

RECEIVED
Justice Court
NOV 16 2016

1 RYAN MICKELSON
2 Deputy County Attorney
3 KIRSTEN H. PABST
4 Missoula County Attorney
5 Missoula County Courthouse
6 Missoula, Montana 59802
7 (406) 258-4737
8 ATTORNEYS FOR PLAINTIFF

9
10 IN THE JUSTICE COURT OF THE STATE OF MONTANA
11 IN AND FOR THE COUNTY OF MISSOULA
12 BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

13 STATE OF MONTANA,
14
15 Plaintiff,
16
17 -vs-
18 JEROMEY GLENN JONES,
19 Defendant,

20 Department No. 1
21 Cause No. CR-2016-1128
22 **COMPLAINT**

23 RYAN MICKELSON, Deputy County Attorney, deposes and says that on or about
24 the 15th day of November, 2016, in Missoula County, the Defendant committed the
25 offenses of COUNT I: ASSAULT WITH WEAPON, a Felony, in violation of Montana law,
26 namely: Mont. Code Ann. 45-5-213, punishable by 20 years MSP and/or \$50,000 fine;
27 COUNT II: AGGRAVATED ASSAULT - REASONABLE APPREHENSION, a Felony, in
28 violation of Montana law, namely: Mont. Code Ann. 45-5-202, punishable by 20 years
MSP and \$50,000 fine.

The facts constituting the offense are:

COUNT I: On or about the 15th day of November, 2016, the above-named
Defendant purposely or knowingly caused bodily injury to Doe with a weapon when he
held a knife to her face and scratched her with the blade.

1 COUNT II: On or about the 15th day of November, 2016, the above-named
2 Defendant purposely or knowingly, with the use of physical force or contact, caused
3 reasonable apprehension of serious bodily injury or death in Jane Doe when he
4 slammed her against a wall, bit her, punched her, strangled her and suffocated her
5 several times, all while threatening to kill her, causing her to believe she was going to
6 die.
7

8
9 DATED this 16th day of November, 2016.
10

11 

12 _____
13 RYAN MICKELSON
14 Deputy County Attorney

15 Subscribed and sworn to before me this ____ day of November, 2016.
16

17 _____
18 JUSTICE OF THE PEACE

19 COMPLAINT 16-2719

20 JUSTIN WHITE, Missoula County Sheriff's Office
21 LOREN HOCHHALTER, Missoula County Sheriff's Office
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13 STATE OF MONTANA,
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15 Plaintiff,
16
17 -vs-
18
19 JEROMEY GLENN JONES,
20
21 Defendant,

Department No. 1
Cause No. CR-2016-1128

AFFIDAVIT OF PROBABLE CAUSE

22 STATE OF MONTANA)
23 : ss
24 County of Missoula)

25 RYAN MICKELSON, Deputy County Attorney, Montana, being first duly sworn
26 upon oath, deposes and says:

27 I have read the official law enforcement reports regarding the investigation of
28 JEROMEY GLENN JONES for allegedly committing the offense(s) set forth in the
complaint and based upon the information contained in the reports, if true, believe
probable cause exists to justify charging the above-named defendant as specified in the
accompanying complaint.

On or about November 15, 2016, at approximately 8:00 p.m., Deputies
Hotchhalter, Wafstet and White were dispatched to the Bonner Town Pump to

1 investigate a report of a woman that walked in the store with no shoes on and was
2 bleeding.

3 Deputy Hotchhalter arrived first. When he entered the Town Pump he observed
4 a young adult female sitting at a table with other women around her. The female was
5 crying, and he observed redness on her face, specifically around her nose and the left
6 eye area. As he approached her, he noticed that she was not wearing any shoes.
7

8 Deputy Hotchhalter identified her as Jane Doe. He asked her what happened, and Doe
9 stated that she had "the shit kicked out" of her. At that time, EMS arrived and they
10 began to check on Doe.
11

12 Deputy Hotchhalter then spoke to a witness, A.K., who works at the Town Pump.
13 A.K. said that Doe told her that Doe's boyfriend, nicknamed "Oreo", had assaulted her
14 at their residence, and that Doe ran away barefoot.
15

