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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-
PATRICK JOSEPH STUDLEY,
Defendant,

Department No. \pm
Cause No. *CR 2017-66*

COMPLAINT

KARLA PAINTER, Deputy County Attorney, deposes and says that from approximately the 12th day of September, 2016, to January 17, 2017 in Missoula County, the Defendant committed the offenses of COUNT I: THEFT BY COMMON SCHEME, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-6-301 (2) [4], punishable by 10 years MSP and/or \$50,000 fine; COUNT II: DECEPTIVE PRACTICES BY COMMON SCHEME, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-6-317[2], punishable by 10 years MSP and/or \$50,000 fine; COUNT III: FORGERY BY COMMON SCHEME, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-6-325(4), punishable by 20 years MSP and/or \$50,000 fine; COUNT IV: ISSUING A BAD CHECK BY COMMON SCHEME, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-6-316(3), punishable by 10 years MSP and/or \$50,000 fine.

1 The facts constituting the offense are:

2 COUNT I: From approximately September 12, 2016 to January 17, 2017, the
3 above-named Defendant purposely or knowingly obtained by deception control over
4 property of several Missoula businesses with the purpose of depriving the owners of the
5 property. These thefts were committed as part of a common scheme. The value of the
6 property exceeds \$1,500.00.
7

8 COUNT II: From approximately September 12, 2016 to January 17, 2017, the
9 above-named Defendant purposely or knowingly obtained or attempted to obtain
10 property, labor, or services by using the pretended number or description of a fictitious
11 credit card. The deceptive practices were part of a common scheme.
12

13 COUNT III: From approximately September 12, 2016 to January 17, 2017, the
14 above-named Defendant when, with purpose to defraud, knowingly without authority
15 made or altered documents (self-printed checks, IRS documents, American Express 3rd
16 party authorization forms, and Illinois corporate filing documents, and other items)
17 apparently capable of being used to defraud others in the manner that they purported to
18 have been made by others or with different provisions or of different compositions. The
19 forgery was committed as part of a common scheme.
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22 COUNT IV: From approximately September 12, 2016 to January 17, 2017, the
23 above-named Defendant committed the offense of issuing bad checks when he issued
24 or delivered checks or other orders upon real or fictitious depositories for the payment of
25 money knowing that it would not be paid by the depository. The checks were issued or
26 delivered as part of a common scheme.
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DATED this 19th day of January, 2017.



KARLA PAINTER
Deputy County Attorney

Subscribed and sworn to before me this ____ day of January, 2017.

JUSTICE OF THE PEACE

COMPLAINT 17-115

GLENVILLE KEDIE, Missoula County Sheriff's Office

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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
19 PATRICK JOSEPH STUDLEY,
20
21 Defendant,

22 Department No. ±
23 Cause No. en 2017-66
24
25 **AFFIDAVIT OF PROBABLE CAUSE**

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

29 KARLA PAINTER, 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 PATRICK JOSEPH STUDLEY for allegedly committing the offense(s) set forth in the
33 complaint and based upon the information contained in the reports, if true, believe
34 probable cause exists to justify charging the above-named defendant as specified in the
35 accompanying complaint.

36 The following pertinent portions are taken directly from the narrative in Missoula
37 County Detective Glenville Kedia's report.

1 PATRICK JOSEPH STUDLEY created numerous fictional checking, credit card
2 and business credit accounts using various alias personal and company names. This
3 investigation showed that STUDLEY used these fictitious accounts to fraudulently
4 obtain merchandise and services totaling almost \$30,000.00 from businesses within
5 Missoula County as well as Ravalli County. Evidence indicates there may be multiple
6 additional victims who have not yet come forward. In addition, separate but related
7 Missoula Police Department investigations showed additional thefts approaching
8 \$10,000 in merchandise and services, and when interviewed by that agency, STUDLEY
9 admitted to numerous other violations in Lewis and Clark as well as Cascade counties.
10 STUDLEY appears to have attempted to flee the area upon learning of ongoing
11 investigations.

