1	MAY 2 2 2015 IN THE JUSTICE COURT OF THE STATE OF MONTANA,		
2	IN AND FOR THE COUNTY OF MISSOULA Justice Court BEFORE Karan A. Orzech, JUSTICE OF THE PEACE		
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5	STATE OF MONTANA Plaintiff,  Dept No. 2 Cause No. CR - 2015 - 453		
7 8	-vs- WILLIAM FARRELL RUSSELL Defendant,  COMPLAINT		
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10	DDIANI OMATY December Assessed a constitution of the second constitution of		
11	BRIAN LOWNEY, Deputy County Attorney, deposes and says that on or about the		
12	21st day of May, 2015, in Missoula County, the Defendant committed the offense of		
13	COUNT I: ATTEMPTED DEVIATE SEXUAL CONDUCT, a Felony, in violation of		
14	Montana law, namely: Mont. Code Ann. § 45-8-218 and Mont. Code Ann. § 45-4-103,		
15   16	punishable by not less than 10 years MSP and/or not to exceed \$50,000.		
17	The facts constituting the offense are:		
18	COUNT I: On or about the 21st day of May, 2015, the above-named Defendant		
19	knowingly attempted to cause another to engage in deviate sexual relations.		
20	DATED this 22nd day of May, 2015.		
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22	BRIAN LOWNEY		
23	Deputy County Attorney		
24	Subscribed and sworn to before me this day of May, 2015.		
25 26			
27	JUSTICE OF THE PEACE		

COMPLAINT 15-1107 CHRIS SHERMER, Missoula City Police Dept

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

Justice Court

STATE OF	MONTANA,
	Plaintiff,

Cause No. CR-2015-453

-VS-

WILLIAM FARRELL RUSSELL, Defendant.

STATE OF MONTANA ) : ss

County of Missoula )

**AFFIDAVIT OF PROBABLE CAUSE** 

BRIAN LOWNEY, 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 WILLIAM FARRELL RUSSELL 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 or about May 20, 2015, Detective Chris Shermer of the Missoula Police Department became aware of a suspicious Missoula Craiglist ad in which the poster was advertising his services in providing human sexual encounters with a dog to interested parties. The ad was posted in the "Personals" section of Craigslist, under the sub-section of "Casual Encounters". The title of the ad read as follows: "seeking only girls knot looking for a good time0m4w-38 (missoula)". The body of the ad read as follows: "if you know what the title is all about i might have what you are looking for hmu to show me you are real and i will give you some better details about what i can offer you

if you are knot into having a good time with me and mans best friend then dont reply thanks for looking and you we tie the knot".

Detective Shermer learned that "knotting" is associated with dogs breeding. When a male dog is mating with a female dog, the male dog's genitals swell up to lock the male dog's genitals inside the female. This is referred to as "knotting", in that the action will tie or knot the animals together to prevent removal until the male is finished mating with the female dog.

Detective Shermer responded to the ad under the persona of young female adult human interested in this activity. The poster, later identified as the Defendant, responded and sent three pictures of a dog's penis and picture of his dog, a black German Shepard, to Detective Shermer. Shermer and the Defendant continued their dialog via text. The Defendant told Shermer that he had a dog he was willing to make available to Shermer for intercourse with Shermer's human persona. The Defendant made arrangements to meet Shermer in Missoula the following day, to complete the agreement. The Defendant described the vehicle he would be driving to Shermer as a means of identifying himself.

The following day, on May 21, 2015, Shermer observed the Defendant driving the vehicle he had described to Shermer to the agreed upon meeting location at the designated time. The Defendant had with him a black German Shepard. The Defendant was arrested upon his arrival to the meet location.

BRIAN LOWNEY

**Deputy County Attorney** 

1	SUBSCRIBED AND SWORN TO before me this day of May, 2015.
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3	UCTION OF THE DEACE
4	JUSTICE OF THE PEACE
5	<u>ORDER</u>
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7	Upon reading the foregoing Affidavit, the Court finds that there is probable cause to
8	believe the above-named Defendant committed the crimes charged.
9	DATED this day of, 2015 at a.m./p.m.
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13	JUSTICE OF THE PEACE
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