Presented to the Court by the foreman of the 1 Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. 2 DISTRICT COURT at Seattle, Washington June 16, 2021 3 WILLIAM M. McCOOL, Clerk 4 Strawy Kattler Deputy 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA, NO. CR21-102 JLR 11 Plaintiff INDICTMENT 12 13 V. 14 RYAN CHRISTOPHER KANE, 15 Defendant. 16 The Grand Jury charges that: 17 COUNT 1 18 (Conspiracy to Distribute Methamphetamine) 19 Beginning at a time unknown, but within the past five years, and continuing until 20 on or about June 7, 2021, in King County, within the Western District of Washington, 21 and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, and others known and 22 unknown, did knowingly and intentionally conspire to distribute methamphetamine, a 23 substance controlled under Title 21, United States Code, Section 812, Schedule II. 24 Specific Quantity Allegations as to Methamphetamine 25 The Grand Jury further alleges that, that the Defendant RYAN CHRISTOPHER 26 KANE, and his conduct as a member of the conspiracy charged in Count 1, which 27 includes the reasonably foreseeable conduct of other members of the conspiracy charged 28

in Count 1, involved 500 grams or more of a mixture or substance containing a detectable 2 amount of methamphetamine, its salts, isomers, or salts of its isomers. 3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 4 and 846. 5 COUNT 2 6 (Distribution of Methamphetamine) 7 On or about October 17, 2019, in King County, within the Western District of 8 Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, did 9 knowingly and intentionally distribute, and did aid and abet the distribution of, 10 methamphetamine, a substance controlled under Title 21, United States Code, Section 11 812, Schedule II. The Grand Jury further alleges that this offense was committed during and in 12 13 furtherance of the conspiracy charged in Count 1, above. 14 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 15 and Title 18, United States Code, Section 2. 16 COUNT 3 17 (Distribution of Methamphetamine) 18 On or about April 23, 2021, in King County, within the Western District of 19 Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, did 20 knowingly and intentionally distribute, and did aid and abet the distribution of, 21 methamphetamine, a substance controlled under Title 21, United States Code, Section 22 812, Schedule II. 23 The Grand Jury further alleges that this offense was committed during and in 24 furtherance of the conspiracy charged in Count 1, above. 25 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 26 and Title 18, United States Code, Section 2. 27 28 UNITED STATES ATTORNEY Indictment - 2

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COUNT 4

(Distribution of Methamphetamine)

On or about April 23, 2021, in King County, within the Western District of Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, did knowingly and intentionally distribute, and did aid and abet the distribution of, methamphetamine, a substance controlled under Title 21, United States Code, Section 812, Schedule II.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5

(Possession of Methamphetamine with Intent to Distribute)

On or about June 7, 2021, in Bothell, in King County, within the Western District of Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE did knowingly and intentionally possess with intent to distribute, and did aid and abet the possession of, with intent to distribute, methamphetamine, a substance controlled under Title 21, United States Code, Section 812, Schedule II.

The Grand Jury further alleges that this offense involved 500 grams or more of a mixture of substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers in violation of Title 21, United States Code, Section 841(b)(1)(A).

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

Indictment - 3 *United States v. Ryan Christopher Kane*

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Indictment - 4
United States v. Ryan Christopher Kane

ASSET FORFEITURE ALLEGATION

All of the allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1 - 5, the defendant, RYAN CHRISTOPHER KANE, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offenses, as well as any property that facilitated the offenses. This property includes, but is not limited to, a sum of money reflecting the proceeds the defendant obtained from the offenses.

Substitute Assets

If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- 1. cannot be located upon the exercise of due diligence;
- 2. has been transferred or sold to, or deposited with, a third party;
- 3. has been placed beyond the jurisdiction of the Court;
- 4. has been substantially diminished in value; or
- 5. has been commingled with other property which cannot be divided without difficulty;

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1	it is the intent of the United States, pursuant to Title 21, United States Code, Section
2	853(p), to seek the forfeiture of any other property of the defendant up to the value of the
3	above-described forfeitable property.
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5	A MIDLIE DILL
6	A TRUE BILL:
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8	DATED: 16 June 2021
9	Signature of Foreperson redacted pursuant
10	to the policy of the Judicial Conference of
11	the United States.
12	FOREPERSON
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14	0-11/
15	For Ille Son
16	TESSA M. GORMAN
17	Acting United States Attorney
18	
19	THOMAS M. WOODS
20	Assistant United States Attorney
21	Stall by for
22	CASEY S. CONZATTI
23	Assistant United States Attorney
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DEFENDANT STATUS SHEET

(One for each defendant)

I. **CASE STATUS** Name of Defendant: Ryan Christopher Kane Has defendant had initial appearance in this case? ✓ Yes No CR MJ 21-334 II. **CUSTODIAL STATUS** If defendant had initial appearance, please check one of the following: ✓ Continue Conditions of Release Continue Detention Temporary Detention, a detention hearing has been scheduled for 6/10/2021 **ARRAIGNMENT** III. Warrant to Issue (If so, please complete Defendant Arrest Warrant Info Sheet) Summons to be Issued for Appearance on Defendant's Address: Letter to Defense Counsel for Appearance on June 24, 2021 at 9 am

Defense Attorney's Name and address: Nancy Tenney

The estimated trial time is 5 days.