12 On November 9, 2016, an individual identifying himself as "EDWARD KILN" (later
13 discovered to be an alias) had contacted Flathead Travel Service, a travel agency
14 located within Missoula International Airport. "KILN" booked an airline ticket for a 79
15 year old female named PATSY KNOTTS, from Missoula to South Carolina via Seattle
16 and Chicago. "KILN" dealt with the travel agency exclusively by phone and did not
17 present himself at the business. When KNOTTS arrived at the airport, she presented a
18 check for \$671.60 in payment of the flight. The check, number 4330, was drawn against
19 First Montana Bank account number 512001464 and imprinted with the business name
20 "Integral Concepts Inc.", and showed an address of 2975 Stockyard Road, Missoula.
21 I later spoke with NANCEY GREAGER, a representative of the travel agency, who
22 confirmed through the airline that KNOTTS had boarded the plane the following day,
23 apparently having presented valid ID to TSA.

24 On November 17, 2016, First Montana Bank returned "KILN's" check for
25 insufficient funds (NSF). Flathead Travel Service contacted "KILN" by phone. He told
26 GREAGER that there had been an error with the bank and that he would make good
27 on the check. However, thereafter he made no effort to do so and the business has
28 been unable to re-contact him at the phone number provided at the time the booking

1 was made. When GRENAGER attempted to contact "KILN" at the address listed on the
2 check, she discovered that the address and business were fictitious, there being no
3 such business anywhere at that location on Stockyard Road.

4 On December 9, 2016, I contacted Suzan Olinger, Vice President at First
5 Montana Bank. She was verbally able to provide the following information; the account
6 number appearing on the check provided by "KILN" to Flathead Travel Service was
7 opened online by a male named PATRICK STUDLEY. She stated that the account was
8 opened with a balance of .83 cents. She stated that no checks were ordered at the time,
9 and that neither the names "EDWARD KILN" nor either of the corporate names listed
10 above were associated with this account number. She stated that in addition to the
11 \$671.60 NSF check returned to Flathead Travel Service, there were as many as 8 other
12 returned checks, one for \$6,990.00 to the Billion Kia franchise automobile dealership.
13 With the assistance of the County Attorney's Office, I drafted a subpoena requesting all
14 bank records associated with the above named accounts and individuals.

15 I was also notified that "KILN's" name had surfaced as part of an ongoing
16 Missoula Police Department investigation. I contacted MPD Detective Stacy Lear and
17 was advised that Townplace Suites hotel, located at 3055 Stockyard Road, Missoula,
18 had on November 11, 2016, reported to MPD that "KILN" had stayed at the hotel from
19 September 12 through October 15, 2016, and had defrauded the hotel for the cost of
20 the stay. The report notes that "KILN" indicated he worked for a German company
21 named "Integrated Systems", and had been staying at the hotel with an adult female
22 and three children aged what hotel staff approximated to be 13, 10 and 8. At checkout,
23 "KILN" had paid the outstanding balance of approximately \$7,000.00 with what was
24 described in the report as "(A) sort of prepaid American Express account". Per the
25 report, "KILN" used a supposed third party authorization form, claiming his company
26 was associated with Montana Rail Link. After checkout, Townplace Suites discovered
27 that the credit card information provided by "KILN" was fraudulent, and that payment for
28

1 the 33 day stay had been refused by American Express. Hotel employees described
2 "KILN" as being approximately 400 – 450 lbs, in his late 30s to early 40s.

3 I later spoke with Billion Kia Missoula General Manager NICK FJERSTAD. He
4 stated PATRICK STUDLEY had purchased a red 2008 Mercury Mountaineer , on
5 September 24, 2016. He stated that STUDLEY had originally paid with an American
6 Express check in the amount of \$6,990.00. The check, number 03129, was also
7 imprinted with the number R2016758003129 up the left side. FJERSTAD said that on
8 September 28, 2016, after STUDLEY had taken possession of the vehicle, the
9 American Express check had been returned by his bank, the reason listed on the return
10 notice as "UNABLE TO LOCATE" the account. FJERSTAD stated that a representative
11 of the dealership had called STUDLEY and spoken to a female claiming to be
12 STUDLEY's assistant. She stated she would send the dealership a replacement check
13 to make good on the purchase. FJERSTAD stated that around October 20, 2016, they
14 received a second check for the vehicle which was drawn on the same First Montana
15 Bank account and check number, 4330, on the check written to Flathead Travel
16 Service. This check also was rejected by the bank as NSF. Since that time the
17 dealership has not been able to contact STUDLEY or locate the vehicle.

