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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT BOWLING GREEN

UNITED STATES OF AMERICA

PLAINTIFF

v.

CRIMINAL NO. 1:18 CR - 4615

RENE A. BOUCHER

DEFENDANT

PLEA AGREEMENT

Pursuant to Rule 11(c)(1)(B) of the Federal Rules of Criminal Procedure, the United States of America, by Jefferson B. Sessions, III, Attorney General of the United States, Josh J. Minkler, United States Attorney for the Southern District of Indiana, and Bradley P. Shepard, Special Attorney to the United States Attorney General, and defendant, RENE A. BOUCHER, and his attorney, Matthew Baker, have agreed upon the following:

1. Defendant agrees to waive Indictment by the grand jury and to plead guilty to a felony Information which will be filed against defendant by the United States Attorney. That information will charge defendant with a violation of Title 18, United States Code, Section 351(e).

2. Defendant has read the charge against him contained in the Information, and that charges have been fully explained to him by his attorney. Defendant fully understands the nature and elements of the crime with which he has been charged.

3. Defendant will enter a voluntary plea of guilty to Count One of the Information in this case. Defendant will plead guilty because he is in fact guilty of the charge[s]. The parties agree to the following factual basis for this plea:

A. Victim 1 is a sitting United States Senator and a neighbor of Boucher, both living in Bowling Green, KY, within the Western District of Kentucky.

B. On November 03, 2017, Victim 1 was mowing his lawn while wearing headphones. Boucher states that he witnessed Victim 1 stacking more brush on a brush pile and had "had enough." Boucher executed a running tackle of Victim 1 on Victim 1's property. Victim 1 did not see the attack coming until the last second, and was unable to brace for the impact. As a direct result of the tackle, Victim 1 sustained displaced left posterolateral fourth through fifth rib fractures with non-displaced seventh, eighth and ninth posterolateral rib fractures. Victim 1 subsequently required medical treatment for pneumonia, which developed as a result of the injuries.

C. The Kentucky State Police responded to the incident, and in a recorded statement, Boucher admitted to running onto Victim 1's property and tackling him. Boucher denied that the attack was politically motivated. Rather, it was a property dispute that finally boiled over. Boucher was subsequently interviewed by the FBI. This interview was 13 minutes long and recorded. Boucher again confessed to tackling Victim 1 while Victim 1 was not looking.

4. Defendant understands that the charge to which he will plead guilty carries a minimum term of imprisonment of zero years and a maximum term of imprisonment of 10 years, a maximum fine of \$250,000, and a three year term of supervised release. Defendant understands that an additional term of imprisonment may be ordered if the terms of the supervised release are violated, as explained in 18 U.S.C. § 3583.

5. Defendant recognizes that pleading guilty may have consequences with respect to his immigration status if he is not a citizen of the United States. Under federal law, a broad range of crimes are removable offenses, which may include the offense to which Defendant is pleading

