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2 Deputy County Attorney
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7 (406) 258-4737
8 ATTORNEYS FOR PLAINTIFF

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IN THE JUSTICE COURT OF THE STATE OF MONTANA
IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

STATE OF MONTANA,
Plaintiff,

-vs-
KAYLIE B CHARLTON,
Defendant,

Department No. 1
Cause No. CR 2016-793
COMPLAINT

ANDREW W. PAUL, Deputy County Attorney, deposes and says that on or about the 15th day of August, 2016, in Missoula County, the Defendant committed the offenses of:

COUNT I: BURGLARY, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-6-204(1), punishable by 20 years MSP and a \$50,000 fine;

COUNT II: ASSAULT ON A PEACE OR JUDICIAL OFFICER, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-210, punishable by not less than 2 years or more than 10 years MSP and \$50,000 fine;

COUNT III: CARRYING CONCEALED WEAPON, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-316(1), punishable by 6 months MCDF and/or \$500 fine.

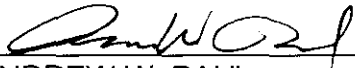
1 The facts constituting the offense are:

2 **COUNT I:** On or about the 15th day of August, 2016, the above-named Defendant
3 knowingly entered or remained unlawfully in Photography Formulary, an occupied
4 structure, with the purpose to commit the offense of Criminal Mischief therein.
5

6 **COUNT II:** On or about the 15th day of August, 2016, the above-named Defendant
7 purposely or knowingly caused bodily injury to Heath Hanson, a peace officer.
8

9 **COUNT III:** On or about the 15th day of August, 2016, the above-named Defendant
10 carried or bore concealed upon their person a pistol.

11 DATED this 17th day of August, 2016.

12 
13 ANDREW W. PAUL
14 Deputy County Attorney

15 Subscribed and sworn to before me this ____ day of August, 2016.

16 _____
17 JUSTICE OF THE PEACE

18 COMPLAINT 16-1966

19 ROBERT PARCELL, Missoula County Sheriff's Office
20 HEATH HANSON, Missoula County Sheriff's Office
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11 IN THE JUSTICE COURT OF THE STATE OF MONTANA
12 IN AND FOR THE COUNTY OF MISSOULA
13 BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

14 STATE OF MONTANA,
15
16 Plaintiff,
17
18 -VS-
19 KAYLIE B CHARLTON,
20 Defendant,

21 Department No. 1
22 Cause No. CR-2016-793
23
24 **AFFIDAVIT OF PROBABLE CAUSE**

25 STATE OF MONTANA)
26 : ss
27 County of Missoula)

28
29 ANDREW W. PAUL, Deputy County Attorney, Montana, being first duly sworn upon
30 oath, deposes and says:

31 I have read the official law enforcement reports regarding the investigation of
32 KAYLIE B CHARLTON for allegedly committing the offense(s) set forth in the complaint
33 and based upon the information contained in the reports, if true, believe probable cause
34 exists to justify charging the above-named defendant as specified in the accompanying
35 complaint.

36
37 On or about the 15th day of August, 2016, Missoula County Sheriff's Deputy
38 Parcell responded to the Photographer's Formulary, in Congdon, Montana. Parcell met

1 with the owner, Bud Wilson. Wilson reported he had walked into his photography
2 classroom and found a female inside. He said that she had torn items off the walls and
3 had thrown items from the counters. Parcell went inside the classroom and observed
4 where items had been pulled from the walls and counters (photographs, old cameras,
5 uniform display, etc.). Wilson said some money had been taken from the safe and
6 placed in a black backpack that he did not recognize. Parcell looked inside the pack
7 and found a Glock pistol, two hunting knives and a stun gun.
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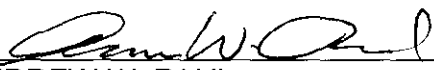
9
10 Wilson said that at about 5:40 a.m., he walked from his house to the classroom
11 and discovered the female in the break room. She was holding a camera and a bunch
12 of photographs. Wilson took the photographs from her and she dropped the camera.
13 Wilson asked the female who she was and what she was doing there. Wilson said that
14 she didn't know where she was or who she was. Wilson told her to get out of the
15 building and she left.
16

17 Parcell learned that the female had used the business phones and left a
18 message on another extension, identifying herself as Kaylie (later identified as Kaylie
19 Charlton (Defendant)). Parcell searched the area but was unable to locate Defendant.
20

21 Parcell later received a call from Defendant's father, Aaron. Aaron had located
22 Defendant and agreed to meet with Parcell. Defendant acted confused and hesitant
23 when Parcell asked her questions. Defendant admitted to being in Congdon early that
24 morning. Defendant claimed she had left her truck at a friend's house and attempted to
25 hitch hike. Defendant wouldn't say where she left her truck. She then became agitated.
26 When asked if she had a black backpack, she said "Yes" and that she believed it had
27 been stolen. Defendant admitted that she was in a "scary house" and that a man came
28

1 and yelled at her. Parcell explained that he was going to have to place Defendant
2 under arrest but that they would use a belly chain so that she could have her hands in
3 front of her during the ride to the Missoula County Detention Facility. Defendant said
4 she would not go. Defendant became agitated and combative. Defendant hit, kicked
5 and tried to bite her father while they tried to restrain her. Deputy Heath Hanson was
6 there to assist. During the struggle to control Defendant, she grabbed the handcuff and
7 caught Hanson's finger inside the chain between the cuffs and twisted it, causing
8 Hanson pain. Even after she was cuffed, Defendant continued to struggle. Parcell
9 called an ambulance to transport Defendant to the hospital in Missoula. While
10 attempting to restrain Defendant in the gurney, Defendant spit in Parcell's face.
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13 Defendant was transported to the hospital. At the hospital, staff discovered a
14 small pistol in Defendant's back pocket. An evaluation was conducted and it was
15 determined that Defendant was impaired due to the consumption of methamphetamine.
16 Defendant was later cleared for transport to the jail. During the drive back to Seeley
17 Lake, Deputy Hanson's right index finger became more sore and began to swell.
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22 ANDREW W. PAUL
23 Deputy County Attorney

24 SUBSCRIBED AND SWORN TO before me this ____ day of August, 2016.
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27 _____
28 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 _____, 2016 at _____ a.m./p.m.

JUSTICE OF THE PEACE