18 FJERSTAD later provided me with copies of the 2 checks used to fraudulently
19 acquire the vehicle, a copy STUDLEY's South Carolina driver's license taken as Secure
20 and Verifiable Identification (SVID) at the time of sale, and a copy of the envelope in
21 which the second check had been sent. The envelope bore a Missoula postmark dated
22 October 18, 2016, and return addresses at both the bogus 2975 Stockyard Road
23 address listed on the "Integral Concepts Inc." checks, and an address of 312 West 5th
24 Street, Portland, OR. FJERSTAD also stated that on his application for Montana title
25 and registration, STUDLEY had listed an address of 2750 Old Hardin Road, Billings MT
26 59101.

27 FJERSTAD described STUDLEY as being overweight, approximately 350 -
28 400lbs, and said he appeared very bold and confident, promising to return and buy

1 various other vehicles which had caught his eye; he also stated that STUDLEY had
2 brought three young children with him.

3 I thereafter ran checks for both STUDLEY and KNOTTS looking for any
4 connection between them. KNOTTS' address of record from her driver's license return
5 also shows as a past address for STUDLEY, and each is listed in the relatives section
6 of the others' report. I also obtained a copy of STUDLEY's South Carolina driver's
7 license photo. I was also provided a copy of still image from the surveillance video from
8 the Townplace Suites showing "KILN"/STUDLEY in the hotel's lobby.

9 On December 13, 2016, I visited the Billion Kia and spoke with STEVEN HOBBS,
10 the salesperson who had sold the vehicle to STUDLEY. Having put together a photo
11 line-up of various individuals of similar age and build to STUDLEY, HOBBS was without
12 any hesitation able to immediately identify STUDLEY's known picture as that of the
13 suspect who had purchase the car with the fraudulent checks. I also showed the same
14 photo lineup to TORREE GUERRERO at Townplace Suites hotel; she stated that she
15 had dealt with "KILN" almost every day during his stay at the hotel, and she likewise and
16 without any hesitation immediately identified STUDLEY's picture as being that of the
17 suspect whom she'd known as "ED KILN".

18 On December 15, 2016, I was contacted by the Spokane County Sheriff's Office
19 and notified that the vehicle had been located in that jurisdiction, but that it had been
20 unoccupied at the time. I was advised that the vehicle had been towed and impounded
21 at Evergreen State Towing (509-489-8697). I later contacted Billion Kia and provided
22 them with this information such that they might make arrangements to recover the
23 vehicle; I also ensured that it was removed from NCIC.

24 On December 21, 2016, I served the subpoena to Olinger at First Montana Bank.
25 In response she provided me with documentation showing that STUDLEY had opened
26 the account online on October 13, 2016, with a balance of .83 cents, using his valid
27 South Carolina driver's license as ID. He had provided an address of 985 Sussex
28 Street, Missoula; however, later investigation showed that this address is actually a

1 vacant lot adjacent to the parking lot for the KTMF television station. The bank account
2 was closed on October 19, 2016 due to insufficient funds. However, between that date
3 and the end of November, various additional checks were written against the account,
4 all of which were rejected by the bank.

5 In addition to the two known checks to Flathead Travel and Billion Kia as
6 documented above, all of the fraudulent checks rejected as NSF show the same 4330
7 check number listed above, and all show the same "Integral Concepts Inc." account
8 holder name and Stockyard Road address. The following additional fraudulent checks
9 were written against the account:

10 - Two checks written to the Mullan Reserve Apartments, 4000 Mullan Road,
11 Missoula; the first, for \$1,246.13 was dated October 14, 2016, the second, for
12 \$171.33, was dated November 5, 2016.

13 - One check written to Town Pump store number 5400 (Mullan and Reserve
14 streets) for \$50.00, dated October 17, 2016; in addition to the "Integral Concepts
15 Inc." imprint, this check also has the name PATRICK STUDLEY hand-written at
16 the top.

17 - One check written to Sleep Diagnostics, a clinic specializing in the diagnosis
18 and treatment of sleep breathing disorders at 1211 S. Reserve Street, Missoula,
19 dated November 4, 2016, for \$559.00.

20 - One check written to Pizza Hut store number 218 located at 801 E. Broadway,
21 Missoula, for \$52.20. This check is undated, but shows as having been submitted
22 to the bank on November 28, 2016.

