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Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington June 16, 2021

WILLIAM M. McCOOL, Clerk
By *Stephanie Kattur* Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.
RYAN CHRISTOPHER KANE,
Defendant.

NO. CR21-102 JLR
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute Methamphetamine)

Beginning at a time unknown, but within the past five years, and continuing until on or about June 7, 2021, in King County, within the Western District of Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, and others known and unknown, did knowingly and intentionally conspire to distribute methamphetamine, a substance controlled under Title 21, United States Code, Section 812, Schedule II.

Specific Quantity Allegations as to Methamphetamine

The Grand Jury further alleges that, that the Defendant RYAN CHRISTOPHER KANE, and his conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged

1 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.

12 The Grand Jury further alleges that this offense was committed during and in
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.

1 **COUNT 4**

2 **(Distribution of Methamphetamine)**

3 On or about April 23, 2021, in King County, within the Western District of
4 Washington, and elsewhere, the Defendant, RYAN CHRISTOPHER KANE, did
5 knowingly and intentionally distribute, and did aid and abet the distribution of,
6 methamphetamine, a substance controlled under Title 21, United States Code, Section
7 812, Schedule II.

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

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

12 **COUNT 5**

13 **(Possession of Methamphetamine with Intent to Distribute)**

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

19 The Grand Jury further alleges that this offense involved 500 grams or more of a
20 mixture of substance containing a detectable amount of methamphetamine, its salts,
21 isomers, or salts of its isomers in violation of Title 21, United States Code, Section
22 841(b)(1)(A).

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)(A),
26 and Title 18, United States Code, Section 2.

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1 **ASSET FORFEITURE ALLEGATION**

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

9 **Substitute Assets**

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

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

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19 ///

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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 TRUE BILL:

6

7 DATED: *16 June 2021*

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9 *Signature of Foreperson redacted pursuant*
10 *to the policy of the Judicial Conference of*
11 *the United States.*

12 FOREPERSON

13 
14

15 TESSA M. GORMAN
16 Acting United States Attorney

17 
18

19 THOMAS M. WOODS
20 Assistant United States Attorney

21 
22

23 CASEY S. CONZATTI
24 Assistant United States Attorney

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

MJ 21-334

CR

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

III. ARRAIGNMENT

- 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.

(Revised March 2018)