

APR 14 2015

Justice Court

1 IN THE JUSTICE COURT OF THE STATE OF MONTANA,  
2 IN AND FOR THE COUNTY OF MISSOULA  
3 BEFORE Karen A. Orzech, JUSTICE OF THE PEACE

4  
5 STATE OF MONTANA  
6 Plaintiff,  
7 -VS-  
8 TODD CHRISTOPHER LEICHLITER  
9 Defendant.

Dept No. <sup>2</sup>  
Cause No. CR-2015-309

COMPLAINT

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11 JENNIFER CLARK, Deputy County Attorney, deposes and says that on or about  
12 the 13th day of April, 2015, in Missoula County, the Defendant committed the offense of  
13 SEXUAL ABUSE OF CHILDREN, a Felony, in violation of Montana law, namely: Mont.  
14 Code Ann. 45-5-625, punishable by Life or 100 years MSP and a \$10,000 fine.

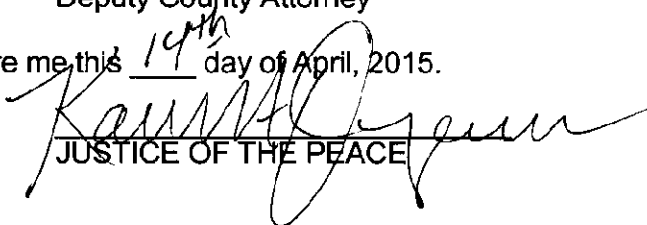
15 The facts constituting the offense are:

16  
17 On or about and between March 21, 2015, and April 13, 2015, the above-named  
18 Defendant committed the offense of sexual abuse of children by traveling within the  
19 state with the intention to meet a person the defendant knew was 15 years old to  
20 engage in sexual conduct.

21 DATED this 14th day of April, 2015.

22  
23   
24 JENNIFER CLARK  
25 Deputy County Attorney

26 Subscribed and sworn to before me this <sup>14<sup>th</sup></sup> day of April, 2015.

27   
28 JUSTICE OF THE PEACE

APR 14 2015

Justice Court

IN THE JUSTICE COURT OF THE STATE OF MONTANA,  
IN AND FOR THE COUNTY OF MISSOULA  
BEFORE Karen A. Orzoch, JUSTICE OF THE PEACE

STATE OF MONTANA,  
Plaintiff,

-vs-

TODD CHRISTOPHER LEICHLITER,  
Defendant.

Cause No. CR-2015-309

**AFFIDAVIT OF PROBABLE CAUSE**

STATE OF MONTANA )  
County of Missoula ) : ss

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

I have read the official law enforcement reports regarding the investigation of TODD CHRISTOPHER LEICHLITER for allegedly committing the offense(s) set forth in the complaint and based upon the information contained in the reports, if true, believe probable cause exists to justify charging the above-named defendant as specified in the accompanying complaint.


On March 24, 2015, Jane Doe's mother called Missoula City Police department for advice on a situation involving a man she was casually dating. She advised that she met Todd Leichliter on a dating website. Leichliter started doing things that raised red flags for her. A few weeks prior to contacting the police, Leichliter asked her if she would get sexually excited if her 15 year old daughter was present and masturbating while they had sex. She told him no and that he shouldn't bring it up again.

She spoke to her daughter about Leichliter's possible interest in her. Jane Doe stated she had never been touched by him, but that he had been contacting her through

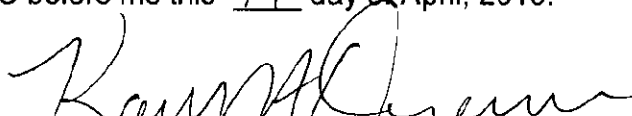
1 a messaging site. On March 21, 2015, Jane Doe and her mother made contact with  
2 Leichliter through the messaging site. Jane Doe established that she was 15. Leichliter  
3 asked her if she wanted to engage in sexual acts with him.  
4

5 Detective Shermer spoke with Jane Doe and her mother. He took over the  
6 messaging between Leichliter and Jane Doe. Leichliter and Jane Doe spoke on the  
7 phone at one point. Jane Doe was at school and Leichliter asked her to touch her  
8 pussy while on the phone with him.  
9

10 On April 13, 2015, Leichliter knew mom was going to be away and sent a  
11 message to Jane Doe "Want me to try and come see you?" and "I can come real soon  
12 and should I bring protection?" Leichliter came to Jane Doe's residence at 8:22 p.m.  
13 He was greeted Detective Shermer and Detective Sargeant Scott Pastian. He was  
14 arrested with condoms.  
15

16   
17 JENNIFER CLARK  
18 Deputy County Attorney

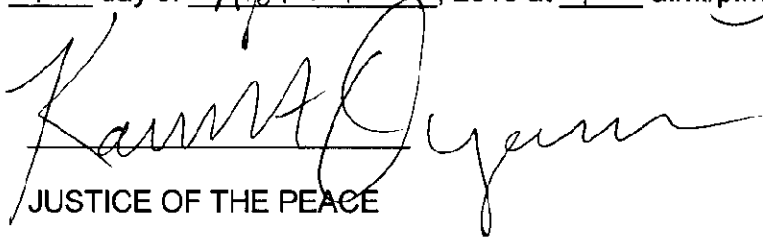
19 SUBSCRIBED AND SWORN TO before me this 14<sup>th</sup> day of April, 2015.

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21 JUSTICE OF THE PEACE  
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ORDER

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

DATED this 14<sup>th</sup> day of April, 2015 at 12<sup>50</sup> a.m./p.m.

  
JUSTICE OF THE PEACE

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