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JUN 18 2015

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,
7 -vs-
8 KEITH JAMES JESSOP
9 Defendant,

Dept No. 2
Cause No. CR-2015-535

COMPLAINT

10 KARLA PAINTER, Deputy County Attorney, deposes and says that from
11 approximately April 2015 to June 2015 in Missoula County, the Defendant committed the
12 offense of COUNT I: ISSUING A BAD CHECK, a Felony, in violation of Montana law,
13 namely: Mont. Code Ann. 45-6-316(3), punishable by 10 years MSP and/or \$50,000 fine.

14
15 The facts constituting the offense are:

16 COUNT I: From approximately April 2015 to June 2015 the above-named
17 Defendant committed the offense of issuing a bad check when he issued or delivered a
18 check or other order upon a real or fictitious depository for the payment of money
19 knowing that it would not be paid by the depository. The checks were issued or
20 delivered as part of a common scheme.

21
22 DATED this 18th day of June, 2015.

23 
24 _____

25 KARLA PAINTER
26 Deputy County Attorney

27 Subscribed and sworn to before me this ____ day of June, 2015.

28 _____
JUSTICE OF THE PEACE

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1 IN THE JUSTICE COURT OF THE STATE OF MONTANA, Justice Court
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-2015-535*

7 -vs-
8 KEITH JAMES JESSOP,
9 Defendant.

AFFIDAVIT OF PROBABLE CAUSE

9 STATE OF MONTANA)
10 : ss
11 County of Missoula)

12 KARLA PAINTER, Deputy County Attorney, Montana, being first duly sworn upon
13 oath, deposes and says:

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

20 On or about June 16, 2015, Officer Horton of the Missoula Police Department
21 responded to Bob Wards for a reported theft. Upon arrival he spoke with employee Allen
22 Cain whom stated a male came into the store on May 22, 2015 and wrote a check in the
23 amount of \$1161.89 for a cart full of merchandise. The cashier identified the male with his
24 driver's license as Keith Jessop. Jessop then left the store only to return a few hours later
25 and ask to exchange a few of the items her purchased for cash. Cain informed Jessop he
26 couldn't exchange the items for cash until the check cleared in approximately six days.
27
28 Cain told Jessop he was welcome to bring all of the items back and they would give him

1 the check. Jessop responded that he wanted to keep some of the items and left the store.
2 Cain and another employee, Jake Childress, then became suspicious of Jessop's
3 behavior believing he may be trying to scam them.
4

5 A few days later Jessop returned to the store and filled up another cart with
6 merchandise valuing approximately \$3000. Childress was working and remembered
7 Jessop from the previous encounter. As Jessop proceeded with the transaction he started
8 to fill out a check for the merchandise. Childress stopped him, informing Jessop they were
9 not going to take a check until they verified the funds through his bank. Jessop then
10 stated "never mind" and left the store.
11

12 Officer Horton also responded to Sportsman's Warehouse for a report of another
13 bad check purchase on June 16. Employee Aaron Olsen stated that on May 21, 2015 a
14 male used a check to pay for \$2051.95 worth of merchandise. The cashier utilized the
15 male's driver's license and identified him as Keith Jessop. Days later, Sportsman's
16 Warehouse received a letter from Action Collection Service informing them the checking
17 account Jessop used had been closed.
18

19 A representative from Cabela's informed Olsen that Jessop had just been in their
20 store approximately 30 minutes earlier trying to purchase items with a check. The store
21 refused to complete the transaction after they called the bank and verified Jessop's
22 account was closed. Cabela's sent an email to Sportsman's Warehouse with a
23 photograph of Jessop and the vehicle he was driving: a silver Chevrolet truck.
24

25 Officer Horton responded to Cabela's and spoke with Loss Prevention Officer
26 Mike Patterson. Patterson reported that on May 20, 2015, a male used a check to
27 purchase \$1454.97 in merchandise. The cashier obtained his driver's license and
28

1 identified the male as Keith Jessop. A few days later, Patterson received a letter
2 informing him the account from which Jessop issued the check had been closed.
3
4 Patterson said that Jessop returned on May 27, 2015 and tried to purchase \$4872.00
5 worth of products using a check. Patterson advised Jessop he would need to verify the
6 check was valid before completing the purchase. Jessop then stated "never mind" and
7 left the store. On June 16, 2015, Jessop again returned to the store and attempted to
8 purchase \$1791.00 worth of merchandise with a check. Again Patterson refused his
9 purchase.
10

11 Costco also received, and honored, bad checks from Keith Jessop on May 20,
12 2015 for \$2,260.98, May 26, 2015 for \$1,524.13, and on May 27, 2015 for \$2,630.27.
13 Officers later located Horton at Lucky Lil's on North Reserve and arrested him.

14 On June 17, 2015, Detective Stacy Lear conducted a recorded interview with
15 Jessop at the jail. Jessop admitted he had a methamphetamine addiction and was
16 passing bad checks to support his substance abuse. Jessop stated he began by writing
17 checks off of his closed US Bank account until he ran out of checks. Next, he opened
18 new accounts at various banks with the minimum deposit then withdrew the funds until
19 only \$20 or \$40 remained in the account. Jessop subsequently passed as many checks
20 for as much merchandise as he could. Jessop would either return the goods to the
21 stores for cash, or sell them to other individuals for money. Jessop stated he knew the
22 checks would not be covered by the amounts remaining in the account. Jessop
23 admitted to opening accounts at Stockman's Bank, Wells Fargo, First Interstate, and
24 First Montana Credit Union. In addition to the businesses above, Jessop confessed to
25 providing bad checks to the following business: Hastings, Wal Mart, Shopko, Quality
26
27
28

1 Supply, Mountain West Coop, Fast Trip, Firestone, Magic Diamond, Montana Lil's,
2 Lucky Lil's, Albertsons, Safeway, CVS, Little Caesars, Ole's and Ace Hardware. While
3 Jessop provided some descriptions of items, he could not recall the exact purchases or
4 amounts from each location.
5

6 Jessop consented to a search of his vehicle and his hotel room where officers
7 recovered some of the stolen items as well as drug paraphernalia including glass tubes
8 and a scale. This investigation is ongoing, but preliminary reports indicate the total
9 amount of goods, services, and cash Jessop obtained from the bad checks is will over
10 \$10,000.
11

12 
13 _____
14 KARLA PAINTER
15 Deputy County Attorney

16 SUBSCRIBED AND SWORN TO before me this ____ day of June, 2015.

17
18 _____
19 JUSTICE OF THE PEACE

20 ORDER

21
22 Upon reading the foregoing Affidavit, the Court finds that there is probable cause to
23 believe the above-named Defendant committed the crimes charged.

24 DATED this ____ day of _____, 2015 at ____ a.m./p.m.

25
26
27 _____
28 JUSTICE OF THE PEACE