

UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED**Jul 17, 2025**CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**SEALED**

United States of America

v.

Joseph Allen Davis

Case No.

2:25-mj-0108 CSK

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 23, 2025 in the county of Sacramento in the
Eastern District of California, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Cortnie Chenoweth.

☒ Continued on the attached sheet.

/s/

Complainant's signature

Cortnie Chenoweth, FBI Special Agent

Printed name and title

Sworn to and signed before me telephonically.

Date: 07/17/2025*Judge's signature*City and state: Sacramento, California

United States Magistrate Judge Chi Soo Kim

Printed name and title

AFFIDAVIT OF FBI SPECIAL AGENT CORTNIE CHENOWETH

I, Special Agent Cortnie Chenoweth, being duly sworn, hereby depose and state:

CRIMINAL COMPLAINT FOR ARREST WARRANT

1. This Affidavit is submitted in support of an arrest warrant and criminal complaint charging **JOESPH ALLEN DAVIS** with:

COUNT ONE: Felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

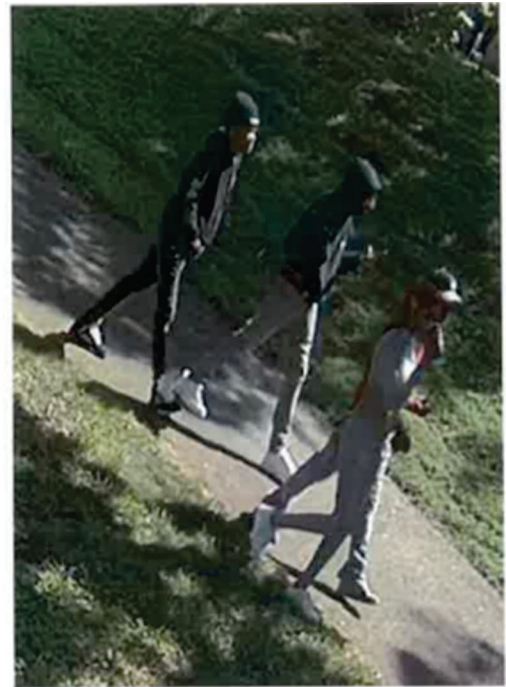
BACKGROUND AND EXPERTISE

2. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the Sacramento Field Office. I received training at the FBI Academy in Quantico, Virginia from October 2024 to March 2025. I was a Forensic Accountant with the FBI from June 2014 to October 2024. During my tenure with the FBI, I have worked in the areas of white-collar crime, counterterrorism, counterintelligence, and violent crime.
3. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.
4. Because this affidavit is submitted for the limited purpose of establishing probable cause for the requested arrest warrant, I have not included each and every fact known to me about this case. Rather, I have set forth only the facts that I believe are necessary to support probable cause.
5. This affidavit is based upon my own personal knowledge but also the knowledge of other law enforcement officers involved in this investigation. Where I describe statements made by other people (including other special agents and/or law enforcement officers), the statements are described in sum, substance, and relevant part. Similarly, where I describe information contained in reports and/or other documents or records in this affidavit, that information is also described in sum, substance, and relevant part.

STATEMENT OF PROBABLE CAUSE

Davis identified as person of interest in shooting at park.

6. On April 12, 2025, there was a shooting at Rainbow City Park, a public park in Davis, California. Three separate people were injured as a result of the shooting. Based on an investigation by the Davis Police Department, Joseph Allen Davis was identified as a person of interest in the investigation based on being identified on surveillance footage.
7. Four minutes prior to the shooting, Davis was captured on surveillance video walking towards Rainbow City Park.



///

///

///

///

///

8. Additional, video footage and eyewitness accounts placed Davis at Rainbow City Park at the time of the shooting.



9. Davis was wearing a black beanie and a black sweatshirt with colorful writing on the sleeves and large design on the back. The Chrome Heart sweatshirt pictured below was recovered from bushes on the west side of 239 Faro Avenue, Davis, California. The sweatshirt tested positive for gunshot residue.



10. The photo below containing a firearm, found on Davis's cell phone, was taken on April 12, 2025, at approximately 1:11 PM Pacific Standard Time, shortly before the shooting occurred.



11. Additionally, the photographs below from the Instagram account owned by Davis under the name luljojo26 show an individual with firearms. The individual is wearing the Chrome Heart sweatshirt in one of the photos.



Davis has a prior felony conviction and is therefore prohibited from possessing firearms.

12. On January 11, 2023, Joesph Davis was sentenced to 90 days jail and two years of probation based on a felony conviction for possession of a firearm by a juvenile ward, in violation of California Penal Code § 29820. 24-FE-017767.

Davis found in possession of firearm during search of his residence on May 23, 2025.

13. On May 19, 2025, law enforcement officers from the Davis Police Department applied for a search warrant for Davis's residence on Young Street in Sacramento. The search warrant was authorized that same day by a Yolo County Superior Court Judge.

14. On May 23, 2025, law enforcement officers served the search warrant at Davis's residence. During the service of the search warrant, officers found an Anderson MFG AR-15-style pistol bearing serial number 18022852.



Preliminary Interstate Nexus Determination

15. Anderson Manufacturing assembles firearms in Hebron, Kentucky. In addition, the lower receiver of the rifle in question appears to bear the stamp “HEBRON, KY”. This indicates that the lower receiver travelled interstate prior to Davis's possession of the firearm.

Davis admits to his involvement in the Rainbow Park shooting and possession of firearms.

16. Law enforcement officers interviewed Davis following the service of the search warrant. During the interview, Davis admitted to the following:
- a. Davis left his home on April 12, 2025, with a short rifle because he needed it for protection.
 - b. Davis was at a large party in Rainbow City Park on April 12, 2025.
 - c. Davis arrived at Rainbow City Park 20 to 25 minutes before the shooting occurred.
 - d. Davis fired his rifle in self-defense as it was “four vs. one.”
 - e. Davis was wearing the Chrome Heart sweater at the time of the shooting and had left it behind when he was driven out of the area.

- f. Davis threw the rifle he used at the shooting in Rainbow City Park into a river.
- g. The MFG AR-15 rifle, serial number 18022852, found during the search of his residence was his and it was new.

REQUEST TO SEAL

17. This Affidavit contains information regarding an ongoing criminal investigation. In light of the on-going nature of the investigation and the likelihood that notice to Davis would likely cause him to flee from prosecution or apprehension and jeopardize the safety of officers attempting to arrest Davis, your Affiant requests that this Affidavit and the resulting arrest warrant be sealed on the Court's docketing system.

CONCLUSION

18. Based on the above information, I believe there is probable cause that Davis unlawfully possessed a firearm, in violation of 18 U.S.C. § 922(g)(1). I hereby request that this court issue an arrest warrant for Davis.

I swear, under the penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

/s/

CORTNIE CHENOWETH
FBI Special Agent

Sworn and Subscribed to me telephonically,
on July 17, 2025,



Hon. CHI SOO KIM
United States Magistrate Judge

Approved as to form:



JUSTIN LEE
Assistant United States Attorney

PENALTY SLIP

United States v. Joseph Allen Davis

COUNT ONE: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

Fine of up to \$250,000, and/or

Imprisonment of up to 15 years, or both

Term of Supervised Release of up to 3 years

Mandatory \$100 Special Assessment