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WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY _____	DEPUTY

The Honorable Theresa L. Fricke

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENDLE RASHEN HAWKINS,

Defendant.

NO. MJ21-5126

COMPLAINT FOR VIOLATION
Title 21, United States Code, Section
841(a)(1)
Title 18, United States Code,
Section 924(c)

Before Theresa L. Fricke, United States Magistrate Judge, U.S. Courthouse,
Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

Possession of Fentanyl Pills with Intent to Distribute

On or about June 14, 2021, at Centralia, Washington, in the Western District of
Washington, KENDLE RASHEN HAWKINS knowingly and intentionally possessed,
and did aid and abet the possession of, with intent to distribute, substances controlled
under Title 21, United States Code, Section 812, to wit: narcotics pills containing a
mixture of substances, including fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny]propanamide).

1 It is further alleged that this offense involved 400 grams or more of a mixture or
2 substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-
3 piperidinyl] propanamide) or 100 grams or more of a mixture or substance containing a
4 detectable amount of any analogue of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-
5 piperidinyl] propanamide).

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

8 **COUNT 2**

9 **Carrying a Firearm During and in Relation to a Drug Trafficking Crime**

10 On or about June 14, 2021, at Centralia, Washington, within the Western District
11 of Washington, KENDLE RASHEN HAWKINS during and in relation to the drug
12 trafficking crime of *Possession of Fentanyl Pills with Intent to Distribute*, as charged in
13 Count 1, did knowingly and intentionally carry, and did aid and abet the carrying of,
14 firearms, to wit: (1) one Palmetto State rifle bearing serial number SCD584678, (2) one
15 Ruger Max 9 pistol bearing serial number 350012664, (3) a FN57 pistol bearing serial
16 number 386400769, (4) one Ruger 57 pistol bearing serial number 642-28382, and (5)
17 one Ruger 57 pistol bearing serial number 642-36470.

18 All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.
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20 And the complainant states that this Complaint is based on the following
21 information:

22 I, SHAWN MCCANN, being first duly sworn on oath, depose and say:

23 **I. INTRODUCTION AND AGENT BACKGROUND**

24 1. I am employed as a Special Agent (SA) with the Federal Bureau of
25 Investigation (FBI) and have been employed with the FBI since September 2017. I am
26 currently assigned to the Seattle Field Division where I am a member of the violent
27 crime, gang, and Transnational Organized Crime – Western Hemisphere squad. In this
28 capacity, I investigate, inter alia, violations of the Controlled Substance Act, Title 21,

1 United States Code, Section 801 et seq., and related offenses. I have received specialized
2 training in the enforcement and investigation of the Controlled Substance Act. I have
3 received over 400 hours of classroom training including, but not limited to, drug
4 identification, drug interdiction, money laundering techniques and schemes, smuggling,
5 and the investigation of individuals and/or organizations involved in the illegal
6 possession, possession for sale, sales, importation, smuggling, manufacturing, and
7 trafficking of controlled substances.

8 2. In my role as a Special Agent for the FBI, I have participated in narcotics
9 investigations (e.g., heroin, cocaine, marijuana, and methamphetamine) that have resulted
10 in the arrest of individuals and the seizure of illicit narcotics and/or narcotics-related
11 evidence and the forfeiture of narcotics-related assets. I have been involved in the service
12 of federal and state search warrants as part of these investigations. I have encountered
13 and have become familiar with various tools, methods, trends, paraphernalia, and related
14 articles utilized by various traffickers in their efforts to import, export, conceal, and
15 distribute controlled substances. I am also familiar with the manner in which drug
16 traffickers use telephones, often cellular telephones, to conduct their unlawful operations,
17 and how they code their conversations to disguise their unlawful activities. I am also
18 familiar with the various methods of packaging, delivering, transferring, and laundering
19 drug proceeds. Additionally, through my training and experience, I can identify illegal
20 drugs by sight, odor, and texture.

