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KING COUNTY  
SUPERIOR COURT CLERK  
SEATTLE, WA

STATE OF WASHINGTON  
KING COUNTY SUPERIOR COURT

STATE OF WASHINGTON,  
Plaintiff,

v.

SAM AARON ADAMS, and;  
DANA LYNN SARGENT,  
Defendants.

NO. 15-C-00888-5-SEA  
NO. 15-C-00889-3-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 and Mr. Mark Lindquist, Pierce County Prosecuting Attorney, do accuse SAM AARON ADAMS and DANA LYNN SARGENT of the crimes of: Theft in the First Degree (5 counts), Theft in the Second Degree (3 counts), Filing a False or Fraudulent Tax Return (4 counts) and Theft in the Third Degree (9 counts) committed as follows:

**COUNT I.**

I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS and DANA LYNN SARGENT of the crime of **Theft in the First Degree**, based on a series of acts connected together with another crime charged herein, and which crimes were so closely

1 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
2 one charge from proof of the other, committed as follows:

3 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
4 County, State of Washington, on or between **January 7, 2013** through **December 30, 2013**, in  
5 a series of transactions which are part of a criminal episode or a common scheme or plan, did  
6 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
7 in RCW 9.41.010, to-wit: sales tax monies collected by Lincoln Plaza Athletic Club, LLC and  
8 held in trust for the Washington State Department of Revenue, of an aggregate value exceeding  
9 \$5,000, with intent to deprive such other of such property and/or the defendant, SAM AARON  
10 ADAMS and/or DANA LYNN SARGENT, was an accomplice in the commission of said  
11 crime(s); and the crime was aggravated by the following circumstances: the crime was a major  
12 economic offense or series of offenses due to the following factors: 1) the current offense  
13 involved attempted or actual monetary loss substantially greater than typical for the offense,  
14 2) the crime involved a high degree of sophistication and planning, 3) the defendant used a  
15 position of trust, confidence, and fiduciary responsibility to facilitate the commission of the  
16 crime, as provided by RCW 9.94A.535(3)(d) and contrary to RCW 9A.56.030(1)(a),  
17 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of the State of Washington.  
18 (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to RCW 9A.56.030,  
19 9A.20.021(1)(b)).

## 20 COUNT II.

21 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
22 and DANA LYNN SARGENT of the crime of **Theft in the First Degree**, based on a series of  
23 acts connected together with another crime charged herein, and which crimes were so closely  
24 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
25 one charge from proof of the other, committed as follows:

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1 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
2 County, State of Washington, on or between **December 14, 2012** through **December 31, 2013**,  
3 in a series of transactions which are part of a criminal episode or a common scheme or plan,  
4 did wrongfully obtain or exert unauthorized control over property, other than a firearm, as  
5 defined in RCW 9.41.010, to-wit: sales tax monies collected by West Seattle Athletic Club  
6 LLC and held in trust for the Washington State Department of Revenue, of an aggregate value  
7 exceeding \$5,000, with intent to deprive such other of such property and/or the defendant,  
8 SAM AARON ADAMS and/or DANA LYNN SARGENT, was an accomplice in the  
9 commission of said crime(s); and the crime was aggravated by the following circumstances:  
10 the crime was a major economic offense or series of offenses due to the following factors:  
11 1) the current offense involved attempted or actual monetary loss substantially greater than  
12 typical for the offense, 2) the crime involved a high degree of sophistication and planning,  
13 3) the defendant used a position of trust, confidence, and fiduciary responsibility to facilitate  
14 the commission of the crime, as provided by RCW 9.94A.535(3)(d) and contrary to  
15 RCW 9A.56.030(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
16 the State of Washington. (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to  
17 RCW 9A.56.030, 9A.20.021(1)(b)).

