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Pamela Eckhardt, Clerk of the Court
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IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF BINGHAM

STATE OF IDAHO,

Plaintiff,

vs.

CRAIG THOMAS ROWLAND,

Defendant.

Case No.

PROBABLE CAUSE AFFIDAVIT

STATE OF IDAHO

County of Bingham

ss:

I, Nick Edwards, Lead Investigator for the Idaho State Attorney General's Office, Criminal Law Division, being first duly sworn, deposes and says:

PROBABLE CAUSE

1. I am a duly sworn, qualified and acting peace officer within the State of Idaho with the Idaho Office of the Attorney General, and have been since 2019. I have 15 years of prior law enforcement experience as a patrol officer and detective with the Pocatello Police Department. I have successfully completed the Idaho Peace Officer Standards and Training (POST) academy and hold a State of Idaho Masters of Law Enforcement Certificate. I have over 2,800 hours of POST

and law enforcement training and over 400 hours of law enforcement instruction. I also hold an A.A.S. in Law Enforcement from Idaho State University, a B.A. in Criminal Justice from American Intercontinental University and an M.S. in Strategic Leadership from the University of Charleston. I am currently assigned to serve as the Lead Investigator of the Special Investigations Unit in the Idaho Office of the Attorney General.

2. The facts in this affidavit come from my personal observations, my training and experience, and information that I have obtained from the individuals identified below. This affidavit is intended to show merely there is sufficient probable cause and does not necessarily set forth all of my knowledge about this matter.

3. As part of my duties with the Idaho Office of Attorney General, I was assigned to investigate a referral we received from the Idaho State Police (ISP). ISP sent our office a report written by Scott Gay, the Chief of the Blackfoot Police Department. The report indicates that Chief Gay was contacted by Craig Rowland, the Bingham County Sheriff, on the morning of November 10, 2021. The report includes this paragraph describing part of the conversation between Chief Gay and Sheriff Rowland:

[Sheriff Rowland] went on to tell me he had really screwed up. He said somewhere around 2000 hours last night on 11/09/21. He was at his residence, he said he had a drink but was not drunk, his Yorkie began barking and he went outside to see what was going on. He said he saw two people by his garage as they were screaming and running away. Rowland said he did not know who they were. He said a few minutes later his Ring Door Bell activated. He also said he heard his front door rattle. Rowland then exited his home in his socks, long johns, and tee shirt. He said he had his gun in hand but no flash light. He saw a vehicle coming back from the end of his road, which is a dead end. He approached the vehicle in the road and stopped it. He then opened the driver's door and grabbed the driver, later identified by him as Chelsea his neighbor, by the hair and pulled her from the vehicle. He said he asked her "who the fuck are you what the fuck are you doing" a couple of times. He said she was terrified and finally answered Chelsea, your neighbor, he then told her to "get the fuck out of here".

4. On November 14, 2021, I interviewed Chelsea Cox.

a. Cox is an adult leader in a local church youth group. On November 9, 2021, in the evening, the youth group held an activity to deliver "thankful turkeys." The girls

made the "thankful turkeys" by tracing their hands, cutting out the hand shapes on the paper, and writing comments on the turkeys listing why they were thankful for certain people. The girls identified potential recipients of the "thankful turkeys" by discussing individuals in the neighborhood for whom they were thankful. The girls identified Lisa Rowland, who is Sheriff Rowland's wife, as well as others.

- b. Cox took seven minor girls in her car to deliver the "thankful turkeys" to the individuals the girls identified. The girls would deliver the "thankful turkeys" by taping a turkey on the door, ringing the doorbell, and running away before the recipient knew who had delivered the turkey.
- c. The group delivered all of the "thankful turkeys" except for two before arriving at the Rowland's residence. Two girls went to deliver the "thankful turkey" but came back to the car giggling and said they saw Craig Rowland and were unable to deliver the "thankful turkey" without getting caught.
- d. After delivering the other "thankful turkey" to another residence, the group returned to the Rowland's residence to try and deliver the "thankful turkey" again. They arrived the second time at the Rowland's residence at approximately 8:00 p.m.
- e. Cox dropped off the girls to deliver the turkey, drove to the end of the road, and turned the vehicle around to wait for the girls to return. The girls returned to the car laughing and Cox began to drive to pass by the Rowland's residence.
- f. Cox observed Sheriff Rowland walking toward the roadway attempting to 'wave' her down with one hand. She observed he had a gun in the other hand.
- g. Cox stopped the car in front of the Rowland's residence. Because the window in her car does not work, Cox opened her car door. The light in the car came on when Cox opened the door and illuminated the inside of the car where the seven minor girls were located. Cox said to Sheriff Rowland: "we are just here to drop off something for Lisa."
- h. Sheriff Rowland then moved to the front driver's side door and looked into the car. He lifted his gun, pointed it at Cox, pointed it at the passenger seat where two of the minor girls were seated, and pointed it back at Cox. Sheriff Rowland told Cox to "get the fuck out of the car."

