

FILED  
VANESSA L ARMSTRONG, CLERK  
Apr 21 2020  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY

UNITED STATES DISTRICT COURT  
for the  
WESTERN DISTRICT OF KENTUCKY

UNITED STATES OF AMERICA )  
v. )  
)  
)

Case No. 5:20MJ-00050-LLK

CHASE BOWMAN-RAINES  
*Defendant*

CRIMINAL COMPLAINT

I, Theodore R. Curtis III, the complainant in this case, state the following is true to the best of my knowledge and belief.

On or about and between the date of February 15, 2020 and April 20, 2020, in the county of Christian in the Western District of Kentucky, the defendant violated:

*Code Sections--Ct. 1 18 U.S.C. § 2252A(a)(5)(A)*

*Offense Description: Possession of Child Pornography*

*Code Sections--Ct. 2 18 U.S.C. § 2252A(a)(2)(A)*

*Offense Description: Receipt or Distribution of Child Pornography*

This criminal complaint is based on these facts:

- See attached Affidavit

  
Special Agent, Theodore R. Curtis III  
Homeland Security Investigations

*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephonic and email submission on this the 21<sup>st</sup> day of April, 2020.*

Date: April 21st, 2020

  
Honorable Lanny King  
United States Magistrate Judge

City and State: Paducah, Kentucky

LAD (AUSA initials)

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Theodore R Curtis III, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations, and have been since November 2000. As part of my official duties as an HSI Special Agent, I investigate criminal violations relating to the sexual exploitation of children and child pornography, including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§§§§ 2251, 2252, 2252A, 2422, and 2423. I have received training in the area of child pornography and child exploitation investigations and have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256(8)(A)), in all forms of media including computer media during law enforcement training and experiences. I have also received training and instruction in the field of investigating child pornography. I have also conducted investigation(s) pertaining to child pornography and child exploitation since June 2008. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States, and to execute search warrants and arrest warrants issued by federal and state courts.

2. This affidavit is submitted in support of a Criminal Complaint for the arrest of CHASE BOWMAN-RAINES, for the following offense: from on or about February 15, 2019 to approximately April 20, 2020, in the Western District of Kentucky, CHASE BOWMAN-RAINES, knowingly possessed child pornography, in violation of Title 18, United States Code,

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Section 2252A(a)(5)(A), and knowingly distributed child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

3. The following information contained in this affidavit is based on my training and experience, my personal participation in this investigation and information provided to me by other law enforcement officials. Unless otherwise indicated, where I have referred to written or oral statements, I have summarized them in substance and in part, rather than verbatim. Not all of the facts of the investigation known to me are contained herein, only those necessary to establish probable cause for the arrest of CHASE BOWMAN-RAINES.

**PROBABLE CAUSE**

4. On or about, June 25, 2019, HSI Bowling Green received a Kik lead pertaining to the suspected distribution of child pornography by Kik username: crainswe. The following was received from Kik:

- a. Username: crainswe
- b. First Name: Craineswe
- c. Last Name: Gggggg
- d. Email: craines30000@icloud.com
- e. User Location: 02/15/2019, 02:06:22 UTC – 12.153.8.135
- f. Birthday \*\*/\*\*1997
- g. Country Code: US
- h. Description (as per Special Agent Curtis) – a female child approximately 4 to 7 years of age that is performing fellatio on an adult male.

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5. On February 3, 2020, HSI Bowling Green received CyberTipline information pertaining to the distribution of child exploitation material across several social media platforms linked to email account [craines30000@icloud.com](mailto:craines30000@icloud.com):

a. CyberTipline Report 62440510, prepared by the National Center for Missing and Exploited Children (NCMEC). On January 7, 2020, NCMEC received information from Snapchat pertaining to child pornography. Snapchat provided the following information pertaining to the Snapchat user:

- Date of Birth: \*\*/\*\*/1997
- Email Address: [craines30000@icloud.com](mailto:craines30000@icloud.com)
- Screen/User Name: Kylesmith5876
- IP Address: 2601:481:0:c010:59ca:3e09:90:3ac3
- Number of uploaded files: 2
- Were entire contents of uploaded files publicly available: Yes
- Filename: a8d59ce7-f722-4751-acd8-

217f84056ef8\_CHAT\_MEDIA\_1578244343969.jpeg

- Description (as per Special Agent Curtis) – a pre-teen/early teenage female that is lying on her back and is clothed. The female has her mouth opened and her tongue sticking out. On the female's tongue is a necklace with a charm. The female has semen on her face, tongue and neck. The female's left hand is visible, and the female has her fingers closed except her middle finger. Above the female are 6 penises and a possible seventh in top left corner of the image

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- Filename: a8d59ce7-f722-4751-acd8-217f84056ef8\_CHAT\_MEDIA\_1578244275132.jpeg
  - Description (as per Special Agent Curtis) – a pre-teen/early teenage female that is lying on her back and is clothed. The female has a pubescent male penis towards her chin. This man has ejaculated semen towards the females' face. To the right of the image, (the left side of the female) is another penis that is ejaculating semen onto the left cheek of the female (only the tip of the penis and part of a hand is visible). To the left of the image (the right side of the female), is another penis that has ejaculated semen on the females' forehead above her right eye. Only part of the penis and a hand is seen in the image.
- b. CyberTipline Report 61295649, prepared by the National Center for Missing and Exploited Children (NCMEC). On December 16, 2019, NCMEC received information from Instagram pertaining to child pornography. Instagram provided the following information pertaining to the Instagram user:
  - Name: Chio
  - Email Address: [craines30000@icloud.com](mailto:craines30000@icloud.com)
  - Screen/User Name: chio\_27789
  - ESP User ID: 12041878406
  - Number of uploaded files: 2

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- File:  
axg8b75qwv4k80wg54800662\_303372760308227\_6104048099926212608\_n.jpg
- Additional Information: This is the profile picture for the account 12041878406
- File:  
ezp51178kdw844gg77400141\_1459492860871755\_3770270972923910736\_n.jpg
- Additional Information: Uploaded December 15, 2019 at 19:14:37 UTC
  - Description (as per Special Agent Curtis) – a prepubescent female approximately 6 to 8 years of age sitting down. The female is nude except for wearing socks. The female has her legs spread and is inserting a vibrator into her vagina.
- IP Address: 2601:481:0:c010:4006:5374:e1c3:55f0

6. On February 5, 2020 a summons was issued to Comcast Cable pertaining to IP addresses: 2601:481:0:c010:59ca:3e09:90:3ac3 and 2601:481:0:c010:4006:5374:e1c3:55f0.

7. On February 6, 2020 the summons was returned by Comcast cable and the following information was received:

a. 2601:481:0:c010:59ca:3e09:90:3ac3:

- Subscriber Name: B.W. (full name redacted)
- Service Address: XXXX Troubleshooter Road, Apt X Fort Campbell, Kentucky 42223 (full address redacted)

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[Handwritten signature]

- Start of Service: 01/01/2020

b. 2601:481:0:c010:4006:5374:e1c3:55f0:

- Subscriber Name: B. L. (full name redacted)
- Service Address: XXXX Adams Drive, Apt X, Fort Campbell, Kentucky  
42223 (full address redacted)
- Start of Service: 11/05/2019

8. On February 12, 2020, a summons was issued to Facebook for Instagram username: chio\_27789.

9. On February 28, 2020, the summons return was received from Facebook. The following information was received pertaining to chio\_27789:

- a. Account Type: Instagram
- b. Registered Email: craines30000@icloud.com
- c. Registration Date: March 25, 2019 at 16:39:44 UTC
- d. Registration IP: 172.220.137.221

10. On March 18, 2020, a summons was issued to Apple for information pertaining to craines30000@icloud.com.

11. On March 19, 2020, a summons was issued to Charter Communications for IP address: 172.220.137.221.

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[Handwritten signature]

12. On March 21, 2020, Charter Communications provided the following information pertaining to IP address: 172.220.137.221:

- a. Subscriber Name: J.R. (full name redacted)
- b. Subscriber Address: 4950 Crystal Creek Road, Morganton, North Carolina, 28655
- c. Lease Start: 02/28/2019 at 10:19:31 pm
- d. Lease End: 10/24/2019 at 6:53:54 pm

13. On March 23, 2020, the summons return from Apple was received. The following subscriber information was received:

- Person ID: 16627631706
- Sign up: January 2, 2019 18:28:22
- Email: craines30000@icloud.com
- First Name: Chase
- Last Name: Bowmanraines
- Street: 7039 Taccoa Road
- City: Fort Campbell
- State: Kentucky
- Area Code: 270
- Phone Number: 4987237

14. On March 23, 2020, based on information received from Charter Communications and Apple, a North Carolina Driver's License was located for CHASE BOWMAN-RAINES, 4950 Crystal Creek Road, Morganton, North Carolina.

