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7 (406) 258-4737
8 ATTORNEYS FOR PLAINTIFF

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IN THE JUSTICE COURT OF THE STATE OF MONTANA
IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

STATE OF MONTANA,
Plaintiff,
-vs-
VERONICA ABBIE GANDY,
Defendant,

Department No. 1
Cause No. CR-2016-247
COMPLAINT

SUZY BOYLAN, Assistant Chief Criminal County Attorney, deposes and says that on or about the 10th day of March, 2016, in Missoula County, the Defendant committed the offenses of COUNT I: ASSAULT ON A MINOR, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-212, punishable by 5 years MSP and/or \$50,000 fine; COUNT II: PARTNER OR FAMILY MEMBER ASSAULT - 1ST OFFENSE, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-5-206[1st], punishable by not less than 24 hours or more than one year MCDF and/or a fine not less than \$100 or more than \$1000; COUNT III: VIOLATION OF NO CONTACT ORDER BY A PERSON CHARGED WITH OR CONVICTED OF PARTNER OR FAMILY MEMBER ASSAULT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-5-209, punishable by 6 months MCDF and/or \$500 fine.

1 The facts constituting the offense are:

2 COUNT I: On or about the 10th day of March, 2016, the above-named
3 Defendant purposely or knowingly caused bodily injury to Jane Doe, age 4, by striking
4 her. At the time of the offense, the victim was under 14 years of age and the Defendant
5 was 18 years of age or older.
6

7 COUNT II: On or about the 10th day of March, 2016, the above-named
8 Defendant purposely or knowingly caused bodily injury to Mary Doe, a partner, by
9 striking her in the head.
10

11 COUNT III: On or about the 10th day of March, 2016, the above-named
12 Defendant with knowledge of a no contact order, purposely or knowingly violated any
13 provision of the order issued under 45-5-209 by calling Mary Doe after being arrested
14 for Partner Assault and being served with an order of no contact.
15

16 DATED this 11th day of March, 2016.

17 

18 SUZY BOYLAN
19 Assistant Chief Criminal County Attorney

20 Subscribed and sworn to before me this ____ day of March, 2016.

21 _____
22 JUSTICE OF THE PEACE

23 COMPLAINT 16-584

24 REBECCA BIRKET, Missoula County Sheriff's Office
25 JOHN LEONARD, Missoula County Sheriff's Office
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7 IN THE JUSTICE COURT OF THE STATE OF MONTANA
8 IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

10 STATE OF MONTANA,
11 Plaintiff,
12 -vs-
13 VERONICA ABBIE GANDY,
14 Defendant,
15

Department No. 1
Cause No. CR-2016-247
AFFIDAVIT OF PROBABLE CAUSE

16 STATE OF MONTANA)
17 : ss
18 County of Missoula)

19 SUZY BOYLAN, Assistant Chief Criminal County Attorney, Montana, being first
20 duly sworn upon oath, deposes and says:

21 I have read the official law enforcement reports regarding the investigation of
22 VERONICA ABBIE GANDY for allegedly committing the offense(s) set forth in the
23 complaint and based upon the information contained in the reports, if true, believe
24 probable cause exists to justify charging the above-named defendant as specified in the
25 accompanying complaint.
26

27 On or about the 10th day of March, 2016, deputies responded to a residence on
28 Audrey Court in Missoula County. Mary Doe reported that she had been arguing with

1 her partner, identified as the above-named Defendant. Defendant was yelling at Mary
2 Doe and began yelling at Mary Doe's daughter, 4 year-old Jane Doe, as well. Mary Doe
3 told Defendant to stop yelling at Jane Doe. In response, Defendant punched Mary Doe
4 in the head several times. Mary Doe went to the bedroom to remove herself from the
5 argument As she left, she saw Defendant fly across the room toward Jane Doe and
6 start punching her. Mary Doe tackled the Defendant and yelled the child to run to her
7 room. Mary Doe and Defendant continued to struggle. At one point, Defendant "choked"
8 Mary Doe. Mary Doe reported that the pressure was not strong enough to cause
9 damage and that she did not fear injury. Defendant punched Mary Doe three or four
10 more times and twisted her breast, causing redness and swelling. Mary Doe got into her
11 daughter's room to call 911. She then heard Defendant leave with Defendant's
12 daughter.
13
14


15
16 Mary Doe had redness and swelling on her forehead consistent with being
17 punched and a scratch on her arm in addition to the redness and swelling to her breast.
18 She also complained of rib pain. She reported she thought Defendant was trying to hurt
19 her and that she was afraid of Defendant.
20

21 Jane Doe was interviewed briefly and stated that Defendant hit her. She said she
22 was in pain. Jane Doe had redness and bruising on her arm, a scratch on her shoulder,
23 and bruising on her hip. She was transported to the hospital for a medical evaluation.
24

25 Defendant was located and interviewed. When asked what occurred, she said it
26 was no big deal. Then she stated she confronted Mary Doe about not talking to her
27 respectfully. She said Mary Doe yelled at her and hit her in the face several times, so
28 Defendant took her child and left. She said Mary Doe abuses Jane Doe.

1 Defendant called Mary Doe twice after being transported to the jail, but before an
2 order of no contact was served on her. The order was served on her at 21:15.

3 Defendant called Mary Doe again at 21:46. When asked why she called the victim after
4 being served with the order, she said she wasn't sure what number she was calling. The
5 number she called was specified on the written order as a number she was prohibited
6 from calling.
7

8
9 
10 SUZY BOYLAN
11 Assistant Chief Criminal County Attorney

12 SUBSCRIBED AND SWORN TO before me this ____ day of March, 2016.

13
14 _____
15 JUSTICE OF THE PEACE

16
17 ORDER

18 Upon reading the foregoing Affidavit, the Court finds that there is probable cause to
19 believe the above-named Defendant committed the crimes charged.
20

21 DATED this ____ day of _____, 2016 at ____ a.m./p.m.

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23 _____
24 JUSTICE OF THE PEACE
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