

COPY

IN THE JUSTICE COURT OF THE STATE OF MONTANA,
IN AND FOR THE COUNTY OF MISSOULA
BEFORE John E. Odlin JUSTICE OF THE PEACE RECEIVED

JUN 21 2013

Justice Court

STATE OF MONTANA
Plaintiff,

-VS-
ANGIE A DOBSON
Defendant.

Cause No. CR-2013-10974-C1

COMPLAINT

M. SHAUN DONOVAN, Deputy Missoula County Attorney, deposes and says that on or about the 20th day of June, 2013, in Missoula County, the Defendant committed the offenses of COUNT I: DRIVING A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF ALCOHOL OR DRUGS - 4TH OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 61-8-401(1)(a)[4th+], punishable by 13 months DOC & not more than 5 years DOC or MSP suspended and \$1,000-\$10,000 fine. If prior placement at residential treatment facility, the sentence shall be not less than 13 months or more than 5 years DOC and a fine between \$1,000 and \$10,000; COUNT II: DRIVING WHILE LICENSE SUSPENDED OR REVOKED, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 61-5-212(1)(i), punishable by not less than 2 days or more than 6 months MCDF and a \$500 fine; COUNT III: CRIMINAL CHILD ENDANGERMENT, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-628,

1 punishable by 10 years MSP and/or \$50,000 fine; COUNT IV: CRIMINAL
2 CHILD ENDANGERMENT, a Felony, in violation of Montana law, namely:
3
4 Mont. Code Ann. 45-5-628, punishable by 10 years MSP and/or \$50,000
5 fine; COUNT V: CRIMINAL CHILD ENDANGERMENT, a Felony, in violation
6 of Montana law, namely: Mont. Code Ann. 45-5-628, punishable by 10 years
7 MSP and/or \$50,000 fine and COUNT VI: CRIMINAL CHILD
8 ENDANGERMENT, a Felony, in violation of Montana law, namely: Mont.
9 Code Ann. 45-5-628, punishable by 10 years MSP and/or \$50,000 fine.
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12 The facts constituting the offenses are:
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14 COUNT I: DRIVING UNDER THE INFLUENCE OF ALCOHOL AND
15 OR DRUGS- FOURTH OR SUBSEQUENT OFFENSE
16

17 On or about June 20, 2013, the above-named Defendant drove or
18 was in actual physical control of a motor vehicle, a 1994 Ford Explorer
19 SUV, upon a way of this state open to the public, Montana Highway 93
20 North and or Montana Highway 10 West, while under the influence of
21 alcohol and/or drugs, a fourth or subsequent offense.
22
23

24 COUNT II: DRIVING WHILE LICENSE SUSPENDED OR REVOKED

25 On or about the 20th of June, 2013, the above-named Defendant
26 drove a motor vehicle on Montana Highway 93 North and or Montana
27
28

1 Highway 10 West, at a time when her privilege to do so was suspended or
2 revoked.
3

4 COUNT III: CRIMINAL CHILD ENDANGERMENT ("MPS")

5 On or about June 20, 2013, the above-named Defendant purposely,
6 knowingly or negligently caused substantial risk of death or serious bodily
7 injury to "MPS", a child under 14 years of age, by operating a motor
8 vehicle, a 1994 Ford Explorer, while under the influence of alcohol or
9 dangerous drugs, with said child in the vehicle.
10
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12 COUNT IV: CRIMINAL CHILD ENDANGERMENT ("OT")

13 On or about June 20, 2013, the above-named Defendant purposely,
14 knowingly or negligently caused substantial risk of death or serious bodily
15 injury to "OT", a child under 14 years of age, by operating a motor vehicle,
16 a 1994 Ford Explorer, while under the influence of alcohol or dangerous
17 drugs, with said child in the vehicle.
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21 COUNT V: CRIMINAL CHILD ENDANGERMENT ("JD")

22 On or about June 20, 2013, the above-named Defendant purposely,
23 knowingly or negligently caused substantial risk of death or serious bodily
24 injury to "JD", a child under 14 years of age, by operating a motor vehicle, a
25 1994 Ford Explorer, while under the influence of alcohol or dangerous
26 drugs, with said child in the vehicle.
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DATED this 21st day of June, 2013,