18 **COUNT III.**

19 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
20 and DANA LYNN SARGENT of the crime of **Theft in the First Degree**, based on a series of  
21 acts connected together with another crime charged herein, and which crimes were so closely  
22 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
23 one charge from proof of the other, committed as follows:

24 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
25 County, State of Washington, on or between **January 1, 2014** through **October 24, 2014**, in a  
26 series of transactions which are part of a criminal episode or a common scheme or plan, did

1 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
2 in RCW 9A.01.010, to-wit: sales tax monies collected by West Seattle Club, LLC and held in  
3 trust for the Washington State Department of Revenue, of an aggregate value exceeding  
4 \$5,000, with intent to deprive such other of such property and/or the defendant, SAM AARON  
5 ADAMS and/or DANA LYNN SARGENT, was an accomplice in the commission of said  
6 crime(s); and the crime was aggravated by the following circumstances: the crime was a major  
7 economic offense or series of offenses due to the following factors: 1) the current offense  
8 involved attempted or actual monetary loss substantially greater than typical for the offense,  
9 2) the crime involved a high degree of sophistication and planning, 3) the defendant used a  
10 position of trust, confidence, and fiduciary responsibility to facilitate the commission of the  
11 crime, as provided by RCW 9A.01.035(3)(d) and contrary to RCW 9A.01.030(1)(a),  
12 9A.01.020(1)(a), and 9A.01.020 and against the peace and dignity of the State of Washington.  
13 (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to RCW 9A.01.030,  
14 9A.01.021(1)(b)).

#### 15 COUNT IV.

16 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
17 and DANA LYNN SARGENT of the crime of **Theft in the First Degree**, based on a series of  
18 acts connected together with another crime charged herein, and which crimes were so closely  
19 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
20 one charge from proof of the other, committed as follows:

21 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
22 County, State of Washington, on or between **September 1, 2012** through **October 24, 2014**, in  
23 a series of transactions which are part of a criminal episode or a common scheme or plan, did  
24 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
25 in RCW 9A.01.010, to-wit: unemployment insurance premiums owed to the Washington State  
26 Employment Securities Department, of an aggregate value exceeding \$5,000, with intent to

1 | deprive such other of such property and/or the defendant, SAM AARON ADAMS and/or  
2 | DANA LYNN SARGENT, was an accomplice in the commission of said crime(s) and contrary  
3 | to RCW 9A.56.030(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
4 | the State of Washington. (Maximum penalty: 10 years and/or a \$20,000 fine, pursuant to  
5 | RCW 9A.56.030, 9A.20.021(1)(b)).

6 | **COUNT V.**

7 | I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
8 | and DANA LYNN SARGENT of the crime of **Theft in the First Degree**, based on a series of  
9 | acts connected together with another crime charged herein, and which crimes were so closely  
10 | connected in respect to time, place, and occasion that it would be difficult to separate proof of  
11 | one charge from proof of the other, committed as follows:

12 | That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
13 | County, State of Washington, on or between **October 1, 2013** through **October 24, 2014**, in a  
14 | series of transactions which are part of a criminal episode or a common scheme or plan, did  
15 | wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
16 | in RCW 9A.10.010, to-wit: insurance premiums owed to AETNA Insurance Company, of an  
17 | aggregate value exceeding \$5,000, with intent to deprive such other of such property and/or the  
18 | defendant, SAM AARON ADAMS and/or DANA LYNN SARGENT, was an accomplice in  
19 | the commission of said crime(s) and contrary to RCW 9A.56.030(1)(a), 9A.56.020(1)(a), and  
20 | 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty:  
21 | 10 years and/or a \$20,000 fine, pursuant to RCW 9A.56.030, 9A.20.021(1)(b)).

22 | **COUNT VI.**

23 | I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
24 | and DANA LYNN SARGENT of the crime of **Theft in the Second Degree**, based on a series  
25 | of acts connected together with another crime charged herein, and which crimes were so  
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1 closely connected in respect to time, place, and occasion that it would be difficult to separate  
2 proof of one charge from proof of the other, committed as follows:

3 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
4 County, State of Washington, on or about **January 15, 2014**, did wrongfully obtain or exert  
5 unauthorized control over property, other than a firearm, as defined in RCW 9.41.010, to-wit:  
6 wages earned by Nick Dalbey, of an aggregate value exceeding \$750, with intent to deprive  
7 such other of such property and/or the defendant, SAM AARON ADAMS and/or DANA  
8 LYNN SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
9 RCW 9A.56.040(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
10 the State of Washington. (Maximum penalty: 5 years and/or a \$10,000 fine, pursuant to  
11 RCW 9A.56.040, 9A.20.021(1)(c)).

