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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-

TERRY LOH JONES,

Defendant,

Department No. 1
Cause No. 2-2017-328

COMPLAINT

MAC BLOOM, Deputy County Attorney, deposes and says that on or about the 26th day of March, 2017, in Missoula County, the Defendant committed the offenses of COUNT I: CRIMINAL ENDANGERMENT, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-207, punishable by 10 years MSP and/or \$50,000 fine; COUNT II: DRIVING UNDER THE INFLUENCE OF ALCOHOL OR DRUGS - 2ND OFFENSE, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 61-8-401(1)(a)[2nd], punishable by not less than 7 days or more than 1 year MCDF and \$1,200-\$2,000 fine; COUNT III: DRIVING WHILE LICENSE SUSPENDED OR REVOKED, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 61-5-212(1)(i), punishable by not less than 2 days or more than 6 months MCDF and a \$500 fine; COUNT IV: FAILURE TO CARRY PROOF OF LIABILITY INSURANCE - 1ST OFFENSE, a Misdemeanor, in

1 violation of Montana law, namely: Mont. Code Ann. 61-6-302(2)[1st], punishable by 10
2 days MCJ and/or \$250-\$500 fine; COUNT V: OPERATING MOTOR VEHICLE WITH
3 EXPIRED REGISTRATION, a Misdemeanor, in violation of Montana law, namely: Mont.
4 Code Ann. 61-3-312, punishable by \$500 fine; COUNT VI: FAILURE TO GIVE NOTICE
5 BY QUICKEST MEANS OF AN ACCIDENT, a Misdemeanor, in violation of Montana law,
6 namely: Mont. Code Ann. 61-7-108, punishable by 20 days MCDF or \$200-\$300 fine.
7

8 The facts constituting the offense are:

9
10 COUNT I: On or about the 26th day of March, 2017, the above-named Defendant
11 knowingly engaged in conduct that created a substantial risk of death or serious bodily
12 injury to Peter Chinikaylo and/or other motorists when she drove the wrong way on
13 interstate 90 while under the influence of alcohol and caused or nearly caused a
14 collision(s).
15

16 COUNT II: On or about the 26th day of March, 2017, the above-named
17 Defendant committed the offense of driving or being in actual physical control of a
18 vehicle, a Plymouth Neon, upon a way of this state open to the public, Interstate 90,
19 while under the influence of alcohol and/or drugs, a second offense.
20


21 COUNT III: On or about the 26th day of March, 2017, the above-named
22 Defendant drove a motor vehicle on Interstate 90 at a time when her privilege to do so
23 was suspended or revoked.
24

25 COUNT IV: On or about the 26th day of March, 2017, the above-named
26 Defendant failed to carry proof of liability insurance while operating a motor vehicle, a
27 Plymouth Neon, on a way of the state open to the public, Interstate 90.
28

1 COUNT V: On or about the 26th day of March, 2017, the above-named
2 Defendant failure to renew the registration of a motor vehicle, a Plymouth Neon, on or
3 before the last day of the month of the motor vehicle's registration period following the
4 expiration of the motor vehicle's registration.
5

6 COUNT VI: On or about the 26th day of March, 2017, the above-named
7 Defendant drove a vehicle involved in an accident resulting in property damage to an
8 apparent extent of \$1000 or more and failed to immediately by the quickest means of
9 communication give notice of the accident to the appropriate law enforcement agency.
10

11 DATED this 27th day of March, 2017.

12 

13 MAC BLOOM
14 Deputy County Attorney

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

16
17 _____
18 JUSTICE OF THE PEACE

19 COMPLAINT 17-773

20 TRAVIS WAFSTET, Missoula County Sheriff's Office
21 JOHN LEONARD, Missoula County Sheriff's Office
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1 numerous calls about a small red car driving eastbound in the westbound lanes of
2 Interstate 90 near mile marker 109. As Trooper Palmer responded to that location,
3 Dispatch continued to advise that they were receiving more calls about multiple near
4 head-on collisions with the wrong way driver. Dispatch eventually received a report of a
5 collision.
6

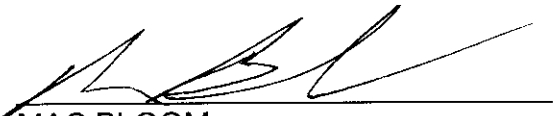
7 At 9:21 p.m., Deputy Wafstet, Missoula County Sheriff's Office, advised that he
8 had located the suspect vehicle, which nearly hit him head-on as well. Deputy Wafstet
9 managed to stop the vehicle. Trooper Palmer arrived on scene minutes later and spoke
10 with the wrong-way driver, Terry Jones. Jones denied nearly colliding with Deputy
11 Wafstet and stated that she lived about a mile away. Jones' vehicle, a 2001 Plymouth
12 Neon, had extensive damage to its passenger side.
13

14 Trooper Palmer immediately noticed that Jones' speech was slurred and that she
15 appeared extremely intoxicated. Jones smelled strongly of alcohol and had watery
16 bloodshot eyes. Her driver's license was suspended. Jones reported that she had not
17 consumed alcohol since "yesterday" despite the fact that there were numerous boxes of
18 wine in her vehicle. She also stated that she intended to call 911 because someone
19 else had hit her vehicle. Rebeckah Labarron, a witness, spoke with law enforcement
20 and reported that she had seen Jones hit a Ford Super-Duty pickup at an interchange
21 east of the Orange Street exit.
22

23 Trooper Palmer placed Jones under arrest and transported her to St. Patrick
24 Hospital. There, staff withdrew a sample of her blood for testing. Trooper Palmer then
25 transported her to jail. It was later determined that Jones collided with Peter Chinikaylo
26 in the westbound lanes of Interstate 90. At that time, Jones was travelling eastbound.
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She left the scene and did not report the crash. Additionally, Trooper Palmer cited her with failing to carry proof of insurance and expired registration.



MAC BLOOM
Deputy County Attorney

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

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 _____, 2017 at _____ a.m./p.m.

JUSTICE OF THE PEACE

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