

1 **I. SUMMARY**

2 Between March 23 and April 7, 2024, Kenneth Ray Johnson collected waste tires from
3 several tire shops in Thurston County, Washington. Mr. Johnson then transported those tires
4 and dumped them at various locations in the Capitol Forest in Thurston County.

5 **II. FACTS**

6 The Washington State Legislature has recognized the importance of minimizing solid
7 waste and implemented several laws pertaining to solid waste handling, recovery, and
8 recycling in order to prevent pollution. RCW 70A.205.010. As such, it is unlawful to dump or
9 deposit one cubic yard or more of solid waste. RCW 70A.205.195. Violation of this statute is
10 a gross misdemeanor.

11 On March 23, 2024, Department of Natural Resources (DNR) Officer Larry Bradeen
12 received a phone call from an individual reporting an abandoned campsite, stating that he
13 observed a medium sized U-Haul with license plate AH54858 driving near MP-6 on the C-
14 Line in the Capitol Forest. The Capitol Forest is 110,000 acres and consists of several dozen
15 dirt roads that are often used for off-road vehicles, mountain biking, and horseback riding. On
16 March 27, DNR was contacted by another individual who lives on Noschka Road. Noschka
17 Road leads into the Capitol Forest and eventually Rock Candy Mountain, intersecting with the
18 C-Line and C-8000. He stated that he observed a U-Haul truck driving down Noschka Road
19 into the Capital Forest. On April 7, another Noschka Road resident contacted DNR and stated
20 that he saw a U-Haul truck drive past his home on Noschka Road, and the truck was picked up
21 on his security camera. A third resident on Noschka Road, also saw this U-Haul on April 7 in
22 the morning and later in the day.

23 As it is very uncommon to see a U-Haul truck in the Capital Forest, on April 10,
24 Officer Bradeen contacted the U-Haul store in Tumwater to investigate. One of the employees
25 advised that the U-Haul with plate AH54858 was rented on March 21 but had not been
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1 returned at the end of its rental period on March 27. Instead, the truck was recovered at the
2 Auburn U-Haul location on April 2 with tire marks on the interior of the truck.

3 On May 6, Trey Shafer, who works for Summit Towing, texted Officer Bradeen that
4 he had been contacted by U-Haul to recover a U-Haul truck in the Capitol Forest at a location
5 with GPS coordinates 47.017199, -123.160531. This is near the B-4120 Line. When Mr.
6 Shafer had gone to retrieve the truck, it was gone but over 100 tires were found where it had
7 been located.

8 On May 8, U-Haul called Officer Bradeen and let him know that the second U-Haul
9 truck had been recovered by Summit Towing at a Motel 6 parking lot located at 400 Lee St. in
10 Tumwater. The U-Haul had a license plate of AH01037. Inside of the U-Haul truck were
11 several tire marks similar to the first truck. The U-Haul employee watched the security camera
12 footage taken by the Noschka Road resident and confirmed that the truck on that footage was
13 the same truck that had just been recovered.

14 On May 11, Officer Bradeen spoke with the manager of the Motel 6 where the U-Haul
15 was recovered. The manager stated that Karrie Delafield was associated with the U-Haul and
16 checked into the motel on April 30 around 11:15 PM. Security camera footage shows Ms.
17 Delafield exiting the U-Haul in muddy clothes and shoes and walking over to the motel
18 check-in desk. Ms. Delafield checked into Room 122 and had a male associate with her who
19 was driving a red GMC Jimmy. The two stayed at the Motel 6 for one week.

20 Officer Bradeen left the Motel 6 office and went to his patrol car. About 20 minutes
21 later, the Motel 6 manager advised Officer Bradeen that the male was returning to pay for
22 their motel room. Officer Bradeen saw the red GMC Jimmy enter the parking lot and saw that
23 it had expired tabs. As such, Officer Bradeen approached the vehicle. The male's name was
24 Kenneth Johnson. As Officer Bradeen was talking to Mr. Johnson, Ms. Delafield approached
25 with two other females. Officer Bradeen advised them to update the vehicle licenses as well as
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1 their drivers licenses as both were suspended. He additionally advised them to resolve their
2 warrants.

3 WSP Sergeant Rogers arrived to assist. Officer Bradeen asked to speak with Ms.
4 Delafield. He read Ms. Delafield her Miranda rights and she agreed to speak with him. Ms.
5 Delafield stated that she had been in the Capitol Forest with a U-Haul that had gotten stuck
6 near the B-4120 line about a week prior. Officer Bradeen asked her about the tires that were
7 found there and she stated that she had gotten the tires from Firestone, Midas, and Les
8 Schwab along the I-5 between Seattle and Tacoma. Ms. Delafield stated that they sold the
9 tires to secondhand tire shops for \$10.00 per tire and then discarded what they couldn't sell in
10 the Capitol Forest. She stated that she drove the U-Haul while Mr. Johnson followed her in his
11 GMC Jimmy.