21 3. I have also worked on drug investigations involving the use of court-
22 authorized wiretaps under Title III. In that capacity, I have had the opportunity to
23 monitor, listen to, and review transcripts and line sheets (prepared by linguists)
24 documenting the content of hundreds of intercepted conversations involving the
25 trafficking of cocaine, methamphetamine, heroin, and other narcotics, by persons who
26 used some form of code to attempt to thwart law enforcement detection. I have also
27 interviewed defendants at the time of their arrest and have debriefed, spoken with, and/or
28 interviewed numerous drug dealers or confidential sources (informants) at proffer and

1 field interviews who were experienced in speaking in coded conversation over the
2 telephone. From these interviews, and also from discussions with other experienced
3 agents, I have gained knowledge regarding the various methods, techniques, codes,
4 and/or jargon used by drug traffickers in the course of their criminal activities, including
5 their use of firearms to protect their narcotics-related activities and of cellular telephones
6 and other electronic means to facilitate communications while avoiding law enforcement
7 scrutiny.

8 4. I have written affidavits in support of court-authorized federal warrants and
9 orders in the Western District of Washington for GPS tracking of telephones, Pen
10 Register/Trap and Trace, and search warrants. Additionally, I have testified in grand jury
11 proceedings, written investigative reports, and conducted and participated in numerous
12 interviews of drug traffickers of various roles within drug organizations, which has
13 provided me with a greater understanding of the methods by which drug trafficking
14 organizations operate.

15 5. I am an investigative law enforcement officer of the United States within
16 the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations
17 of, and to make arrests for, violations of the Controlled Substance Act, Title 21, United
18 States Code, Section 801 *et seq.*, and related offenses.

19 6. The facts set forth in this Affidavit are based on my own personal
20 knowledge; knowledge obtained from other individuals during my participation in this
21 investigation, including other law enforcement personnel; review of documents and
22 records related to this investigation; communications with others who have personal
23 knowledge of the events and circumstances described herein; and information gained
24 through my training and experience. Because this Affidavit is submitted for the limited
25 purpose of establishing probable cause to believe that Defendant committed the crime set
26 forth herein, this document does not contain all of my knowledge of the larger
27 investigation.

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1 **II. PURPOSE OF AFFIDAVIT**

2 7. This Affidavit is made in support of a Complaint against KENDLE
3 RASHEN HAWKINS for one count of *Possession of Fentanyl Pills with Intent to*
4 *Distribute* in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and
5 2, and one count of *Carrying a Firearm During and in Relation to a Drug Trafficking*
6 *Crime* in violation of Title 18, United States Code, Sections 924(c) and 2.

7 **III. SUMMARY OF PROBABLE CAUSE**

8 8. I, together with other agents and officers of the FBI, the Seattle Police
9 Department (SPD), and other agencies have been conducting an investigation of a large
10 Drug Trafficking Organization (DTO) which was believed to be distributing significant
11 amounts of cocaine, crack cocaine, marijuana, and other controlled substances in the
12 Western District of Washington. During the course of the investigation, law enforcement
13 obtained judicial authorization to intercept a number of cellular telephones used by
14 members of the DTO.

15 9. On March 31, 2021, agents obtained indictments and arrest warrants for 19
16 individuals associated with this DTO who were charged with narcotics and firearms
17 related charges, including Conspiracy to Distribute Controlled Substances. On the same
18 day, agents obtained approximately 89 federal search warrants for 40 locations,
19 associated vehicles, and persons. These search warrants authorized agents to not only
20 search for and seize cellular/communication devices, but also to search the contents of
21 any cellular/communication devices that were seized.

22 10. On April 7, 2021, agents executed the arrest and search warrants in a
23 takedown that resulted in the arrests of 24 individuals – the 19 indicted individuals as
24 well as five additional individuals who were arrested on probable cause, charged by
25 Complaint, and subsequently indicted. One of those indicted individuals was Kenneth
26 Lee, a local cocaine source of supply to Michael Walker DTO members, including
27 Jimmy Carter. The searches of the residences, vehicles, and persons during this takedown
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1 resulted in the seizure of over 40 firearms, nearly \$450,000 in cash and nearly four
2 kilograms of cocaine.

