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SEP 27 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 JASON SCOTT SANDERS
9 Defendant,

Dept No. 2
Cause No. CR-2015-898

COMPLAINT

10
11 BRITTANY SANTORNO, Deputy County Attorney, deposes and says that on or
12 about the 14th day of August, 2015, in Missoula County, the Defendant committed the
13 offenses of COUNT I: PARTNER OR FAMILY MEMBER ASSAULT - 3RD OR
14 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
15 Ann. 45-5-206[3rd+], punishable by not less than 30 days or more than 5 years MSP
16 and/or a fine not less than \$500 or more than \$50,000; COUNT II: UNLAWFUL
17 RESTRAINT, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-5-
18 301, punishable by 6 months MCDF and/or \$500 fine; COUNT III: AGGRAVATED
19 ASSAULT - BODILY INJURY, a Felony, in violation of Montana law, namely: Mont. Code
20 Ann. 45-5-202, punishable by 20 years MSP and \$50,000 fine; COUNT IV: KIDNAPPING,
21 a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-302, punishable by
22 not less than 2 years or more than 10 years MSP and/or \$50,000 fine; COUNT V:
23 ASSAULT WITH WEAPON, a Felony, in violation of Montana law, namely: Mont. Code
24 Ann. 45-5-213, punishable by 20 years MSP and/or \$50,000 fine.

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26
27 The facts constituting the offense are:
28

1 COUNT I: On or about the 14th day of August, 2015, the above-named
2 Defendant purposely or knowingly caused bodily injury to Ashley Warden, a
3 partner/family member by hitting her in the head and upper body with a pan multiple
4 times.
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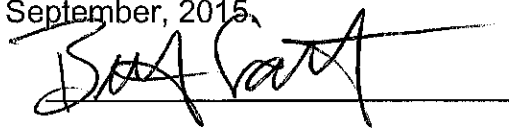
6 COUNT II: On or about the 14th day of August, 2015, the above-named
7 Defendant knowingly or purposely and without lawful authority restrained the victim so
8 as to interfere substantially with the victim's liberty by unlawfully tying her up.
9

10 COUNT III: On or about the 14th day of August, 2015, the above-named
11 Defendant purposely or knowingly caused serious bodily injury to another by strangling
12 Ashley Warden.

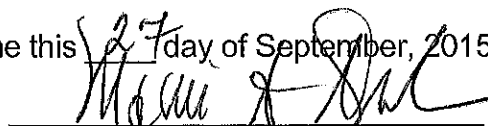
13 COUNT IV: On or about the 14th day of August, 2015, the above-named
14 Defendant knowingly or purposely, and without lawful authority, restraining the victim by
15 holding the victim in a place of isolation using physical force or threat of physical force.
16

17 COUNT V: On or about the 14th day of August, 2015, the above-named
18 Defendant purposely or knowingly caused bodily injury to Ashley Warden with a
19 weapon, to wit: He held a box cutter to her throat.
20

21
22 DATED this 27th day of September, 2015.

23 
24 BRITTANY SANTORNO
25 Deputy County Attorney

26 Subscribed and sworn to before me this 27 day of September, 2015.

27 
28 JUSTICE OF THE PEACE

COMPLAINT 15-2199

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2 IN AND FOR THE COUNTY OF MISSOULA
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5 STATE OF MONTANA,
6 Plaintiff,

Cause No. CR-2015-898

7 -vs-

8 JASON SCOTT SANDERS,
9 Defendant.

AFFIDAVIT OF PROBABLE CAUSE

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

13 BRITTANY SANTORNO, Deputy County Attorney, Montana, being first duly sworn
14 upon oath, deposes and says:

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

20 On or about the 26th of September, Officer Crass responded to 2405 McIntosh
21 Loop #13 for a report of a burglary in progress. Upon arrival, he met Ashley Warden
22 who stated her boyfriend, the Defendant, Jason Sanders, was trying to enter her house,
23 but ran when he heard the sirens. Ashley stated she and Sanders had dated for six
24 years and shared a child in common, but he had moved out about a week prior and she
25 had been staying at a friend's home because she was scared to death of Sanders.
26

27 She then told Officer Crass about an incident that had occurred on August 14,
28 2015. She stated she and Sanders were sitting in the living room having an argument

1 and Sanders began to get very agitated and made a fist with his right hand and started
2 punching his left saying, "it's time to die bitch." At this point Sanders got up from the
3 couch and started walking towards Ashley. She attempted to get up and run away, but
4 Sanders continued to chase her around the apartment swinging his fists at her. Ashley
5 then ran into the kitchen and grabbed a quart size pan to try to defend herself. Sanders
6 then punched her in upper arm, causing her to drop the pan and her arm to go
7 completely numb. Warden then began slapping her on both sides of her face with an
8 open hand; this caused Ashley to fall to the floor, where she once again tried to grab the
9 pan to defend herself.
10
11

12 Sanders then took the pan and began repeatedly striking her in the head and
13 upper body with the pan. Ashley then grabbed a piece of broken ceramic plate and
14 swung it at Sanders, which cut his upper abdomen. Sanders then knelt on the floor and
15 started strangling Ashley with both hands, just as she was about to lose consciousness,
16 he let go, only to begin strangling her again shortly after. Ashley stated she was unable
17 to get any air while she was being strangled.
18

19 As Ashley was in and out of consciousness, Sanders drug her into the living
20 room, yelling to her "you bitch, you cut me. You're gonna sit here and die with me." He
21 then began to tie her up with various extension cords. Sanders tied Ashley's ankles and
22 thighs together and her wrists and upper arms together behind her back. Sanders then
23 went into the bedroom and got a pillow and blanket and laid down on the floor next to
24 her.
25


26 Ashley began pleading with Sanders to untie her. He then got up and shut off all
27 the power, he then returned with a box cutter and held it to Ashley's throat while he
28

1 accused her of drugging him and trying to kill him. After a while, Sanders untied her
2 wrists and then went into his bedroom. Ashley was then able to untie the rest of her
3 restraints and as she was getting up to leave, Sanders returned again with a machete in
4 his hand. He then forced her into the bedroom and barricaded the door shut. Sanders
5 continued to accuse Ashley of trying to hurt him and of destroying their stuff. At this
6 point, Ashley began to agree with him to avoid angering him further.
7

8 Ashley provided Officer Crass with photographs of her injuries, which showed
9 several cuts on her head that were red in color and varied in length, she also had
10 photographs depicting bruising on her face, eyes, neck and arms. At the conclusion of
11 the interview, there was a knock on the door and it was Sanders. He was subsequently
12 arrested for a municipal court warrant.
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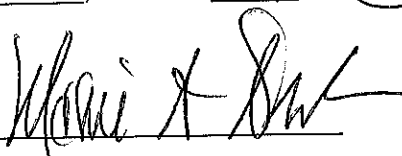
14 
15 BRITTANY SANTORNO
16 Deputy County Attorney

17
18 SUBSCRIBED AND SWORN TO before me this 27th day of September, 2015.

19 
20 JUSTICE OF THE PEACE
21 ORDER

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

25 DATED this 27 day of Sept, 2015 at 9:13 a.m./p.m.
26

27 
28 JUSTICE OF THE PEACE