12 **COUNT VII.**

13 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
14 and DANA LYNN SARGENT of the crime of **Theft in the Second Degree**, based on a series  
15 of acts connected together with another crime charged herein, and which crimes were so  
16 closely connected in respect to time, place, and occasion that it would be difficult to separate  
17 proof of one charge from proof of the other, committed as follows:

18 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
19 County, State of Washington on or between **October 15, 2013** through **November 2, 2013**, in  
20 a series of transactions which are part of a criminal episode or a common scheme or plan, did  
21 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
22 in RCW 9.41.010, to-wit: wages earned by Stephanie Ponder, of an aggregate value exceeding  
23 \$750, with intent to deprive such other of such property and/or the defendant, SAM AARON  
24 ADAMS and/or DANA LYNN SARGENT, was an accomplice in the commission of said  
25 crime(s) and contrary to RCW 9A.56.040(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against  
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1 the peace and dignity of the State of Washington. (Maximum penalty: 5 years and/or a \$10,000  
2 fine, pursuant to RCW 9A.56.040, 9A.20.021(1)(c)).

3 **COUNT VIII.**

4 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
5 and DANA LYNN SARGENT of the crime of **Theft in the Second Degree**, based on a series  
6 of acts connected together with another crime charged herein, and which crimes were so  
7 closely connected in respect to time, place, and occasion that it would be difficult to separate  
8 proof of one charge from proof of the other, committed as follows:

9 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
10 County, State of Washington on or between **December 16, 2013** through **December 31, 2013**,  
11 in a series of transactions which are part of a criminal episode or a common scheme or plan,  
12 did wrongfully obtain or exert unauthorized control over property, other than a firearm, as  
13 defined in RCW 9A.10.010, to-wit: wages earned by Daryl Wallace, of an aggregate value  
14 exceeding \$750, with intent to deprive such other of such property and/or the defendant, SAM  
15 AARON ADAMS and/or DANA LYNN SARGENT, was an accomplice in the commission of  
16 said crime(s) and contrary to RCW 9A.56.040(1)(a), 9A.56.020(1)(a), and 9A.08.020 and  
17 against the peace and dignity of the State of Washington. (Maximum penalty: 5 years and/or a  
18 \$10,000 fine, pursuant to RCW 9A.56.040, 9A.20.021(1)(c)).

19 **COUNT IX.**

20 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
21 and DANA LYNN SARGENT of the crime of **Filing a False or Fraudulent Tax Return**,  
22 based on a series of acts connected together with another crime charged herein, and which  
23 crimes were so closely connected in respect to time, place, and occasion that it would be  
24 difficult to separate proof of one charge from proof of the other, committed as follows:

25 That the defendants SAM AARON ADAMS and DANA LYNN SARGENT, in King  
26 County, State of Washington, on or about **August 2, 2012**, did make or cause to be made a

1 false and/or fraudulent return and/or made or caused to be made a false statement on a return,  
2 to-wit: a Combined Excise Tax Return for July, 2012, for business conducted by Lincoln Plaza  
3 Athletic Club, LLC, with intent to defraud the State and evade the payment of a tax or a part  
4 thereof and/or the defendant, SAM AARON ADAMS and/or DANA LYNN SARGENT, was  
5 an accomplice in the commission of said crime(s); contrary to RCW 82.32.290(2)(a)(iii), 2(b),  
6 9A.08.020 and 9A.20.021(1)(c), and against the peace and dignity of the State of Washington.  
7 (Maximum penalty: 5 years and/or a \$10,000 fine, contrary to RCW 82.32.290(2)(a), and  
8 9A.20.021).

9 **COUNT X.**

10 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
11 and DANA LYNN SARGENT of the crime of **Filing a False or Fraudulent Tax Return**,  
12 based on a series of acts connected together with another crime charged herein, and which  
13 crimes were so closely connected in respect to time, place, and occasion that it would be  
14 difficult to separate proof of one charge from proof of the other, committed as follows:

15 That the defendants SAM AARON ADAMS and DANA LYNN SARGENT, in King  
16 County, State of Washington, on or about **August 21, 2012**, did make or cause to be made a  
17 false and/or fraudulent return and/or made or caused to be made a false statement on a return,  
18 to-wit: a Combined Excise Tax Return for June, 2012, for business conducted by Lincoln Plaza  
19 Athletic Club, LLC, with intent to defraud the State and evade the payment of a tax or a part  
20 thereof and/or the defendant, SAM AARON ADAMS and/or DANA LYNN SARGENT, was  
21 an accomplice in the commission of said crime(s); contrary to RCW 82.32.290(2)(a)(iii), 2(b),  
22 9A.08.020 and 9A.20.021(1)(c), and against the peace and dignity of the State of Washington.  
23 (Maximum penalty: 5 years and/or a \$10,000 fine, contrary to RCW 82.32.290(2)(a), and  
24 9A.20.021).

