoke threatening language from their Company Acknowledgement Agreement about suing the worker for $5,000. Some of the workers were

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(206) 464-6430

promised pay if they met and returned the equipment. However, attempts to meet were rebuffed. Many workers retained these text messages, which were subsequently photographed or otherwise reproduced as evidence. Ultimately, when these texts and emails produced no results, the workers reported they realized they were not going to be paid, so they stopped working.

NSF Check Writing:

Four former workers, Ristine, Fulbright, Alexia Hendricks (Hendricks), and Briana Daniels (Daniels), reported they were each given at least one check that was returned/unable to be cashed due to NSF. Daniels reported she worked from October 23, 2017, to December 18, 2017. She received three valid checks prior to her last check, which was NSF. She never received any other checks for her final work. Ristine reported she worked for ACS from June 6, 2017, to July 3, 2017. Ristine reported she received three valid checks, her last check was NSF, and she never received any other checks from the company. Fulbright reported on July 11, 2018, she attempted to cash two checks at the bank listed on her WCS check but the teller told her the smaller, $380 check, was valid but the $777 check could not be cashed due to insufficient funds. Hendricks also reported on August 13, 2018, that she received an NSF check from WCS (copy of check provided). Hendricks stated her first day of work was May 8, 2018.

Financials/Search Warrants:

Workers and witnesses told investigators they believed JACKSON and BOND received payment for the housekeeping services in two ways: payments from Amazon Home Services (Amazon) and payments from private homeowner customers who paid through Square online payments. Workers reported they were not allowed to accept direct payment for their services. Paperwork for ACS instructed clients to pay via Square. The information, provided by Erika Arreola's hiring packet, stated the business "only accepts debit and credit cards online through Square" and outlined payment terms as follows:

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> Recurring cleaning invoices are emailed through Square on the day of the cleaning service. Payments are due within 24 hours of receiving an invoice. Any payment not received within that time can be subject to a $5.00 daily late fee. Late fees accrue *every* day until *an* invoice is paid. Email reminders are sent each day until payments are received. Payments can be charged automatically on the 2nd day after service is provided. All invoices that are 10 days past due can be sent to collections. The client agrees to pay any collection, attorney, or courts costs if required to secure payment of any invoice.

One homeowner and customer of ACS and WCS forwarded the emails she received from ACS/WCS to investigators. That invoice directed the homeowner to pay the invoice within a week via an embedded Square pay hyperlink.

Investigators contacted Amazon legal department and it provided information that ACS/WCS was paid periodically for the services booked through them. Amazon reported retaining all information regarding its payments to companies, arrangements for payment, and the signed contracts.

Search warrants were authorized for ACS/WCS signature cards and all deposits and debits into and out of ACS/WCS accounts for the following entities: 1) Columbia Bank, 2) Chase Bank, 3) Square, and 4) Amazon Homes Services. Each provided responsive materials.

The Amazon detailed records were reviewed and investigators found during the timeframe the workers were not paid for services rendered, October 2017, through July 2018, Amazon deposited 26 payments totaling $110,149.45 into JACKSON/BONDS Chase Bank account ending in #935.

Square records showed 11 deposits between October 2017, through July 2018, to ACS/WCS totaling $90,454.50. The overall total income from March 2017, through August 2018, to the Square account was $354,744.95. The information from Square provides limited detail and did not include associated invoices for each payment.

The chart below shows deposits from Amazon and Square into bank accounts controlled by BOND/JACKSON during the period workers were not paid.

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	Amazon Deposits	Square Deposits	Total per month
Oct-17	$11,512.07	$18,933.50	$30,445.57
Nov-17	$32,919.97	$14,432.00	$47,351.97
Dec-17	$12,504.62	$13,325.00	$25,829.62
Jan-18	$5,963.03	$11,720.50	$17,683.53
Feb-18	$7,155.61	$6,780.50	$13,936.11
Mar-18	$5,164.03	$11,532.00	$16,696.03
Apr-18	$2,159.97	$8,169.00	$10,328.97
May-18	$17,199.68	$3,258.00	$20,457.68
Jun-18	$11,767.42	$864.00	$12,631.42
Jul-18	$3,803.05	$571.00	$4,374.05
Aug-18		$869.00	$869.00
Grand Total:	$110,149.45	$90,454.50	**$200,603.95**

By comparison, the chart below shows deposits from Amazon and Square into bank accounts controlled by BOND/JACKSON during the period workers were typically paid (March 2017-Sept. 2017) immediately prior to workers not typically paid (Oct. 2017-Aug. 2018).

MONTH	YEAR	AMOUNT
March	2017	$14,292.50
April	2017	$23,377.20
May	2017	$23,305.50
June	2017	$20,879.00
July	2017	$37,189.50
August	2017	$16,623.50
Sept	2017	$17,573.30
	TOTAL	$153,241

Columbia and Chase Bank accounts in BOND and JACKSON's names were reviewed. These records show deposits from Square and Amazon into accounts under BOND and JACKSON's name. No extraordinary business expenses were noted, rather only minimal possible business overhead (exclusive of salaries) of approximately 77 items totaling $5,634.55 such as cleaning supplies and employee ads. Each account reviewed showed a comingling of both business and numerous personal expenditures.