23 - One check written to Super 1 Foods, 39 Stevensville Cutoff Road # 1,
24 Stevensville, for \$194.88, undated but submitted to the bank on November 25,
25 2016.

26
27 I spoke with Sleep Diagnostics' Clinical Director and owner, YVETTE WORMAN.
28 She described the individual who had written the check as an obese male using the

1 name "Mark Williams". She stated that he had come into the clinic requesting testing for
2 a sleep breathing disorder and a replacement C-PAP machine. She stated that on his
3 medical intake form he had provided various phone numbers, one of which matched the
4 number appearing on the above checks (406-880-5414). She stated that a second
5 number given, 803-459-4049, had originally connected her to a male named "Chris"
6 who claimed no knowledge of "Mark Williams". I later ran a check for this number, which
7 came back as belonging to a Christopher Back of Norwood, NY and formerly of
8 Bishopville, SC, but could find no related connection to STUDLEY. When I called the
9 number it was no longer in service.

10 I later visited the clinic and DAVID PETERSON positively identified STUDLEY
11 from a photo line-up. He provided me with copies of the returned check, along with
12 copies of the intake documents filled out by STUDLEY using the name "Mark Williams"
13 at the time of treatment.

14 "KILN" had provided Townplace Suites with several "American Express 3rd Party
15 Authorizations Form/Transaction Approval" documents supposedly authorizing the
16 payment of over \$7,000.00 for lodging, parking, and room incidentals accrued by
17 STUDLEY and the family members staying with him, claiming the authorizations were
18 from "KILN's" parent company in Germany. Hotel General Manager RACQUEL RAUSH
19 provided copies of these documents, which show supposed authorization codes for
20 various amounts through an alleged American Express account, number
21 "375150013067731." The documents are addressed to "Front Desk or Edward Kiln"
22 care of Townplace Suites; the card member name is listed as "SP Marketing Group
23 (Hilpostein Germany)". A later check of that company name showed various suspicious,
24 incomplete webpages. I was also able to determine that the German town in question is
25 actually spelled Hilpolstein, not Hilpostein as noted on the supposedly official American
26 Express account authorization form. The hotel also provided emails between RAUSCH
27 and "KILN" in which he claims the reason the hotel can't verify payment is that his
28 company's German office is closed for the day.

1 On January 3, 2016, I spoke with JESSICA MAO, Assistant Property Manager at
2 Mullan Reserve Apartments. She stated that in October 2016, an apartment had been
3 leased to "EDWARD KILN", who still held the lease. However, she stated that a recent
4 inspection showed that the apartment has been abandoned. She stated that the lease
5 had been arranged via phone and email with "KILN", but that a male she knew as "Joe"
6 or "Joey", whom "KILN" claimed was his employee, actually lived at the apartment with
7 three young children. She stated that while she had never actually met "KILN", they
8 frequently had spoken and emailed. She stated that she had frequently joked with
9 "Joe", telling him in partial jest that she believed he might actually be "KILN". When I
10 showed her the above photo line-up, she immediately identified STUDLEY as the male
11 known to her as "Joe" and suspected by her to be "KILN".

12 She provided me with copies of 2 lease agreements signed by "KILN", as well as
13 application documents from "KILN" listing variations on STUDLEY's date of birth and
14 contact information. She also included emails from "KILN" referencing "Joey" as being
15 the person who would actually be living there, and a picture she said that "KILN" had
16 sent to her of "Joey", whom "KILN" claimed to be visiting in hospital. Included with
17 "KILN's" lease application packet were copies of Federal W-9 Request For Taxpayer ID
18 Number forms, and a purported letter from the IRS to "KILN" and "Integral Concepts
19 Inc." listing the bogus Stockyard Road location as a mailing address, assigning an
20 Employer Identification Number of 27-4405939. The application packet also included
21 copy of IRS form 1120S, U.S. Income Tax Return for an S Corporation for "Integral
22 Consulting Inc." bearing "KILN's" name and listing an address in Moline, Illinois.
23 I spoke with IRS Special Agent Martin Halko, who confirmed that the IRS would not
24 release taxpayer information in a case such as this, even in response to a subpoena.

