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IN THE JUSTICE COURT OF THE STATE OF MONTANA,
IN AND FOR THE COUNTY OF MISSOULA
BEFORE JUSTICE OF THE PEACE
Amy L Blixt

SEP 17 2014

Justice Court

STATE OF MONTANA
Plaintiff,

-vs-
JEREMY LASALLE ST GODDARD
Defendant.

Cause No. *CA-2014-12491-C1*

AMENDED COMPLAINT

JENNIFER CLARK, Deputy County Attorney, deposes and says that on or about the 30th day of August, 2013, in Missoula County, the Defendant committed the offenses of COUNT I: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT II: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT III: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT IV: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT V: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT VI: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT VII: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine;

1 COUNT VIII: SEXUAL ASSAULT, a Misdemeanor, in violation of Montana law, namely:
2 Mont. Code Ann. 45-5-502(1)[1], punishable by 6 months MCDF and/or \$500 fine; COUNT
3 IX: DISORDERLY CONDUCT, a Misdemeanor, in violation of Montana law, namely:
4 Mont. Code Ann. 45-8-101(2), punishable by 10 days MCDF and/or \$100 fine; COUNT X:
5 ASSAULT - REASONABLE APPREHENSION OF BODILY INJURY, a Misdemeanor, in
6 violation of Montana law, namely: Mont. Code Ann. 45-5-201, punishable by 6 months
7 MCDF and/or \$500 fine; COUNT XI: DISORDERLY CONDUCT, a Misdemeanor, in
8 violation of Montana law, namely: Mont. Code Ann. 45-8-101(2), punishable by 10 days
9 MCDF and/or \$100 fine; COUNT XII: INDECENT EXPOSURE - 1ST OFFENSE, a
10 Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-5-504(1)[1st],
11 punishable by 6 months MCDF and/or \$500 fine.
12
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14 The facts constituting the offense are:

15
16 COUNT I: On or about the 30th day of August, 2013, the above-named
17 Defendant knowingly disturbed the peace of Jane Doe 1 by asking her if her panties
18 matched and asking for her name and number.

19
20 COUNT II: On or about the 27th day of September, 2013, the above-named
21 Defendant knowingly disturbed the peace of Jane Doe 1 by walking up behind her and
22 commenting several times, "I want you to sit on my face" and "I want to lick that pussy."

23
24 COUNT III: On or about the 17th day of October, 2013, the above-named
25 Defendant knowingly disturbed the peace of Jane Doe 2 by telling her "your pants are
26 see-through...I can see your pussy" and other lewd comments.
27
28

1 COUNT IV: On or about the 18th day of October, 2014, the above-named
2 Defendant knowingly disturbed the peace of Jane Doe 3 by telling her "your pants are
3 see-through...I can see your pussy."
4

5 COUNT V: On or about end of October/beginning of November, 2013, the
6 above-named Defendant knowingly disturbed the peace of Jane Doe 4 by asking her
7 five times if she was wearing no underwear or a thong.

8 COUNT VI: On or about the 5th day of November, 2013, the above-named
9 Defendant knowingly disturbed the peace of Jane Doe 4 by following her and saying "I
10 can see your pussy...you have a nice pussy" multiple times.
11

12 COUNT VII: On or about the 5th day of November, 2013, the above-named
13 Defendant knowingly disturbed the peace of Jane Doe 5 by approaching her and stating
14 "I see your pants are see-through. Are you wearing underwear?"
15

16 COUNT VIII: On or about the 7th day of November, 2013, the above-named
17 Defendant knowingly subjected Jane Doe 6 to sexual contact by grabbing her buttocks
18 with an open hand and grabbing her front genitalia with his other hand and attempting to
19 lift her skirt without consent.

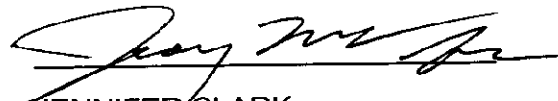
20 COUNT IX: On or about the 10th day of May, 2014, the above-named Defendant
21 knowingly disturbed the peace of Jane Doe 7 by telling her that if he saw her on campus
22 he would make her vagina squirt.
23

24 COUNT X: On or about the 10th day of May, 2014, the above-named Defendant
25 purposely or knowingly caused reasonable apprehension of bodily injury in Jane Doe 7
26 by blocking her access to her car while holding a screw driver in his hand after making
27 lewd comments to her.
28

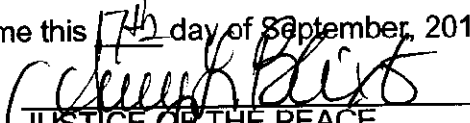
1 COUNT XI: On or about the 27th day of June, 2014, the above-named
2 Defendant knowingly disturbed the peace of Jane Doe 8 by taking a picture up her skirt
3 and commenting on her underwear.
4

5 COUNT XII: On or about February 2014, the above-named Defendant committed
6 the offense of indecent exposure by knowingly or purposely exposing his genitals under
7 circumstances in which the Defendant knew the conduct was likely to cause affront or
8 alarm in order to arouse or gratify the Defendant's own sexual response by
9 masturbating in front of his window.
10

11 DATED this 17th day of September, 2014.

12 
13 JENNIFER CLARK
14 Deputy County Attorney

15 Subscribed and sworn to before me this 17th day of September, 2014.

16 
17 JUSTICE OF THE PEACE
18

19 COMPLAINT 14-1875
20 Missoula City Police Dept BRUECKNER
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SEP 17 2014

