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MAR 19 2013

Justice Court

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

COPY

STATE OF MONTANA
Plaintiff,
-VS-
JEFFREY RAY SHOEMAKER
Defendant.

Cause No. CR-2013-10670-C2

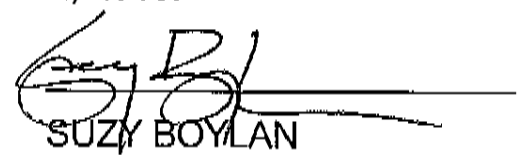
COMPLAINT

SUZY BOYLAN, Assistant Chief Deputy Missoula County Attorney,
deposes and says that on or about 2005, in Missoula County, the Defendant
committed the offense of COUNT I: INCEST, a Felony, in violation of
Montana law, namely: Mont. Code Ann. 45-5-507, punishable by no less than
2-4 years or more than 100 years or life MSP and \$50,000 fine.

The facts constituting the offense are:

COUNT I: On or about the 1st day of January, 2005, the above-
named Defendant knowingly had sexual intercourse with Jane Doe,
approximately age 9, his stepdaughter.

DATED this 19th day of March, 2013.



SUZY BOYLAN
Assistant Chief Deputy County Attorney

1 Subscribed and sworn to before me this 19th day of March, 2013.

2
3 JUSTICE OF THE PEACE

4 COMPLAINT 13-661

MAR 19 2013

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,

Cause No. CR-2013-10670-C2

7
8 -VS-

AFFIDAVIT OF PROBABLE
CAUSE

9 JEFFREY RAY SHOEMAKER,
10 Defendant.

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

14 SUZY BOYLAN, Deputy County Attorney of Missoula County,
15 Montana, being first duly sworn upon oath, deposes and says:

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17 I have read the official law enforcement reports regarding the
18 investigation of JEFFREY RAY SHOEMAKER for allegedly committing the
19 offense(s) set forth in the complaint in and based upon the information
20 contained in the reports, if true, believe probable cause exists to justify
21 charging the above-named defendant as specified in the accompanying
22 complaint.
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25 Jane Doe, currently age 15 and living in Billings, disclosed to her
26 mother that she had been raped by her stepfather, identified as the above-
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1 named Defendant, while they were living in the City of Missoula when she
2 was a child. Defendant and Jane Doe's mother are no longer married.
3

4 Jane Doe has a developmental delay that makes her seem younger
5 than she is. She reported that Defendant "molested" her when they lived
6 in a trailer park in Missoula. She stated that Defendant put his penis inside
7 her vagina. She also said he told her that if she told anyone he would come
8 back and that if she screamed he would go into her sister's room.
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11 On or about March 19, 2013 Detective Katie Petersen of the Missoula
12 Police Department and Detective Scott King of the Missoula County
13 Sheriff's Office met with Defendant for an interview. In the interview,
14 Defendant admitted having sexual intercourse with Jane Doe by putting his
15 penis in her vagina in 2005, when she was approximately nine years old.
16
17 He stated they were at home on the couch watching television. He became
18 sexually aroused by something he saw on the television. Jane Doe was
19 wearing a nightgown and no underwear and he inserted his penis into her
20 vagina. He was unable to ejaculate and went to the shower to masturbate
21 afterwards. He denied making any threats to her.
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SUZY BOYLAN
Assistant Chief Deputy County Attorney

1 SUBSCRIBED AND SWORN TO before me this 19th day of March,
2 2013.

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4
5 JUSTICE OF THE PEACE

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8 ORDER

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

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14 DATED this _____ day of _____, 2013 at _____ a.m./p.m.

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17 JUSTICE OF THE PEACE
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