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15. On March 24, 2020, HSI Bowling Green received information from U.S. Army CID Fort Campbell, Kentucky that CHASE BOWMAN-RAINES (matching dates of birth) resides on Fort Campbell at 7039 Toccoa Road, the same address listed on the Apple account associated with Email: craines30000@icloud.com.

16. On April 3, 2020, a preservation request was submitted to Apple for craines30000@icloud.com.

17. On April 3, 2020, SA Curtis applied for and received a federal search warrant for Apple iCloud account: craines30000@icloud.com. The search warrant was subsequently served on April 3, 2020.

18. On April 15, 2020, SA Curtis received the search warrant return from Apple pertaining to craines30000@icloud.com, the email account associated with the cyber tips from Instagram, Snapchat, and Kik.

19. From April 16, 2020 to April 17, 2020, a review of the search warrant return was conducted pertaining to images and videos located in craines30000@icloud.com. The following is a sampling of what was located:

a. Name: chat-media-video-30E95BFA-A02E-42E9-A61A-5D89A8837039

- File Type: Video
- Length: 8 seconds
- Description – a nude child approximately 4 to 8 years of age that is lying on their stomach in a bathtub. The child is laying between the spread legs of a pubescent man. The child is performing fellatio on the man.

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b. Name: chat-media-video-323186B1-A55C-4902-A2CE-7A2B10160897

- File Type: Video
- Length: 2 seconds
- Description – a prepubescent female approximately 8 to 12 years of age that is nude from the waist down. The female is using her left hand to spread open her vagina while attempting to insert a unknown black device into her vagina.

c. Name: IMG\_3375

- File Type: Video
- Length: 3 minutes 14 seconds
- Description: (Summarized) The video is a compilation of images and starts with an image of a child approximately 8 to 12 years of age that is clothed. At approximately the 11 second point of the video, an image of a pubescent penis next to the vagina/anus of a prepubescent female child. The vaginal area of the child is all that is present in the image. At the 22 second point of the video, a closeup image of a prepubescent vagina being spread by an unseen individual's hands. At the 1 minute 12 second point of the video, the video switches from images to video clips. The first video clip that is seen is a prepubescent female approximately 4 to 8 years of age laying naked on her back. A pubescent man is masturbating near the female's vagina. The man ejaculates on the female's vagina.

d. Name: IMG\_3431

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- File Type: Image
- Description: Two female children approximately 4 to 8 years of age that are sitting. One female is not clothed from the waist up and is sitting between the legs of an adult male. The other female child is wearing a long shirt/nightgown next to the other female but outside of the man's legs. Both females are grasping the man's penis.

e. Name: IMG\_3432

- File Type: Image
- Description: A child that appears to be 4 to 8 years of age that has her tongue out and near semen that is on the back of another individual.

20. On April 20, 2020, the Army's Central Investigations Division (CID), obtained and executed a military search warrant for the residence of CHASE BOWMAN-RAINES. Agents seized six cellular phones, an iPod, and a computer that will be analyzed.

21. CHASE BOWMAN-RAINES consented to an interview and confessed to knowingly possessing and distributing child pornography while present in the Western District of Kentucky, namely while he was on the military base at Ft. Campbell.

22. CHASE BOWMAN-RAINES identified the social media accounts associated with the cyber tips as being accounts that he managed. He admitted to using the email address associated with the cyber tips to set up the accounts. He also admitted to subscribing to the iCloud account where additional images and videos containing child pornography were located. He admitted to uploading and distributing the child pornography located on the accounts and stated that he traded those images for other types of pornography.

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**CONCLUSION**

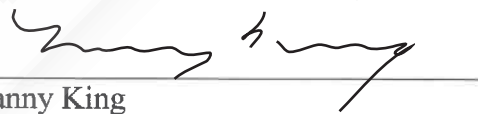
This affidavit is submitted in support of a Criminal Complaint for the arrest of CHASE BOWMAN-RAINES, for the following offenses: from on or about February 15, 2019 to approximately April 20, 2020, in the Western District of Kentucky, CHASE BOWMAN-RAINES, knowingly possessed child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(A), and knowingly distributed child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

Respectfully submitted,



Theodore R Curtis III  
Special Agent  
Homeland Security Investigations

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone and email submission on this the 21st day of April, 2020.



Lanny King  
United States Magistrate Judge



## Case Assignment Standard Magistrate Assignment

Case number 5:20MJ-50

Note: Judge determined by charging documentation.

Assigned on 4/21/2020 10:25:16 AM  
Transaction ID: 33164

[Return](#)

FILED  
VANESSA L ARMSTRONG, CLERK  
Apr 21 2020  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF KENTUCKY  
DIVISION**

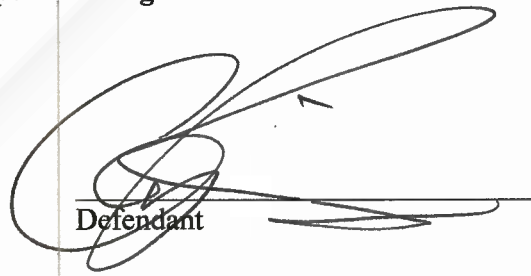
United States of America, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CHASE BOWMAN-RAINES )  
 )  
 Defendant )

**DEFENDANT'S CONSENT TO  
APPEAR BY VIDEO  
TELECONFERENCE**  
 )  
Case No. 5:20MJ-00050-LLK

You will be appearing before a federal judge at the United States District Court. The courthouse is equipped with video teleconferencing equipment which permits you to see and speak with the Judge by video teleconference rather than appearing in person. You have the right to appear in person before a Judge or you can waive that right and consent to a hearing by video teleconference. By signing this form you are giving your consent to allow the court proceedings or hearings (Initial Appearance) to be conducted by video teleconference.

**I understand that by signing this form, I am providing my consent for court proceedings to be conducted by video teleconference as provided for in Rule 5 of the Federal Rules of Criminal Procedure. This consent is provided freely and voluntarily and no threats or promises have been made to compel me to sign this form.**

Dated: 04/21/2020

  
Defendant

\_\_\_\_\_  
Defendant's Attorney (if applicable)

AO 98 (Rev. 12/11) Appearance Bond

<p><b>FILED</b></p> <p>VANESSA L ARMSTRONG, CLERK</p> <p>APRIL 21, 2020</p> <p>U.S. DISTRICT COURT WESTERN DISTRICT OF KENTUCKY</p>
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# UNITED STATES DISTRICT COURT

for the

Western District of Kentucky

United States of America )

v. )

Case No. 5:20MJ-00050-LLK )

CHASE BOWMAN-RAINES )

*Defendant* )

### APPEARANCE BOND

#### Defendant's Agreement

I, CHASE BOWMAN-RAINES (*defendant*), agree to follow every order of this court, or any court that considers this case, and I further agree that this bond may be forfeited if I fail:

- ( X ) to appear for court proceedings;
- ( X ) if convicted, to surrender to serve a sentence that the court may impose; or
- ( X ) to comply with all conditions set forth in the Order Setting Conditions of Release.

#### Type of Bond

- ( ) (1) This is a personal recognizance bond.
- ( X ) (2) This is an unsecured bond of \$ 25,000.00.
- ( ) (3) This is a secured bond of \$ \_\_\_\_\_, secured by:
  - ( ) (a) \$ \_\_\_\_\_, in cash deposited with the court.
  - ( ) (b) the agreement of the defendant and each surety to forfeit the following cash or other property (*describe the cash or other property, including claims on it – such as a lien, mortgage, or loan – and attach proof of ownership and value*):

If this bond is secured by real property, documents to protect the secured interest may be filed of record.