25 "KILN's" lease application packet had also included a copy of an corporate
26 Articles of Organization form bearing the seal of the Illinois Secretary of State's Office,
27 dated May 2004 and listing a corporate name of New Image LLC and Integral
28 Consulting Concepts Inc. "Edward P Kiln" is listed as the registered agent, and the

1 same Moline, IL address is listed as shows on the IRS form 1120S. In checking with
2 the Illinois Secretary of State's Office, I was able to find LLC filing records for both of
3 those company names; the first, New Image LLC, shows as having been involuntarily
4 dissolved in September 2003, and not having been reassigned since. The second,
5 Integral Consulting, shows as an LLC first registered in July 2006 and still in good
6 standing, with an address in Chicago. I later contacted this company's registered agent
7 and owner MICHAEL LOUGH whom confirmed neither STUDLEY nor any of his alias
8 names had ever been associated with that company. Based on this, all of the
9 documents used in order to obtain the apartments appear to be completely fabricated.

10 MAO also provided copies of the purported American Express check for
11 \$1,691.76 with which "KILN" had initially paid, and which had been rejected. While a
12 slightly different format than the fraudulent American Express check STUDLEY had
13 initially submitted to Billion Kia, the check shows a similar check number of 10319, but
14 the same R2016758003129 number printed in red up the left side.

15 In speaking to YVETTE WORMAN at Sleep Diagnostics, she had stated that
16 Missoula physician Dr. CLARK TAYLOR at Surgical Arts Center, 805 S. Reserve Street,
17 Missoula, had likewise been a victim of fraud by the same individual she had known as
18 "Mark Williams". I later contacted Surgical Arts Center, speaking with bookkeeper
19 JEANETTE COLLINS. She stated that "Mark Williams" had received medical treatment
20 totaling \$866.00 for which he had not paid. However, she stated that he had not
21 attempted to pass any checks or other fraudulent financial instruments, but had simply
22 failed to pay his outstanding bill before leaving, and now could not be located for
23 collection at any of the bogus addresses provided. She provided me with a copy of the
24 outstanding invoice, as well as the patient intake information sheet which he'd filled out,
25 listing a variation on STUDLEY's birthdate, a fictitious Social Security Number, but the
26 same bogus address of 985 Sussex Street as given to Sleep Diagnostics, and the same
27 phone number as appears on the First Montana Bank checks. Medical Assistant
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1 RIANA SKARLAND identified STUDLEY from a photo line-up as the individual who had
2 presented himself as "Mark Williams".

3 Both COLLINS at Surgical Arts Center and PETERSON at Sleep Diagnostics
4 indicated an additional medical office which had been a victim of fraud by STUDLEY,
5 using the name "Mark Williams". I later met with TRISH KRIER at the offices of Dr.
6 DAVID WILCOX, Montana Dental Arts, at 1001 SW Higgins Avenue #107, Missoula.
7 KRIER was also able to identify STUDLEY from a photo line-up as the individual who
8 had presented himself as "Mark Williams". The office's business manager CRISTA
9 WILCOX later provided me with documents from STUDLEY's fraudulent transaction,
10 consisting of an "American Express 3rd Party Authorization Form/Transaction Approval"
11 form, dated October 10, 2016, nearly identical in format to those provided to Townplace
12 Suites. The document purportedly authorizes two payments for dental services, of
13 \$5,009.90 and \$2,951.11 respectively. WILCOX also provided two response letters from
14 American Express, dated December 18 and 23; these indicate that the authorization
15 code was not valid, and that the charge was either declined or the card expired.

16 WILCOX also provided a copy of a NSF check written to the business by
17 STUDLEY as "Williams", dated October 4, 2016, and drawn on a purported Capital One
18 Bank account number 3024965782 for \$222.00. The check is imprinted with the name
19 "Mark Williams" and the fictitious 985 Sussex Avenue address, and shows as having
20 been returned due to the account being closed. Based on this information, it appears
21 reasonable STUDLEY may have defrauded additional, as yet undetected victims.

22 I also contacted TERENCE FALK, bookkeeper at Super 1 Foods Stevensville. She
23 stated that the business had not yet reported the fraudulent check to the Ravalli County
24 Sheriff's Office.