16 At that time, "Oreo" walked up to the Town Pump. Deputy White asked him what
17 his name was and he replied "Jeromey". Deputy Wafstet discovered that "Oreo" was
18 the nickname for Jeromey Jones. Deputy Hotchhalter told Jeromey to place his hands
19 behind his back as he was being detained for an assault investigation. During a pat
20 down, Deputy Hotchhalter found a black folding knife in his rear right pants pocket.
21

22 Thereafter, Deputy Hotchhalter conducted a brief interview with Doe before she
23 was transported to St. Pat's Hospital by ambulance. Doe told him that Jeromy threw
24 her around like a pinball. She stated "he didn't hold back" and that he tried to kill her.
25 She stated he covered her mouth and nose with his hands so she couldn't breathe for
26 approximately one minute. Doe also said Jeromey placed his elbow into her throat and
27 then let her go right before she passed out. Doe told him that Jeromey had slapped,
28

1 punched and banged her face into the wall as well as punched her in the nose. Doe
2 fled her residence barefoot with her dog. Deputy Hotchalter asked Doe why this
3 assault occurred, and she said it was because she had woken him up after he had been
4 drinking. EMS then transported Doe to St. Pat's Hospital.
5

6 Deputy Hotchalter then spoke with Town Pump employee, A.G. She stated she
7 was working up front at the counter when she heard yelling by the main door. A.G. said
8 she observed Doe standing by the front main door "covered in blood." She rushed over
9 and tried to talk to Doe. A.G. said she found out that Jeromey had picked Doe up and
10 threw her around as well as bit her. Doe told A.G. that Jeromey was drunk and that
11 Doe had been "afraid for her life."
12

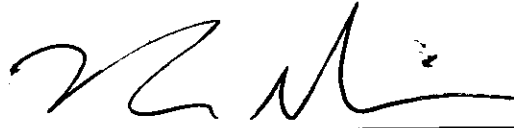
13 Deputies Hotchalter and Wafstet learned that Doe and Jeromey lived in an RV.
14 They found the RV and Sgt. Schmill went to St. Pat's and obtained consent from Doe to
15 enter the RV to take photos. Deputies Hotchalter and Wafstet entered the RV. There
16 was blood on the white sheet on the bed. They also observed damage to the hallway
17 wall as the wall was cracked and broken in. It appeared to be the size of a head.
18

19 Thereafter, Deputy Hotchalter conducted a detailed follow up interview with Doe
20 at the hospital. Doe stated at 1:00 p.m., Jeromey was drinking with the neighbors and
21 she told him to stop, but he kept taking shots. Doe stated Jeromey acted like he was
22 going to hit her and then threw her down on to the floor. She said he acted like he was
23 going to smash her head into the floor but then let her up and said "it's ok, I love you."
24 Doe said Jeromey went outside and vomited from being drunk. She helped him, and
25 escorted him into the RV. She said that eventually he went to sleep.
26
27

28 Doe said when he woke up he began talking nonsense and accusing her of

1 cheating on him. Doe stated Jeromey began punching her and slapping her in the face.
2 Doe said he picked her up and threw her down and into the wall. She said he threw her
3 into the window, and pounded her head into the wall. She stated he bit her legs, arms,
4 stomach and face. She said he also punched her arms, legs and stomach. Doe stated
5 Jeromey got her on the floor, and he put both of his hands over her mouth and nose so
6 she could not breathe. Doe said she tried to get him off of her but she was not strong
7 enough to do it. She stated he waited "until the last moment before she blacked out" to
8 let her go and breathe. She said he wanted to make sure she stayed awake. Doe
9 stated Jeromey did this to her for a total of three times.
10
11

12 Doe stated Jeromey pulled out a black and blue spring loaded folding knife, held
13 it to the corner of her left eye and told her that he was going to kill her as he scratched
14 her face with the blade. Doe explained that Jeromey kept telling her "I'm going to kill
15 you" and "your'e going to die." Doe also said that while they were on the floor, Jeromey
16 tried to break her leg by laying down and pulling it up in a Mixed Martial Arts type of
17 hold. The interview was then concluded.
18

19
20 
21

22 RYAN MICKELSON
23 Deputy County Attorney

24 SUBSCRIBED AND SWORN TO before me this ____ day of November, 2016.
25
26

27 _____
28 JUSTICE OF THE PEACE

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

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