- ( ) (c) a bail bond with a solvent surety (*attach a copy of the bail bond, or describe it and identify the surety*):

#### Forfeiture or Release of the Bond

*Forfeiture of the Bond.* This appearance bond may be forfeited if the defendant does not comply with the above agreement. The court may immediately order the amount of the bond surrendered to the United States, including the security for the bond, if the defendant does not comply with the agreement. At the request of the United States, the court may order a judgment of forfeiture against the defendant and each surety for the entire amount of the bond, including interest and costs.

AO 98 (Rev. 12/11) Appearance Bond

*Release of the Bond.* The court may order this appearance bond ended at any time. This bond will be satisfied and the security will be released when either: (1) the defendant is found not guilty on all charges, or (2) the defendant reports to serve a sentence.

**Declarations**

*Ownership of the Property.* I, the defendant – and each surety – declare under penalty of perjury that:

- (1) all owners of the property securing this appearance bond are included on the bond;
- (2) the property is not subject to claims, except as described above; and
- (3) I will not sell the property, allow further claims to be made against it, or do anything to reduce its value while this appearance bond is in effect.

*Acceptance.* I, the defendant – and each surety – have read this appearance bond and have either read all the conditions of release set by the court or had them explained to me. I agree to this Appearance Bond.

I, the defendant – and each surety – declare under penalty of perjury that this information is true. (See 28 U.S.C. § 1746.)

Date: 04/21/2020

X   
Defendant's signature

_____ <i>Surety/property owner – printed name</i>	_____ <i>Surety/property owner – signature and date</i>
_____ <i>Surety/property owner – printed name</i>	_____ <i>Surety/property owner – signature and date</i>
_____ <i>Surety/property owner – printed name</i>	_____ <i>Surety/property owner – signature and date</i>

**CLERK OF COURT**

Date: 04/21/2020

/s/ Mary Butler, Deputy Clerk  
\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Approved.

Date: 04/21/2020

  
Lanny King, Magistrate Judge  
United States District Court  
\_\_\_\_\_  
*Judge's signature*



UNITED STATES DISTRICT COURT
for the
Western District of Kentucky

United States of America
v.
CHASE BOWMAN-RAINES
Defendant

Case No. 5:20MJ-00050-LLK

ORDER SETTING CONDITIONS OF RELEASE

IT IS ORDERED that the defendant's release is subject to these conditions:

- (1) The defendant must not violate federal, state, or local law while on release.
(2) The defendant must cooperate in the collection of a DNA sample if it is authorized by 42 U.S.C. § 14135a.
(3) The defendant must advise the court or the pretrial services office or supervising officer in writing before making any change of residence or telephone number.
(4) The defendant must appear in court as required and, if convicted, must surrender as directed to serve a sentence that the court may impose.

The defendant must appear at: U.S. District Court, 501 Broadway, Paducah, KY 42001
Place

on AS DIRECTED
Date and Time

If blank, defendant will be notified of next appearance.

- (5) The defendant must sign an Appearance Bond, if ordered.

**ADDITIONAL CONDITIONS OF RELEASE**

IT IS FURTHER ORDERED that the defendant's release is subject to the conditions marked below:

(x) (6) The defendant is placed in the custody of:

Person or organization \_\_\_\_\_

Address (only if above is an organization) \_\_\_\_\_

City and state \_\_\_\_\_

Tel. No. \_\_\_\_\_

who agrees to (a) supervise the defendant, (b) use every effort to assure the defendant's appearance at all court proceedings, and (c) notify the court immediately if the defendant violates a condition of release or is no longer in the custodian's custody.

Signed: \_\_\_\_\_

Custodian

Date

(x) (7) The defendant must:

(x) (a) submit to supervision by and report for supervision to the USPO Matt Clear immediately upon release, by telephone at 502-432-1809.

(x) (b) continue or actively seek employment.

( ) (c) continue or start an education program.

(x) (d) surrender any passport to: Pretrial services officer including any military issued passports

(x) (e) not obtain a passport or other international travel document.

( ) (f) abide by the following restrictions on personal association, residence, or travel: Western District of Kentucky

must reside at his residence, \_\_\_\_\_

Redacted

Redacted

(x) (g) avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, including: Any known victims

( ) (h) get medical or psychiatric treatment: \_\_\_\_\_

( ) (i) return to custody each \_\_\_\_\_ at \_\_\_\_\_ o'clock after being released at \_\_\_\_\_ o'clock for employment, schooling, or the following purposes: \_\_\_\_\_

( ) (j) maintain residence at a halfway house or community corrections center, as the pretrial services office or supervising officer considers necessary.

(x) (k) not possess a firearm, destructive device, or other weapon.

( ) (l) not use alcohol ( ) at all ( ) excessively.

( ) (m) not use or unlawfully possess a narcotic drug or other controlled substances defined in 21 U.S.C. § 802, unless prescribed by a licensed medical practitioner.

( ) (n) submit to testing for a prohibited substance if required by the pretrial services office or supervising officer. Testing may be used with random frequency and may include urine testing, the wearing of a sweat patch, a remote alcohol testing system, and/or any form of prohibited substance screening or testing. The defendant must not obstruct, attempt to obstruct, or tamper with the efficiency and accuracy of prohibited substance screening or testing.

( ) (o) participate in a program of inpatient or outpatient substance abuse therapy and counseling if directed by the pretrial services office or supervising officer.

(x) (p) participate in one of the following location restriction programs and comply with its requirements as directed.

( ) (i) **Curfew.** You are restricted to your residence every day ( ) from \_\_\_\_\_ to \_\_\_\_\_, or ( ) as directed by the pretrial services office or supervising officer; or

(x) (ii) **Home Detention.** You are restricted to your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer; or

( ) (iii) **Home Incarceration.** You are restricted to 24-hour-a-day lock-down at your residence except for medical necessities and court appearances or other activities specifically approved by the court.

(x) (q) submit to location monitoring as directed by the pretrial services office or supervising officer and comply with all of the program requirements and instructions provided.

(x) You must pay all or part of the cost of the program based on your ability to pay as determined by the pretrial services office or supervising officer.

(x) (r) report as soon as possible, to the pretrial services office or supervising officer, every contact with law enforcement personnel, including arrests, questioning, or traffic stops.

(x) (s) The defendant shall contribute to the U.S. Probation Office's costs of services rendered based upon his ability to pay as reflected in his monthly cash flow as it relates to the court-approved sliding scale fee.

(x) (t) The defendant shall refrain from any unsupervised contact with any minors under the age of 18.

(x) (v) The location monitoring component will be GPS.

(x) (w) Follow any and all military orders or regulations.

**Pretrial Computer Conditions – Western District of Kentucky**

**No Computer or Internet Access**

**Corresponding Special Conditions:**

- The defendant is prohibited from access to any computer as defined by 18 USC 1030(e)(1), Internet Service Provider, bulletin board system, or any other public or private computer network or the service at any location (including employment or education) without prior written approval of the Court. Any approval shall be subject to any conditions set by the Court.
- The defendant shall not use or possess any removable storage devices to include hard drives, CD/DVD ROM Drives, USB thumb drives.
- The defendant shall provide the USPO with all requested financial documents to monitor the defendant's compliance with the computer and Internet prohibition.

 04/21/2020  
Peter J. Lee 4/21/20

**ADVICE OF PENALTIES AND SANCTIONS**

TO THE DEFENDANT:

YOU ARE ADVISED OF THE FOLLOWING PENALTIES AND SANCTIONS:

Violating any of the foregoing conditions of release may result in the immediate issuance of a warrant for your arrest, a revocation of your release, an order of detention, a forfeiture of any bond, and a prosecution for contempt of court and could result in imprisonment, a fine, or both.

While on release, if you commit a federal felony offense the punishment is an additional prison term of not more than ten years and for a federal misdemeanor offense the punishment is an additional prison term of not more than one year. This sentence will be consecutive (i.e., in addition to) to any other sentence you receive.