- i. As Cox went to put her car in park, Sheriff Rowland moved closer to her and grabbed her hair. He yanked her hair down and told her again to "get the fuck out of this car." Cox got out of the car.
- j. Sheriff Rowland pointed his gun at Cox and asked what the fuck she was doing. Cox attempted to explain they were dropping something off for his wife but Sheriff Rowland yelled that he could or would shoot Cox.
- k. Sheriff Rowland lifted the gun and pointed it at Cox's head while holding the gun approximately two inches from her forehead. Sheriff Rowland asked Cox who the fuck she was. Cox responded "Chelsea." Sheriff Rowland told her not to ever do this again, that he could shoot her, and to get the fuck out of here.
- l. Cox said that when she identified herself to Sheriff Rowland she did not think it registered. She stated to me: "That's when I really got scared because the gun was still at my head and he didn't know who I was."

5. Cox's husband was also present for the interview. He offered that Sheriff Rowland has been a close family friend for 30 years. Cox grew up in the house next to the Rowland's house, they live right down the road from the Rowland's house, and they let Sheriff Rowland keep his trailer on their property.

6. On November 14, 2021, I interviewed B.W. (age 16) who was a passenger in the front seat of the car during the interaction with Sheriff Rowland. She initially thought Sheriff Rowland was joking until he started yelling and waving down the car to stop. She saw Sheriff Rowland point his gun at Cox as Cox stopped the vehicle. She saw Sheriff Rowland grab Cox by the hair and "yank" her out of the car. She said that as soon as Sheriff Rowland pulled Cox out of the car he put his gun to Cox's head. She said that the Sheriff repeatedly used "the 'F' word" during the interaction including when he told Cox "I will fucking shoot you!"

7. On November 14, 2021, I interviewed A.W. (age 14) who was a passenger in the back seat of the car during the interaction with Sheriff Rowland. She saw Sheriff Rowland run into the middle of the road while carrying a gun. She said Sheriff Rowland grabbed Cox by the hair and began screaming "the 'F' word." She saw Sheriff Rowland pull Cox out of the car. She said "[t]he gun got really close, like he's holding it right to her." She said the gun was always to Cox's head after she got out of the car.

8. On November 14, 2021, I interviewed Q.A. (age 12) who was a passenger in the back seat of the car during the interaction with Sheriff Rowland. She saw Sheriff Rowland

standing on the side of the road with a gun and initially thought he was joking. She said Cox stopped the vehicle and opened the door and Sheriff Rowland "started going off" on Cox. She heard Sheriff Rowland say "never fucking do that to me" and "I will fucking shoot you" and said Sheriff Rowland was just saying a lot of mean words. She saw Sheriff Rowland pull Cox out of the car by her hair and point his gun at Cox's head, and she said that it looked like the gun was touching Cox's head.

9. On November 14, 2021, I interviewed K.K. (age 15) who was a passenger in the front seat of the car during the interaction with Sheriff Rowland. She saw Sheriff Rowland walking toward the roadway with a gun. She said Sheriff Rowland walked into the middle of the roadway as Cox slowed the car to a stop. She initially thought Sheriff Rowland was joking. She said Sheriff Rowland was just yelling at Cox, Sheriff Rowland did not seem like himself, and Sheriff Rowland showed no signs of recognizing Cox. She saw Sheriff Rowland grab Cox's hair and heard him tell Cox to get out of the car. She described the grabbing as not super violent but definitely more than it needed to be. She said she had difficulty seeing the gun after the car door was open because B.W. was sitting on her lap. She heard Sheriff Rowland tell Cox that he would fucking shoot her if she ever did that again.

10. On November 14, 2021, I interviewed K.W. (age 15) who was a passenger in the back seat of the car during the interaction with Sheriff Rowland. She saw Sheriff Rowland walking toward the road with a gun. She initially thought Sheriff Rowland was joking. She said Sheriff Rowland walked up to the car and asked what the fuck they were doing with his gun to his side. She heard Sheriff Rowland tell Cox to get the fuck out of the car. She saw Cox start to get out of the car when Sheriff Rowland grabbed Cox's hair and yanked her out of the car. She saw Cox just standing there while Sheriff Rowland pointed his gun at her head. She heard Sheriff Rowland ask Cox who the fuck she was and heard Cox give her name to Sheriff Rowland. She heard Sheriff Rowland tell Cox to leave.

