

1 MAC BLOOM
2 Deputy County Attorney
3 KIRSTEN H. PABST
4 Missoula County Attorney
5 Missoula County Courthouse
6 Missoula, Montana 59802
7 (406) 258-4737
8 ATTORNEYS FOR PLAINTIFF

9
10 IN THE JUSTICE COURT OF THE STATE OF MONTANA
11 IN AND FOR THE COUNTY OF MISSOULA
12 BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

13 STATE OF MONTANA,

14 Plaintiff,

15 -VS-

16 MICHAEL ERIC ROMAS,

17 Defendant,

Department No. 1
Cause No. CF-2016-839

COMPLAINT

18 Mac Bloom, Deputy County Attorney, deposes and says that on or about the 27th
19 day of August, 2016, in Missoula County, the Defendant committed the offenses of
20 COUNT I: AGGRAVATED ASSAULT - REASONABLE APPREHENSION, a Felony, in
21 violation of Montana law, namely: Mont. Code Ann. 45-5-202, punishable by 20 years
22 MSP and \$50,000 fine; COUNT II: PARTNER OR FAMILY MEMBER ASSAULT - 3RD
23 OR SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
24 Ann. 45-5-206[3rd+], punishable by not less than 30 days or more than 5 years MSP
25 and/or a fine not less than \$500 or more than \$50,000; COUNT III: PARTNER OR
26 FAMILY MEMBER ASSAULT - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation
27 of Montana law, namely: Mont. Code Ann. 45-5-206[3rd+], punishable by not less than 30
28 days or more than 5 years MSP and/or a fine not less than \$500 or more than \$50,000.

1 The facts constituting the offense are:

2 COUNT I: On or about the 27th day of August, 2016, the above-named
3 Defendant purposely or knowingly, with the use of physical force or contact, caused
4 reasonable apprehension of serious bodily injury or death in Jane Doe by strangling her
5 and/or throwing her to the ground in their apartment.
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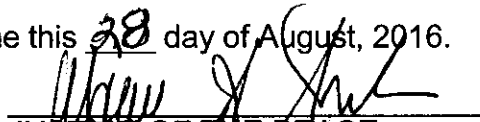
7 COUNT II: On or about the 27th day of August, 2016, the above-named
8 Defendant purposely or knowingly caused bodily injury to Jane Doe, his wife, when he
9 struck her twice in the face in their apartment, a third or subsequent offense.
10

11 COUNT III: On or about the 27th day of August, 2016, the above-named
12 Defendant purposely or knowingly caused bodily injury to M.M., his father-in-law, when
13 he grabbed him by the throat and/or punched him in the face, a third or subsequent
14 offense.
15

16 DATED this 28th day of August, 2016.

17 
18 MAC BLOOM
19 Deputy County Attorney

20 Subscribed and sworn to before me this 28 day of August, 2016.

21 
22 JUSTICE OF THE PEACE

23 COMPLAINT 16-2067
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17 Defendant,

Department No. 1

Cause No. CF-2016-839

AFFIDAVIT OF PROBABLE CAUSE

18 STATE OF MONTANA)
19 : ss
20 County of Missoula)

21 MAC BLOOM, Deputy County Attorney, Montana, being first duly sworn upon oath,
22 deposes and says:

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

28 On or about the 27th day of August, 2016, at approximately 10:00 a.m., Officer
Kaneff and Officer Malone, Missoula City Police Department, responded to a residence

1 regarding a reported disturbance. Upon arrival, they made contact with Jane Doe, who
2 stated that her husband, Michael Romas (Defendant) assaulted her earlier that day. She
3 explained that she just found out that her grandmother had been diagnosed with a life-
4 threatening illness so she asked Defendant to accompany her to the hospital for a visit.
5 Defendant refused and Doe began to cry. Defendant then lost his temper and struck her
6 in the face twice—once with an open palm and once with a closed fist. Officer Kaneff
7 observed that Doe had a “fresh” and “swelling” black eye. Doe reported feeling pain when
8 she was struck.
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11 Doe also stated that at some point that morning Defendant grabbed her by the
12 throat and threw her to the ground. She reported that Defendant has done this before. On
13 this occasion, Doe had momentary trouble breathing and feared for her life and the life of
14 her young daughter, who was also present. Officer Malone observed that Doe had red
15 marks on her neck consistent with strangulation.
16

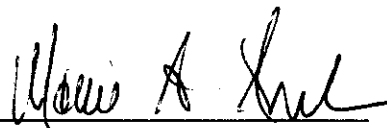
17 After the strangulation, Doe called her father, M.M. for help. M.M. drove to the
18 residence to pick up Doe and Doe’s daughter. When he arrived, he told Defendant to
19 never touch his daughter again. At that point, Defendant grabbed M.M. by the throat and
20 punched him in the face, causing pain and injury. Officer Malone was unable to observe
21 marks on M.M.’s throat, but noted that he did not get a careful look.
22

23 Next, Officer Kaneff and Officer Malone responded to Defendant’s location and
24 asked him to provide a statement. Defendant claimed that he never touched Doe and that
25 her black eye came from falling in the shower. Defendant said that M.M. entered his
26 residence and “attacked him.” Defendant stated that he did not hit M.M. but did shove him
27
28

1 to the ground. Officer Kaneff observed that Defendant's knuckles were red, which
2 contradicted his story. Defendant was then placed under arrest and transported to jail.
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MAC BLOOM
Deputy County Attorney
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9 SUBSCRIBED AND SWORN TO before me this 28 day of August, 2016.

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JUSTICE OF THE PEACE
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3 ORDER

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

6 DATED this 28 day of Aug, 2016 at 3:50 PM Not
8:30 a.m. p.m.

7 
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9 JUSTICE OF THE PEACE