It is a crime punishable by up to ten years in prison, and a \$250,000 fine, or both, to: obstruct a criminal investigation; tamper with a witness, victim, or informant; retaliate or attempt to retaliate against a witness, victim, or informant; or intimidate or attempt to intimidate a witness, victim, juror, informant, or officer of the court. The penalties for tampering, retaliation, or intimidation are significantly more serious if they involve a killing or attempted killing.

If, after release, you knowingly fail to appear as the conditions of release require, or to surrender to serve a sentence, you may be prosecuted for failing to appear or surrender and additional punishment may be imposed. If you are convicted of:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more – you will be fined not more than \$250,000 or imprisoned for not more than 10 years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years – you will be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony – you will be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor – you will be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender will be consecutive to any other sentence you receive. In addition, a failure to appear or surrender may result in the forfeiture of any bond posted.

**Acknowledgment of the Defendant**

I acknowledge that I am the defendant in this case and that I am aware of the conditions of release. I promise to obey all conditions of release, to appear as directed, and surrender to serve any sentence imposed. I am aware of the penalties and sanctions set forth above.

X

Defendant's Signature

X

Fort Campbell, KY

City and State

**Directions to the United States Marshal**

- ( ) The defendant is ORDERED released after processing.
- ( ) The United States marshal is ORDERED to keep the defendant in custody until notified by the clerk or judge that the defendant has posted bond and/or complied with all other conditions for release. If still in custody, the defendant must be produced before the appropriate judge at the time and place specified.

Date: April 21, 2020

Lanny King, Magistrate Judge  
United States District Court

Signature of Judicial Officer

Lanny King, US Magistrate Judge,

Printed name and title

DISTRIBUTION: COURT DEFENDANT PRETRIAL SERVICE U.S. ATTORNEY U.S. MARSHAL

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
PADUCAH DIVISION**

**CRIMINAL CASE NUMBER: 5:20-MJ-00050-LLK-1**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**v.**

**CHASE BOWMAN-RAINES (1)**

**DEFENDANT**

**ORDER ON INITIAL APPEARANCE**

The above-styled case came before the Honorable Lanny King, United States Magistrate Judge, and was called in open court on April 21, 2020, for the purpose of conducting an initial appearance on a Criminal Complaint.

The defendant, Chase Bowman-Raines, was present, in custody at the McCracken County Detention Center. Present and representing the United States was Assistant United States Attorney Leigh Ann Dycus. The proceedings in this case were transcribed by Terri Turner, Official Court Reporter. All parties appeared for this hearing via video teleconferencing through Zoom.

The Court advised the defendant of his right to have this hearing held in person rather than through video teleconferencing pursuant to Rule 5(f) of the Federal Rules of Criminal Procedure. However, due to the Coronavirus Aid, Relief, and Economic Security Act (CARES) and General Order No. 20-9, the Court explained to the defendant that he was not sure when an in person

proceeding would be allowed. The defendant acknowledged that he understood this right and consented to proceed via video conferencing. The defendant signed the written consent and it will be filed in the record.

The Court advised the defendant of his Constitutional Rights pursuant to Rule 5 of the Federal Rules of Criminal Procedure, including his right to court appointed counsel and the defendant acknowledged that he understood those rights. The defendant acknowledged receipt of a copy of the Criminal Complaint and Affidavit in Support and was advised of the nature of the offense with which he is charged. The Court asked the defendant if he would like counsel appointed to represent him and the defendant notified the Court that he had retained private counsel and waived his right to court appointed counsel. The Court asked the defendant the name of his attorney and he only knew his name to be Mr. Kern. The United States did not move for the defendant's detention and the defendant will be placed on bond and released from custody after these proceedings.

The Court notified the defendant that he was entitled to a preliminary hearing, but did not schedule one at this time, since his attorney was not present for this hearing. Pursuant to Rule 5.1(c) of the Federal Rules of Criminal Procedure, the defendant is entitled to have this hearing within a reasonable time, but not later than 21 days after his initial appearance is held. Once, defendant's counsel enters an entry of appearance, the Court will contact the parties and schedule this

proceeding. The Court explained to the defendant that he would be released from custody on a \$25,000 Appearance Bond with an Order Setting Conditions of Release. The Court advised the defendant of all the conditions of his release, including the condition that he follow any and all military orders and regulations and noncompliance of any of these conditions would be in violation of his release. Upon release from custody, the defendant will be placed on Location Monitoring (GPS) and must reside at his residence on the Fort Campbell Military Base. The Court advised the defendant to stay in contact with his probation officer and notify the officer immediately if he loses his military housing. The defendant is required to get approval from the probation officer prior to any move.

**IT IS THEREFORE ORDERED** the defendant be **released** from custody pursuant to Appearance Bond and Order Setting Conditions of Release executed by him on this date, April 21, 2020.

April 22, 2020

P:0/45  
LLK-mhb

  
  
**Lanny King, Magistrate Judge**  
**United States District Court**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH

UNITED STATES OF AMERICA

PLAINTIFF

v.

CRIMINAL NO. 5:20-mj-00050-LLK

CHASE BOWMAN-RAINES

DEFENDANT

**ORDER EXTENDING TIME TO FILE INFORMATION OR INDICTMENT**

Having considered the United States' Motion to Extend Time in which to File Indictment, as well as the Western District of Kentucky's General Orders No. 20-02, 20-08, and 20-09 In Re: Court Operations Related to COVID-19, and finding that good cause exists supporting the same, the Court hereby finds as follows:

1. The government filed a complaint in this case on April 21, 2020, and this Court issued an arrest warrant on the same date. Defendant was arrested on April 21, 2020, and first appeared before this Court on that date. Defendant was ordered released after his initial appearance on April 21, 2020. The Speedy Trial Act, 18 U.S.C. § 3161, ordinarily would require that an indictment or information charging the defendant with the commission of an offense must be filed on or before May 21, 2020. 18 U.S.C. § 3161(b).
2. On March 13, 2020, Chief Judge Greg N. Stivers issued General Order No. 20-02 In Re: Court Operations Related to COVID-19, which included a directive stating that "[a]ll grand jury proceedings in this District are CONTINUED except those that are 30-day cases or are necessary to protect the safety of the community, pending



further Order of the Court.” (Gen. Order 20-03, ¶ 4.) On April 1, 2020, Chief Judge Stivers issued General Order No. 20-08 In Re: Court Operations Related to COVID-19, Supplemental Order Concerning Grand Jury Proceedings, stating that “[i]n light of the ongoing COVID-19 epidemic, and in order to protect the public health, . . . all grand jury proceedings, which were continued generally by General Order 20-02, are continued until May 1, 2020.” (Gen. Order 20-08.) On April 17, 2020, Chief Judge Stivers issued General Order No. 20-09 In Re: Supplemental Order Concerning Court Operations Related to COVID-19, stating that “All grand jury proceedings, which were continued generally by General Order 20-08, are continued until May 29, 2020.” (Gen. Order 20-09, ¶ 3.)

3. No grand juries have met in the Western District of Kentucky since the issuance of General Order 20-02. The Speedy Trial Act automatically provides for an additional thirty days to seek an indictment “in a district in which no grand jury has been in session during such thirty-day period.” 18 U.S.C. § 3161(b). Given the grave public-health concerns discussed in General Order 20-02 and based on the current declaration of a national and statewide public-health emergency, this Court cannot readily determine whether enough individual grand jurors will be in a position to report for duty sufficient to maintain the required quorum in the event in the event the Court were to call them to meet at this time.
4. For these reasons, the ends-of-justice are served by continuing the thirty-day statutory Speedy Trial Clock set forth in 18 U.S.C. § 3161(b), resetting the thirty-day period to begin anew on the date that this Court permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the

normal course, as communicated through a new General Order, and excluding the period of time between the date on which the defendant was arrested and the date on which this Court first permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, for all Speedy Trial Act purposes. Further, given the foregoing, doing so outweighs the best interest of the public and defendant in a speedy indictment and speedy trial.