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**COUNT XI.**

I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS and DANA LYNN SARGENT of the crime of **Filing a False or Fraudulent Tax Return**, 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 SAM AARON ADAMS and DANA LYNN SARGENT, in King County, State of Washington, on or about **June 25, 2013**, did make or cause to be made a false and/or fraudulent return and/or made or caused to be made a false statement on a return, to-wit: a Combined Excise Tax Return for April, 2013, for business conducted by West Seattle Athletic Club, LLC, with intent to defraud the State and evade the payment of a tax or a part thereof and/or the defendant, SAM AARON ADAMS and/or DANA LYNN SARGENT, was an accomplice in the commission of said crime(s); contrary to RCW 82.32.290(2)(a)(iii), 2(b), 9A.08.020 and 9A.20.021(1)(c), and against the peace and dignity of the State of Washington. (Maximum penalty: 5 years and/or a \$10,000 fine, contrary to RCW 82.32.290(2)(a), and 9A.20.021).

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**COUNT XII.**

I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS and DANA LYNN SARGENT of the crime of **Filing a False or Fraudulent Tax Return**, 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 SAM AARON ADAMS and DANA LYNN SARGENT, in King County, State of Washington, on or about **March 25, 2014**, did make or cause to be made a false and/or fraudulent return and/or made or caused to be made a false statement on a return, to-wit: a Combined Excise Tax Return for January, 2014, for business conducted by West

1 Seattle Club, LLC, with intent to defraud the State and evade the payment of a tax or a part  
2 thereof and/or the defendant, SAM AARON ADAMS and/or DANA LYNN SARGENT, was  
3 an accomplice in the commission of said crime(s); contrary to RCW 82.32.290(2)(a)(iii), 2(b),  
4 9A.08.020 and 9A.20.021(1)(c), and against the peace and dignity of the State of Washington.  
5 (Maximum penalty: 5 years and/or a \$10,000 fine, contrary to RCW 82.32.290(2)(a), and  
6 9A.20.021).

### 7 **COUNT XIII.**

8 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
9 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
10 acts connected together with another crime charged herein, and which crimes were so closely  
11 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
12 one charge from proof of the other, committed as follows:

13 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
14 County, State of Washington on or between **December 5, 2013** through **December 31, 2013**,  
15 in a series of transactions which are part of a criminal episode or a common scheme or plan,  
16 did wrongfully obtain or exert unauthorized control over property, other than a firearm, as  
17 defined in RCW 9A.01.010, to-wit: wages earned by Anani Agbemehin, with intent to deprive  
18 such other of such property and/or the defendant, SAM AARON ADAMS and/or DANA  
19 LYNN SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
20 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
21 the State of Washington. (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to  
22 RCW 9A.56.050, 9A.20.021(2)).

### 23 **COUNT XIV.**

24 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
25 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
26 acts connected together with another crime charged herein, and which crimes were so closely

1 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
2 one charge from proof of the other, committed as follows:

3 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
4 County, State of Washington on or about **November 11, 2013**, in a series of transactions which  
5 are part of a criminal episode or a common scheme or plan, did wrongfully obtain or exert  
6 unauthorized control over property, other than a firearm, as defined in RCW 9A.41.010, to-wit:  
7 wages earned by Lesa Bryant, with intent to deprive such other of such property and/or the  
8 defendant, SAM AARON ADAMS and/or DANA LYNN SARGENT, was an accomplice in  
9 the commission of said crime(s) and contrary to RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and  
10 9A.08.020 and against the peace and dignity of the State of Washington. (Maximum penalty:  
11 364 days and/or a \$5,000 fine, pursuant to RCW 9A.56.050, 9A.20.021(2)).

12 **COUNT XV.**

13 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
14 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
15 acts connected together with another crime charged herein, and which crimes were so closely  
16 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
17 one charge from proof of the other, committed as follows:

18 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
19 County, State of Washington on or between **September 30, 2013** through **October 30, 2013**,  
20 in a series of transactions which are part of a criminal episode or a common scheme or plan,  
21 did wrongfully obtain or exert unauthorized control over property, other than a firearm, as  
22 defined in RCW 9A.41.010, to-wit: wages earned by Kelly Buchanan, with intent to deprive  
23 such other of such property and/or the defendant, SAM AARON ADAMS and/or DANA  
24 LYNN SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
25 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
26

1 the State of Washington. (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to  
2 RCW 9A.56.050, 9A.20.021(2)).

