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DEC 12 2016
JUSTICE COURT

D. JAMES MCCUBBIN
Deputy County Attorney
KIRSTEN H. PABST
Missoula County Attorney
Missoula County Courthouse
Missoula, Montana 59802
(406) 258-4737
ATTORNEYS FOR PLAINTIFF

IN THE JUSTICE COURT OF THE STATE OF MONTANA
IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Landee N. Holloway, JUSTICE OF THE PEACE

STATE OF MONTANA,

Plaintiff,

-VS-

AMY SONDRAL JOHNSON,

Defendant,

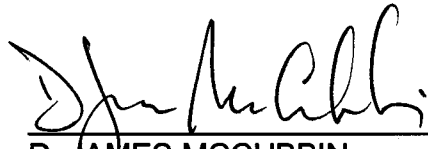
Department No. 2
Cause No. CR-2016-1230
COMPLAINT

D. JAMES MCCUBBIN, Deputy County Attorney, deposes and says that on or about the 31st day of October, 2016, in Missoula County, the Defendant committed the offenses of COUNT I: CONSPIRACY TO COMMIT CRIMINAL POSSESSION OF DANGEROUS DRUGS WITH INTENT TO DISTRIBUTE - OPIATE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-9-103(2) and 45-4-102, punishable by Not less than 2 years or more than 20 years MSP and/or a \$50,000 fine; COUNT II: CRIMINAL POSSESSION OF DRUG PARAPHERNALIA, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-10-103, punishable by 6 months MCDF and/or \$500 fine.

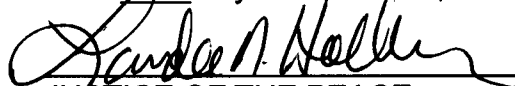
The facts constituting the offense are:

1 COUNT I: On or about the 31st day of October, 2016, the above-named
2 Defendant agreed with another, Matthew Jones and/or Greg Kalayjian, to possess
3 HEROIN, a dangerous drug, as defined in 50-32-101, an opiate as defined in 50-32-
4 101(19), with intent to distribute; and that Defendant was present at 3333 Brooks St. #
5 607, and/or possessed drug paraphernalia including scales and/or plastic baggies, in
6 furtherance of the agreement.
7

8 COUNT II: On or about the 31st day of October, 2016, the above-named
9 Defendant knowingly possessed with intent to use drug paraphernalia to compound,
10 convert, produce, process, prepare, test, analyze, pack, repack, store, contain, conceal,
11 inject, ingest, inhale, or otherwise introduce into the human body a dangerous drug, to
12 wit: scales and/or multiple distribution-type plastic baggies.
13

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17 D. JAMES MCCUBBIN
Deputy County Attorney

18
19 Subscribed and sworn to before me this 13th day of December, 2016.

20 
21 JUSTICE OF THE PEACE

22 COMPLAINT 16-2729

23 MATT STONESIFER, Missoula City Police Dept
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Department No. 2

Cause No. CR-2016-1230

AFFIDAVIT OF PROBABLE CAUSE

STATE OF MONTANA)
 : ss
County of Missoula)

D. JAMES MCCUBBIN, Deputy County Attorney, Montana, being first duly sworn
upon oath, deposes and says:

I have read the official law enforcement reports regarding the investigation of AMY
SONDRA JOHNSON 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 10/31/2016 at approximately 0040 hours MPD Officer O'Dell located
wanted subject Matthew Lucas Jones in the doorway of 3333 Brooks St. # 607,

1 Missoula, Montana (Brooks St. Motor inn), a hotel room registered to Jones. Jones was
2 placed under arrest pursuant to an outstanding arrest warrant. Also inside the hotel
3 room were AMY JOHNSON and Greg Kalayjian.
4

5 A search of Jones' person incident to arrest located 4.03 grams suspected
6 methamphetamine and 4.65 grams suspected heroin along with \$4,536 currency.

7 Officer O'Dell contacted the on-call probation/parole officer, who authorized a
8 probation/parole search of the hotel room registered to Jones. A search of the hotel
9 room located in excess of 12 grams of suspected heroin and miscellaneous drug
10 paraphernalia.
11

12 A consent search of luggage that was in the room, self-identified as belonging to
13 AMY JOHNSON, located drug paraphernalia including digital scales and approximately
14 several dozen (estimated) small plastic zip-top baggies of the type commonly used for
15 distribution of methamphetamine and heroin.
16

17 A blue Nissan passenger car, parked outside the room and known to be under
18 the control of Matthew Jones was seized. A white Subaru registered to Greg Kalayjian
19 was parked outside the room and was also seized. Keys to both vehicles were found
20 inside the hotel room. Both vehicles were later searched pursuant to search warrants.
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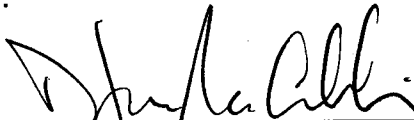
22 The search of the Blue Nissan located a loaded .45 caliber handgun, 61.2 grams
23 suspected methamphetamine, a scale, packaging, and a homemade magnet box
24 consistent with vehicle borne drug trafficking activity (as well as other items).
25

26 A search of Greg Kalayjian's white Subaru located a .45 caliber handgun and a
27 .40 caliber handgun, both loaded, and a lockbox (keys to lockbox on keyring with car
28

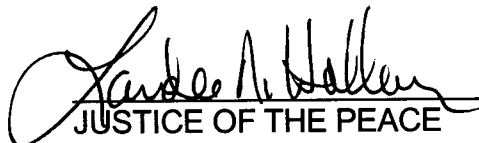
1 key) containing 41.3 grams suspected methamphetamine, 59.1 grams suspected black
2 tar heroin, methadone, Suboxone, and \$11,991 in currency (among other items).

3 NIK tests were conducted on various samples of the drugs that were found,
4 including the methamphetamine and heroin on Jones' person, methamphetamine found
5 in the blue Nissan, and methamphetamine and heroin in the white Subaru. All tests
6 returned presumptively positive.

7
8 Police Detective Stonesifer knows, based on his training and experience, that the
9 quantities of methamphetamine and heroin involved in this case are all well in excess of
10 user quantities; and the quantities of drugs together with the quantities of currency
11 involved, the presence of scales and distribution-size baggies, and the presence of
12 firearms indicate that the drugs located on in the 3333 Brooks St . #607 and from each
13 vehicle were intended for distribution. Detective Stonesifer is aware that the street level
14 retail value of the methamphetamine and heroin seized in this case are in excess of
15 \$29,000 based upon local pricing.
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20 D. JAMES MCCUBBIN
Deputy County Attorney

21 SUBSCRIBED AND SWORN TO before me this 13th day of December, 2016.

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24 JUSTICE OF THE PEACE
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JUSTICE COURT

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 13th day of December, 2016 at 3:00 a.m./p.m. (p.m.)


JUSTICE OF THE PEACE