5. Failure to grant the requested continuance continuing the thirty-day statutory Speedy Trial clock would require to the Court to dismiss any complaint for which an information or indictment has not been filed within 18 U.S.C. § 3161(b)'s required thirty-day time limit, either with or without prejudice, 18 U.S.C. § 3162(a)(1), which may result in a miscarriage of justice.
6. Failure to continue this case is also likely to put government counsel, witnesses, grand jurors, and Court personnel at unnecessary risk.
7. The continuance is not based on congestion of the Court's calendar, lack of diligent preparation on the part of the attorney for the government, or failure on the part of the attorney for the United States to obtain available witnesses.

THEREFORE, FOR GOOD CAUSE SHOWN:

1. The thirty-day statutory Speedy Trial Clock set forth in 18 U.S.C. § 3161(b), which was originally set to expire on May 21, 2020, is hereby continued until thirty days after the date on which this Court permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the normal course, based on the Court's assessment of the public-health concerns raised by the coronavirus (COVID-19) and communicated through a new General Order.

2. Pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i), and (h)(B)(iii), the time period of April 21, 2020, to the date that this Court permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the normal course, communicated through a new General Order, inclusive, is hereby excluded in computing the time for all Speedy Trial Act purposes, including but not limited to the time within which an indictment or information must be filed (18 U.S.C. § 3161(b)).
3. Nothing in this Order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excluded from the period within which an indictment or information must be filed or a trial must commence. Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which indictment or information must be filed or a trial must commence.

IT IS SO ORDERED.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
Lanny King  
United States Magistrate Judge

cc: USAO (LAD)  
Chase Bowman-Raines  
Attorney of Record

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH

UNITED STATES OF AMERICA

PLAINTIFF

v.

CRIMINAL NO. 5:20-mj-00050-LLK

CHASE BOWMAN-RAINES

DEFENDANT

**UNITED STATES' MOTION TO  
EXTEND TIME IN WHICH TO FILE INDICTMENT**

The United States of America, by counsel, hereby moves this Court to continue the thirty-day time period imposed by the Speedy Trial Act for returning an indictment in the above-captioned case, and to exclude such time for all Speedy Trial Act purposes, including, but not limited to the thirty-day time period under 18 U.S.C. § 3161(b) in which an information or indictment must be filed.

The United States initiated this case via complaint and arrest warrant. A complaint was filed and a federal arrest warrant issued for Defendant Chase Bowman-Raines on April 21, 2020. The defendant was subsequently taken into federal custody and first appeared before the United States Magistrate Judge on April 21, 2020. The defendant was released after his initial appearance on April 21, 2020. Under 18 U.S.C. § 3161(b) an indictment or information must be filed within thirty days from the date on which a defendant was arrested. Under normal circumstances, this would require the United States to seek an indictment filed no later than May 21, 2020.

On March 13, 2020, Chief Judge Greg N. Stivers issued General Order No. 20-02 In Re: Court Operations Related to COVID-19, which included a directive stating that “[a]ll grand jury proceedings in this District are CONTINUED except those that are 30-day cases or are necessary to protect the safety of the community, pending further Order of the Court.” (Gen. Order 20-02, ¶ 4.) The Court entered General Order 20-02 in response to the COVID-19 pandemic and the “discovery of, and increases in, confirmed coronavirus (‘COVID-19’) cases within the Commonwealth of Kentucky.” (Gen. Order 20-02, preamble.) The Court further stated that, with “respect to health risks created by those exposed to COVID-19, the Court also acknowledges state and local guidance regarding the need to limit large gatherings of persons. More specifically, the Court seeks to take immediate and necessary precautions to reduce the possibility of exposure to the virus and slow the spread of the disease, to the extent practical.” *Id.* On April 1, 2020, Chief Judge Stivers issued General Order No. 20-08 In Re: Court Operations Related to COVID-19, Supplemental Order Concerning Grand Jury Proceedings, stating that “[i]n light of the ongoing COVID-19 epidemic, and in order to protect the public health, . . . all grand jury proceedings, which were continued generally by General Order 20-02, are continued until May 1, 2020.” On April 17, 2020, Chief Judge Stivers issued General Order No. 20-09 In Re: Supplemental Order Concerning Court Operations Related to COVID-19, stating that “All grand jury proceedings, which were continued generally by General Order 20-08, are continued until May 29, 2020.”

The United States is continuing to investigate and prosecute this case, and plans to diligently prepare it for indictment, including making arrangements to obtain available witnesses to testify before a grand jury. Nonetheless, the United States is cognizant of

the concerns identified in General Order 20-02, and of the public-health risk created for government counsel, witnesses, grand jurors, and Court personnel by assembling during the period of the public-health emergency created by the COVID-19 pandemic. Since the issuance of General Order 20-02, no grand jury has been called to meet in the Western District of Kentucky, and none is anticipated to meet in coming weeks. Given the current declaration of a statewide and national public-health emergency, the number of grand jurors who are in a position to report for duty may not be sufficient to maintain the required quorum in the event the Court were to call them to meet at this time.

The Speedy Trial Act automatically provides for an additional thirty days to seek an indictment “in a district in which no grand jury has been in session during such thirty-day period.” 18 U.S.C. § 3161(b). It is unclear whether this provision would be operative in the present situation, however, because General Order 20-02 does allow for a grand jury for “30-day cases.” (Gen. Order 20-02, ¶ 4.) The Speedy Trial Act also excludes from “the time within which an information or an indictment must be filed, or in computing the time within which the trial of any such offense must commence,” any period of delay based on a continuance granted by “any judge” based on “findings that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h) & (h)(7)(A). The court must set forth “in the record of the case” its reasons supporting such a finding, after considering the factors identified in the statute, among others. *Id.*, § 3161(h)(7)(A) & (B). Additionally, a national pandemic most certainly falls under 18 U.S.C. § 3161(h)(7)(B)(iii), which allows a court excluding time to consider “[w]hether, in a case in which arrest precedes indictment, delay in the filing of the indictment is caused because the arrest occurs at a time such that it is

unreasonable to expect return and filing of the indictment within the period specified in section 3161(b).” See, e.g., *Furlow v. United States*, 644 F.2d 764, 767–69 (9th Cir. 1981) (affirming Speedy Trial exclusion after eruption of Mt. St. Helens); *United States v. Scott*, 245 Fed. Appx. 391, 394 (5th Cir. 2007) (Hurricane Katrina)).

Accordingly, to eliminate the risk of dismissal under the Speedy Trial Act, and to comply with the statute, the Court’s General Orders, and public-health requirements, the United States respectfully requests that this Court (1) grant this motion; (2) find that the ends-of-justice require the Court to continue the thirty-day clock in this case, with the thirty-day period to begin anew on the date that this Court, through a new General Order, permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the normal course; and (3) exclude the period of time between the date on which Defendant was arrested and the date on which the Court first permits grand juries in the Western District of Kentucky to resume meeting and proceeding generally, for all Speedy Trial Act purposes, including, but not limited to the thirty-day time period under 18 U.S.C. § 3161(b) in which an information or indictment must be filed.

Respectfully submitted,

RUSSELL M. COLEMAN  
United States Attorney

/s/ Leigh Ann Dycus  
Leigh Ann Dycus  
Assistant U.S. Attorney  
501 Broadway, Suite B29  
Paducah, Kentucky 42001  
270-816-3354  
[leigh.ann.dycus@usdoj.gov](mailto:leigh.ann.dycus@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2020, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system and mailed the foregoing to Chase Bowman-Raines at his last known address.

/s/ Leigh Ann Dycus

Leigh Ann Dycus  
Assistant U.S. Attorney





**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
PADUCAH DIVISION**

**CRIMINAL CASE NUMBER: 5:20MJ-00050-LLK**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**v.**

**CHASE BOWMAN-RAINES**

**DEFENDANT**

**ORDER**

A telephonic status conference was held before the Honorable Lanny King, United States Magistrate Judge on May 8, 2020.

The defendant, Chase Bowman-Raines, appeared, without counsel, and on his own behalf. The United States was represented by Assistant United States Attorney Leigh Ann Dycus. The defendant's probation officer, Matt Cleer, was present on the conference. These proceedings were going to be transcribed by Terri Turner, Official Court Reporter. However, she was having technical difficulties dialing into the conference and was not able to connect to the conference. Judge King explained to the parties that this conference would not be transcribed, but he would proceed with the conference.