11. On November 14, 2021, I interviewed M.S. (age 12) who was a passenger in the back seat of the car during the interaction with Sheriff Rowland. She saw Sheriff Rowland standing next to the car with a gun. She initially thought Sheriff Rowland was joking. She heard Sheriff Rowland tell Cox to get out of the fucking car. She said Sheriff Rowland kept using "the F bomb." She saw Sheriff Rowland open the door of the car and point his gun at Cox's head. She saw Cox get out of the car and heard Sheriff Rowland ask Cox what her name was. She heard Cox

give Sheriff Rowland her name. She said she heard Sheriff Rowland say "I'm going to fucking shoot you" multiple times to Cox.

12. On November 14, 2021, I attempted to interview A.B. (age 13) who was a passenger in the car during the interaction with Sheriff Rowland. She said she did not wish to speak about what happened but gave me a written statement about what had occurred. She confirmed that she wrote the statement. According to her written statement, she thought Sheriff Rowland was coming outside to say thank you for dropping off the "thankful turkey." She wrote that she saw the gun and "he (Sheriff Rowland) said if we do it again I'll shoot you are leader was really scared and didn't answer he either pulled her hair or her hair and said do you understand he let go then told her to get out of the car he did not pull her out he asked her who she was and when he found out I think he was really embarrassed and so he said get the (f) word out of here and shut her door pretty hard then we left" [sic].

13. On November 17, 2021, I interviewed Sheriff Rowland and his wife Lisa Rowland simultaneously. Sheriff Rowland's attorney, Justin Oleson, was present for the interview.

- a. Sheriff Rowland said that, on November 9, 2021, he let his dog out to go to the bathroom around 8 pm. As he was letting the dog out, he saw two people come around the side of the garage. It startled him, and he said something like "hey" to them. The two people ran down his driveway and down the road. Sheriff Rowland said he went outside to ensure no one had broken into his county vehicle. He saw nothing was broken and went back inside his house and went upstairs.
- b. Sheriff Rowland told me he heard his front screen door open and heard a knock at the door. The Sheriff told me he thought someone was going to break into his residence.
- c. He went back down the stairs and told his wife (Lisa) to get his gun for him. Lisa handed him his gun belt and he removed it from the holster. He then turned the outside light on and observed an unknown number of people running down the road.
- d. He walked outside with his gun in his hand and walked to the end of his driveway. His finger was on the slide and never on the trigger "like you're supposed to." He saw a vehicle at the end of the cul-de-sac turning around and thought to himself "what the hell are they doing out here? Are they casing me out? Are they casing the neighborhood out?"

- e. He walked out to the end of his driveway near his large air compressor. He was "in the road by the air compressor", the vehicle pulled up and stopped in the roadway and the driver opened the door to the vehicle. He did not recognize the vehicle and stated it's "not a neighborhood car" and "I know every car on our block".
- f. Sheriff Rowland then told me "I reach in and I pull the driver out by the hair I say 'who the fuck are you?' and I do have my gun in my hand but I still have my finger on the slide. she says 'Chelsea' and I said 'get the fuck out of here'."
- g. Later during the interview, Sheriff Rowland's attorney Justin Oleson stated that the driver stopped the vehicle and began getting out of the vehicle on their own prior to the Sheriff grabbing the driver by the hair. Sheriff Rowland then told me "she (Chelsea) opens the door she starts to get out of the car" and he did not recognize her.
- h. When asked if the Sheriff pointed the gun at Cox when he pulled her out of the car, he told me he did. The Sheriff then stood up and demonstrated holding the gun in one hand while simultaneously holding someone by the hair or head with the other hand. The Sheriff described holding the gun in a "ready" position, but demonstrated holding the gun pointed directly at the individual in the neck or head area.
- i. Sheriff Rowland told me he had one "alcoholic beverage" at dinner at 5:30 pm and he did not feel impaired as a result of the alcohol. Sheriff Rowland told me he takes four prescribed medications, none of which were impairing his ability to think clearly. Sheriff Rowland told me "I had all of my facilities with me, I was clear as a freakin bell."
- j. During our interview, Sheriff Rowland stated that the recent time change had "really messed me up."
- k. Both Sheriff Rowland and Lisa Rowland mentioned that they had received threats. I asked about specific threats they had received.
- l. Lisa Rowland told me about an event that occurred in Costco on October 2, 2021. She was contacted by a male individual who had been arrested as a result of a drug investigation that she had been involved in. She said this individual did not like her but liked making cookies with Sheriff Rowland in jail. This individual approached her in Costco with a bag of dog food. He said hi, told her that he was

out of jail and working to find a job and that he had gotten a new dog. Later, when this individual was checking out of Costco, he became angry with the Costco employees because they would not let him check out without a membership.

