



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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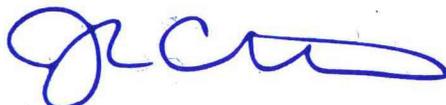
1 did knowingly procure or offer a false or forged instrument, to wit: Department of Labor and  
2 Industries Notice of Asbestos Abatement Project re: Lake Valley Baptist Church, 935 Valley  
3 Road, to be filed, registered, or recorded in a public office, which instrument, if genuine, might  
4 be filed, 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  
20 ROBERT W. FERGUSON  
Attorney General

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