The Court asked the defendant if he had hired private counsel or if he would like to see if he qualified for court appointed counsel. The defendant advised the Court that he was going to the bank on this date and see if he could qualify for a

loan in order to hire private counsel. Judge King placed the defendant under oath and asked him questions regarding his finances. Upon questioning the defendant under oath and after considering the defendant's finances, the Court determined that the defendant qualified for counsel pursuant to 18 U.S.C. § 3006A. The Court advised the defendant to contact his probation officer on Monday and notify him if he had hired private counsel to represent him on this case. If he hires private counsel, the defendant is to let his attorney know that he needs to file an entry of appearance in this case no later than Monday, May 11, 2020. If, he is not able to hire private counsel, then the Federal Public Defender will be appointed to represent him on this matter.

As to the preliminary hearing, and due to the defendant's lack of representation, the Court ruled that he would extend the hearing deadline thirty (30) days from today's date. The Court explained to the defendant his rights pursuant to Rule 5.1(c) and Rule 5.1(d) of the Federal Rules of Criminal Procedure, and that he was entitled to a preliminary hearing within twenty-one (21) days of his initial appearance, but that deadline could be extended, if he agreed to the extension. The defendant consented to delay the preliminary hearing thirty (30) days, in order to secure counsel to represent him and allow time to prepare for this hearing.

**IT IS THEREFORE ORDERED that:**

1. If the defendant does not retain private counsel, the **Federal Public Defender** will be **appointed** to represent the defendant pursuant to the Criminal Justice Act. A separate text order will be entered designating that appointment.
2. Upon entry of appearance by defendant's counsel, a **preliminary hearing** will be scheduled in a separate order.
3. A **telephonic status conference** is scheduled for **Tuesday, May 12, at 2:00 p.m. C.T.** before Magistrate Judge Lanny King. All parties shall connect to the call by dialing the **Toll-Free Meeting Number 1-877-848-7030** and entering the **Access Code 7238577#** when prompted.

May 11, 2020

  
Lanny King, Magistrate Judge  
United States District Court



cc: USPO-Matt Cleer via e-mail to forward information to the defendant

P:0/10  
LLK-mhb

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF KENTUCKY AT PADUCAH

**APPEARANCE**

Case 5:20-MJ-50-LLK

To the Clerk of this court and all parties of record:

Enter my appearance as counsel  
in this case for

CHASE BOWMAN-RAINES

May 18, 2020  
Date

s/Donald J. Meier  
Print Name

629 S. Fourth Avenue, Suite 200  
Address

Louisville, KY 40202  
CityStateZip Code

(502) 584-0525  
Phone Number

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
PADUCAH DIVISION**

**CRIMINAL CASE NUMBER: 5:20MJ-00050-LLK**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**v.**

**CHASE BOWMAN-RAINES**

**DEFENDANT**

**ORDER**

A telephonic status conference was held before the Honorable Lanny King, United States Magistrate Judge, on May 12, 2020.

The defendant, Chase Bowman-Raines, was present on this conference. Present and representing the defendant was Assistant Federal Public Defender Chastity R. Beyl. Ms. Beyl notified the Court that she was not sure if she or another attorney would be assigned to this case, but she would be appearing with the defendant for today's proceeding. The United States was represented by Assistant United States Attorney Leigh Ann Dycus. The defendant's probation officer, Matt Cleer, was present on the conference. This proceeding was transcribed by Terri Turner, Official Court Reporter.

On May 8, 2020, a telephonic status conference was held and the Court extended the deadline to schedule the preliminary hearing thirty (30) days from that date, in order for the defendant to retain counsel and to allow them time

to prepare for the hearing. Now that counsel has the Federal Public Defender appointed to represent him, the Court discussed scheduling the preliminary hearing.

**IT IS HEREBY ORDERED** the **preliminary hearing** be scheduled on **Thursday, June 4, 2020 at 1:30 p.m. C.T.** via video teleconferencing through Zoom before Magistrate Judge Lanny King at the United States District Court in Paducah, Kentucky.

May 26, 2020

  
**Lanny King, Magistrate Judge**  
**United States District Court**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH

UNITED STATES OF AMERICA

PLAINTIFF

v.

CRIMINAL NO. 5:20-mj-00050-LLK

CHASE BOWMAN-RAINES

DEFENDANT

**ORDER EXTENDING TIME TO FILE INFORMATION OR INDICTMENT**

Having considered the United States' Motion to Extend Time in which to File Indictment, as well as the Western District of Kentucky's General Orders No. 20-02, 20-08, and 20-09 In Re: Court Operations Related to COVID-19, and finding that good cause exists supporting the same, the Court hereby finds as follows:

1. The government filed a complaint in this case on April 21, 2020, and this Court issued an arrest warrant on the same date. Defendant was arrested on April 21, 2020, and first appeared before this Court on that date. Defendant was ordered released after his initial appearance on April 21, 2020. The Speedy Trial Act, 18 U.S.C. § 3161, ordinarily would require that an indictment or information charging the defendant with the commission of an offense must be filed on or before May 21, 2020. 18 U.S.C. § 3161(b).
2. On March 13, 2020, Chief Judge Greg N. Stivers issued General Order No. 20-02 In Re: Court Operations Related to COVID-19, which included a directive stating that "[a]ll grand jury proceedings in this District are CONTINUED except those that are 30-day cases or are necessary to protect the safety of the community, pending

further Order of the Court.” (Gen. Order 20-03, ¶ 4.) On April 1, 2020, Chief Judge Stivers issued General Order No. 20-08 In Re: Court Operations Related to COVID-19, Supplemental Order Concerning Grand Jury Proceedings, stating that “[i]n light of the ongoing COVID-19 epidemic, and in order to protect the public health, . . . all grand jury proceedings, which were continued generally by General Order 20-02, are continued until May 1, 2020.” (Gen. Order 20-08.) On April 17, 2020, Chief Judge Stivers issued General Order No. 20-09 In Re: Supplemental Order Concerning Court Operations Related to COVID-19, stating that “All grand jury proceedings, which were continued generally by General Order 20-08, are continued until May 29, 2020.” (Gen. Order 20-09, ¶ 3.)

3. No grand juries have met in the Western District of Kentucky since the issuance of General Order 20-02. The Speedy Trial Act automatically provides for an additional thirty days to seek an indictment “in a district in which no grand jury has been in session during such thirty-day period.” 18 U.S.C. § 3161(b). Given the grave public-health concerns discussed in General Order 20-02 and based on the current declaration of a national and statewide public-health emergency, this Court cannot readily determine whether enough individual grand jurors will be in a position to report for duty sufficient to maintain the required quorum in the event in the event the Court were to call them to meet at this time.
4. For these reasons, the ends-of-justice are served by continuing the thirty-day statutory Speedy Trial Clock set forth in 18 U.S.C. § 3161(b), resetting the thirty-day period to begin anew on the date that this Court permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the



normal course, as communicated through a new General Order, and excluding the period of time between the date on which the defendant was arrested and the date on which this Court first permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, for all Speedy Trial Act purposes. Further, given the foregoing, doing so outweighs the best interest of the public and defendant in a speedy indictment and speedy trial.

5. Failure to grant the requested continuance continuing the thirty-day statutory Speedy Trial clock would require to the Court to dismiss any complaint for which an information or indictment has not been filed within 18 U.S.C. § 3161(b)'s required thirty-day time limit, either with or without prejudice, 18 U.S.C. § 3162(a)(1), which may result in a miscarriage of justice.
6. Failure to continue this case is also likely to put government counsel, witnesses, grand jurors, and Court personnel at unnecessary risk.
7. The continuance is not based on congestion of the Court's calendar, lack of diligent preparation on the part of the attorney for the government, or failure on the part of the attorney for the United States to obtain available witnesses.

THEREFORE, FOR GOOD CAUSE SHOWN:

1. The thirty-day statutory Speedy Trial Clock set forth in 18 U.S.C. § 3161(b), which was originally set to expire on May 21, 2020, is hereby continued until thirty days after the date on which this Court permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the normal course, based on the Court's assessment of the public-health concerns raised by the coronavirus (COVID-19) and communicated through a new General Order.

2. Pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i), and (h)(B)(iii), the time period of April 21, 2020, to the date that this Court permits grand juries in the Western District of Kentucky to resume meeting and proceed generally, in the normal course, communicated through a new General Order, inclusive, is hereby excluded in computing the time for all Speedy Trial Act purposes, including but not limited to the time within which an indictment or information must be filed (18 U.S.C. § 3161(b)).
3. Nothing in this Order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excluded from the period within which an indictment or information must be filed or a trial must commence. Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which indictment or information must be filed or a trial must commence.

IT IS SO ORDERED.

[DN 10]



*Thomas B. Russell*

**Thomas B. Russell, Senior Judge  
United States District Court**

May 27, 2020

CC: Attorneys of Record

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH  
(Filed Electronically)**

**DOCKET NO. 5:20MJ-50-LLK  
UNITED STATES OF AMERICA,**

**PLAINTIFF,**

**VS.**

**CHASE BOWMAN-RAINES,**

**DEFENDANT.**

**WAIVER OF PRELIMINARY EXAMINATION OR HEARING**

I, Chase Bowman-Raines, charged in this District and having appeared before this Court and been advised of my rights as required by Rule 5 or Rule 32.1 Fed.R.Crim.P., including my right to have a preliminary (examination)(hearing), do hereby waive (give up) my right to a preliminary (examination)(hearing).

s/ Chase Bowman-Raines  
Signed w/ permission from client via phone

s/ Donald J. Meier  
Counsel for Defendant

Date: 5/29/2020

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
PADUCAH DIVISION

CRIMINAL CASE NUMBER: 5:20MJ-00050-LLK

UNITED STATES OF AMERICA

PLAINTIFF

v.

CHASE BOWMAN-RAINES

DEFENDANT

ORDER

The defendant, through counsel, filed a Waiver of a Preliminary Examination or Hearing with the Court on May 29, 2020.

IT IS HEREBY ORDERED that the Preliminary Hearing scheduled for Thursday, June 4, 2020 at 1:30 p.m. Central Time before Magistrate Judge Lanny King is hereby CANCELED.

June 1, 2020



A handwritten signature in black ink, appearing to read "Lanny King", is written over a circular official seal of the United States District Court for the Western District of Kentucky. The seal features an eagle with wings spread, perched on a shield, with the text "United States District Court" and "Western District of Kentucky" around the perimeter.

Lanny King, Magistrate Judge  
United States District Court

**FILED**  
VANESSA L. ARMSTRONG, CLERK

JUN 17 2020

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

UNITED STATES OF AMERICA

v.

**CHASE BOWMAN-RAINES**

INDICTMENT

NO. 5-20-cr-12-TBR

18 U.S.C. § 2252A(a)(2)(B)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2252A(b)(1)

18 U.S.C. § 2252A(b)(2)

18 U.S.C. § 2253

The Grand Jury charges:

COUNT 1

*(Distribution of Child Pornography)*

On or about February 15, 2019, in the Western District of Kentucky, Christian County, Kentucky, the defendant, **CHASE BOWMAN-RAINES**, knowingly distributed child pornography, as that term is defined in 18 U.S.C. § 2256(8)(A), using any means and facility of interstate commerce and in and affecting interstate commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(B) and 2252A(b)(1).

The Grand Jury further charges:

COUNT 2  
*(Distribution of Child Pornography)*

On or about December 15, 2019, in the Western District of Kentucky, Christian County, Kentucky, the defendant, **CHASE BOWMAN-RAINES**, knowingly distributed child pornography, as that term is defined in 18 U.S.C. § 2256(8)(A), using any means and facility of interstate commerce and in and affecting interstate commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(B) and 2252A(b)(1).

The Grand Jury further charges:

COUNT 3  
*(Distribution of Child Pornography)*

On or about January 7, 2020, in the Western District of Kentucky, Christian County, Kentucky, the defendant, **CHASE BOWMAN-RAINES**, knowingly distributed child pornography, as that term is defined in 18 U.S.C. § 2256(8)(A), using any means and facility of interstate commerce and in and affecting interstate commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(B) and 2252A(b)(1).

The Grand Jury further charges:

COUNT 4  
*(Possession of Child Pornography)*

On or about and between February 15, 2019, and April 20, 2020, in the Western District of Kentucky, Christian County, Kentucky, the defendant, CHASE BOWMAN-RAINES, knowingly possessed child pornography, as that term is defined in 18 U.S.C. § 2256(8)(A), that involved a minor who had not attained 12 years of age, and that had been transported in interstate commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

NOTICE OF FORFEITURE

As a result of committing the offenses in Counts 1 through 4 of this Indictment, the defendant, CHASE BOWMAN-RAINES, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(3), all of the rights, title, and interests in any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property, and all visual depictions which were produced, transported, mailed, shipped, or received in violation of law.

A TRUE BILL.

  
FOREPERSON

  
RUSSELL M. COLEMAN  
UNITED STATES ATTORNEY

RMC:LAD

UNITED STATES OF AMERICA v. CHASE BOWMAN-RAINES

**PENALTIES**

Counts 1-3: NL 5 yrs./NM 20 yrs./\$250,000/both/ NL 5 yrs./NM Life Supervised Release  
Count 4: NM 20 yrs./\$250,000/both/ NL 5 yrs./NM Life Supervised Release  
\*mandatory \$5,000 assessment per count if the defendant is non-indigent (18 U.S.C. § 3014 – effective 5/29/2015)  
Forfeiture

**NOTICE**

**ANY PERSON CONVICTED OF AN OFFENSE AGAINST THE UNITED STATES SHALL BE SUBJECT TO SPECIAL ASSESSMENTS, FINES, RESTITUTION & COSTS.**

**SPECIAL ASSESSMENTS**

18 U.S.C. § 3013 requires that a special assessment shall be imposed for each count of a conviction of offenses committed after November 11, 1984, as follows:

Misdemeanor:	\$ 25 per count/individual	Felony:	\$100 per count/individual
	\$125 per count/other		\$400 per count/other

**FINES**

In addition to any of the above assessments, you may also be sentenced to pay a fine. Such fine is due immediately unless the court issues an order requiring payment by a date certain or sets out an installment schedule. You shall provide the United States Attorney's Office with a current mailing address for the entire period that any part of the fine remains unpaid, or you may be held in contempt of court. 18 U.S.C. § 3571, 3572, 3611, 3612

**Failure to pay fine as ordered may subject you to the following:**

1. **INTEREST and PENALTIES** as applicable by law according to last date of offense.

For offenses occurring after December 12, 1987:

No **INTEREST** will accrue on fines under \$2,500.00.

**INTEREST** will accrue according to the Federal Civil Post-Judgment Interest Rate in effect at the time of sentencing. This rate changes monthly. Interest accrues from the first business day following the two week period after the date a fine is imposed.

**PENALTIES** of:

10% of fine balance if payment more than 30 days late.

15% of fine balance if payment more than 90 days late.

2. Recordation of a **LIEN** shall have the same force and effect as a tax lien.
3. Continuous **GARNISHMENT** may apply until your fine is paid.

18 U.S.C. §§ 3612, 3613

If you **WILLFULLY** refuse to pay your fine, you shall be subject to an **ADDITIONAL FINE** of not more than the greater of \$10,000 or twice the unpaid balance of the fine; or **IMPRISONMENT** for not more than 1 year or both. 18 U.S.C. § 3615



RESTITUTION

If you are convicted of an offense under Title 18, U.S.C., or under certain air piracy offenses, you may also be ordered to make restitution to any victim of the offense, in addition to, or in lieu of any other penalty authorized by law. 18 U.S.C. § 3663

APPEAL

If you appeal your conviction and the sentence to pay your fine is stayed pending appeal, the court shall require:

1. That you deposit the entire fine amount (or the amount due under an installment schedule during the time of your appeal) in an escrow account with the U.S. District Court Clerk, or
2. Give bond for payment thereof.