3 11. In late April 2021, agents spoke with a confidential source (CS) who
4 advised agents that a male going by the name “Kendle” was a regional source of supply
5 of cocaine to Kenneth Lee. The CS¹ advised that Kendle lived in Arizona but made
6 several trips per year to the Seattle area, during which Kendle rents a car, hides several
7 kilograms of cocaine in the vehicle, drives to the Seattle area, and distributes the cocaine
8 to multi-ounce and kilogram level redistributors in the Seattle area, including Kenneth
9 Lee. The CS provided a phone number for Kendle as (602) 907-0704 (TT86).

10 12. Agents conducted law enforcement database checks on TT86, which was
11 associated with an address that was the same address listed for KENDLE RASHEN
12 HAWKINS in these databases in Phoenix, Arizona. Additionally, in May 2021, agents
13 obtained subscriber information for TT86, which showed that the billing address for
14 TT86 was another address associated with KENDLE RASHEN HAWKINS in the
15 CLEAR database.

16 13. On May 20, 2021, the Honorable S. Kate Vaughan issued a search warrant
17 for GPS location data and Pen Register and Trap and Trace data on TT86.

18 14. On or about May 23, 2021, GPS location data for TT86 showed that
19 KENDLE RASHEN HAWKINS flew from Phoenix, Arizona to Seattle in the early
20 morning, travelled to a few locations in the Seattle and Tacoma areas, and then flew back
21 to Phoenix, Arizona that same night arriving around 10:50 p.m. Based on my training and
22 experience, I know that Phoenix is a primary drug trafficking hub for several drug
23 trafficking organizations, and that the narcotics are trafficked from Mexico, across the
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25 ¹ CS has provided credible and reliable information in the past on other investigations, including the underlying
26 investigation here that led to the charges and seizures described herein. CS has multiple felony convictions involving
27 crimes of violence. CS also has several gross misdemeanor or misdemeanor convictions, which include making false
28 or misleading statements more than five years ago. The CS has outstanding warrants for misdemeanor offenses and
a felony, none of which involve crimes of violence or crimes relating to dishonesty. CS is a paid informant with
Seattle Police Department for over five years who has not been closed for cause by any other law enforcement
agency. CS’s identity is not being disclosed in this application to protect CS’s safety.

1 United States border, and to hub cities such as Phoenix. From these hub cities, including
2 Phoenix, the narcotics are then moved around the country via drug runners and
3 distributors using common drug trafficking routes and methods. I know that one of the
4 most common drug trafficking routes between hub city Phoenix and Seattle is via
5 Interstate 5. Also based on my training and experience, I know that drug traffickers
6 frequently make short trips via plane, apart from and in advance of physically driving
7 narcotics to other locations, in order to meet with their drug trafficking associates and
8 make arrangements for large loads of narcotics to be delivered. These drug traffickers
9 often attend these meetings in person and make short trips via plane, even going and
10 returning on the same day, as a way to talk in person with their drug trafficking associates
11 to evade law enforcement detection. Many of these drug traffickers are sophisticated and
12 aware of law enforcement investigative techniques, including wiretaps. Accordingly, I
13 believe that KENDLE RASHEN HAWKINS's short plane trip from Phoenix to Seattle
14 and back in the same day may be indicative of drug trafficking.

15 15. In the afternoon of June 13, 2021, agents observed that TT86 was travelling
16 north from Phoenix toward Seattle. Agents monitored the GPS location data for TT86,
17 which showed that KENDLE RASHEN HAWKINS drove from Phoenix all the way to
18 the Sacramento, California area, stopped for a few hours (probably at a hotel), and then
19 continued driving north on Interstate 5 headed towards Seattle. Based on this route and
20 timing, agents believed that TT86 would be in the Western District of Washington later
21 during the day on June 14, 2021. Based on my training and experience and CS
22 information, I believed that KENDLE RASHEN HAWKINS's travel was consistent with
23 CS information that KENDLE RASHEN HAWKINS travels by car from Phoenix to the
24 Seattle area with narcotics concealed in his vehicle as a means of trafficking cocaine and
25 other narcotics from Phoenix to Seattle. I also believed that his prior short plane trip to
26 the Seattle area may have been for the purpose of making arrangements for this suspected
27 narcotics load.