Justice Court

1 IN THE JUSTICE COURT OF THE STATE OF MONTANA,
2 IN AND FOR THE COUNTY OF MISSOULA
3 BEFORE Amy L Blixt, JUSTICE OF THE PEACE

4
5 STATE OF MONTANA,
6 Plaintiff,

7 -vs-

8 JEREMY LASALLE ST GODDARD,
9 Defendant.

Cause No. *CK-2014-12491-C1*

**AMENDED
AFFIDAVIT OF PROBABLE CAUSE**

10 STATE OF MONTANA)
11)
12) : ss
13 County of Missoula)

14 JENNIFER CLARK, Deputy County Attorney, Montana, being first duly sworn upon
15 oath, deposes and says:

16 I have read the official law enforcement reports regarding the investigation of
17 JEREMY LASALLE ST GODDARD for allegedly committing the offense(s) set forth in the
18 complaint and based upon the information contained in the reports, if true, believe
19 probable cause exists to justify charging the above-named defendant as specified in the
20 accompanying complaint.

21 On or about August 30, 2013, Jeremy St. Goddard approached Jane Doe 1 on
22 the University of Montana and asked her if her "panties matched." The male asked for
23 her name and number and she provided a false name of Bailey and a false number.
24 Then sometime between September 9, 2013 and September 13, 2013, the same male
25 approached her and asked her about her name being Bailey and provided her with the
26 number she had previously given him. On September 27, 2013, the same male
27 approached her and told her "I want you to sit on my face" and "I want to lick that
28 pussy."

1 Jane Doe 2 reported that on October 17, 2013, a male followed her out of lecture
2 hall and commented, "Your pants are see-through...I can see your pussy." He followed
3 her to her car and commented "You have a tight butthole...I just want to tell you your
4 pants are see-through." He knocked on the window of her car and asked "Are you
5 wearing any underwear?" and "Has anyone ever made you squirt, I really want to lick
6 your clit."
7

8 Jane Doe 3 reported that on October 18, 2013, she was walking home from the
9 university campus and she was approached by a male in a silver Audi with tinted
10 windows. The male asked for directions to Aber Hall. The male then stated "Hey your
11 pants are see-through...I can see your pussy."
12

13 Jane Doe 4 reported that around late October or early November 2013, she was
14 approached by a male outside Urey Lecture Hall. He followed her up the stairs and
15 asked if she was wearing no underwear or a thong. He repeated this statement five
16 times before she was able to walk away.
17

18 Jane Doe 4 reported that on November 5, 2013, she left Urey Lecture hall and
19 the same male followed her saying "I can see your pussy...you have a nice pussy." He
20 repeated the statement.
21

22 Jane Doe 5 reported that on November 5, 2013, she was approached by a male
23 who stated, "I see your pants are see-through. Are you wearing underwear?"
24

25 Jane Doe 6 reported that on November 7, 2013, she was approached by a male
26 as she was walking down the stairs in the Language Arts Building. She was carrying a
27 box and the male offered to carry the box. The male pretended to trip at the bottom of
28 the stairs and fell to the ground. He looked up her skirt. She told him to knock it off. He

1 then grabbed her buttocks with one hand and her crotch area with his other hand and
2 attempted to pull up her skirt. She threatened to spray him with pepper spray. He
3 stated, "Glad you're not wearing any panties" and ran off.
4

5 A safety notification was issued by the university and the incidents seemed to
6 stop at the university.


7 On May 10, 2014, Jane Doe 7 reported that as she left Bio Life, a male was
8 standing outside his open passenger door and was blocking her access to the driver's
9 door of her car. The male was holding a screw driver. He asked prying questions and
10 expressed an interest in her panties. He commented that if he saw her on campus, he
11 would make her vagina squirt. He was driving a silver Audi.
12

13 On June 27, 2014, Jane Doe 8 reported that a male approached her in the Bio
14 Life parking lot and said he saw something wrong with her car. He encouraged her to
15 get close and bend down. She observed him holding his cell phone with the camera
16 lens up under her skirt. He gave her a "creepy smirk" and stated "nice leopard print
17 panties." He was driving a silver Audi.
18


19 Detective Connie Brueckner was able to determine that Jeremy St. Goddard was
20 at Bio Life during these two incidents and that he drives a silver Audi. His description
21 matched the descriptions provided in the other reports.
22

23 On September 5, 2014, Detective Brueckner learned of another incident involving
24 St. Goddard. Jane Doe 9 reported that in February 2014, St. Goddard knocked on his
25 apartment window at the Council Groves Apartments. When she looked up, he was
26 standing at his window, with his penis in his hand and masturbating. He smiled at her
27
28

1 when she looked up. Jane Doe 9 reported other concerning encounters with St.
2 Goddard at the apartment complex.

3
4 
5 JENNIFER CLARK
6 Deputy County Attorney


7 SUBSCRIBED AND SWORN TO before me this 17th day of September, 2014.

8 
9 JUSTICE OF THE PEACE
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11
12 ORDER

13
14 Upon reading the foregoing Affidavit, the Court finds that there is probable cause to
15 believe the above-named Defendant committed the crimes charged.

16 DATED this 17th day of September, 2014 at 4:20 a.m./p.m.
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19 JUSTICE OF THE PEACE
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