18 U.S.C. § 3572(g)

PAYMENTS

If you are ordered to make payments to the U.S. District Court Clerk's Office, certified checks or money orders should be made payable to the Clerk, U.S. District Court and delivered to the appropriate division office listed below:

LOUISVILLE: Clerk, U.S. District Court  
106 Gene Snyder U.S. Courthouse  
601 West Broadway  
Louisville, KY 40202  
502/625-3500

BOWLING GREEN: Clerk, U.S. District Court  
120 Federal Building  
241 East Main Street  
Bowling Green, KY 42101  
270/393-2500

OWENSBORO: Clerk, U.S. District Court  
126 Federal Building  
423 Frederica  
Owensboro, KY 42301  
270/689-4400

PADUCAH: Clerk, U.S. District Court  
127 Federal Building  
501 Broadway  
Paducah, KY 42001  
270/415-6400

If the court finds that you have the present ability to pay, an order may direct imprisonment until payment is made.

FORM DBD-34  
JUN.85

No.

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**UNITED STATES DISTRICT COURT**  
Western District of Kentucky  
At Louisville

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THE UNITED STATES OF AMERICA

vs.

**CHASE BOWMAN-RAINES**

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**INDICTMENT**

**COUNTS 1, 2, 3**

*Distribution of Child Pornography*  
18 U.S.C. §§2251A(a)(2)(B) and 2252A(b)(1)

**COUNT 4**

*Possession of Child Pornography*  
18 U.S.C. §§2252A(a)(5)(B) and 2252A(b)(2)

**Forfeiture**

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*A true bill.*

[Redacted Signature]  
*Foreperson*

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*Filed in open court this 17<sup>th</sup> day of June, 2020.*

**VANESSA L. ARMSTRONG, CLERK**

**JUN 17 2020**

*Clerk*

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*Bail, \$*

**U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY**

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## Case Assignment Standard Criminal Assignment

Case number 5:20CR-12-TBR

Assigned : Senior Judge Thomas B. Russell  
Judge Code : 4413

Assigned on 6/17/2020 3:08:53 PM  
Transaction ID: 36843

[Request New Judge](#)

[Return](#)

**FILED**  
VANESSA L. ARMSTRONG, CLERK

JUN 17 2020

U.S. DISTRICT COURT  
WEST'N. DIST. KENTUCKY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH

UNITED STATES OF AMERICA

PLAINTIFF

vs.

5:20-CR-12-TBR

CHASE BOWMAN-RAINES

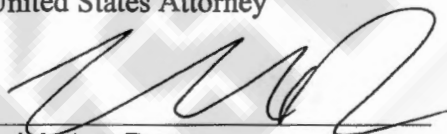
DEFENDANT

**NOTICE OF ENTRY OF APPEARANCE**

Assistant United States Attorney Leigh Ann Dycus hereby enters her appearance of record on behalf of the United States of America.

Respectfully submitted,

RUSSELL M. COLEMAN  
United States Attorney



Leigh Ann Dycus  
Assistant United States Attorney  
501 Broadway, Room 29  
Paducah, Kentucky 42001  
Phone: (270) 443-6188  
FAX: (270) 444-6794  
Email: [leigh.ann.dycus@usdoj.gov](mailto:leigh.ann.dycus@usdoj.gov)

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH**

**CRIMINAL CASE NUMBER 5:20CR-00012-TBR-1**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**v.**

**CHASE BOWMAN-RAINES**

**DEFENDANT**

**ARRAIGNMENT ORDER  
& RECIPROCAL ORDER OF DISCOVERY**

The above-styled case came before the Honorable Lanny King, United States Magistrate Judge, and was called in open court on July 21, 2020, for arraignment on an Indictment in Paducah, Kentucky.

The defendant, Chase Bowman-Raines, appeared in court, with his attorney Assistant Federal Public Defender Aaron M. Dyke. Mr. Dyke appeared on behalf of Assistant Federal Public Defender Donald J. Meier. The United States was represented by Assistant United States Attorney Leigh Ann Dycus. The proceedings in this case were digitally recorded in the Second Floor Courtroom.

The defendant, through counsel, acknowledged receipt of a copy of the Indictment and the Penalty Page. The Court read the Indictment into the record and advised the defendant of the nature of offenses with which he is charged and the minimum and maximum penalties provided by law. The Court entered a **NOT GUILTY PLEA** on the defendant's behalf as to **Counts 1-4** of the Indictment.

**IT IS HEREBY ORDERED** that a **telephonic further proceedings** be scheduled before **Senior Judge Thomas B. Russell** on **August 28, 2020 at 9:00 a.m. C.T.** for the sole purpose of establishing a trial date. The Court shall place the conference call at the scheduled

hour. Counsel shall notify the Court if the conference call is to be received at a telephone other than counsel's telephone number which is on record with the Court. If matters, other than the setting of a trial date, which would require a personal appearance by the defendant and counsel for the parties need to be addressed, the Court should be notified as soon as possible. The defendant is **released** and shall continue to abide by the same terms and conditions of release as previously ordered in the Appearance Bond that was entered into the record on April 21, 2020.

**IT IS HEREBY FURTHER ORDERED** that the parties proceed to give reciprocal discovery pursuant to the provisions of Fed. R. Crim. P. 16, and 18 U.S.C. § 3500 Jencks Act, subject to the limitations and conditions set forth therein, and including, not by way of limitations, the following:

**THE UNITED STATES**

The United States shall permit the defendant to inspect and copy or photograph:

1. Any relevant written or recorded statements made by the defendant or copies thereof within the possession, custody or control of the United States, the existence of which is known or by the exercise of due diligence may become known to the United States Attorney;
2. The substance of any oral statement which the United States intends to offer in evidence at the trial made by the defendant whether before or after arrest in response to interrogation by any person then known to the defendant to be a Government agent;
3. Recorded testimony of the defendant before the Federal Grand Jury which relates to the offense charged;
4. Books, papers, documents, photographs, tangible objects, buildings or places or copies of portions thereof which are within the possession, custody, or control of the United States and which the United States intends to introduce as evidence in chief at the trial of this case;
5. Results of reports of physical or mental examinations and of scientific tests or experiments or copies thereof which are within the possession, custody, or control of the United States; the existence of which is known or by the exercise of due diligence may become known to the United States Attorney, and which the United States intends to introduce as evidence in chief at the trial of this case;
6. Copy of the prior criminal record of the defendant, if any that is within the possession, custody, or control of the United States, the existence of which is known, or by the exercise of due diligence may become known, to the United States; and

7. Any tape recording made by the Government agents of any conversation with the defendant.

**THE DEFENDANT**

The defendant shall provide the following information to the United States for the purpose of inspection, examination and photocopying:

1. All books, papers, documents, photographs, tangible objects, or copies, or portions thereof, which are within the possession, custody, or control of the defendant, and which the defendant intends to introduce as evidence in chief at the trial in this case; and
2. Any results or reports of mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial, or which were prepared by a witness whom the defendant intends to call at trial when the results or reports related to his testimony.

**Compliance** with this Order shall be accomplished on or before **August 21, 2020**.

July 24, 2020



A handwritten signature in black ink, appearing to read "Lanny King". The signature is written in a cursive style and is positioned over a circular seal.

**Lanny King, Magistrate Judge  
United States District Court**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
PADUCAH DIVISION  
CRIMINAL ACTION NO. 5:20-CR-12-TBR**

UNITED STATES OF AMERICA

PLAINTIFF

V

CHASE BOWMAN-RAINES

DEFENDANT

**ORDER**

**IT IS ORDERED.**

Due to the Court's schedule, the **telephonic further proceedings** set on August 28, 2020 is CANCELLED and is set on **August 31, 2020 at 11:00 a.m. Central Time**. The Court shall initiate the call to counsel.

In the interest of justice, and pursuant to 18 USC§3161(h)(7)(A), §3161(h)(7)(B)(i), §3161(h)(7)(B)(ii), and §3161(h)(7)(B)(iv), the period of delay between August 28, 2020 and August 31, 2020 is excluded from the time allowed for a speedy trial.



*Thomas B. Russell*



**Thomas B. Russell, Senior Judge  
United States District Court**

cc: Counsel  
AUSA

August 20, 2020