1 16. On June 14, 2021, agents conducted physical surveillance in Oregon and
2 Washington along Interstate 5 Northbound to identify the vehicle being driven KENDLE
3 RASHEN HAWKINS. At around La Center, Washington, at approximately 5:00 p.m.,
4 agents identified a black 2019 Mitsubishi Outlander bearing Washington license
5 BPM8316 (“Subject Vehicle”), registered to Fox Rent A Car Inc. in SeaTac, Washington
6 driving on Interstate 5 Northbound with an occupant who was positively identified as
7 KENDLE RASHEN HAWKINS based on a comparison to his driver’s license
8 photograph. Agents ran the license plate for the Subject Vehicle, and observed that the
9 vehicle was a rental car, consistent with CS information that KENDLE RASHEN
10 HAWKINS uses rental cars to transport narcotics from Phoenix to Seattle. At the time
11 that agents observed KENDLE RASHEN HAWKINS in the Subject Vehicle, GPS
12 location data for TT86 placed the device within the vicinity of the Subject Vehicle and
13 KENDLE RASHEN HAWKINS. Agents maintained physical surveillance on Kendle
14 Hawkins in the Subject Vehicle as he continued to travel northbound on Interstate 5, and
15 GPS location data for TT86 continued to travel with the Subject Vehicle and Kendle
16 Hawkins.²

17 17. At approximately 5:29 p.m., agents observed the Subject Vehicle exit off of
18 Interstate 5 and pull into an ARCO gas station. Agents observed Kendle Hawkins and an
19 unknown male occupant exit the Subject Vehicle. Kendle Hawkins and the unknown
20 male occupant put the gas pump nozzle in the Subject Vehicle’s tank, and then walked
21 one block away while the vehicle was refueling. Agents observed Kendle Hawkins and
22 the unknown male smoke what appeared to be a cigarette approximately one block away
23 from the gas station. About five minutes later, Kendle Hawkins and the unknown male
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26 ² The GPS location data being collected consisted of large ping radii having an average accuracy radius of 2,000 to
27 3,000 meters. Agents had therefore received authorization to use a cell site simulator to locate TT86, based on a
28 search warrant issued by the Honorable Brian A. Tsuchida earlier during the day on June 14, 2021. At this point,
agents had not yet used the cell site simulator to locate TT86, but believed that the user of TT86 was in the Subject
Vehicle based on the GPS tracking data and physical surveillance on the occupants of the Subject Vehicle. Agents
later located TT86 using the cell site simulator, as discussed in the next paragraph.

1 walked back to the gas station, got into the Subject Vehicle, and departed, getting back on
2 Interstate 5 northbound. While Kendle Hawkins was parked at the ARCO, cell tower data
3 for TT86 placed the device within the vicinity of Kendle Hawkins. Additionally, agents
4 utilized a cell site simulator to locate TT86 and confirm its presence at the ARCO gas
5 station, based on a search warrant issued by the Honorable Brian A. Tsuchida earlier that
6 day.

7 18. Agents followed the Subject Vehicle as Kendle Hawkins travelled
8 northbound on Interstate 5. Agents matched the speed of the Subject Vehicle and
9 determined it was travelling at around 78 miles per hour in a 70 mile per hour speed limit
10 zone.

