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**IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON**

STATE OF WASHINGTON,

Plaintiff,

v.

KARRIE DENISE DELAFIELD,

Defendant.

NO. 26-M00144 WAG

COMPLAINT

I, Nicholas W. Brown, 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 Jon Tunheim, Thurston County Prosecuting Attorney, hereby allege KARRIE DENISE DELAFIELD did commit the following crimes:

Count 1

UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic yard of solid waste, to wit: waste tires, at the C-Line and the C-7000 Line intersection in the Capitol State Forest in Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine).

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1 **Count 2**

2 UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the
3 defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic
4 yard of solid waste, to wit: waste tires, at C-8000 Line MP 4 in the Capitol State Forest in
5 Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross misdemeanor. (Max
6 penalty: 364 days confinement and \$5,000 fine).

7 **Count 3**

8 UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the
9 defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic
10 yard of solid waste, to wit: waste tires, near the C-5010 Line in the Capitol State Forest in
11 Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross misdemeanor. (Max
12 penalty: 364 days confinement and \$5,000 fine).

13 **Count 4**

14 UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the
15 defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic
16 yard of solid waste, to wit: waste tires, near the B-4120 Line in the Capitol State Forest in
17 Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross misdemeanor. (Max
18 penalty: 364 days confinement and \$5,000 fine).

19 **Count 5**

20 UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the
21 defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic
22 yard of solid waste, to wit: waste tires, near the entrance to Rock Candy Mt. in the Capitol
23 State Forest in Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross
24 misdemeanor. (Max penalty: 364 days confinement and \$5,000 fine).

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1 **Count 6**

2 UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the
3 defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic
4 yard of solid waste, to wit: waste tires, near the B-0740 Line in the Capitol State Forest in
5 Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross misdemeanor. (Max
6 penalty: 364 days confinement and \$5,000 fine).

7 **Count 7**

8 UNLAWFUL DUMPING OF SOLID WASTE, committed as follows: That the
9 defendant, on or about March 23-April 7, 2024, dumped or deposited more than one cubic
10 yard of solid waste, to wit: waste tires, near the B-5300 Rock Pit in the Capitol State Forest in
11 Thurston County, Washington, in violation of 70A.205.195(3)(c), a gross misdemeanor. (Max
12 penalty: 364 days confinement and \$5,000 fine).

13 **Count 8**

14 TRANSPORTING WASTE TIRES WITHOUT A LICENSE, committed as follows:
15 That the defendant, on or about April 7, 2024, transported waste tires in the Capitol Forest in
16 Thurston County, Washington without proper licensing pursuant to RCW 70A.205.445, in
17 violation of RCW 70A.205.450, a gross misdemeanor. (Max penalty: 364 days confinement
18 and \$5,000 fine).

19 **Count 9**

20 TRANSPORTING WASTE TIRES WITHOUT A LICENSE, committed as follows:
21 That the defendant, on or about March 23-April 2, 2024, transported waste tires in the Capitol
22 Forest in Thurston County, Washington without proper licensing pursuant to RCW
23 70A.205.445, in violation of RCW 70A.205.450, a gross misdemeanor. (Max penalty: 364
24 days confinement and \$5,000 fine).

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1 DATED this 17th day of March, 2026.

2 NICHOLAS W. BROWN
3 Attorney General of Washington

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5 COURTNEY BLACKBURN, WSBA #55161

6 Assistant Attorney General

7 Washington Office of the Attorney General

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