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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA, Plaintiff,

v.

EMMET BOWENS, a/k/a **Emmitt Bowens**, Defendant.

Case No.: 6:21-cr-00141-RBD-EJK

MOTION TO SUPPRESS EVIDENCE, MOTION TO DISMISS INDICTMENT, MOTION FOR SPEEDY TRIAL RELIEF, AND MOTION FOR RELEASE ON BOND

Defendant Emmet Bowens, appearing pro se, respectfully moves this Court to suppress all evidence obtained in violation of the Fourth and Fifth Amendments, to dismiss the indictment where the Government's case relies on unlawfully obtained evidence, to grant relief under the Speedy Trial Act and the Sixth Amendment, and to order Defendant's release on bond. In support, Defendant states as follows:

I. INTRODUCTION

This motion seeks suppression of evidence obtained through unconstitutional searches, seizures, interrogations, and compelled disclosures in connection with a PPP/SBA wire fraud investigation. Defendant has been incarcerated for over one year, including completion of approximately four months of court-ordered confinement and evaluation at the Federal Medical Center in Butner, North Carolina.

II. PROCEDURAL AND CUSTODIAL BACKGROUND

Defendant has been continuously detained for more than one year. The majority of delays in this case are not attributable to Defendant. Defendant has complied with all court orders and remains detained pending trial.

III. STATEMENT OF FACTS

The Government's case relies primarily on PPP/SBA applications, bank records, and electronic data obtained without valid warrants, probable cause, or lawful consent.

IV. FOURTH AMENDMENT VIOLATIONS

The searches and seizures were conducted without proper warrants or were overbroad and lacked particularity, requiring suppression.

V. FIFTH AMENDMENT VIOLATIONS

Defendant was subjected to custodial interrogation without Miranda warnings, and compelled financial certifications were used as criminal evidence.

VI. SPEEDY TRIAL ACT AND SIXTH AMENDMENT VIOLATIONS

Defendant has been detained well beyond the time limits contemplated by the Speedy Trial Act, 18 U.S.C. § 3161. The length of delay is presumptively prejudicial, the reasons for delay weigh against the Government, Defendant has asserted his right to a speedy trial, and Defendant has suffered actual prejudice through prolonged incarceration, anxiety, and impairment of his defense. Continued detention under these circumstances violates both statutory and constitutional guarantees.

VII. MOTION TO DISMISS INDICTMENT

Because the indictment is supported by unlawfully obtained evidence and further undermined by Speedy Trial violations, dismissal is warranted.

VIII. MOTION FOR RELEASE ON BOND

In light of the prolonged pretrial detention, Defendant respectfully moves for release on bond pursuant to the Bail Reform Act. Defendant is not a flight risk, poses no danger to the community, has complied with all court orders, and conditions of release can reasonably assure appearance and community safety.

IX. CONCLUSION

Defendant respectfully requests that this Court suppress all unlawfully obtained evidence, dismiss the indictment, grant Speedy Trial relief, order Defendant's release on bond, and grant any further relief deemed just and proper.

Emmet Bowens
12/15/2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Suppress Evidence, Motion to Dismiss Indictment, Motion for Speedy Trial Relief, and Motion for Release on Bond was mailed on the date below to: United States Attorney's Office Middle District of Florida 400 North Tampa Street, Suite 3200 Tampa, FL 33602 _____ Emmet Bowens Defendant, Pro Se John E. Polk Correctional Facility Inmate ID #: 202500010733 Date: 12/15/2025

Respectfully submitted,

Emmet Bowens, a/k/a Emmitt Bowens
Defendant, Pro Se
John E. Polk Correctional Facility
Inmate ID #: 202500010733
211 Eslinger Way
Sanford, FL 32773

Emmet Bowens
Emmet Bowens
Date: 12/15/2025

Emmett Brown
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Middle District of Florida
Orlando Division
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Orlando, FL 32801



