

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

STATE OF ALASKA,

Plaintiff,

vs.

KRIS RHODES KILE  
DOB: 10/27/1967  
APSIN ID: 6251355  
DMV NO.: 6251355 AK  
ATN: 115745364

KATHRYN LEANNE HERMAN  
DOB: 10/20/1959  
APSIN ID: 0862110  
DMV NO.: 0862110 AK  
ATN: 115745436

Defendants.

No. 3AN-20-\_\_\_\_\_ CR (Kris Rhodes Kile)

No. 3AN-20-\_\_\_\_\_ CR (Kathryn Leanne Herman)

INDICTMENT

I certify this document and its attachments do not contain the (1) name of a victim of a sexual offense listed in AS 12.61.140 or (2) residence or business address or telephone number of a victim of or witness to any offense unless it is an address identifying the place of a crime or an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court. The following counts charge a crime involving DOMESTIC VIOLENCE as defined in AS 18.66.990:

Count I - AS 11.41.120

Manslaughter

Kris Rhodes Kile - 001, Kathryn Leanne Herman - 001

Count II - AS 11.41.130

Criminally Negligent Homicide

Kris Rhodes Kile - 002, Kathryn Leanne Herman - 002

Count III - AS 11.71.020

Misconduct Involving a Controlled Substance in the Second Degree

Kris Rhodes Kile - 003

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Count IV - AS 11.71.040  
Misconduct Involving a Controlled Substance in the Fourth Degree  
Kris Rhodes Kile - 004

Count V - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 005

Count VI - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 006

Count VII - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 007

Count VIII - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 008

Count IX - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 009

Count X - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 010

Count XI - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 011

Count XII - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 012

Count XIII - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 013

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Count XIV - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 014

Count XV - AS 11.71.040(a)(1)  
Misconduct Involving a Controlled Substance in the Third Degree  
Kris Rhodes Kile - 015

Count XVI - AS 11.71.030(a)(1)(B)  
Misconduct Involving a Controlled Substance in the Second Degree  
Kris Rhodes Kile - 016

Count XVII - AS 11.71.040(a)(1)  
Misconduct Involving a Controlled Substance in the Third Degree  
Kris Rhodes Kile - 017

Count XVIII - AS 11.71.040(a)(11)(A)  
Misconduct Involving A Controlled Substance In The Third Degree  
Kris Rhodes Kile - 018

THE GRAND JURY CHARGES:

COUNT I:

That in the Third Judicial District, State of Alaska, on or about March 5, 2015, at or near Anchorage, KRIS RHODES KILE and KATHRYN LEANNE HERMAN, as principals and/or accomplices, intentionally, knowingly, or recklessly causes the death of another person under circumstances not amounting to murder in the first or second degree.

All of which is a Class A Felony offense being contrary to and in violation of AS 11.41.120 and against the peace and dignity of the State of Alaska.

COUNT II:

That in the Third Judicial District, State of Alaska, on or about March 5, 2015, at or near Anchorage, KRIS RHODES KILE and KATHRYN LEANNE HERMAN, as principals and/or accomplices, with criminal negligence, caused the death of another person.

1 All of which is a class B Felony offense being contrary to and in violation of AS  
2 11.41.130 and against the peace and dignity of the State of Alaska.

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4 COUNT III:

5 That in the Third Judicial District, State of Alaska, on or about March 2, 2015, at o  
6 r near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed any amount  
7 of a schedule IA controlled substance, to wit: oxycodone and hydromorphone.

8 All of which is a felony class A offense being contrary to and in violation of  
9 AS 17.30.080 and 11.71.020 and against the peace and dignity of the State of Alaska.

10 COUNT IV:

11 That in the Third Judicial District, State of Alaska, on or about March 3, 2015, at o  
12 r near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed any amount  
13 of a schedule IVA controlled substance, to wit: diazepam.

14 All of which is a felony class C offense being contrary to and in violation of  
15 AS 17.30.080 and 11.71.040 and against the peace and dignity of the State of Alaska.

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17 COUNT V:

18 That in the Third Judicial District, State of Alaska, on or about November 2016 - O  
19 ctober 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or  
20 dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled  
21 substance, to patient Me.

22 All of which is a class B Felony offense being contrary to and in violation of AS  
23 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
24 Alaska.

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26 COUNT VI:

27 That in the Third Judicial District, State of Alaska, on or about August 2017, at o  
r near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed 25 or more

1 tablets, ampules, or syrettes containing a schedule IA controlled substance, Oxycodone,  
2 to patient Me.

3 All of which is a class B Felony offense being contrary to and in violation of AS  
4 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
5 Alaska.

6 COUNT VII:

7 That in the Third Judicial District, State of Alaska, on or about June 2016 - N  
8 ovember 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or  
9 dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled  
10 substance to patient H.

11 All of which is a class B Felony offense being contrary to and in violation of AS  
12 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
13 Alaska.