M. SHAUN DONOVAN
Deputy Missoula County Attorney

JUSTICE OF THE PEACE

COMPLAINT 13-1485
Missoula County Sheriff's Office SARGENT, JESSOP and BURT

1 IN THE JUSTICE COURT OF THE STATE OF MONTANA,
2 IN AND FOR THE COUNTY OF MISSOULA
3 BEFORE John E. Odlin, JUSTICE OF THE PEACE

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JUN 21 2013

Justice Court

5 STATE OF MONTANA,
6 Plaintiff,

Cause No. CR.2013-10974-C1

7 -VS-

**AFFIDAVIT OF PROBABLE
CAUSE**

9 ANGIE A DOBSON,
10 Defendant.

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

14 M. SHAUN DONOVAN, Deputy County Attorney of Missoula County,
15 Montana, being first duly sworn upon oath, deposes and says:

17 I have read the official law enforcement reports regarding the
18 investigation of ANGIE A DOBSON for allegedly committing the offense(s)
19 set forth in the complaint in and based upon the information contained in the
20 reports, if true, believe probable cause exists to justify charging the above-
21 named defendant as specified in the accompanying complaint.
22

24 On or about the 20th day of June, 2013 Missoula County Deputy
25 Sheriff Zachary Sargent observed a maroon 1994 Ford Explorer SUV
26 traveling on Montana Highway 93 North and Montana Highway 10 West,
27 bearing a license plate assigned to a 1998 Honda Civic automobile
28

1 reported stolen in Lake County. The SUV was stopped and the driver
2 identified as Angie A Dobson. There were four passengers in the Explorer,
3 "MPS," "OT," "JD" and "ACP." Each of them is a female child less than 14
4 years of age.
5


6
7 A check of Ms. Dobson's driving history disclosed her driving
8 privileges have been suspended by the State of Arizona and she has four
9 previous convictions for Driving Under the Influence of Alcohol or Drugs in
10 that state.
11

12 As officers talked with Ms. Dobson they noticed indicators that she
13 was under the influence of alcohol or drugs including slurred speech,
14 fidgeting, bloodshot eyes and a dry mouth. She admitted ingesting the
15 dangerous drug methamphetamine the day before by smoking it. An open
16 and partially full can of beer was present inside the SUV and a portable
17 breath test confirmed Ms. Dobson had been consuming alcohol. Her scores
18 on the Standard Field Sobriety Tests indicated impairment and Angie
19 Dobson was arrested for Driving Under the Influence of Alcohol or Drugs
20 and transported to the Missoula County Detention Facility.
21

22 At MCDF Deputy Ross Jessop, a certified Drug Recognition Expert,
23 conducted a DRE evaluation and concluded Ms. Dobson was under the
24 influence of methamphetamine. A sample of the Defendant's blood was
25
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1 drawn with her consent and has been sent to the Montana State Forensic
2 Laboratory for toxicology analysis.
3

4 Senate Bill 160 passed by the 63rd Montana Legislature and effective
5 immediately, created the offense of Criminal Child Endangerment and
6 provides in part: "*A person commits the offense of criminal child*
7 *endangerment if the person purposely, knowingly or negligently causes*
8 *substantial risk of death or serious bodily injury to a child under 14 year of*
9 *age by ... operating a motor vehicle under the influence of alcohol or*
10 *dangerous drugs with a child in the vehicle.*" According to the Legislative
11 Services Division, Senate Bill 160 will be codified as Section 45-5-628 in
12 the 2013 edition of the Montana Code Annotated.
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17 
18 M. SHAUN DONOVAN
19 Deputy Missoula County Attorney

20
21 SUBSCRIBED AND SWORN TO before me this 21st day of June,
22 2013.
23

24 JUSTICE OF THE PEACE
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DATED this _____ day of _____, 2013 at _____ a.m./p.m.

JUSTICE OF THE PEACE