



IN THE DISTRICT COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF MASON

STATE OF WASHINGTON,	)	NO. <b>PA14066</b>
Plaintiff,	)	
	)	<b>CRIMINAL COMPLAINT</b>
vs.	)	
	)	Unlawful Hydraulic Project Activities
<b>WILLIAM KENNETH CAYO,</b>	)	RCW 77.55.300; Unlawful Shoreline Activity
	)	RCW 90.58.220
Defendant.	)	Unlawful Water Pollution-RCW 90.48.140
_____	)	

I, Robert 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 Michael K. Dorcy, Mason County Prosecuting Attorney, do accuse WILLIAM KENNETH CAYO, of the crimes of: Unlawful Hydraulic Project Activities (1 count); Unlawful Shoreline Activity (1 count); and Unlawful Water Pollution (1 count), committed as follows:

**UNLAWFUL HYDRAULIC PROJECT ACTIVITIES – RCW 77.15.300**

On or about the period beginning with 1<sup>st</sup> through 9th days of February, 2013, in the County of Mason, State of Washington, the above-named Defendant did construct a form of hydraulic project or perform other work on a hydraulic project and did fail to have a hydraulic project approval required under Chapter 77.55 RCW for such construction or work; contrary to Revised Code of Washington 77.15.300(1).

(Maximum Penalty - 364 days in jail or \$5,000 fine, or both pursuant to RCW 77.15.300(2) and RCW 9.92.020, plus restitution, assessments and court costs.)

**UNLAWFUL SHORELINE ACTIVITY – RCW 90.58.220**

On or about the period beginning with 1<sup>st</sup> through 9th days of February, 2013, in the County of Mason, State of Washington, the above-named Defendant did engage in activities on the shorelines of the state, to wit: the Tahuya River, in violation of the provisions of RCW Chapter 90; or of a master program, to wit: The Mason County Shoreline Master Program; rule

or regulation pursuant thereto, to wit: Chapter 174-27 Washington Administrative Code (WAC);  
contrary to Revised Code of Washington 90.58.220.

(Maximum Penalty - 90 days in jail or \$1,000 fine, or both pursuant to RCW 90.58.220, plus  
restitution, assessments and court costs.)

**UNLAWFUL WATER POLLUTION – RCW 90.48.140**

On or about the period beginning with 1<sup>st</sup> through 9th days of February, 2013, in the  
County of Mason, State of Washington, the above-named Defendant did throw, drain, run, or  
otherwise discharge, or did cause, permit, or allow to be discharged, into the waters of this state  
organic or inorganic matter that causes or tends to cause pollution of such waters; to wit: soil and  
gravel, contrary to Revised Code of Washington 90.48.080 and contrary to Revised Code of  
Washington 90.48.140.

(Maximum Penalty - 364 days in jail or \$10,000 fine, or both pursuant to RCW 90.48.140, plus  
restitution, assessments and court costs.)

DATED this 29 day of October, 2014.

ROBERT W. FERGUSON,  
Attorney General

  
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WILLIAM SHERMAN, WSBA #29365  
Assistant Attorney General

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