25 On January 10, 2017, I was notified by Missoula Police Department's Detective
26 Guy Baker that the previous Friday, January 6, he and FBI Special Agent Shawn
27 Schrader had interviewed STUDLEY in regard to his connection to a cell phone scam in
28 South Carolina and New York. It was not until Det. Baker later consulted with other

1 MPD detectives that the connection between STUDLEY and this case became
2 apparent.

3 Per Hamilton Police Det. Daniel Altschwager, HPD had been contacted by the
4 Hamilton AT&T store after STUDLEY had attempted to purchase 7 iPhones from them.
5 The store stated that an internal company email had warned that STUDLEY had
6 previously purchased or attempted to purchase cell phones at other AT&T stores in
7 Helena and Great Falls using bogus financial accounts and documents. The Hamilton
8 store stated that STUDLEY had attempted to purchase the phones with cash, but had
9 used purported IRS corporate Employer Identification Number documents for a
10 company named "Aarris Atepa" (A web search later showed this to be an architecture
11 firm in New York). STUDLEY was detained by Hamilton Police Department and
12 STUDLEY agreed to go to the HPD office and be interviewed by Agent Schrader and
13 Det. Baker regarding the matter.

14 Det Baker stated that STUDLEY gave an address of 450 Home Acres Road in
15 Stevensville, and a cell number of 543-341-9010. I later spoke with Det. Altschwager,
16 who stated that STUDLEY had earlier given HPD a different address than the one given
17 to Agent Schrader, that being 635 Home Stretch Road, Stevensville, along with a
18 slightly different phone number: 503-341-9010.

19 I went to Stevensville and attempted to locate the two addresses which
20 STUDLEY had given to Det. Altschwager and Agent Schrader. As was the case with the
21 two previous addresses on Stockyard and at 935 W. Sussex, the numbers given on
22 Home Acres Road were not valid, and there was no such address. When I attempted to
23 contact STUDLEY at the 543-341-9010 phone number given, I received a generic
24 outgoing Verizon message stating that the number could not be reached. Upon
25 checking the 635 Home Stretch Road address, I discovered that the address was valid
26 but the homeowner, DARREL WISE, had no knowledge of STUDLEY by any of his
27 aliases. When I attempted to contact the 503-341-9010 number, I received a voicemail
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1 greeting from a young female. When I tried the number again later, I received a generic
2 outgoing greeting stating that the subscriber had not yet set up voicemail.

3 Det. Baker notified me that upon learning of my investigation, Agent Schrader
4 had re-contacted STUDLEY and asked him to come in to his office. At that time he
5 would notify me so I could interview STUDLEY. However, Agent Schrader later advised
6 me that STUDLEY had contacted him claiming a death in the family, and had cancelled
7 the appointment. I notified Agent Schrader of my findings at the two Stevensville
8 addresses.

9 Shortly thereafter, Det. Baker notified me that the day following his and Agent
10 Schrader's interview of STUDLEY, the Missoula AT&T store had filed a complaint in
11 which it reported that STUDLEY had fraudulently obtained 11 iPhones from the store
12 after having set up a fictitious business account. Det. Baker notified me that he would
13 be conducting his own separate investigation into STUDLEY's actions involving the
14 phones. Det. Baker went on to state that during his interview at Hamilton PD, after
15 having been advised of his rights pursuant to Miranda, STUDLEY had admitted
16 involvement in fraudulently obtaining cell phones in Missoula; however, at that time no
17 AT&T report had yet been filed. It should be noted that per that report, in this most
18 recent fraudulent transaction with AT&T, STUDLEY had used yet another variation of
19 the same above phone number, again changing one digit and giving the number as
20 503-341-1010.

21 While checking for this report number, I coincidentally located another MPD
22 report, number 2017-0510 from January 5, 2016, in which Paul's Pancake Parlor
23 restaurant reported that STUDLEY, as "ED KILN", had set up a fraudulent business
24 account in the name Integral Concepts Inc., using the fictitious Stockyard Road
25 address. He then charged \$439.85 in meals through November 2016.

26 In order to collect the two passports for STUDLEY's children which had been
27 reported as having been abandoned in STUDLEY's unit at the Mullan Reserve
28 Apartments, I met with property manager CHANTELE FICKINGER, who took me to

1 the abandoned apartment, unit C312, and surrendered to me the two passports
2 belonging to the juveniles. The apartment had been left in a very untidy and dirty
3 condition, with various items of abandoned personal property and trash scattered on the
4 floors and countertops. Of interest, on the kitchen counter were a pair of brand new
5 western-style boots with Boot Barn store tags still attached. There were also two pieces
6 of new-in-box Montana Silversmiths jewelry including a silver tennis bracelet and a
7 silver necklace with what appeared to be an opal pendant.

