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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
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5 STATE OF MONTANA
6 Plaintiff,
7 -vs-
8 SARAH RAE MCKNIGHT
9 Defendant,

Dept No. 2
Cause No. CR-2015-1188

COMPLAINT

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11 KIRSTEN H. PABST, Missoula County Attorney, and JASON MARKS, Chief
12 Deputy Missoula County Attorney, depose and say that on or about the 18th through the
13 21st day of December, 2015, in Missoula County, the Defendant committed the offenses
14 of COUNT I: CONSPIRACY to commit AGGRAVATED KIDNAPPING, a Felony, in
15 violation of Montana law, namely: Mont. Code Ann. 45-5-303 and 45-4-102, punishable by
16 Life Imprisonment or 2-100 years MSP and/or a \$50,000 fine; COUNT II:
17 ACCOUNTABILITY for ATTEMPTED DELIBERATE HOMICIDE, a Felony, in violation of
18 Montana law, namely: Mont. Code Ann. 45-5-102[1], 45-4-103, and 45-2-301, punishable
19 by life imprisonment, or not less than 10 or more than 100 years MSP; COUNT III:
20 DELIBERATE HOMICIDE, a Felony, in violation of Montana law, namely: Mont. Code
21 Ann. 45-5-102[1][b], punishable by life imprisonment, or not less than 10 or more than 100
22 years MSP; COUNT IV: TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE,
23 a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-7-207, punishable by
24 10 years MSP and/or \$50,000 fine; and COUNT V: THEFT, a Felony, in violation of
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1 Montana law, namely: Mont. Code Ann. 45-6-301(1)[8], punishable by a fine of not more
2 than \$50,000.00 and/or not more than 10 years MSP.

3 The facts constituting the offenses are:

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5 COUNT I: On or about the 18th day of December, 2015, through the 21st day of
6 December, 2015, the above-named Defendant, with the purpose that the offense of
7 Aggravated Kidnapping be committed, agreed with another, Scott Price, to the
8 commissions of the offense of Aggravated Kidnapping. In furtherance of the
9 conspiracy, the above-named Defendant and/or Scott Price purchased zip ties and duct
10 tape and sought out potential victims in Missoula County.
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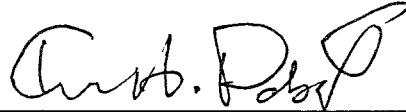
12 COUNT II: On or about the 21st day of December, 2015, the above-named
13 Defendant, before or during the commission of the offense of Attempted Deliberate
14 Homicide, with the purpose to facilitate the commission of the offense, aided and/or
15 abetted Scott Price in the commission of the offense of Attempted Deliberate Homicide
16 against Jane Doe by acting as a getaway driver after Scott Price stabbed Jane Doe.
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18 COUNT III: On or about the 21st day of December, 2015, the above-named
19 Defendant was legally accountable for the commission of robbery and , in the course of
20 the robbery, another person legally accountable for the robbery, Scott Price, caused the
21 death of Lonette Keehner, a human being.
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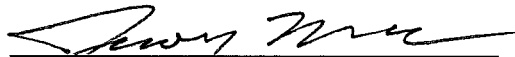
23 COUNT IV: On or about the 21st day of December, 2015, the above-named
24 Defendant believing that an official proceeding or investigation is pending or about to be
25 instituted, destroyed, concealed or removed a temporary registration tag from her car,
26 with the purpose to impair its verity or availability in such proceeding or investigation.
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1 COUNT V: On or about the 21st day of December, 2015, the above-named
2 Defendant purposely or knowingly obtained or exerted unauthorized control over a 2009
3 Chevrolet Malibu, owned by Lonette and/or David Keehner, with the purpose of
4 depriving the owners of the property. The value of the property exceeds \$1,500.00.
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6 DATED this 23rd day of December, 2015.