3 **COUNT XVI.**

4 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
5 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
6 acts connected together with another crime charged herein, and which crimes were so closely  
7 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
8 one charge from proof of the other, committed as follows:

9 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
10 County, State of Washington on or between **October 28, 2013** through **December 27, 2013**, in  
11 a series of transactions which are part of a criminal episode or a common scheme or plan, did  
12 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
13 in RCW 9.41.010, to-wit: wages earned by Mariah Hoops, with intent to deprive such other of  
14 such property and/or the defendant, SAM AARON ADAMS and/or DANA LYNN  
15 SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
16 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
17 the State of Washington. (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to  
18 RCW 9A.56.050, 9A.20.021(2)).

19 **COUNT XVII.**

20 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
21 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
22 acts connected together with another crime charged herein, and which crimes were so closely  
23 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
24 one charge from proof of the other, committed as follows:

25 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
26 County, State of Washington on or between **September 18, 2013** through **October 14, 2013**,

1 in a series of transactions which are part of a criminal episode or a common scheme or plan,  
2 did wrongfully obtain or exert unauthorized control over property, other than a firearm, as  
3 defined in RCW 9A.41.010, to-wit: wages earned by Mark Hummel, with intent to deprive such  
4 other of such property and/or the defendant, SAM AARON ADAMS and/or DANA LYNN  
5 SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
6 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
7 the State of Washington. (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to  
8 RCW 9A.56.050, 9A.20.021(2)).

9 **COUNT XVIII.**

10 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
11 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
12 acts connected together with another crime charged herein, and which crimes were so closely  
13 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
14 one charge from proof of the other, committed as follows:

15 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
16 County, State of Washington on or between **October 20, 2013** through **November 4, 2013**, in  
17 a series of transactions which are part of a criminal episode or a common scheme or plan, did  
18 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
19 in RCW 9A.41.010, to-wit: wages earned by Thu H. Nguyen, with intent to deprive such other  
20 of such property and/or the defendant, SAM AARON ADAMS and/or DANA LYNN  
21 SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
22 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
23 the State of Washington. (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to  
24 RCW 9A.56.050, 9A.20.021(2)).

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1 in RCW 9.41.010, to-wit: wages earned by Cheryl Williams, with intent to deprive such other  
2 of such property and/or the defendant, SAM AARON ADAMS and/or DANA LYNN  
3 SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
4 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
5 the State of Washington. (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to  
6 RCW 9A.56.050, 9A.20.021(2)).

7 **COUNT XXI.**

8 I, Robert W. Ferguson, Attorney General aforesaid, do accuse SAM AARON ADAMS  
9 and DANA LYNN SARGENT of the crime of **Theft in the Third Degree**, based on a series of  
10 acts connected together with another crime charged herein, and which crimes were so closely  
11 connected in respect to time, place, and occasion that it would be difficult to separate proof of  
12 one charge from proof of the other, committed as follows:

13 That the defendants, SAM AARON ADAMS and DANA LYNN SARGENT, in King  
14 County, State of Washington on or between **March 25, 2013** through **November 11, 2013**, in a  
15 series of transactions which are part of a criminal episode or a common scheme or plan, did  
16 wrongfully obtain or exert unauthorized control over property, other than a firearm, as defined  
17 in RCW 9.41.010, to-wit: wages earned by Ramon Velasquez, with intent to deprive such  
18 other of such property and/or the defendant, SAM AARON ADAMS and/or DANA LYNN  
19 SARGENT, was an accomplice in the commission of said crime(s) and contrary to  
20 RCW 9A.56.050(1)(a), 9A.56.020(1)(a), and 9A.08.020 and against the peace and dignity of  
21 the State of Washington.

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1 (Maximum penalty: 364 days and/or a \$5,000 fine, pursuant to RCW 9A.56.050,  
2 9A.20.021(2)).

3 DATED this 4<sup>th</sup> day of February, 2015.

4  
5 ROBERT W. FERGUSON  
6 Attorney General

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8 SCOTT A. MARLOW, WSBA # 25987  
9 Assistant Attorney General  
10 Attorney for the State of Washington

11 TIENNEY K. MILNOR, WSBA # 32701  
12 Assistant Attorney General  
13 Attorney for the State of Washington  
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