8 On January 11, 2017, I spoke with Boot Barn assistant store manager YVONNE
9 BROUGH, who reported that on November 1, 2016, "ED KILN" had opened a
10 commercial account at Boot Barn, using the company name "New Image Group LLC",
11 and an address of 435 W. Sussex, Missoula. She provided me a copy of the
12 commercial account documentation, which gives the same phone number as was listed
13 on the bogus First Montana Bank checks, and lists both PATRICK STUDLEY and "ED
14 KILN" as contacts. BROUGH stated that STUDLEY had come into the store several
15 times, buying large quantities of merchandise each time. She later provided me with
16 documentation showing \$2,224.10 in fraudulently obtained merchandise which
17 STUDLEY had received but not paid. She stated that this total was actually after a 10%
18 discount of the actual merchandise value, based on the commercial discount given.

19 As part of my efforts to locate STUDLEY I checked with various schools in the
20 area, and was notified by Jefferson School that his daughter and son were currently
21 enrolled there. However, the school advised me that on January 9, 2016, only three
22 days after STUDLEY was interviewed by Agent Schrader, the school was notified by
23 STUDLEY they would be leaving town "for a death in the family".

24 The school provided the same 435 W. Sussex address as was listed on the
25 fraudulent Boot Barn account for contact. I later contacted owner of that property,
26 WILLIAM CRANDELL, whom confirmed neither STUDLEY nor any of his personal or
27 corporate aliases reside or receive mail there.

1 It should be noted that in speaking with both Agent Schrader and with Det.
2 AltSchwager, they stated that while being interviewed STUDLEY had displayed slurred
3 and stammered speech, and said that he'd claimed to have a brain tumor. Other victims
4 during my investigation also stated that STUDLEY had claimed to suffer from a brain
5 tumor; however, in interviewing several of the witnesses, this also appears to be a
6 fabrication. AMANDA WOOD, a desk clerk at Townhouse Suites advised that
7 STUDLEY told her he had "stomach tumors" not a brain tumor. Many of the victims also
8 reported varying accounts of STUDLEY's speech patterns. For example, MAO stated
9 that "Joey" claimed to have a brain tumor, but that the confused or stuttering speech he
10 displayed was not consistent. However, she stated that when she'd spoken to him by
11 phone as "ED", he had been very confident, very "Flirtatious" and "Forward", and had
12 not displayed any type of delayed or confused speech whatsoever.

13 On January 17, 2017 I was assigned related case number 2017-0302, in which
14 Lolo Pizza Hut manager LUKE BLOTKAMP reported that STUDLEY had passed two
15 fraudulent checks at the restaurant, one for \$53.95 and another for \$59.31. MPD Det.
16 Lear also advised me that per her related case number, in October 2016, STUDLEY,
17 using the "ED KILN" and "Intergral Systems Inc" personal and corporate aliases, had
18 opened a line of credit at the Sportman's Warehouse store on North Reserve Street.
19 She stated that the store reported STUDLEY had charged \$1,927.63 in merchandise to
20 the account but had not made any payments.

21 I was subsequently contacted by Franklin School and advised that STUDLEY
22 had called to say that he would be coming by to pick up student records for his children.
23 MPD Officer Puddy, contacted me and advised that he was at the school awaiting
24 STUDLEY's arrival as he had an outstanding warrant out of Missoula municipal court.
25 I went to the school to meet with Ofc. Puddy. While there, Washington Elementary,
26 where STUDLEY's other son is a student, called to say that STUDLEY was also
27 heading there to pick up student records as well. I waited at Franklin School while Ofc.
28

1 Puddy went to Washington School. Shortly thereafter Ofc. Puddy contacted me and
2 advised me that he had STUDLEY in custody on the city warrant.