- m. Sheriff Rowland identified another individual who has constant contact with law enforcement. The Sheriff said he is considered dangerous and always possessing a firearm. He sends emails saying the Sheriff should be put in jail or fired and some of his emails are 40 pages long with "conspiracy theories." I asked if this man has any open cases against him for stalking but did not receive an answer.
- n. Sheriff Rowland also stated: "I have been doing this job for 36 years. I've had drunk Indians drive down my cul-de-sac. I've had drunk Indians come to my door. I live just off of the reservation, we have a lot of reservation people around us that are not good people, they, they committed crimes, we've arrested them, so on and so forth."

14. On December 14, 2021, our office received videos from Ring LLC that were captured by Sheriff Rowland's video doorbell. Ring provided three videos in response to a search warrant.

- a. The first video starts with two girls standing at the corner of Sheriff Rowland's house. One girl is obstructing the view of the other. The girls scream and run away from the front door. It sounds like Sheriff Rowland screams at the girls. Immediately afterward, Sheriff Rowland opens his front door and lets his dog inside. Sheriff Rowland can then be heard laughing. Sheriff Rowland then walks out to the corner of his house and the video ends.
 - i. With the light from the porch, it is clear in the video that the person running is a minor child, approximately 10-12 years old.
- b. The second video shows three girls approach Sheriff Rowland's front door. One girl opens the screen door. A second girl tapes a paper turkey onto the inside of the screen door. The first girl then rings the doorbell and knocks on the door. All the girls run. A few seconds later, the porch light turns on. Sheriff Rowland can then be heard saying "thank you" and then "that's frickin' bullshit." The video then shows Sheriff Rowland opening the screen door. His face is in close proximity to and pointed toward the paper turkey. As he closes the screen door, Sheriff Rowland says "get my gun."

- i. The turkey was taped to the inside of the screen door such that Sheriff Rowland could see and read it when he opened his front door. Consistent with Sheriff Rowland saying "thank you," the front of the turkey has "thank you" written on the front in large letters.
- ii. Sheriff Rowland brought the turkey that was taped to his door to our interview. I took a photograph of the turkey, which is included below:



- c. The third video shows Sheriff Rowland coming back inside of his house. It appears to have been captured after the confrontation at the car. Sheriff Rowland is holding his gun in his right hand. He takes the turkey off of the screen door. He says that it was "Chelsea." A woman, presumably Lisa Rowland, says "we're done."

15. Based on these facts, your Affiant has probable cause to believe Craig Thomas Rowland committed the crimes of AGGRAVATED BATTERY, a Felony, Idaho Code §§ 18-903(a) and/or (b), 18-907(b), and 18-908, AGGRAVATED ASSAULT, a Felony, Idaho Code §§ 18-901(b), 18-905(a), and 18-906, and EXHIBITION OR USE OF DEADLY WEAPON, a Misdemeanor, Idaho Code § 18-3303.

STATUTORY AUTHORITY

16. The Idaho Office of the Attorney General has statutory authority to retain this case and act as special prosecutor pursuant to Idaho Code § 31-2002, which states: "Notwithstanding any provision of law to the contrary, the attorney general may conduct an investigation of any

allegation of a violation of state criminal law, against a county officer occupying an elective office for violation of state criminal law in his official capacity."

17. Craig Rowland occupies the elective office of Bingham County Sheriff and did at the time the alleged events occurred.


18. Sheriff Rowland was acting in his official capacity at the time the alleged actions occurred for purposes of Idaho Code § 31-2002, which states: "For purposes of this section, a county officer occupying an elective office shall be deemed to have performed an act in his 'official capacity' when such act . . . involves the use of public property or equipment of any kind" The firearm the Sheriff used during the alleged events was issued to him by the Bingham County Sheriff's Office, which makes it public property and/or equipment.

19. The alleged acts constituted a violation of state criminal law. The alleged acts include Aggravated Battery, a violation of Idaho Code §§ 18-903 and 18-907, Aggravated Assault, a violation of Idaho Code §§ 18-901 and 18-905, and Exhibition or Use of a Deadly Weapon, a violation of Idaho Code § 18-3303.

CERTIFICATION UNDER PENALTY OF PERJURY

"I certify under penalty of perjury, pursuant to the law of the State of Idaho, the foregoing is true and correct." (Idaho Code Section 9-1406)

Dated this ²⁰14 of December, 2021.



Nicholas Edwards

PC found. Dec. 14, 2021 5:11pm

