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**STATE OF WASHINGTON
CHELAN COUNTY SUPERIOR COURT**

THE STATE OF WASHINGTON,

Plaintiff,

v.

TIMOTHY POWELL, an individual,
and A1 ASBESTOS, LLC, a
Washington Limited Liability
Company,

Defendants.

NO.

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 Douglas Shae, Chelan County Prosecuting Attorney, hereby allege that TIMOTHY POWELL, did commit the following crimes:

COUNT I – OFFERING A FALSE INSTRUMENT FOR FILING OR RECORD

On or about October 28, 2014, in the State of Washington, Chelan County, TIMOTHY POWELL and A1 ASBESTOS, LLC, a Washington Limited Liability Company, did knowingly procure or offer a false or forged instrument, to wit: Okanogan County Central Landfill Asbestos Waste Shipment Record dated October 28, 2014, to be filed, registered, or recorded in a public office, which instrument, if genuine, might be filed, registered or recorded in such office under law of this state; contrary to RCW 9A.08.030, and RCW 40.16.030, and against the peace and dignity of the State of Washington. (Class C Felony with a maximum

1 penalty of five years in prison and/or a \$5,000 fine pursuant to RCW 40.16.030, plus
2 restitution, cost of prosecution and assessments)

3 **COUNT II - OFFERING A FALSE INSTRUMENT FOR FILING OR RECORD**

4 On or about October 29, 2014, in the State of Washington, Chelan County, TIMOTHY
5 POWELL and A1 ASBESTOS, LLC, a Washington Limited Liability Company, did
6 knowingly procure or offer a false or forged instrument, to wit: Okanogan County Central
7 Landfill Asbestos Waste Shipment Record dated October 29, 2014, to be filed, registered, or
8 recorded in a public office, which instrument, if genuine, might be filed, registered or recorded
9 in such office under law of this state; contrary to RCW 9A.08.030, and RCW 40.16.030, and
10 against the peace and dignity of the State of Washington. (Class C Felony with a maximum
11 penalty of five years in prison and/or a \$5,000 fine pursuant to RCW 40.16.030, plus
12 restitution, cost of prosecution and assessments)

13 **COUNT III - OFFERING A FALSE INSTRUMENT FOR FILING OR RECORD**

14 On or about August 18, 2014, in the State of Washington, Chelan County,
15 TIMOTHY POWELL and A1 ASBESTOS, LLC, a Washington Limited Liability Company,
16 did knowingly procure or offer a false or forged instrument, to wit: Department of Labor and
17 Industries Notice of Asbestos Abatement Project re: Quincy Manor, 201 D St. SW, to be filed,
18 registered, or recorded in a public office, which instrument, if genuine, might be filed,
19 registered or recorded in such office under law of this state; contrary to RCW 9A.08.030, and
20 RCW 40.16.030, and against the peace and dignity of the State of Washington. (Class C
21 Felony with a maximum penalty of five years in prison and/or a \$5,000 fine pursuant to
22 RCW 40.16.030, plus restitution, cost of prosecution and assessments)

23 **COUNT IV - OFFERING A FALSE INSTRUMENT FOR FILING OR RECORD**

24 On or about September 21, 2014, in the State of Washington, Chelan County,
25 TIMOTHY POWELL and A1 ASBESTOS, LLC, a Washington Limited Liability Company,
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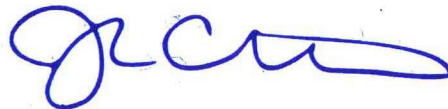
1 did knowingly procure or offer a false or forged instrument, to wit: Department of Labor and
2 Industries Notice of Asbestos Abatement Project re: Lake Valley Baptist Church, 935 Valley
3 Road, to be filed, registered, or recorded in a public office, which instrument, if genuine, might
4 be filed, registered or recorded in such office under law of this state; contrary to
5 RCW 9A.08.030, and RCW 40.16.030, and against the peace and dignity of the State of
6 Washington. (Class C Felony with a maximum penalty of five years in prison and/or a \$5,000
7 fine pursuant to RCW 40.16.030, plus restitution, cost of prosecution and assessments)

8 **COUNT V - FORGERY**

9 On or about and between April 1, 2015 and April 30, 2015, in the State of Washington,
10 Chelan County, TIMOTHY POWELL and A1 ASBESTOS, LLC, a Washington Limited
11 Liability Company, with intent to injure or defraud, did falsely make, complete or alter a
12 written instrument, and/or did possess, utter, offer, dispose of, or put off as true a written
13 instrument which it knew to be forged, said instrument being an Grant County Landfill
14 Asbestos Waste Shipment Record dated April 20, 2015; contrary to Revised Code of
15 Washington 9A.60.020(1). (Class C Felony with a maximum penalty of five years in prison
16 and/or a \$5,000 fine pursuant to RCW 9A.60.020, plus restitution, cost of prosecution and
17 assessments)

18 DATED this 28 day of December, 2016.

19 ROBERT W. FERGUSON
20 Attorney General

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22 JOSHUA CHOATE, WSBA # 30867
23 Assistant Attorney General
24 Attorney for Plaintiff
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