12 Mr. Johnson joined the conversation at this time and was Mirandized. Mr. Johnson
13 stated he understood his rights and agreed to speak with Officer Bradeen. Mr. Johnson and
14 Ms. Delafield admitted to dumping tires at the gravel pit near B-5000 line. They also admitted
15 to driving the U-Haul seen by Mr. Lovan on March 23. At some point after this date, Ms.
16 Delafield's license was suspended so she hired someone named "Justin" to rent the second U-
17 Haul. During the conversation, both Ms. Delafield and Mr. Johnson admitted to dumping tires
18 at the following locations:

- 19 • C-Line and the C-7000 Line intersection
- 20 • C-8000 Line MP 4 – Dumped tires here twice
- 21 • The C-5010 Line
- 22 • B-4120 Line
- 23 • Rock Candy MT entrance – Main B-Line
- 24 • B-0740 Line
- 25 • B-5300 Rock Pit
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1 According to the Washington Department of Ecology records, neither Ms. Delafield
2 nor Mr. Johnson possess a license with the Washington Department of Ecology to transport
3 waste tires. DNR conducted clean up at the sites and found the following approximate number
4 of tires:

- 5 • C-Line and the C-7000 Line intersection – 64 tires
- 6 • C-8000 Line MP 4 – Dumped tires here twice – 516 tires
- 7 • The C-5010 Line – 15 tires
- 8 • B-4120 Line – 122 tires
- 9 • Rock Candy MT entrance – Main B-Line – 127 tires
- 10 • B-0740 Line – 15 tires
- 11 • B-5300 Rock Pit – 150 tires

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13 **III. BAIL/CONDITIONS OF RELEASE**

14 Provided the defendant appears at arraignment, the State is not opposed to continued
15 release on personal recognizance with the condition that all permit regulations are abided by,
16 no waste tires are accepted, and that he has no criminal law violations.

17 I certify under penalty of perjury under the laws of the State of Washington that the
18 foregoing is true and correct.

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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
8 Environmental Protection Division
9 800 5th Avenue, Suite 2000, TB-14
10 Seattle, WA 98104-3188
11 Tel: 206-464-7744
12 Fax: 206-587-5088
13 Email: Courtney.Blackburn@atg.wa.gov
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APPENDIX A TO PLEA AGREEMENT
PROSECUTOR'S UNDERSTANDING OF DEFENDANT'S CRIMINAL HISTORY
(SENTENCING REFORM ACT)

DATE: 03/02/2026
 DEFENDANT: **Kenneth Ray Johnson**
 ALIAS(ES):

DOB: 01/09/1982
 RACE: W
 GENDER: M

DOL: WA19816392 FBI: 648375WB7 DOC:

DNA taken:

<u>CRIME</u>	<u>DATE OF CONVICTION</u>	<u>PLACE OF CONVICTION</u>	<u>Incarceration/Probation DISPOSITION</u>
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ADULT FELONIES:
 N/A

ADULT MISDEMEANORS:	<u>DATE OF VIOLATION</u>	<u>COURT CASE #</u>
Driving While License Susp or Revoked 3	07/13/2001	C00038740
Driving While License Susp or Revoked 2	04/23/2002	CR0053806
Poss. Stolen Property 2 Attempt	01/08/2010	509EX0459
Reckless Burning 2 nd Degree	08/05/2024	3AC001459
Malicious Mischief 3 rd Degree	08/05/2024	3AC001459

JUVENILE FELONIES:	<u>DATE OF CONVICTION</u>	
Residential Burglary	03/11//1997	97-8-00230-7

JUVENILE MISDEMEANORS:	<u>DATE OF VIOLATION</u>	
Reckless Endangerment	01/21/1997	96-8-01447-1
VUCSA-POSS MARIJ 40 GRAMS OR LESS	10/25/1999	99-8-01520-4

JOHNSON, KENNETH RAY

AFFIDAVIT BY CERTIFICATION

I am an Assistant Attorney General employed by the Washington State Attorney General's Office, and make this affidavit in that capacity. I have reviewed the following databases maintained by federal and state agencies to determine the above named defendant's criminal history: NCIC (maintained by the FBI), WWCIC (Washington State Patrol Criminal History Section), JIS (Judicial Information System). I may have reviewed the following databases or other sources, including but not limited to: DOL (Washington State Department of Licensing) and DOC (Washington State Department of Corrections). A review of those sources indicates the defendant's criminal history is as listed above.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.



Courtney Blackburn
Assistant Attorney General

DATED this 17th day of March, 2026, at the Seattle Office.