Employers False Reporting or Failure To Secure Payment of Compensation:

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LNI records show BOND and JACKSON did not report employee hours to LNI, pay industrial insurance for their employees, nor open an industrial insurance account, all in criminal violation of Chapter 51 RCW.

Payroll:

Review of search warrants materials for ACS/WCS checking accounts at Chase Bank and Columbia Bank show payroll checks. Both bank accounts listed BOND and JACKSON as signers of the accounts. The records show the Columbia Bank account was used for payroll from June 4, 2017, through its suspension (due to excessive overdraws) with a final payroll check on April, 8, 2018. Records show that between March 20, 2018, and June 29, 2018, payroll was paid, at least in part, through the Chase account. Based on these bank records (primarily check images that including the name of the employee, amount paid, and dates worked) the following quarterly paid payroll information was derived:

Income VS. Workers Pay				
Time Frame	Number of Paid Employees	Paid to Workers	Income: Square Plus Amazon	Income Minus Paid Employees
2 Q 2017	17	$19,126.00	$67,561.70	$48,435.70
3 Q 2017	23	$21,777.12	$71,386.30	$49,609.18
4 Q 2017	28	$42,916.50	$103,627.16	$60,710.66
1 Q 2018	18	$17,056.00	$48,315.67	$31,259.67
2 Q 2018	11	$16,746.80	$43,418.07	$26,671.27
3 Q 2018	0	$0.00	$5,243.05	$5,243.05
TOTALS		$117,622.42	$339,551.95	**$221,929.53**

Worker interviews and wage claims show additional employee hours worked at least between the third quarter of 2017, through the third quarter of 2018. Again, no employee hours, paid or unpaid, were reported to LNI. Per LNI rules, quarterly reports and payments are due by the end of the month following the quarter (i.e., the 1st quarter report, January 1 – March 31, is due by April 30). This information is available to the public and on LNI's website. Per

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JACKSON's previous interactions with LNI and through voicemails he left, it is apparent JACKSON was aware of how and when LNI insurance premiums must be reported and paid.

According to the Washington State Department of Revenue (DOR) and LNI, JACKSON has owned or been a governor in twenty (20) Washington businesses since October 2004. JACKSON has demonstrated his knowledge that as a business owner he is required to pay industrial insurance premiums. For example, between 2005-2008, Jackson owned and operated A-Team Security, LLC. He had an industrial insurance account and timely submitted quarterly reports. In 2008, JACKSON faxed a letter to LNI stating the company no longer had employees as of March 31, 2008, requested the industrial insurance account be closed, and reported, "If we happen to hire employees again, we will start up a new account."

Further, since 2004, JACKSON has had numerous wage complaints filed against his companies and LNI documented numerous times throughout those investigations where LNI educated JACKSON regarding when industrial insurance premiums must be paid by an employer. For example in 2011, LNI received wage complaints from employees of Paradise Café, a JACKSON owned business. LNI audited the business and found JACKSON underreported 889 work hours and six workers. Jackson declined to participate in the audit, but was mailed a preliminary audit findings letter and information on mandatory reporting of workers.

In this case, ACS/WCS was contacted by LNI about the failure to pay wages and failure to set up an insurance account between March 2017, and December 2018. All of the contacts regarding ACS and WCS were with JACKSON. JACKSON's typical response to LNI was to indicate he was too busy to deal with the wage theft complaints and that the workers were lying. He also indicated he knew the LNI rules and insisted the complainants were all independent contractors. According to LNI, they documented these contacts with JACKSON using a system called the Automated Compliance System. LNI employees are trained to confirm the identity of

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the person they are speaking with to ensure that they are authorized to speak to LNI on behalf of the corporation. LNI employees make entries summarizing phone calls, emails, and other contacts with the company owners. LNI Automated Compliance System records show each contact with JACKSON by LNI was documented in this manner.

Independent Contractor vs. Employee:

The facts discovered by investigation show that each ACS/WCS worker was an employee, not an independent contractor. As indicated above, when each worker was hired she was told she was a contract employee and directed to sign and return a hiring packet. However, despite what the workers were told by ACS/WCS, the conditions of their employment do not meet the independent contractor test. Only one worker had her own registered businesses, only one was licensed bonded or insured, none set or adjusted their own schedules, each was paid hourly, each reported her hours to ACS/WCS, all were engaged in the company business of cleaning, and they did not maintain separate books outside of ACS/WCS.

JACKSON and BOND were aware of the requirements for a worker to be an independent contractor. Each was familiar with their hiring packet provided to many of the ACS/WCS workers, which included a LNI document commonly found on LNI's website as part of the Workers' Compensation Record Keeping and Reporting Guide, titled "Independent Contractors." This document contains the 7-step checklist employers can use as a guide to determine if they are hiring someone as an employee or an independent contractor, derived from RCW 51.08.195.