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9 _____
10 KIRSTEN H. PABST
11 County Attorney

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13 _____
14 JASON MARKS
15 Chief Deputy Missoula County Attorney

16 Subscribed and sworn to before me this ____ day of December, 2015.

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19 JUSTICE OF THE PEACE

20 COMPLAINT 15-2952
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1 IN THE JUSTICE COURT OF THE STATE OF MONTANA,
2 IN AND FOR THE COUNTY OF MISSOULA
3 BEFORE Karen A. Orzoch, JUSTICE OF THE PEACE

4
5 STATE OF MONTANA,
6 Plaintiff,

Cause No. *CR-2015-1188*

7 -VS-

8 SARAH RAE MCKNIGHT,
9 Defendant.

AFFIDAVIT OF PROBABLE CAUSE

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

15 KIRSTEN H. PABST, Missoula County Attorney, Montana, and JASON MARKS,
16 Chief Deputy Missoula County Attorney, being first duly sworn upon oath, depose and say:

17 We have read the official law enforcement reports regarding the investigation of
18 SARAH RAE MCKNIGHT for allegedly committing the offenses set forth in the complaint
19 and based upon the information contained in the reports, if true, believe probable cause
20 exists to justify charging the above-named defendant as specified in the accompanying
21 complaint.
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23 On December 21, 2015 around 11:30 am, Jane Doe was at Fresh Market on
24 South Reserve in Missoula County. After completing her shopping, Doe returned to her
25 vehicle with her groceries. She put her groceries away and walked around to the
26 driver's side door to get into her vehicle. She observed a male, who was unknown to
27 her, but later identified as Scott Price, standing outside of a dark colored Honda. The
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1 Honda was parked next to Doe's vehicle. Price was leaning into the passenger side of
2 the Honda and appeared to be speaking to someone in the driver's seat, later identified
3 as Sarah McKnight. Price was also partially blocking Doe's access to her vehicle.
4
5 Doe, went to the driver's side of her vehicle and began to open her door. She said,
6 "excuse me" to Price as she tried to get by him. Price moved and Doe sat in the driver's
7 seat of her vehicle. Doe turned to her right to put her purse on the passenger seat.
8
9 When she turned back around, Price was standing at her door. He then began stabbing
10 her in the abdomen with a knife. Doe could not recall Price saying anything before he
11 stabbed her.

12 Doe screamed "stop" several times and attempted to offer Price her purse,
13 thinking he was trying to rob her. Price stopped stabbing her and got into the
14 passenger side of the Honda. The car slowly drove off. Doe stepped out of her vehicle
15 and attempted to obtain the license plate of the Honda. She observed the dark colored
16 Honda had a temporary tag.
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18 As the Honda drove off, Doe screamed for help. Another female came over and
19 took a picture of the suspect vehicle. Doe was transported to Community Medical
20 Center where she was treated for multiple stab wounds. Doctors discovered Price had
21 stabbed Doe in the middle of her stomach, just above her diaphragm. She had two
22 defensive stab wounds on her left hand. Doe survived her injuries. Police recovered a
23 black sheath for a fixed blade Buck knife at the scene of the stabbing.
24

25 The same day, Lonette Keehner was working as a housekeeper at the Super 8
26 motel across Brooks Street from Missoula Fresh Market. Around 12:50 pm, Missoula
27 City Police Officers were dispatched to the Super 8 for a report of a person who had
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1 been found face down in one of the hotel rooms. Lonette's body was found in a
2 downstairs room in the hotel. There was a significant injury to her throat and she was
3 deceased. Witnesses at the hotel described two potential suspects at the scene. One
4 was as a male. The other suspect was a female. Two witnesses were subsequently
5 able to positively identify Sarah McKnight was the female when shown her picture in a
6 photo lineup. However, no one was able to get a good view of the male.
7