11 19. At approximately 6:14 p.m., a marked unit with the Centralia Police
12 Department conducted a traffic stop on the Subject Vehicle on the basis of the speeding
13 infraction and the independent probable cause developed by agents from CS information,
14 GPS location data, and physical surveillance as set forth above. KENDLE RASHEN
15 HAWKINS was identified as the passenger in the Subject Vehicle, and D.A. was
16 identified as the driver of the Subject Vehicle based on driver's licenses on each
17 individual, respectively. During the traffic stop, the Centralia Police Department officer
18 requested the registration from D.A. who leaned over and opened the glove box to get the
19 paperwork. When the glove box was opened the Centralia PD officer and an agent with
20 the officer observed, in plain view, a high capacity drum magazine in the glove box. At
21 this point, the agent asked what the item in the glove box was, and KENDLE RASHEN
22 HAWKINS remarked that it was not loaded. The Centralia PD officer and the agent then
23 asked both Kendle Hawkins and D.A. to exit the vehicle.

24 20. The Centralia PD officer, who is also a trained narcotics K9 handler,
25 deployed his narcotics K9 around the outside of the Subject Vehicle after D.A. and
26 KENDLE RASHEN HAWKINS had been removed from the vehicle. The narcotics K9,
27 which is certified in the detection of cocaine, heroin, and methamphetamine, alerted on
28 the passenger side of the Subject Vehicle, where the window was rolled down, providing

1 a positive indication for the presence of narcotics in the Subject Vehicle. The Centralia
2 PD officer told KENDLE RASHEN HAWKINS and D.A. that the K9 had alerted to the
3 presence of cocaine, methamphetamine, or heroin in the car, and KENDLE RASHEN
4 HAWKINS stated that they had just smoked marijuana. The narcotics K9, however, is
5 not trained or certified to alert to the presence of marijuana. KENDLE RASHEN
6 HAWKINS and D.A. declined to provide consent to search the Subject Vehicle.

7 21. That evening, agents applied for an obtained a search warrant for the
8 Subject Vehicle issued by the Honorable Theresa L. Fricke. Agents conducted a search of
9 the Subject Vehicle that evening and located one rifle and four pistols hidden in the trunk
10 area of the Subject Vehicle.³ Agents also located approximately 50,000 narcotics pills,
11 which field tested presumptive positive for the presence of fentanyl (N-phenyl-N-[1-(2-
12 phenylethyl)-4-piperidinyl] propanamide); these were hidden in the trunk area of the
13 Subject Vehicle near the firearms. Additionally, agents located two firearms suppressors,
14 a high capacity drum magazine, two magazines, and two cell phones. The items located
15 and seized are depicted below:

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28 ³ KENDLE RASHEN HAWKINS appears to have felony convictions out of Arizona that would make him ineligible
to possess firearms or ammunition. I am working on obtaining records further documenting this criminal history.
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22. The car rental agreement for the Subject Vehicle was located during the search and showed that the Subject Vehicle was rented under the name Kendle Hawkins.

23. Based on my training and experience, I know that 50,000 narcotics pills is well in excess of personal use amounts of narcotics; it is instead consistent with possession for distribution. The 50,000 pills, together with their packaging, weighed nearly five kilograms. Even discounting the packaging, the pills weighed well over 400 grams.

24. Based on my training and experience, I also know that it is common for drug dealers to carry firearms on their person or within reach in order to protect themselves, their product, and their proceeds of drug trafficking from robbery and assault. Based on KENDLE RASHEN HAWKINS's possession of five firearms in close proximity to the narcotics pills, I believe that the firearms at issue were possessed in order to further KENDLE RASHEN HAWKINS's drug dealing.

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IV. CONCLUSION

25. Based on the above facts, I respectfully submit that there is probable cause to believe that KENDLE RASHEN HAWKINS did knowingly and intentionally commit the crimes of *Possession of Fentanyl Pills with Intent to Distribute* in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 2, and *Carrying a Firearm During and in Relation to a Drug Trafficking Crime* in violation of Title 18, United States Code, Sections 924(c) and 2.



Shawna McCann, Complainant
Special Agent, FBI

Based on the Complaint and Affidavit, to which the above-named agent provided a sworn statement attesting to the truth of the contents of such, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 15th day of June, 2021.



The Honorable Theresa L. Fricke
United States Magistrate Judge