14 COUNT VIII:

15 That in the Third Judicial District, State of Alaska, on or about January 10, 2017, a  
16 t or near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed 25 or  
17 more tablets, ampules, or syrettes containing a schedule IA controlled substance,  
18 Oxycodone to patient H.

19 All of which is a class B Felony offense being contrary to and in violation of AS  
20 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
21 Alaska.

22 COUNT IX:

23 That in the Third Judicial District, State of Alaska, on or about February 12 - F  
24 ebruary 16, 2017, at or near Anchorage, KRIS RHODES KILE knowingly delivered or  
25 dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled  
26 substance, Meperidine and Oxycodone to patient H.

1 All of which is a class B Felony offense being contrary to and in violation of AS  
2 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
3 Alaska.

4 COUNT X:

5 That in the Third Judicial District, State of Alaska, on or about November 2016 - O  
6 ctober 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or  
7 dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled  
8 substance to patient J.

9 All of which is a class B Felony offense being contrary to and in violation of AS  
10 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
11 Alaska.

12 COUNT XI:

13 That in the Third Judicial District, State of Alaska, on or about September 24, 2  
14 018, at or near , KRIS RHODES KILE knowingly delivered or dispensed 25 or more  
15 tablets, ampules, or syrettes containing a schedule IA controlled substance, Oxycodone,  
16 to patient J.

17 All of which is a class B Felony offense being contrary to and in violation of AS  
18 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
19 Alaska.

20 COUNT XII:

21 That in the Third Judicial District, State of Alaska, on or about October 2016 to A  
22 ugust 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or  
23 dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled  
24 substance, to patient G.

25 All of which is a class B Felony offense being contrary to and in violation of AS  
26 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of  
27 Alaska.

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COUNT XIII:

That in the Third Judicial District, State of Alaska, on or about November - December, 2016, at or near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled substance to patient G.

All of which is a class B Felony offense being contrary to and in violation of AS 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of Alaska.

COUNT XIV:

That in the Third Judicial District, State of Alaska, on or about October 2016 to October 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled substance, to patient K.

All of which is a class B Felony offense being contrary to and in violation of AS 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of Alaska.

COUNT XV:

That in the Third Judicial District, State of Alaska, on or about November 2, 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed any amount of a schedule IVA or VA controlled substance, diazepam to patient Mo.

All of which is a class C Felony offense being contrary to and in violation of AS 17.30.080 and 11.71.040(a)(1) and against the peace and dignity of the State of Alaska.

COUNT XVI:

That in the Third Judicial District, State of Alaska, on or about November 2016 - October 2018, at or near Anchorage, KRIS RHODES KILE knowingly delivered or dispensed 25 or more tablets, ampules, or syrettes containing a schedule IA controlled substance to two patients N and N.

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All of which is a class B Felony offense being contrary to and in violation of AS 17.30.080 and 11.71.030(a)(1)(B) and against the peace and dignity of the State of Alaska.

COUNT XVII:

That in the Third Judicial District, State of Alaska, on or about January 7, 2017, at or near , KRIS RHODES KILE knowingly delivered or dispensed any amount of a schedule IVA or VA controlled substance, soma, to patient N.

All of which is a class C Felony offense being contrary to and in violation of AS 17.30.080 and 11.71.040(a)(1) and against the peace and dignity of the State of Alaska.

COUNT XVIII:

That in the Third Judicial District, State of Alaska, on or about December 17, 2017, at or near , KRIS RHODES KILE knowingly delivered or dispensed any amount of a schedule IA controlled substance, fentanyl to patient N.

All of which is class C Felony offense being contrary to and in violation of AS 17.30.080 and 11.71.040(a)(11)(A) and against the peace and dignity of the State of Alaska.

DATED this \_\_\_\_ day of March, 2020 at Anchorage, Alaska.

A true bill

Grand Jury Foreperson

Eric Senta  
Assistant Attorney General  
Alaska Bar No. 1011091

**Department of Law, Criminal Division, Medicaid Fraud Control Unit**

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WITNESSES EXAMINED BEFORE THE GRAND JURY:

- Investigator Jeanette L. G. Bartz
- Tracey Jones
- Detective A. Randy Adair
- Margaret Summers
- Cristin Rolf
- Mackenzie Cooper
- Wendy Thon
- Denise Valentine

Search Warrants:

- 1. 3AN-18-03424SW
- 2. 3AN-18-03530SW
- 3. 3AN-18-03792SW
- 4. 3AN-18-03793SW
- 5. 3AN-18-03873SW
- 6. 3AN-19-00121SW
- 7. 3AN-19-00388SW
- 8. 3AN-19-00552SW
- 9. 3AN-19-00822SW
- 10. 3AN-19-01323SW
- 11. 3AN-19-01580SW
- 12. 3AN-19-01831SW
- 13. 3AN-19-01832SW
- 14. 3AN-19-01833SW
- 15. 3AN-19-01834SW
- 16. 3AN-19-01835SW
- 17. 3AN-19-02045SW
- 18. 3AN-19-3012SW
- 19. 3AN-19-3013SW
- 20. 3AN-19-4166SW