

United States Court of Appeals  
For the Eighth Circuit

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No. 24-3625

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United States of America

*Plaintiff - Appellee*

v.

Alaya Rahm

*Defendant - Appellant*

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Appeal from United States District Court  
for the Western District of Arkansas - Fayetteville

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Submitted: June 9, 2026

Filed: June 12, 2026

[Unpublished]

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Before SMITH, ERICKSON, and STRAS, Circuit Judges.

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PER CURIAM.

Alaya Rahm appeals the sentence the district court<sup>1</sup> imposed after he pleaded guilty to a drug offense. He challenges a drug-premises enhancement and argues his sentence is substantively unreasonable.

Upon careful review, we conclude the district court did not clearly err by concluding that Rahm maintained a drug premises. See United States v. Clark, 135 F.4th 622, 625 (8th Cir. 2025); United States v. Miller, 698 F.3d 699, 706-07 (8th Cir. 2012). We also conclude the sentence is substantively reasonable. See United States v. Feemster, 572 F.3d 455, 461-62 (8th Cir. 2009) (en banc) (reviewing sentence under deferential abuse-of-discretion standard; discussing substantive reasonableness); United States v. McCauley, 715 F.3d 1119, 1127 (8th Cir. 2013) (noting when district court has varied below Guidelines range, it is “nearly inconceivable” that court abused its discretion by not varying downward further). Accordingly, we affirm.

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<sup>1</sup>The Honorable Timothy L. Brooks, Chief Judge, United States District Court for the Western District of Arkansas.