3 I met with Ofc. Puddy and the school, and was notified that STUDLEY was in a
4 rental SUV from Avis rent-a-car. I transported STUDLEY to the Missoula County Jail.
5 Once there, I advised STUDLEY of his rights pursuant to Miranda. He stated that he
6 would be willing to speak with me only after he had been permitted to make a
7 statement. He signed the Miranda form and proceeded to give a statement that he was
8 willing to admit to all charges but did not wish to be fingerprinted or booked until he had
9 been given the opportunity to speak with either Department of Homeland Security or the
10 FBI. STUDLEY initially wished to tell me about a large international, multi-state
11 conspiracy involving a Middle Eastern male and an Asian male out of New York. He
12 claimed to have stumbled across incriminating evidence on a computer, leading to his
13 receiving threats in regard to large numbers of cell phones being unlawfully shipped out
14 of the country, indicating that he had left South Carolina in fear for his life and had come
15 to Missoula because it was "In the middle of nowhere". He stated that he'd
16 underestimated the cost of living in Missoula and had been forced to sell some phones
17 and other items to an individual named "Al Gonzales", who worked with two other
18 individuals, an "Eli" and a "Rob". He attempted to infer that it was these other unknown
19 persons who had prompted him to begin creating fraudulent checks and accounts.

20 STUDLEY stated that he was an expert with the graphics creation software
21 program Adobe Illustrator, and admitted to having created checks on accounts which he
22 knew to be unfunded, and to having created checks on non-existent American Express
23 pre-paid accounts. He claimed he had done this only to pay expenses and to keep his
24 children fed and clothed. He repeatedly attempted to claim that "Eli" or "Rob" were the
25 ones who had fabricated the "ED KILN" alias for him, claiming that he'd simply failed to
26 correct anyone who believed he was "ED KILN". STUDLEY however later
27 acknowledged that he had provided the 3rd party American Express authorization forms
28 to Townplace Suites and to the dental office knowing that they were not genuine.

1 I asked about the various aliases; in each case he appeared to plead ignorance,
2 until I pointed out that the checks he'd already admitted to having forged were written by
3 him to various medical offices using the various aliases including "Mark Williams". In
4 every instance, it was only after being confronted with the fact that I had copies of the
5 documents that he admitted to having defrauded each of the various businesses.


6 In regard to the merchandise obtained from Boot Barn, he said he'd wanted to
7 buy clothing for his children; when I asked about the jewelry, he tearfully stated that he'd
8 just wanted to give his daughter and his estranged wife nice things. In regard to
9 merchandise obtained from Sportsman's Warehouse, he claimed that he'd bought
10 towels, toiletries, first aid supplies, and cots, so his children would have somewhere to
11 sleep. STUDLEY acknowledged that he had either knowingly issued checks which he
12 had printed himself against accounts which he knew to be unfunded, or that he had
13 knowingly presented American Express authorization forms created against a legitimate
14 but unfunded American Express pre-paid account, or that he had knowingly set up
15 commercial accounts using fictitious business names and addresses along with fictitious
16 tax and corporate registration documents purporting to be from the IRS but which he
17 had created himself using his computer knowledge.

18 I asked him to estimate approximately how much merchandise and services he'd
19 acquired using the fraudulent methods documented during in my investigation. After
20 some consideration, he said, "About \$25,000.00." The actual total obtained thus far in
21 my investigation appears to be approximately \$30,000.00.

22 In addition to the victim business documented thus far in my investigation and in
23 those currently being conducted by Det. Lear and Det. Baker, STUDLEY also admitted
24 to having set up fictitious commercial accounts at Rosauer's grocery store and the Good
25 Food Store. He stated that he had obtained upwards of \$700.00 in outstanding
26 fraudulently obtained merchandise with each.

27 In a separate interview with Detective Guy Baker, STUDLEY admitted to a similar
28 fraudulent scheme on December 8, 2016 in which he obtained 11 iPhones from a

1 Missoula AT&T store valued at \$8,479.00 using separate fraudulent business accounts.
2 STUDLEY also acquired 7 iPhones in the same manner from an AT&T store in Helena.
3 That offense occurred on January 5, 2017 and the cumulative value of those devices
4 was \$5,243.00.

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7 _____
8 KARLA PAINTER
9 Deputy County Attorney

10 SUBSCRIBED AND SWORN TO before me this ____ day of January, 2017.

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13 JUSTICE OF THE PEACE
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ORDER

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

5 DATED this ____ day of _____, 2017 at ____ a.m./p.m.
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