The next page of the hiring packet was a document titled "Washington Cleaning Service Company Acknowledgment Agreement." This document outlined Performance Requirements, Supplies, Pay, End of Service, and Clients. The Performance Section stated the worker is "working for the company" and "representing the company." The third page of the packet is the "Independent Contractor Agreement." That page attempts to establish the employees as

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independent contractors. The page lists RCW 51.08.195 and claims that the workers meet the "six part test" in that code section which, if met, would exempt them from mandatory industrial insurance coverage. The six parts of the test are as follows:

> (1) The individual has been and will continue to be free from control or direction over the performance of the service, both under the contract of service and in fact; and
> (2) The service is either outside the usual course of business for which the service is performed, or the service is performed outside all of the places of business of the enterprise for which the service is performed, or the individual is responsible, both under the contract and in fact, for the costs of the principal place of business from which the service is performed; and
> (3) The individual is customarily engaged in an independently established trade, occupation, profession, or business, of the same nature as that involved in the contract of service, or the individual has a principal place of business for the business the individual is conducting that is eligible for a business deduction for federal income tax purposes; and
> (4) On the effective date of the contract of service, the individual is responsible for filing at the next applicable filing period, both under the contract of service and in fact, a schedule of expenses with the internal revenue service for the type of business the individual is conducting; and
> (5) On the effective date of the contract of service, or within a reasonable period after the effective date of the contract, the individual has established an account with the department of revenue, and other state agencies as required by the particular case, for the business the individual is conducting for the payment of all state taxes normally paid by employers and businesses and has registered for and received a unified business identifier number from the state of Washington; and
> (6) On the effective date of the contract of service, the individual is maintaining a separate set of books or records that reflect all items of income and expenses of the business which the individual is conducting.

Since no ACS/WCS worker satisfied all criteria, the company hired workers, not contractors, and industrial insurance was mandatory. Most notably, no worker was free from "control or direction over the performance of the service, both under contract of service and in fact." Rather, each was under the control and direction of ACS/WCS. Further, only one of the 38 workers interviewed had his/her own separate business. Since they do not pass the independent contractor test, each worker was a covered worker or employee of ACS-WCS.

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Interview/Messages From BOND and JACKSON:

Investigators left business cards at the most current address found for BOND. She reached out and agreed to be interviewed at the Everett LNI office on March 21, 2019. She reported she was no longer with JACKSON. However, she reported she spoke with him prior to the interview and he told her to either not answer the questions or to give answers that he provided to her over the phone. She indicated he wanted her to lie about everything. She also stated he asked her to call him back after the interview to tell him what information was sought.

She reported she met JACKSON on Facebook and he is much older than she was and, because he had owned so many businesses, she relied on him for all the business advice she received. When showed Secretary of State documents that she was an owner of both ACS and WCS, she began to cry and said she did not know she was an owner and said she did not authorize him to create any business using her name. Workers and managers reported BOND held herself out as an owner. BOND reported she worked full-time cleaning homes and hiring people. BOND admitted she signed checks but reported JACKSON controlled when they were mailed. She said they argued about some business practices but she portrayed herself as having no knowledge of any of their personal or business finances or how many workers were not being paid. BOND acknowledged she knew some workers were not paid. She believed the business was making a profit. She acknowledged making purchases with her debit card from the business account. BOND was shown some checks written to other JACKSON-owned businesses and she said she had no idea checks were being written to those other business accounts. She indicated JACKSON told her about the LNI independent contractor information but later in the interview agreed they were (covered) workers since they could not answer affirmatively to the independent contractor test about command and control.

On Sunday, March 31, 2019, less than a week after we interviewed BOND, I received 11

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successive voice mails[2] from JACKSON on my state-owned work cell. The first one came in 9:33 p.m. and the last one started at 10:06 p.m., from "Unknown Caller." JACKSON stated his companies, ACS and WCS, do not exist anymore but admitted he did own them. He stated he did not run the day-to-day operations and BOND was the "face of the company." He stated his company did nothing wrong, it was not thriving, and called it "a little business." He said he had all the employees sign the independent contractor's agreement and he read out loud the 7-step independent contractor test. He stated he has owned companies for 20 years. He stated it was the workers' fault they did not get paid due to their actions and because LNI took "close to $2,000" from their account.

Conclusion:

Based upon the foregoing, there is probable cause to believe JACKSON and BOND, as principal or accomplice, committed the offenses of Theft in the Second Degree (17 acts), Theft in the Third Degree (8 acts), and Employers False Reporting or Failure to Secure Payment of Compensation.

I certified under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED 26th day of September, 2019.

KIM TRIPLETT-KOLERICH
Senior Investigator, Criminal Litigation Unit
Office of the Attorney General

[2] Voicemails recorded to my stated-owned work cell have a time limit.

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Criminal Justice Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-6430