8 Behind the Super 8, officers located a dark colored Honda with a missing rear
9 registration tag. The space for the rear registration was cleaner than the rest of the
10 vehicle, indicating the tag had been recently removed. There were fresh tire tracks in
11 the snow and the windows were free of snow or ice, indicating the vehicle had been
12 recently driven. The VIN number on the vehicle came back as registered to Sarah
13 McKnight. McKnight had an outstanding warrant for her arrest and was a suspect in a
14 Washington robbery. Inside the car officers recovered a bloody Buck knife from under
15 the front passenger seat and the temporary registration tag from the trunk.
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18 Officers discovered that Lonette's vehicle was missing from the Super 8 parking
19 lot. It was determined that her keys and her hotel passkey were missing from her
20 person. The car was a red 2009 Chevrolet Malibu. It was subsequently recovered in
21 Idaho. Law enforcement spoke with a woman who admitted driving Sarah McKnight
22 and Scott Price from the place they left Lonette's car to a motel in Coeur d'Alene. Law
23 enforcement arrested Price and McKnight on outstanding warrants and searched the
24 motel room. They recovered the Super 8 passkey that matched the one taken from
25 Lonette along with numerous knives and bloody clothing.
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1 Detectives from Missoula interviewed McKnight. She told them that she had met
2 up with Price in Great Falls the previous week while she was there for a federal court
3 appearance. It was her understanding that Price was on the run after committing a
4 murder in Miles City. She knew Price through her husband and, according to their
5 presence on social media, all claimed white supremacist ties. McKnight indicated that
6 she and Price were regularly using methamphetamine through the ensuing events.
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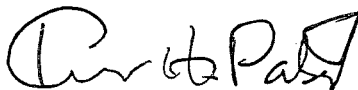
8 McKnight said that she and Price drove from Great Falls to Missoula in her dark
9 colored Honda. Once in Missoula they determined that they needed money and a more
10 reliable vehicle. She said they purchased duct tape and zip ties with the plan to kidnap
11 a person with a vehicle they wanted, take the vehicle, and force the person to disclose
12 PIN numbers for any debit cards they might have. The zip ties were recovered from
13 McKnight's Honda and a roll of duct tape was recovered from the motel room in Coeur
14 d'Alene. McKnight indicated that they were looking for a potential target in the Fresh
15 Market parking lot when they encountered Jane Doe. She said that she did not hear the
16 exchange between Price and Jane Doe, but did know that Price stabbed Jane Doe and
17 then got into the car with a bloody knife and told her to drive. She did drive away.
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20 McKnight said that they parked behind the Super 8 motel and went into the motel
21 looking for someone to rob in order to get a new car. She said that they found Lonette
22 cleaning a room. She said Price physically assaulted Lonette and forced her to empty
23 her pockets and describe her car. He took the car keys and hotel passkey away from
24 Lonette and gave them to McKnight. Scott Price had Sarah McKnight open the door
25 across the hall and he then forced Lonette into the other room. McKnight reassured a
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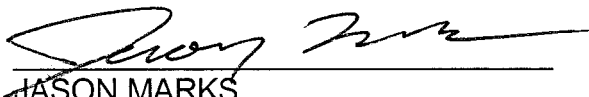
1 guest that was concerned by the noise that everything was fine and then went outside
2 and began transferring her and Price's belongings to Lonette's car.

3 McKnight said that Price ran out of the Super 8 and they left in Lonette's car.
4 She said Price told her that he had killed Lonette and, as they were driving through
5 town, he threw a bloody knife out the window of the car. That knife has been recovered
6 by Missoula City Police based on McKnight's description of where Price threw it.
7

8 Price was interviewed and confessed to killing Lonette. He attributed his actions
9 to his methamphetamine use. He was unclear about what he had done in the Fresh
10 Market parking lot but did admit to striking a woman while holding a knife in his hand.
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14 _____
KIRSTEN H. PABST
Missoula County Attorney

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17 _____
JASON MARKS
Chief Deputy Missoula County Attorney

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19 SUBSCRIBED AND SWORN TO before me this ____ day of December, 2015.
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22 _____
JUSTICE OF THE PEACE
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ORDER

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

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

JUSTICE OF THE PEACE